

F.A.O. Andy Rutter, Suffolk County Council Planning Section
Growth, Highways & Infrastructure
Fifth Floor
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

19th October 2023

Sent via Email

Dear Mr Rutter

SCC/0045/23SE – Land North of Spring Grove Farm, Withersfield, Suffolk CB9 7SW

As you may be aware, Jaynic Properties Ltd own the Epicentre at Enterprise Way in Haverhill, which is located only 250 metres to the south of the proposed anaerobic digestion facility at the above site.

The Epicentre opened in November 2020 and is an innovation centre and start-up facility for small businesses, which has had considerable success in attracting emerging and growing businesses to this edge of town location. The siting of the Epicentre was seen as a key location by West Suffolk Council at the entrance into Haverhill from the north-west, and a suitable, high quality 'landmark' building was designed to reflect this. It also capitalises on its location by creating extensive countryside views from its upper floors in almost every direction, including to the north and the site of the proposed AD facility. The building is not yet fully let but our existing occupiers, many in the hi-tech/science/research industries, appreciate both the location and outlook of the building.

An AD facility so close to our landmark building will inevitably impact on its perceived edge of countryside location and if odours become issue, new occupiers will inevitably be put-off. This building is also naturally ventilated, so relies on open windows to achieve a through-flow of fresh air.

Our concerns about the potential impact of odours from the proposed AD facility are such that we have commissioned independent odour consultants to assess the planning application and its supporting technical information against established good practice and guidance, and to consider whether there is a risk of unacceptable odour conditions which would affect the Epicentre site – this report, by Michael Bull & Associates Ltd (MBAL) is attached, and its conclusions are set out below:

- *The proposed development includes the delivery, storage and handling of material that can be highly odorous including chicken litter and farmyard manure. While the actual process of anaerobic digestion is enclosed and is likely to have low odour emissions, the storage and handling on site of this material will result in fugitive emissions of odour which have not been assessed;*
- *No information is provided regarding the frequency that stored material will be disturbed, how frequently it will be moved around site and how odours would be controlled during these activities;*
- *The odour assessment has been based on a single assessment method, namely the SPR approach; this is a suitable method but is a qualitative approach largely based on professional judgement. In MBAL's view, some of the source odour potential and the pathway effectiveness to the Epicentre have been underestimated;*
- *The Epicentre is promoted as a high-quality working space and as such, should be considered to be a highly sensitive receptor. Where there are large odour emissions, such as from handling of material such as chicken litter, there is the potential for a high level of impact from the proposal development upon the Epicentre;*

JAYNIC PROPERTIES LTD

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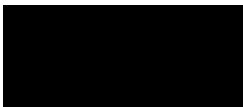
- *The use of a single assessment method is not in accord with the IAQM guidance which suggests that a multitool approach should be used. Other methods that could be applied include a detailed FIDOR/FIDOL assessment and indicative dispersion modelling based on published emission data for available sources;*
- ***Given the lack of such assessments and the potential for high odour emissions to occur from some activities, it is concluded that there is a risk of significant adverse odour impacts at the Epicentre.***

Given these professional findings we believe the proposed site for the AD facility is far too close to both the Epicentre and the Arboretum housing area (150 established homes) at Three Counties Way, which is only 350 metres to the south-east of the application site. In addition, construction has now commenced on a further 145 homes to the west of Three Counties Way, which will be even closer to the application site.

Research also shows that high odour emissions from AD facilities in other parts of the country are clearly an ongoing issue, despite professional reassurances by the operators, which has had a significant impact on nearby properties – see attached note containing recent press articles on such events.

In the light of all the above, we would like to register our strongest possible objections to this proposal, as the risk of high odour emissions from the proposed AD facility are likely to occur at key stages of the AD process, which would have a significant and detrimental impact on the operation, letting and management of the Epicentre.

Yours sincerely



NIC RUMSEY
Managing Director



Enc : - Review of Odour Assessment by Michael Bull & Associates (18/10/2023)
- Extracts from recent press articles regarding odour emissions from AD Facilities