**Application Number: SCC/0045/23SE**

**Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons**

**Applicant: Acorn Bioenergy Limited/Thurlow Estate**

Dear Mr Rutter

I strongly object to the above application for the following reasons:

**Location:**

The site of this proposed development is entirely unsuitable compared to others that are available. Two other sites are obvious, although the Thurlow Estate has another 16,000 acres to choose from.

MANOR FARM (Point to point Race Course) could be considered ideal given that some 90% or more of the feed stock will be imported via main road access is fundamental to the application, but it was set aside in favour of Spring Grove Farm. The Council will find the reasons given can be described as 'thin on evidence'. In fact the race course has a dedicated direct access off the A1307 which is dual carriageway at that point. The necessary infrastructure is essentially in place at this potential site, and mains power could be brought in quite easily 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" 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 applicant constantly stresses the importance of transport logistics in site selection.

WESTERN WOODS FARM, the old West Wratting WW11 Air Field, is the central hub of all of the Thurlow Estate's operations and it is the best location by far. It satisfies all the requirements stated by the applicant as paramount in site selection, bar one. 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 4 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, central to the application, that all lead to Wadgells Wood, which is immediately adjacent to Western Woods Farm. With the infra structure and all associated services in place, including importantly all associated traffic movements, very few receptors and as it currently handles the harvest from some 16,000 acres of cereal cropping, makes this site perfect for the whole operation, and would meet little opposition. Sadly, the applicant rejected this site on the grounds that they wanted sole security of tenancy and would not entertain a shared location for business, even with their partner The Thurlow Estate. This explanation hold little weight and is easily mitigated by both parties, should they have chosen this site.

I fear that the location of Spring Grove Farm has little to do with this choice for development, rather, it provides little revenue for the Thurlow Estate. A much greater profit for the state will be gained by leasing this awkwardly farmed land to Acorn, and receiving in return the digestate – a valued by product - at a beneficial rate from its partner, Acorn.

Alternative sites can be proven more suitable. The applicant, and its partner, the Thurlow Estate, should be forced to provide better explanation as to why it favours a site that will have such a detrimental impact on so many in favour of the few.

**Odour:**

There is a mass of evidence that supports the claims of unbearably bad odours from local residents that live close to similar developments; almost no assessments, bar those carried out by the applicants themselves, exist to deny these claims. Indeed, a decent independently commissioned report by Jaynic, the owners of the Epicentre, criticises the assessment and the methodology used by the applicant as 'not in accord with IAQM guidance' and that other methods should be applied given the sensitivity of local receptors. This implies the applicant has deliberately and knowingly used methodology that will be sympathetic to its cause.

This alone should raise alarms with the Planning Department. If the applicant has done this deliberately on this significant issue, what other assessment has it canted to achieve a favourable outcome for itself?

The applicant claims mitigation will be built into the construction of the plant and it will be operated to standards of the licence issued by the Environmental Protection Agency (the same that has allowed the dumping of sewage into the nations waterways for decades, unpunished). One could assume all AD plants are built and operated to these standards but still the complaints of malodours continue to rise. Obviously the mitigation aspects the operators of AD plants across the country use are completely ineffective. We can expect the same from this developer, Acorn, who has, incidentally, never built nor operated and AD plant.

The cause of the bad odours is rotting vegetation and poultry/farmyard manure. These materials will be delivered to site and deposited from both uncovered HGVs and uncovered farm tractors with open trailers. One of the main activities undertaken on-site will be to move the waste from delivery vehicles to the storage tanks (clamps), and from the storage tanks to the AD vessel. This will be done using JCBs. The 'waste' will be in the open throughout until moved into the clamps. The clamps will be opened to allow access for the 'waste' material, so they will be opened and closed regularly throughout all times of the day. Local residents will be subjected to foul odours emanating from the material as it's moved about the site, and from the clamps, which contain rotting waste, when they are opened. This is unacceptable. Additionally, this type of 'waste', by its very their nature, will attract vermin and flies. Flies especially are attracted to this type of organic waste, but, unlike vermin, are also likely to travel away from the source. There is a high probability of infestations from both species within a 1km radius.

**Flooding:**

The site is designated as Flood Zone 3. Recent photographic evidence demonstrates that the site floods in many areas, especially to the east of the site where the clamps are to be situated. Flooding, when it happens, will lead to the local watercourse being polluted. This will cause an unacceptable risk to human health and that of the wildlife that inhabits Meldham Washland (Flood Park), forbidden by the National Planning Policy Framework. Further to this risk is the addition of surface water to the Flood Park that would otherwise be absorbed by the land at Spring Grove Farm. Meldham Washland is a flood storage reservoir situated at the confluence of Spring Grove Brook, Stour Brook and Hanchett End Brook. The Washland has been brought into use effectively twice in recent history. Firstly in 1987 when it half filled with water, and more recently in 2001 when the monthly average rainfall fell in 24 hours. The reservoir came close to being full, and so protected the town of Haverhill to its East. Should this happen again, Spring Grove Farm, to the West, with no protection, will almost certainly flood. The consequences of plant being built and the 31 acre hardstanding adding to significant run-off to the flood defence area could be catastrophic for Haverhill. The application ignores and therefore completely fails consider and mitigate this consequence causes. This is unacceptable and the Council should force the applicant to address this serious issue.

Clear evidence of recent flooding to the eastern section of the development can be viewed on the Muck Off Acorn website and Facebook page. The risk of flooding should not be allowed to be easily dismissed.

**Traffic & Feedstock**:

The applicant has submitted a traffic assessment carried out by themselves only. Should this be relied on? It conveniently assesses incidents within the 'immediate vicinity' of the site entrance/exit. This is so specific as to be ridiculous and is clear its aim is to move attention away from the fact that the HGV/Farm vehicles servicing the site will use the length of the A1307 from as far away as the Four Wentways roundabout to Haverhill via Linton. The Council should force the applicant to not be disingenuous and provide a full and comprehensive assessment of traffic incidents, the extent of the increased risk posed to the public by the enormous increase in the number of HGVs and Farm tractor/trailers using this route, and a mitigation plan that makes sense. The A1307 is already designated a dangerous route and there have been several fatal accidents over the years, some involving children. Any increase in traffic movement, especially HGVs and slow moving farm vehicles should not be permitted on this road. The applicant details the majority of deliveries to and from the site will use this dangerous road.

Suffolk Local Transport Plan 4.88 (2006-2011) plan contains local objectives towards achieving a sustainable transport network. "The problems of traffic congestion in the market towns of Haverhill and Bury St Edmunds is noted, as is the high number of daily vehicle movements passing through Haverhill due to out commuting to Cambridge. "Other roads in the borough which are part of the Primary Route Network are carrying large volumes of traffic. Where they pass through villages, the local environment is being put under significant pressure. Increased levels of traffic between Bury St Edmunds and Diss on the A143, between Bury St Edmunds and Thetford on the A134 and between Haverhill and Cambridge on the A1307 are of particular concern."

The junction of Skippers Lane, Horseheath Road, Hollow Hill and Withersfield is already a sensitive area because of the tight bends, lack of pavements and rat run traffic, dog walkers, cyclists and horse riding. In this sensitive area HGV and farm traffic traffic flows should not be increased.

With a potential extra 5036 Tractor/HGV traffic movements on these rural roads there "would be an unacceptable impact on highway safety and the residual cumulative impacts on the road network would be severe."

**Noise/Lighting:**

The construction period will be lengthy and will use heavy construction machinery throughout. There will be a need to excavate the site in preparation for concreting over the 31 acres. Construction, therefore, will involve hundreds, of HGV movements, which will cause noise levels to rise which will be a significant inconvenience to local residents. Once operational the plant will operate on a 24/7 basis. During daytime operation one of the main activities undertaken on-site will be to move the waste from delivery vehicles to the storage tanks, and from the storage tanks to the AD vessel. This will be done using JCBs, and will include scraping the digger shovel on the concrete surface and around the inside of the storage tanks. The noise is horrendous (chalk on a blackboard).

As the site is not time constrained it will be operational at light, so will require floodlighting outside of daylight hours, causing light pollution. The normal business of the site will be conducted during the hours of darkness, meaning its usual operations, including gas tanker movements with reversing

sirens, will continue at the time of day when sound travels further, affecting even more residents than usual.

**Methane:**

Methane is known to contribute to greenhouse gasses at 25 times more than CO2. It is at risk of explosion when not properly mitigated, as evidenced by the recent lightning strike in Oxfordshire. The applicant has not provided any evidence to demonstrate sufficient mitigation to the same event, preferring to claim the event is highly unlikely. The plant in Oxfordshire had been struck twice in the past, before the explosion this year.

The combined impact of mal odours and methane will significantly reduce local air quality and will have a devastating effect on the surrounding area.

Additionally, Biogas contains hydrogen sulphide. This is a toxic gas proven to be the cause of several deaths in the UK agricultural sector in relation to slurry tank management. Slurry is the second product of an anaerobic digester, after methane. Hydrogen sulphide is heavier than air so will fall to the ground, lying in wait for an unsuspecting person to disturb it.

**For all of the reasons above, I strongly urge the Council to deny this application. They are duty bound to take into consideration the detrimental effects of this development, and not the profits for a local landowner and a non-domiciled foreign beneficiary.**