

SCC/0045/23SE Anaerobic Digester Spring Grove Farm

INTRODUCTION

The application is by definition a Commercial, Industrial Waste Operation and reluctantly acknowledged as such by the applicant (see letter SLR 27th June)

It is one of several submitted by Acorn across the Country and broadly follows a cut and paste exercise. Their understanding of local geography and comprehension of the hierachal trunk road system appears to be somewhat limited for a professional, hence the choice of location at Spring Grove Farm in the first instance and the proposed use of the A338 Oxford Existing Site Access (see Transport Statement Fig 7.1)

The proposed site is not designated in the local plan for Industrial development, and is prone to annual flooding, both natural and controlled.

It is located within a Flood Risk Category 3 Zone. The applicant by default is promoting the location, the Stour flood plain and Meldham Wash Lands as Zone 1. The clue is in the description. The Wash Lands which encompass the application area were constructed to protect Haverhill from flooding following the disastrous floods of 1956 which engulfed the town.

The current farming practices of the Thurlow Estate can show no demonstrable agricultural need for the process to support the application.

The applicant cites an annual feed stock need of 92,000 tonnes of raw materials to facilitate production, which will comprise of 40% manure, (coded waste) the catalyst for the operation and 60% green crops. The figure of 92,000 tonnes is a little arbitrary and is the absolute minimum a plant of this magnitude (thought to be one of the largest proposed in the UK) can operate on.

The Estate do not keep poultry, do not keep cattle, and currently the only maize that is grown is for recreational purposes, pheasant cover.

It is accepted that the proposal will import some 90% or more of the feed stock via the public highway. The scoping report identifies that direct trunk road access is the prime factor in identifying a suitable location, the two alternative sites that were briefly scoped in the submission, failed to meet this objective.

The applicant has some 16,000 acres at his disposal, the site being promoted is the nearest to Haverhill, Suffolk's fifth largest conurbation and the village of

Withersfield and will impact on the greatest number of residents and will have the greatest impact on the as built environment.

ALTERNATIVE SITES

MANOR FARM (Point to point Race Course)

Given that some 90% or more of the feed stock, will be imported, main road access is fundamental. The Race course has a dedicated direct access off the A1307 which is dual carriageway at that point. It will also benefit from a new roundabout being built some 800m to west to allow traffic egressing the site on the dual carriage way to resume a journey eastward. Given that the applicant has the benefit of government funding the access to race course could be further improved with a new roundabout which would be at the start of the dual carriageway section. This would benefit race goers alike.

The infrastructure is essentially in place and mains power could be brought quite easily to site if the process is not self-sufficient in its energy needs.

The plant could be located such on the undulating site that it would genuinely not be seen. There would be no need for the “virtual pipe line” or “green corridors” the euphemisms favoured by the applicant as no one will be impacted by either the smell, noise, vermin, 24/7 operation, light pollution or traffic as there are no receptors or industry in the immediate vicinity. The actual % of feed stock that will/could be produced by the Estate as a break crop is so insignificant that a “central location” is not a deciding criteria for location. It is basic transport logistics.

Ironically this location was scoped favourably pre submission by the Vestey family and it transpires, from a recent conversation with the Estate that a senior farm manager is currently having a new property constructed that could be impacted by the submission. Hence Spring Grove Farm took precedence.

The wellbeing of one individual Vestey employee is deemed greater than the thousands of Haverhill and Withersfield residents who will be impacted by the submission. The Contempt and Distain, which the Estate hold us in, to their credit, is consistent.

RECTORY FARM BALSHAM

This site is a little more than a kilometre from the main A11 trunk road and enjoys superb access both to the north and south by dedicated slip roads.

The site is served by a single 7.3m wide carriageway and is located adjacent to A W Sewerage treatment works and is in the shadow of a wind farm.

There are by implication no landscape issues, no receptors close by and most important is situated on Grade 3 Land, which is ideally suited to grow foliage for composting, whereas Spring Grove Farm is prime Grade 2, this is acknowledged by the applicant.

Given that main road access is the primary deciding factor, the A11 is directly linked to the A1307 which currently serves the 16000 acres at the applicant's disposal. Break crops grown locally can be transported via the internal road network.

WADGELLS FARM

This can be accessed from the A143 and the Farm essentially houses the kennels for the hounds of the Thurlow and Puckeridge Hunt. Again there are a handful of receptors which are mostly Estate owned that are within a kilometre of the area and importantly the prevailing south westerly winds will dissipate the stench of the composting process away from the town. The site lends itself to a one system of traffic management, via Sowley Green to the south and a widened ghost lane on the A143 to the north.

BLUNTS HALL/WASH FARM

Blunts Hall (formerly a meat processing factory) and adjacent Wash Farm have a well-established commercial use and again have direct links to the A143. Both sites currently do not have a tenant. Should this be a requirement direct links to the Estates main infrastructure at Western Woods, which the applicant uses to promote Spring Grove Farm would be via the established farm network of hardened tracks and High Noon Farm.

Western Wood Farm West Wrating WW11 Air Field

This location is the central hub of all of the Estates Operations and it is the best location by far, by a country mile. It ticks every box bar one, which I will cover later. It utilises the hardened infrastructure of a World War Two airfield with much of the PQ Concrete still in place. It houses grain storage silos/drying

facilities, plant, workshops and admin. It is a secure site with gated access and has an excellent traffic management system in place. The preferred location Spring Grove makes reference to virtual pipe lines and green corridors that all lead to the site and the adjacent Wadgells Wood. This appears to be the mecca of the process, so logically why not site the whole operation there? The infrastructure and all associated services are in place.

There are very few receptors as such, housing being predominately Estate owned

This site currently handles the harvest from some 16,000 acres of cereal cropping and most importantly all associated traffic movements.

There is an opportunity to construct a private metaled link to the A1307 which would not only serve the proposal but reduce the current impact both of harvest and distribution currently through the villages.

However regrettably when Acorn gave their Presentation to the village, September 2022 I asked the same obvious question to one of the senior members in attendance why not The Airfield and the logic/rationale call it what you like was that they wanted sole security of tenancy, they would not entertain a shared location for business.

CONCLUSION

The applicant states in his Planning Statement that the production of biomethane is a critical step towards our commitment towards carbon net zero.

“use of biomethane in ‘hard-to-abate’ sectors is a critical step in the world’s journey to carbon net zero. It is a mature and well understood fuel that can be used today while hydrogen and electrification solutions are developed.”

By implication this is accepted as an interim solution to generate green energy. This is at the expense of food production. Five years ago the UK produced some 60% of its basic food requirement, today with the dash for sacrificial green crops and solar farms taking Grade 2 agricultural land out of production we now barely produce 50% our food for the table. The applicant cites fuel poverty.

- Fuel poverty – The rapidly rising cost of fuel in the UK is impacting on the welfare of large numbers of people across the country. Development of additional supplies of gas within the UK will help protect against inflationary energy prices.

This is an interesting statement in so much that in reality promoting such plants which take Grade 2 agricultural land out of food production not only impacts on the cost of living, with higher food prices across the nation but the misplaced grants, (your money and mine) by Central Government which promote such Installations further add to the cost of living and this has been flagged by the NFU. We move from fuel Poverty to Food Poverty, at an even greater cost.

The term “Double Whammy” is probably more appropriate.

Further consideration needs to be given to the short term life expectancy of generating biogas. The future for these plants is limited as hydrogen and electrification solutions are developed.

On the other hand, composting of domestic putrescible food waste does have a positive future. As a nation some 40% of domestic “black bin” waste is food waste.

This under current waste regulations is either buried or incinerated, both which have impacts on the Environment

This is really what this particular application will ultimately support given its twenty-five-year design life and whilst we are assessing the application against policy we should be mindful of the ultimate agenda behind the submission, and the woefully inept, disjointed thinking of Central Government.