

**County Matter: Waste**

**Mid Devon District: Variation of Condition 6 of permissions DCC/3725/2014 (as varied by DCC/3825/2015 and DCC/3850/2016) to remove the restriction on the importation of poultry products by road; Willand Anaerobic Digester, Lloyd Maunder Road, Willand.**

**Location: Land adjacent to the existing abattoir, Lloyd Maunder Road, Willand, Cullompton**

**Applicant: Willand Biogas LLP**

**Application No: 18/00009/DCC**

**Date application received by Devon County Council: 21 December 2017**

Report of the Chief Planner

***Please note that the following recommendations are subject to consideration and determination by the Committee before taking effect.***

**Recommendation: It is recommended that the application to vary condition 6 of planning permission DCC/3725/2014 is granted subject to:**

- (i) **an additional amendment being made to Condition 13 as indicated in Appendix I to ensure all odorous feedstock delivered to the site and digestive exported from the site is transported in sealed containers; and**
- (ii) **a deed of variation to the original legal agreement on lorry routeing to apply to the new consent.**

## **1. Summary**

- 1.1 This application is for the variation of a condition attached to the permissions relating to the construction of an anaerobic digestion [AD] facility at land adjacent to the Two Sisters poultry abattoir, Willand.
- 1.2 It is considered that the material planning considerations in the determination of the application are whether the proposed alteration to the feedstock would raise issues of additional traffic, noise, odour or other pollution on the application site.
- 1.3 The planning application, representations received, and consultation responses are available to view on the Council website under reference DCC/4037/2017 or by clicking the following link:  
<https://planning.devon.gov.uk/PlanDisp.aspx?AppNo=DCC/4037/2017>

## **2. The Proposal/Background**

- 2.1 The application site is located between the existing Two Sisters abattoir and poultry processing plant and the sewage treatment works to the north of the village of Willand and north of the main railway line adjacent to the old Tiverton Junction and is about 4.5km from Junction 27 and 4.9km from Junction 28 of the M5 by road.
- 2.2 This AD plant was subject of a report to the Development Management Committee and, at its meeting on 15 April 2015, members resolved to grant planning permission for the development (Minute \*89 refers). The planning application indicated that the plant would produce 2MW power and would process 49,000 tonnes of mixed waste and crops. This included an assumed 25,000 tonnes of poultry waste from the

adjacent Two Sisters poultry abattoir which would not be delivered by public highway but from within the site.

- 2.3 At that time the operators were confident of contracts with the abattoir to make up the remaining feedstock without the need for additional road movements and a condition limiting road deliveries was offered as there was considerable concern within the district at that time about the movement of chicken manure and litter products by open trailer and the odour issues arising from this.
- 2.4 Condition 6 was therefore attached to the consent restricting the tonnage of road deliveries to 25,000 tonnes of material and requiring that road deliveries would not include poultry products.
- 2.5 There have been two further applications (DCC/3825/2015 and DCC/3850/2016) determined in 2016 to vary the plant design, and to increase the road deliveries to 55,000 tonnes. These applications were subject of a report to the Development Management Committee and, at its meeting on 27 April 2016, members resolved to grant variations to Condition 6 and Condition 2 of the original consent (Minute \*4 refers). As part of the approval the applicant entered into a Section 106 agreement controlling the routing of deliveries to the plant. Condition 6 of the new decision notice increased the amount of feedstock delivered by road to 55,000 tonnes per annum whilst still not allowing for the delivery of the poultry product to the plant by road.
- 2.6 This application seeks only to vary Condition 6 in order to remove the reference to the delivery of poultry products by road. If permitted this would enable the plant to accept waste from a wider variety of sources and to secure commercial flexibility in the future supply of feedstock to increase the breadth of the waste stream. It is acknowledged that this might include poultry in food waste, fallen stock and chicken litter. The application documentation states that this flexibility is needed to "future proof" the plant for variations in the feedstock supply market but that any poultry litter would also be transported to the plant in sealed lorries in the same manner as the rest of the odorous waste feedstock.
- 2.7 Phase 1 of the plant is constructed and is currently producing 1,000m<sup>3</sup>/h of Renewable Gas from an input tonnage of 125 tonnes of grass silage per day. The existing Environmental Permit already allows for the importation of manures, but not for general food wastes or animal by-products. The access road is currently being surfaced and the weighbridge is constructed and awaiting sign-off from the Department of Transport.
- 2.8 The current facility is a crop-only operation as the existing permit requires that, for the importation of manures, the negative pressure reception building must be in use. The applicant has stated that this and the tanks and plant required for operating as a waste facility will not be constructed until they have a waste permit and there are waste contracts in place. None of these contracts can be sought until such time as this issue is resolved as there may be chicken products in food wastes for example.
- 2.9 Following the initial concerns raised by the adjacent abattoir and the District and Parish Councils, the applicants have submitted a "Transportation and Pollution Protocol" document to explain how they intend to deal with on and off farm matters as well as biosecurity issues. This was also the subject of a more limited consultation with those who had initially raised these matters including the adjacent abattoir.

### **3. Consultation Responses**

- 3.1 Environment Agency: No objection. As the proposal is to import poultry manures by road, the feedstock falls within the category of agricultural manures covered by the existing Environmental Permit (EP). The EA has also given narrative advice on the relationship between the planning consent and the permit which is discussed in more detail below in Section 6. The EP will ensure that appropriate measures are in place to protect the environment and human health and sets conditions relating to odour and noise. These conditions will come into effect as soon as the facility accepts waste feedstocks.
- 3.2 Mid Devon District Council (Planning): Raise questions about the impact of the application on traffic movements through the village and query the off-site impacts of the proposal as well as the odour impacts on dwellings in Willand. Following the second consultation they reiterated their objections based on lack of indication about number of trips and specific routes within the wider countryside and lack of safeguards about delivery and digestate movements. With relation to the submitted transportation and pollution protocol they have maintained their objections based on lack of information about specific routeing and destination for digestate although they do consider the use of sealed transport units to be more acceptable.
- 3.3 Mid Devon District Council (Environmental Health): Recommends refusal of the application unless additional conditions are applied to restrict the storage and spreading of digestate in accordance with the Control of Pollution (Silage, Slurry and Agricultural Fuel Oil) Regulations 2010 and requiring that spreading should conform to the principles set out in the Code of Good Agricultural Practice to protect water, soil and air quality.
- 3.4 Willand Parish Council: Objection. Approval would have a potential adverse cumulative impact on the health and wellbeing of the residents and properties with relation to heavy traffic, road safety and odour. The Parish Council expresses concerns about past variations to the consent and that the original approval was based on incorrect information about the source and delivery of feedstock and the changes to the proposals caused by the apparent lack of waste contracts. They raise concerns about the enforcement capability of DCC and the EA and that the EA considers chicken manure to be an agricultural feedstock. They feel that the planning process is flawed as no feedstock is now available from the adjacent factory and that the number of amendments to the original proposal is unacceptable. They also raise concerns about the enforceability of the good practice protocol submitted by the operators in response to the issues raised about on farm biosecurity and that of the adjacent abattoir, location of cleaning facilities for vehicles and other matters which are essentially matters for the Environment Agency. The operator has addressed a number of these issues and these are picked up in Section 6 below.
- 3.5 Food Standards Agency: The FSA was consulted when the original concerns were expressed about the importation of poultry litter by the vet acting for the neighbouring Two Sisters Food Group (see 4.1 below). The FSA was provided with the additional "Transportation and Pollution Protocol" supplied by the applicant and asked to comment further. It commented that the procedures put in place would mitigate the risk and ease their concerns.

### **4. Advertisement/Representations**

- 4.1 The application was advertised in accordance with the statutory publicity arrangements by means of a site notice, notice in the press and notification of neighbours by letter.

As a result of these procedures, two representations have been received. Firstly, from a District Councillor objecting to the proposal based on inaccuracies in the planning documentation regarding the ability to import wastes for the adjacent abattoir stating that the permission should not be altered to allow the importation of such material due to the inability of the applicant to secure other contracts.

- 4.2 The second letter was forwarded by the adjacent Two Sisters Food Group (2SFG) from their veterinary adviser expressing concerns about the biosecurity of their operation if the applicants were to import chicken litter (in particular). On the basis of this comment, the County Council involved the Food Standards Agency and the veterinary arm of the Environment Agency, the Animal and Plant Health Agency (APHA). The comments from the FSA are set out above in Para. 3.5 and APHA stated that this would be an "animal by-products" issue that would be considered as a part of any waste permit application. The Two Sisters Food Group were re-consulted when the applicant submitted their "Transportation and Pollution Protocol" and asked to supply any further comments from their veterinary adviser. No further comment has been received.

## **5. Planning Policy Considerations**

- 5.1 In considering this application the County Council, as County Planning Authority, is required to have regard to the provisions of the Development Plan insofar as they are material to the application, and to any other material considerations. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that where regard is to be had to the Development Plan, the determination shall be in accordance with the Development Plan unless material considerations indicate otherwise. In this case, the relevant Development Plan policies are listed below and referred to in more detail in Section 6.

### **Devon Waste Plan (Adopted 11 December 2014)**

Policies W1 (Presumption in Favour of Sustainable Development); W2 (Sustainable Waste Management); W3 (Spatial Strategy); W5 (Reuse, Recycling and Materials Recovery); W6 (Energy Recovery); W15 (Infrastructure and Community Services); W17 (Transportation and Access); and W18 (Quality of Life).

### **Mid Devon Local Plan (Development Management Policies) (Adopted October 2013)**

Policies DM1 (Sustainable Development); DM5 (Renewable and Low Carbon Energy); DM6 (Transport and Air Quality); DM7 (Pollution).

## **6. Comments/Issues**

- 6.1 The material considerations in the determination of this application are discussed below. The concerns expressed about the control of the destination of the digestate are noted but these are not material to the determination of the application as this activity will not be altered by the current application and is controlled by other legislation as set out in paragraph 6.6 below.

### Highways Issues

- 6.2 The original application was accompanied by a detailed Transport Statement and the planning permission including a condition requiring the submission of a traffic management plan and was accompanied by a legal agreement controlling routeing through Willand Village. This proposal does not increase the existing maximum

permitted road delivery to the site which would remain restricted to 55,000 tonnes per year. There seems to be a concern that this proposal would replace the 10,000 tonnes of feedstock from the abattoir, but if it did so it would still be constrained by the overall delivery restriction and so it would replace other feedstocks rather than increase them as it is the nature of the feedstock rather than the amount that is being altered.

- 6.3 There are therefore no new planning issues in terms of highway impacts as the traffic numbers do not increase. The existing conditions and schemes already enable the Council to require information about the source of feedstock and the destination of digestate so that if local issues do arise then there is at least some evidence of where the transport movements may have come from.

#### Economic Considerations

- 6.4 The original application was submitted to benefit from the Feed-in Tariff scheme for biogas from AD processes. At that time no contracts had been let and from discussions with the applicant and the EA there are no current waste contracts in place.
- 6.5 The Parish Council has expressed its concern about amendments and variations to the original approval but these have been mainly made in response to the requirements of the EA in terms of plant alterations and due to the ongoing uncertainty about commercial contracts. The applicant has made it clear that they intend to pursue waste contracts to implement the application as already approved and this will mean that they will enter into contracts with local producers of agricultural and trade wastes. The use of such wastes in an anaerobic digestion plant will remove them from the waste stream and produce energy direct into the gas grid. It is clear that the nature of contracts will alter over the life of the site and due to economic fluctuations and changes in technology. The applicant has also pointed out that before such contracts are finally signed, their status is commercially confidential.
- 6.6 Seeking to control the source and destination of products to and from the plant by planning condition, when contracts are still uncertain, would not meet the tests for planning conditions set out in the National Planning Policy Framework because they cannot be precise or enforceable. The conditions as written seek to control the on-site and local highway impacts of this operation with wider impacts being controlled by a mix of permitting and farming good practice requirements. In any case there are no new issues arising from the proposed change to the nature of the feedstock that cannot be dealt with by the clarification of the vehicles to be used for delivery to ensure that odour issues are properly managed.

#### Proximity to Residential Properties and Pollution Control Measures.

- 6.7 The nearest residence is some 50m from the site boundary across the main railway line. It is acknowledged that there are already existing odour problems in this area from the Two Sisters chicken abattoir and also from the adjacent sewage treatment works. The original application was supported by a bioaerosol and odour risk assessment and this has been updated to cover the proposed importation of chicken litter. Nevertheless, the emissions of odour from the site are controlled by the Environmental Permit. The Environment Agency has pointed out that the reception building with the proposed odour control system must be built before wastes including manures are accepted. Any remaining impacts that might be controlled by the planning system therefore relate only to the delivery of feedstock and the exportation of digestate on the local road network.

- 6.8 It is not considered that there would be any additional likelihood of odour from the importation of poultry products or wastes so long as they are also imported in sealed containers like the other wastes such as food wastes that are already permitted to be used by the existing permission. The applicant has stated that poultry litter would be imported and managed in the same way as for food waste in sealed trucks. It is suggested that to alleviate any concerns about this, Condition 13 is amended to require that any odorous materials imported into the site must be in sealed containers (the current condition only refers to waste). With relation to the concerns expressed about off-site impacts, the applicant has also provided an advisory protocol for the use of digestate from this operation based on good practice advice. This includes the washing of vehicles bringing in manures from farms which will occur within the reception building and the dirty water will go into the drainage system from that operation which is controlled by the Environmental Permit.

#### The Destination of Digestate

- 6.9 There are concerns about the management of land associated with the destination and storage of the digestate from AD plants in Mid Devon generally. This was made clear by the comments made by the District Council, Environmental Health Officer [EHO] and the Parish Council. However, the management of the digestate will not be affected by the variation in Condition 6 being applied for, and these concerns relate more to the existing planning permission.
- 6.10 There are two main considerations, firstly that this plant is only now starting to produce digestate and therefore cannot be held responsible for existing issues on farms and, secondly, that the tests for planning conditions, the uncertain nature of the contracts and the as yet unknown destination of feedstock would mean that the planning system was being required to control how, as yet unspecified, farmers use their land.
- 6.11 The nature of the digestate itself will inform some of the controls over storage and spreading:
- (a) If the digestate is not produced using waste materials (e.g. a crop/manure - only plant) as currently operating, then the digestate does not qualify as waste. However, the permission at Willand is not for a crop/manure-only plant and, as the owners are actively pursuing waste contracts, this is an unlikely long-term outcome. In any case, any digestate from animal manures must be stored in facilities that meet the Control of Pollution (Silage, Slurry and Agricultural Fuel Oil) Regulations 2010. The fact that there is already legislation covering this would mean that a planning condition would be unnecessary and the spreading of digestate onto farmland does not normally require planning permission.
  - (b) If there is waste in the feedstock (food waste or fallen stock) then the digestate, if it does not meet a specific quality test (PAS110), remains waste and its storage and spreading require an Environmental Permit which should not be duplicated by a planning condition.
  - (c) If the digestate does pass the PAS110 quality standard then it is no longer considered to be waste and the EA guidance states that, if good practice is followed, quality digestate should not pose a risk to human health or the environment. In any case, the spreading and holding of digestate is already subject to a Code of Good practice to protect water, soil and air quality and the EA is already ensuring through the EP that there is sufficient storage available at this site so that digestate is not taken to farms at unsuitable times of year.

- 6.12 It is clear that the unknown composition of the digestate will inform the final controls over its storage and spreading on agricultural land. It is also apparent that the unknown nature and duration of waste or crop contracts would mean that any condition restricting or controlling the destination of digestate would be unspecific and unenforceable as it may be stored in existing lawfully constructed farm lagoons as well as being spread direct to land.
- 6.13 The existing Condition 11 requires the operator to provide the waste planning authority with records of the source and destination of the transport movements to and from the plant and these can be requested in order to support or refute concerns that may be emerging at any particular farm destination.
- 6.14 Given the concerns expressed by the District Council, Environmental Health Officer and the Parish Council, the County Council, following further discussions with the applicant and the EA, asked the operator to provide the 'Transportation and Pollution Protocol' as mentioned above. This encourages storage and spreading in accordance with the existing good practice guidelines for applying digestate to farmland. Additionally, the Environment Agency, through the Environmental Permit, is ensuring that there is sufficient digestate available on the site and/or off-site storage capacity during the winter months to avoid "over spreading" at the destination farms. Both the EA and the FSA consider that this protocol would clarify the approach. Furthermore, the operator has stated that they will be applying for ISO14001 accreditation which is an externally audited environmental accreditation as well as following the best practice standards of the Anaerobic Digestion and Bioresources Association.

## **7. Reasons for Recommendation/Alternatives Options Considered**

- 7.1 The Committee has the option of approving, deferring or refusing this planning application.
- 7.2 The removal of part of Condition 6 as requested would have no material impact on the overall number of vehicle movements to and from the site, and a small clarification to Condition 13 would ensure that the importation of any odorous materials, whether or not they are technically classed as wastes, would need to be within enclosed containers. There would therefore be no likelihood of poultry litter importation causing additional odour in the area.
- 7.3 It can be seen from the original attempts to secure a contract with the adjacent abattoir, that attempting to tie an emerging technology to as yet unspecified and un-let contracts is not a reliable means of controlling or anticipating the environmental impacts of an operation. The existing and proposed conditions, along with the EP will be the appropriate means of controlling such impacts and attempts to tie the AD to the activities of individual farmers and the way they may manage their land are not recommended in terms of the NPPF Guidance on the precision and enforceability of planning conditions.
- 7.4 There would need to be a deed of variation to the existing legal agreement to ensure that the reissued consent was subject to the same routing agreement and delivery times within Willand village.

Mike Deaton  
Chief Planner

Local Government Act 1972: List of Background Papers

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| <b>Background Paper</b> | <b>Date</b>     | <b>File Ref.</b> |
|-------------------------|-----------------|------------------|
| Original Application    | 12 January 2015 | DCC/3725/2014    |
| Casework File           | 6 January 2016  | DCC/3825/2015    |
| Casework File           | 21 March 2016   | DCC/3850/2016    |

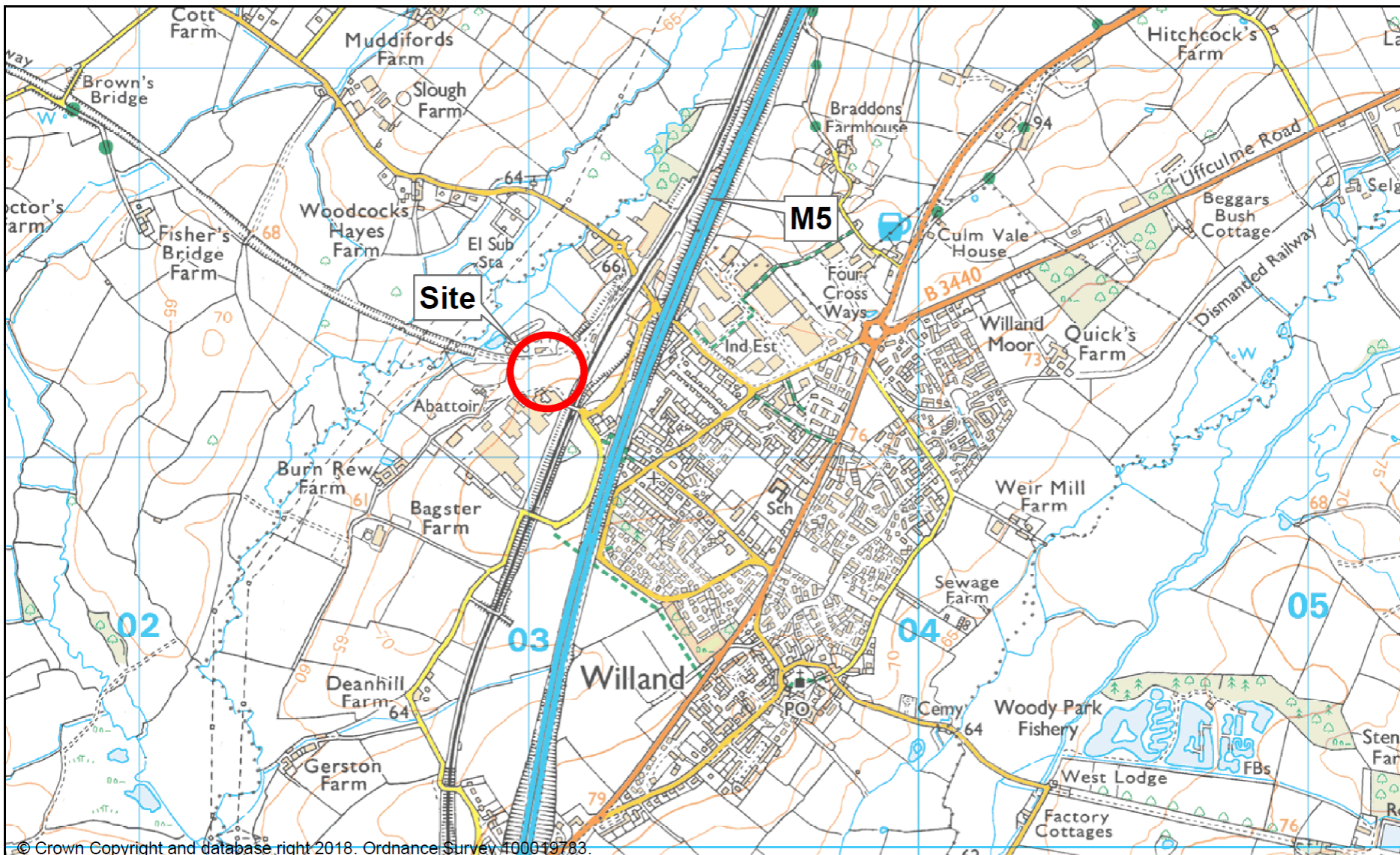
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sc/variation of condition Willand anaerobic digester Lloyd Maunder Road Willand


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Location Plan



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|  | Chief Planner | Development Management Committee<br>County Matter: Waste   | date<br>July 2018 | scale<br>1:12,500              |
|   |               | Variation of Condition 6 of permissions DCC/3725/2014 and DCC/3850/2016 to remove the restriction on the importation of poultry products by road; Willand Anaerobic Digester, Lloyd Maunder Road, Willand. |                   | Application No:<br>18/0009/DCC |

**Planning Conditions (Conditions 6 and 13 amended – all others as previously issued or as altered through variations to drawings through Non-Material Amendment process.**

1. The development shall commence within 3 years of the date of this permission. Written notification of the date of commencement shall be sent to the Waste Planning Authority within seven days of commencement.

REASON: To comply with Section 91 of the Town and Country Planning Act 1990 and to enable the Waste Planning Authority to adequately monitor the development.

2. The development shall be carried out in strict accordance with the details shown on the approved drawings and documents numbered: WIN01\_Willand\_SLa\_002 (Figure 1a: Site Location); WIN01\_Willand\_SLb\_001 (Figure 1b: Site Location); Plan AMZ01\_SP\_012 Site Plan (06.07.2018)\*; Figure 3 Elevation AMZ01\_EL\_007 (06.07.2018)\* (Figure 3 - Elevation - Silage Clamps); WIN01\_Willand\_CSa\_003 Figure 4 Cross Section (20160308 GFLE-Willand Phase 3 Planning v04-35-Cross Section A-A) (Figure 6 - Silage Clamp Cross Section - Overview); WIN01\_Willand\_CSb/c\_002 (Figure 6 - Cross Sections B-B and C-C); WIN01\_Willand\_CSD-D\_002 (Figure 8 – Planting Specification for a screening bund); WIN01\_Willand\_PP\_01 (Figure 9 – Planting specification for Willand Anaerobic Digester); WIN01\_Willand\_Flg10\_001 (Figure 3 - Individual Structures - site overview); WIN01\_Willand\_Flg10\_001 Figure 10 Individual Structures (20160308 GFLE-Willand Phase 3 Planning v04 1-36 – Structures 1-6; 13854-SC001 (Access Track Long Section); A3-002 (Indicative Road Transverse Sections A&B); except as varied by the conditions below.

\* (As approved by Non-Material amendment dated 06.07.2018)

REASON: To ensure that the development is carried out in accordance with the approved details.

3. The development hereby permitted shall be constructed in accordance with the construction traffic management plan approved on 22 July 2015 under Article 30 of the Town and Country Planning (Development Management Procedure) (England) Order 2010.

REASON: In the interest of highway safety and the efficient operation of the M5 motorway and its junctions

4. No development approved by this permission shall be commenced until details of a scheme for the provision of surface water management has been submitted to and approved in writing by the Waste Planning Authority. The details shall include:
  - (a) details of the drainage during the construction phase;
  - (b) details of the final sustainable drainage scheme;
  - (c) provision for exceedance pathways and overland flow routes;
  - (d) a timetable of construction;
  - (e) a construction quality control procedure;
  - (f) a plan for the future maintenance and management of the system and overland flow routes.

Prior to occupation of the site it shall be demonstrated to the satisfaction of the Waste Planning Authority that relevant parts of the scheme have been completed in

accordance with the details and timetable agreed. The scheme shall thereafter be managed and maintained in accordance with the approved details unless otherwise approved in writing by the Waste Planning Authority.

REASON: To prevent the increased risk of flooding and minimise the risk of pollution of surface water by ensuring the provision of a satisfactory means of surface water control and disposal during and after development.

5. No material shall be imported for storage at the clamps at Burn Rew Farm until such time as the highway improvement shown on drawing DCC/01 shall have been carried out.

REASON: In the interests of highway safety.

6. **The amount of feedstock delivered by road to this site shall not exceed 55,000 tonnes per annum.**

**REASON: To ensure that the impacts on the public highway network and on odour management as set out in the supporting Transportation Statement and Planning Supporting Statement are not exceeded in the interests of local amenity and highway safety.**

7. The external materials for the cladding of the proposed buildings and digestate tanks shall be RAL 7038 (goose wing grey) and the security fencing shall be RAL 6005 (dark green) unless otherwise agreed in writing by the Waste Planning Authority.

REASON: To ensure the chosen materials for this development minimise its impact on the character and appearance of the landscape in accordance with policy W12 of the Devon Waste Plan.

8. No vehicle or mobile plant used (other than visiting road lorries) shall be operated within the permission area unless they have been fitted with and use "white noise" alarms.

REASON: In the interest of protecting the local environment and community from adverse impact of noise generated at the site and to comply with policies of the Development plan: in particular policies W18 of the Devon Waste Plan and Policy COR01 of the Mid Devon Local Plan.

9. The landscaping scheme shown on plans: WIN01\_Willand\_PP\_002 (Figure 8 - Planting Specification for a screening bund) and WIN01\_Willand\_PP\_01 (Figure 9 - Planting specification for Willand Anaerobic Digester) shall be carried out **by 31 December 2018**. The approved scheme shall be maintained for a period of five years. Any trees, plants or grassed areas, or replacement of it, that is removed, uprooted, destroyed or dies within five years of the date of planting shall be replaced with the same or similar species in the same location.

REASON: To protect the character and appearance of the local landscape in accordance with policy W12 of the Devon Waste Plan.

10. The applicant shall implement the habitat enhancement and ecological mitigation measures as set out in the report dated 26 March 2015 (Appendix 11).

REASON: To ensure that proposed development minimises the impact on species and habitats and delivers the proposed mitigation and enhancement proposed in support of the proposal in accordance with Policy W11 of the Devon Waste Plan.

11. Prior to the importation of any feedstock to this operation, the applicant shall submit to, and have approval in writing from, the Waste Planning Authority a Traffic Management Plan (TMP) including:
- (a) Official delivery routes;
  - (b) Actions to be taken against those in breach of the delivery instructions;
  - (c) hours during which delivery and construction traffic will travel to and from the site, with such vehicular movements being restricted to between 8:30 am to 9.30 am and 3.00pm to 4.00pm Mondays to Fridays to safeguard school pick up and drop off;
  - (d) the number, sizes of vehicles, and origin and destination of vehicles visiting the site in connection with the development and the frequency of their visits should be logged for Planning Authority inspection;
  - (e) details of proposals to promote car sharing amongst staff in order to limit staff vehicles parking off-site.

On approval the applicant shall take all reasonable steps to implement the approved plan.

REASON: In the interests of highway safety.

12. The applicant shall keep records of the amount and nature of the deliveries to the site and such records shall be made available on written request to the Waste Planning Authority.

REASON: To ensure that the proposed vehicular movements are maintained within the levels set out in the Transportation Statement in the interests of highway safety and public amenity.

- 13. All waste or odorous feedstock delivered to this site and digestate leaving it by road shall be transported in sealed containers or tankers.**

**REASON: To prevent odours from the transportation of waste feedstock causing detriment to the amenity of residents along the delivery routes.**

14. There shall be no external storage of waste materials or soiled containers.

REASON: To prevent odours from this site affecting the amenity of nearby property.