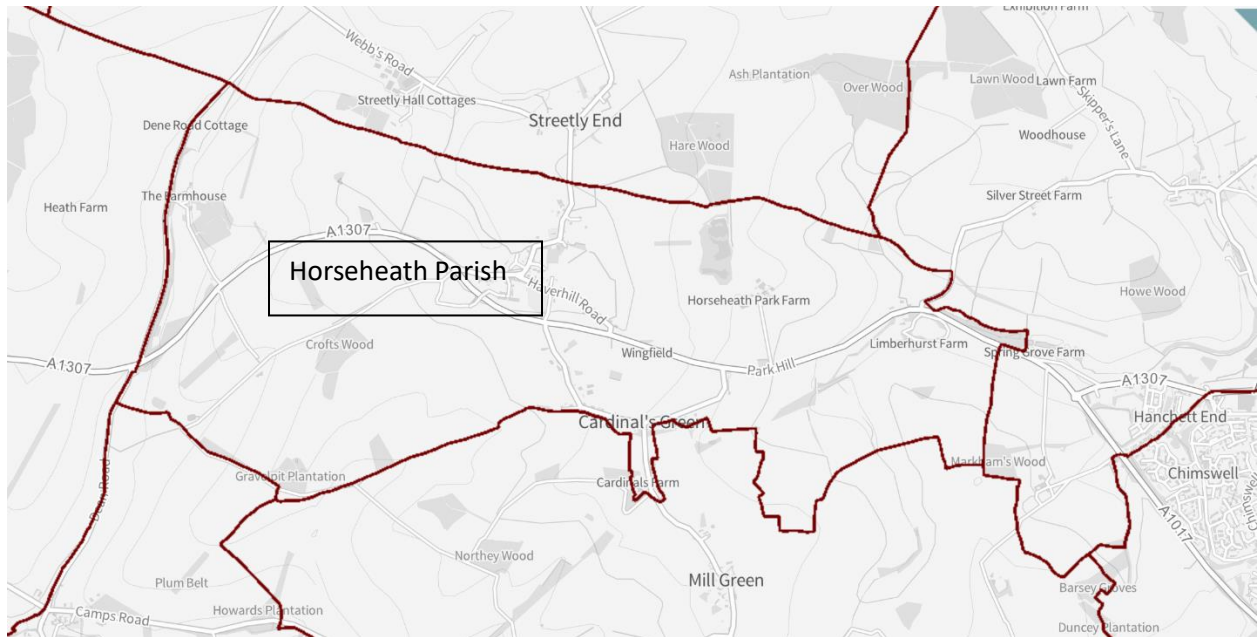


## Horseheath Parish Council Objections to an Anaerobic Digester Facility at Spring Grove Farm, Haverhill (SCC/OO45/23SE)

Horseheath Parish Council objects in the strongest possible terms to the proposal to site an anaerobic digestion facility at Spring Grove Farm and the associated lagoon site on land north east of Cage's Wood. The Spring Grove Farm site is on the Horseheath Parish and Cambridgeshire border as the images below illustrate. The environmental and traffic consequences of this development will directly impact Horseheath Parish. Although the application is being dealt with by Suffolk County Council we wish to ensure the views of Horseheath Parish are taken fully in to account.



Figures 1 & 2 – Horseheath Parish (source Magic Map)



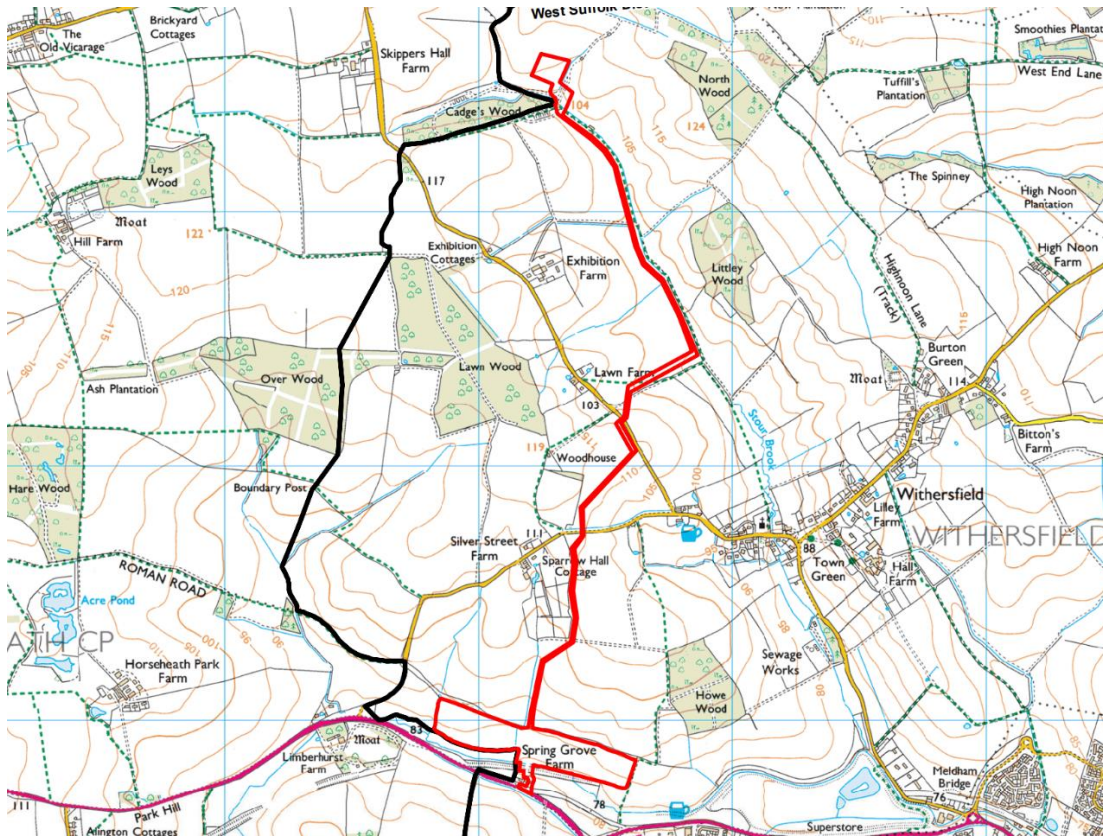


Fig 3 The site of the proposed Biodigester plant and the lagoons linked by pipeline.

### **Assumptions and Uncertainties**

We note that the application states that the exact constituent waste mix fed in to the biodigestion unit may vary and that it is not possible to specify this accurately prior to the operation of the plant. We also note that there is no clarity as to the origin of the source material.

It therefore seems to us that it will not be possible to quantify either the environmental impacts or the number of HGV journeys and the impact on traffic beyond providing a range for both of these areas. The application does not do this comprehensively, but provides rough estimates based on assumptions. We believe exact likely operating ranges should be supplied to allow a fully informed determination to be made.

### **Policy Material Objections**

Suffolk Minerals & Waste Plan (adopted in 2020) Policies WP3 and WP7 do not support this application as the site is neither used for existing waste management, industry or distribution, or allocated for these purposes. The land is grade 2 agricultural land; the establishment of this plant would be against the current site designation and completely change the character of the land.

Given the proximity to the South Cambridgeshire parishes of this plant we suggest the proposed plant should be tested against the Cambridgeshire Local Plan in addition to the Suffolk Local Plan for industry and waste management.

### **Environmental Material Objections**

The location is entirely inappropriate for this plant; there is no evidence that the applicant has sought other sites away from the Thurlow Estate. There are approximately 1000 homes within a 1km radius of the proposed site. Haverhill Research Park and the Epicentre is 200m from the boundary. The Meldham Wash lands, a vitally important flood protection area which is also home to a diverse range of local fauna and flora, is adjacent to the site. The application proposes over 4 hectares of impermeable hard surfaces that are at the base of gentle slopes; the site itself has flooded twice in the last month. Therefore, despite the environmental assessment provided, there is a high risk of:

- Ground water contamination and contamination of Stour Brook and other joining water courses
- Increased flood risk for Haverhill due to the potential increase in surface water
- Persistent increased light and noise pollution from the 24 hour operation of the site
- Potential contamination with NH<sub>3</sub> and leaching of hydrogen sulphide and formaldehyde<sup>1</sup> which could all impact local ancient woodland such as Cadge's Wood and the Over and Lawn woods, an SSSI
- Potential infestations of flies and vermin that could impact local residential dwellings
- There will be discharge of methane from the plant<sup>2</sup> which could impact climate change mitigation measures. Together with waste odours, there is likely to be an impact on air quality for local residents and the environment

Finally, we do not accept that there will be only a minimal impact on heritage assets such as Limberhurst Thatch in Horseheath Parish. The high probability of odours, noise and light pollution, as well as the change in visual appearance from a rural area to an industrial plant will clearly impact on a heritage asset which is only 400 metres from the site.

### **Economic Material Objections**

Haverhill Vision 2031(adopted by St Edmundsbury Borough Council in 2014) identifies 12 hectares of land at Hanchet End as a strategic employment site in Policy HV10. This policy zones this land for technology, research and light industrial employment, aiming to bring high quality jobs to Haverhill. Haverhill Research Park and the landmark Epicentre innovation centre is only 200m from the site boundary. In addition, the Flying Shuttle public house is also within 250m of the site boundary. The visual appearance of this site, its noise and odour will be hugely detrimental to attracting developers and high value employers to the area. No prestigious employer is going to want to site their office overlooking such an unattractive set of structures with the well documented risk of unpleasant odours.

### **Highways and Infrastructure concerns**

The application attempts to provide a range of HGV journeys per day according to the use of agricultural waste at different times of year. However this is not further

broken down in to ranges depending upon the type of crops or waste used or by the likely distance such waste might travel from. Therefore the true impact on the transport system is unclear. The stated range is 50-148 HGV/tractor movements per day.

The application does not make reference to accident statistics held by Cambridgeshire County Council for the A1307. This secondary A road, part of the Major Road Network has a high rate of fatalities in the section through Horseheath Parish and congestion all along the route. The impact of significantly more tractor/HGV journeys will be hugely detrimental for all those driving to school and work in Cambridge from Haverhill and has the potential to contribute to further road traffic accidents. The application should provide much greater detail on the impact of the plant related traffic on the road through South Cambridgeshire.

Additionally, a significant problem in Horseheath along the A1307 is the use of laybys by HGV drivers as wild toilets. There is no infrastructure for HGV drivers along the route. We would be very concerned by the likely health hazards of further human waste deposited along the verges in Horseheath Parish.

Should this application be granted we would expect there to be legal agreements between the County Council and the developers limiting HGV movements to major highways and away from villages and residential areas so that local traffic movements are not impeded.

### **Loss of residential amenities**

As others have previously stated, we recognise the impact this industrial plant will have on local footpaths and public rights of way and the Meldham Washland. We agree that the presence of a large scale waste processing facility represents a significant loss of residential amenity to residents of Haverhill, especially those in the Hanchet End area. The visual, noise, traffic, odour and pollution impacts are all detrimental to those close to this facility. The substantial change in the character of the area from technology and research based high value employment, modern homes and leisure facilities, to a large scale facility for processing farm waste on a prominent approach into Haverhill is detrimental to the amenity of the town in general.

Finally, the adverse impacts on the locality seem out of proportion to the direct local benefits. As far as we can tell the holding company for Acorn is European; the only local benefits this plant might bring seems to be 5 wte jobs and the use of spent digestate instead of fertiliser across the Thurlow Estate. We understand that, given the likely change in crops grown to operate the plant, it is questionable as whether there is a long term environmental benefit in terms of soil health of this change.

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<sup>1</sup> Environmental impact of Biogas: A short review of current knowledge. Paolini et al, Journal of Environmental Science and Health, 2018, Vol 53, (10) 899-906

<sup>2</sup> Biogas emissions could threaten Net Zero targets – Imperial News – Imperial College London, 26<sup>th</sup> May 2021, accessed 6<sup>th</sup> November 2023