



# NEIL PARISH

*Member of Parliament for Tiverton & Honiton*

The Rt Hon George Eustice MP  
Secretary of State for Environment, Food and Rural Affairs  
Department for Environment, Food and Rural Affairs  
Nobel House  
17 Smith Square  
London  
SW1P 3JR

20<sup>th</sup> April 2022

Dear Secretary of State,

## **Re: Industrial Scale Anaerobic Digestors**

We are writing to you as Devon MPs regarding the use of industrial scale Anaerobic Digester (AD) plants in England.

As you will know, small scale AD plants present a valuable opportunity for farmers to utilise the by-products of their crops and animal materials and convert the waste into renewable biogas. The benefits of the technology are undeniable: preventing biodegradable waste from entering landfill and creating a useful energy source. Such models are a potential solution to our goal of decarbonising the agricultural sector and beyond.

However, there are concerns within the rural communities we represent about the wider use of industrial scale AD plants, and the impacts they have upon on the environment and residents. We have been engaging and discussing the use of large AD plants with Devon residents and wish to outline their concerns.

### HGVs

Firstly, it is a logistical necessity to use HGVs to transport waste and biofuel to and from AD plants. For industrial scale AD plants this has the potential to require a stream of HGVs to-and-fro from the main digestion chambers, to processing plants and distributors.

Often these vehicles must traverse very rural roads where the plants are stationed; often disturbing and placing pressure on already underdeveloped road networks. Such disruption can cause difficulties for motorists, and rural residents who depend upon the use of country lanes for their day-to-day commutes.

Similarly, the use of HGVs on often unsuitable country lanes poses safety concerns for rural communities. Pedestrians, equestrians, and cyclists alike are potentially vulnerable to HGV traffic.

We would stress that before any industrial scale AD plant is authorised, developers must consider the impact the logistics of their proposals will have upon local road networks, communities, and whether in fact the existing transport infrastructure is suitable.

### Produce for use as digestate

We are also concerned about the sustainability issues revolving around the use of AD plants. During the global food crisis that we currently find ourselves in, the notion of growing and utilising potential food crops for biomass production does not seem morally justifiable.





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As we strive to bolster our domestic food supply, alleviating demand on international markets, it seems odd to concentrate our efforts on planting crops for biomass, rather than food production.

Industrial scale AD plants have also been known to import biomass from farms that are far beyond county borders. This process adds to the sustainability issues of their use, as the fuel needed for crop transportation only further intensifies carbon consumption.

AD plants can boost our sustainability credentials, but only when the biomass they use is derived from local waste food and animal products, rather than edible crops acquired from considerable distances.

Once again, this demonstrates the benefits of using smaller scale AD plants- aimed at repurposing food waste and animal materials from within a narrow vicinity.

### Environmental and community impacts

There are concerns within Devon that the use of industrial scale AD plants has the potential to cause environmental damage to our county's natural habitats and waterways. The potential release of air and liquid pollutants is of great concern - in particular the release of gases such as carbon monoxide and nitrogen oxides, as well as the transmission of harmful leachate into watercourses. This low-level pollution must be tackled, and any risk of more alarming toxic spills must be mitigated against before industrial scale AD plants are approved.

Finally, as you will know, an almost unavoidable output of AD plants is odour, varying in degree depending on which feedstock is used for the process. Naturally, communities do not wish to be located near a production plant that emits foul odours, especially considering the potential health implications that such a scenario could cause. Therefore, it is essential that licenses are only approved for industrial scale AD plants when developers can demonstrate that they will have minimal impact on surrounding communities.

Achieving a greener energy mix for the UK, and our Net Zero ambitions, will undoubtedly mean investment in renewable energy sources, including anaerobic digestion. However, it is essential that the full cost and benefits of industrial scale AD plants are realised before they are permitted to be developed in rural communities such as ours.

As the Government continues to map out how AD will be utilised across the UK, we would urge you to consider a model that focuses on the use of smaller scale AD plants - that benefit local farmers and communities. Furthermore, we ask that stringent checks - focusing on environmental suitability, sustainability, and community impacts - are carried out on proposals for industrial scale AD plants before licences are distributed.

Thank you for your assistance on this matter and we look forward to hearing from you.

Yours sincerely,

Neil Parish MP

Mel Stride MP