

CHISLET PARISH COUNCIL

c/o 84 Roberts Road
Greatstone on Sea
New Romney
TN28 8RG

Canterbury City Council
Planning & Enforcement

08.10.21

Dear Sirs

Planning Application 21/02265

Chislet Parish Council has considered this application and has voted as follows – one Cllr declared an interest; two Cllrs support the application and six Cllrs object to the application as detailed below

Chislet Parish Council respectfully advises CCC Planning to reject the “installation of digestate storage ecobag bag with construction of bund” planning request submitted by A&J Pace on 15 September.

With reference to the Planning Statement submitted by Finn’s and the planning application document:

Background

Section 2.0 – Background Information of the Planning Statement is largely irrelevant to the approval process. The original digestate pit was almost at the maximum size allowed under permitted development. St Nicholas Court Farm (SNCF) and associated entities represent one of the largest property organisations in the Canterbury district. Given this, they must know the rules and it is insufficient to argue that revised planning consent for the doubling in size of the pit “got missed” (Para 2.5) or that the action they took was somehow accidental or innocuous.

If planning permission is granted it means that all normal due diligence related to such large undertakings will have been skipped by using permitted development as a loophole. The arguments that the changes made were “required” by a civil engineering firm contradict the fact that such firms would only ever provide advice. The decision taken by the landowner was made for commercial reasons, not out of necessity in the context of a planning application assessment.

Section 3.0 – Site location and description and Section 4.0 Proposed development are misleading. There has never been a place called “Marley Farm”. Until the creation of this digestate pit, the location was pure arable fields associated with Church Farm, Hoath.

Pollution

Pollution risk from this digestate pit is potentially significant and has not been properly addressed. We believe that the applicants’ negative response to Section 12 of application form concerning the Biodiversity and Geological Conservation is wrong. There is a strong case that the location of this pit even at its original size is too close to drainage ditches and groundwater, contravening the Environmental Agency’s Standard rules SR2010No17 and WRAP’s digestate good practice guide.

The digestate pit is located in fields that are on a slope grounded by clay soil which means all water drains southwards into the Nethergong Penn. No environmental assessment has been conducted into the risk posed by the digestate pit. Digestate spillage has caused some notable environmental disasters killing wildlife in British rivers. Paragraphs 2.2 / 2.3 of Finn’s planning statement confirm the vulnerability of digestate pits to damage and egress of chemicals in potentially harmful concentrations for the environment. Given the damage that has already been done to the Stodmarsh Nature Reserve by water pollutants, consent to this proposal risks compounding the environmental damage to the water system East of Canterbury.

Amongst other things, odour is considered a relevant risk factor by the Environment Agency which is ignored by the planning statement. It is unpleasant in itself and a potential warning of greater pollution risks. Residents of Chislet and Hoath have noticed a material deterioration in air quality as a result of this pit.

Traffic

The planning statement's arguments about the traffic benefits contradict experience of residents and require further investigation, having also been skirted by the permitted development process. Permitted development still requires a full traffic survey to be conducted. This was not done and the assertions in the planning statement are insufficient either for permitted development or planning consent.

SNCF used to spread digestate on these fields before this pit was built but there is no evidence for this "effectively clogging up local roads" (Para 4.4). The construction of this pit has increased the number of journeys as all tankers now travel first to the pit to fill it, then later they return to collect digestate to spread on the fields. SNCF's own calculations say that spreading takes 450 journeys (Para 7.2). Adding an extra stop at the pit will create an extra 450 journeys – all 900 of them down the narrow Marley Lane which connects two federated primary schools. As well as traffic disruption and safety concerns, this compounds pollution.

The passage of many huge farm vehicles, often more than twenty in a day including articulated HGVs, along a small country lane with many blind corners has been immense and negatively affected the safety and security of residents. It is typical, and considered best practice, for digestate pits of this size to be located within easy access of a major A-Road.

It is sophistry to pretend that the doubling in size of this pit can reduce or have a beneficial impact on traffic flows. The extension of the usage season into the winter months (Para 7.1) will actually increase the risk to residents given poorer light and weather conditions and increase the number of days ruined for residents by the traffic.

Contradictory intentions

The location of this pit is further undermined by the parallel proposal to which the landowner is party, to build a solar farm south of Marley Lane. This solar farm would consume half of the 256 acres that are apparently served by this pit (Para 3.1) and completely surround it. This would lead to a significant increase in traffic because the digestate would have to be transported further away to other arable fields.

Conclusion

In summary it is the view of Chislet Parish Council that environmental and traffic concerns mean that this huge digestate pit should be rejected.

Thank you for your consideration and we would be delighted to engage further.

Yours faithfully



G. Eaton
Clerk to Chislet Parish Council