

The Rt Hon George Eustice MP
Secretary of State for Environment,
Food and Rural Affairs
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JOHN HART

Conservative Group Leader
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Dear George Eustice,

Anaerobic Digestion

I am writing on behalf of Team Devon (Leaders and Chief Executives) which brings together Devon's eight district councils, Devon County Council, the Dartmoor National Park Authority, and representatives of the Devon Association of Local Councils.

Team Devon members have had discussions over recent months about anaerobic digestion (AD) as a sustainable means of using biomass waste and energy crop feedstocks to produce biogas and digestate. Our overall position on AD is:

- We support the use of food waste being processed by anaerobic digestion as opposed to it being used for composting.
- We recognise that green gases produced from anaerobic digestion are useful in providing low-carbon energy for buildings and transport.
- Using anaerobic digestion to process sewage sludge and slurry reduces the amount of methane entering the atmosphere. The digestate when used as a fertilizer displaces the need for manufactured fertilizers, which themselves are a carbon intensive product.
- We support the use of biofuels to generate electricity and heat, and as a vehicle fuel, where the land capacity is available and the ecological impacts associated with energy crops can be appropriately managed.
- We have serious concerns about the incentives for energy crops which, applying the precautionary principle, we suggest it would be prudent not to promote them for digestion as a response to the climate emergency.
- We are also concerned about the double incentive effect of farmers benefiting from an incentive to grow the crop, and the subsidy the AD operators (often the same farm company) receive to generate energy that feeds into the grid.

Some local residents and organisations, particularly in Mid and East Devon, have long-standing complaints about the impacts of the activities associated with some anaerobic digestion plants, specifically the transport, spreading and storage of digestate. The absence of up to date national planning policies for AD, the local impacts of AD plants and the ancillary developments associated with them make it very difficult to address these concerns in a coordinated way. The complex, and sometimes overlapping, planning and regulatory responsibilities continues to make it almost impossible to establish and implement policies consistently across the county.

We would value the help and support of officials in your Department to draw on examples of best practice to devise a protocol to improve the cooperation and coordination between local authorities and the Environment Agency in relation to the planning controls and regulatory requirements associated with AD, particularly ancillary development. In particular, we see a need for a clearly identified policy boundary on when AD activity moves from a sustainable on-farm energy activity to a fully regulated waste disposal activity.

I look forward to hearing from you.

Yours sincerely,

A handwritten signature in cursive script that reads "John Hart".

John Hart

Chair of Team Devon and Leader of Devon County Council

C.C. Neil Parish MP, Chair of Environment, Food and Rural Affairs Commons Select Committee