

Dear Mr Rutter,

I am writing to object to the proposed Anaerobic Digestion Facility at Spring Grove Farm ([SCC/0045/23SE](#)) for the following reasons.

Adverse impact on Landscape and Environment The proposed AD plant is classed as an industrial waste processing plant which involves the transportation, storage, handling and processing of biowaste. First, this application is not in accordance with Suffolk mineral and waste plan policies WP3 and WP7 because the site is not currently used for waste management, distribution or used for any industry. The site is also not integrated with a water treatment facility nor near any agricultural buildings. Second, National Policy guidelines for waste processing plants prioritise landscape character and localised height restrictions in planning considerations. The proposed AD plant would respect neither factors because the intention would be to build this on agricultural land in a rural area which has also been identified as of vital importance as a green corridor and gateway to Haverhill (local policy: Haverhill Vision 2031). An industrial waste processing complex of this scale (5 digesters 17m high) would take away highly productive grade 2 agricultural land which is against national policy. The buildings would dominate or overshadow the area and there is no screening possible to mitigate the visual impact. The developer's statements that planting will be an effective screen are inaccurate given that the existing trees are deciduous and that the industrial buildings would rise above the trees. Hundreds of family homes and also the Epicentre look out on this rural area, and it is also visible from the popular recreational area the Meldham Washlands (West Town Park). Turning this area into an industrial waste processing plant is completely incompatible with national and local policy. **The existing natural landscape and Haverhill's green gateway and amenities risk being irreversibly lost if this waste complex is built.**

Adverse impact on amenities of adjacent areas by smell and air pollution The proposed AD would be within close proximity of hundreds of family homes, and also schools, food outlets, and the Epicentre, a recently built research centre, which attracts high-tech businesses to the town and is an important link between Haverhill and Cambridge. The Epicentre is located within 210m of the proposed AD site. The property developer behind The Epicentre commissioned an independent review of odour assessment which was submitted as an objection. This report concluded that the risk of odours impacting residents and businesses close to the proposed development is higher than stated by the applicant, in particular due to odours relating to the delivery, storage and handling of farmyard manure and chicken manure. From this independent assessment it appears that the applicant did not factor in these emissions and also it would follow that they are not likely to be able to control emissions from this source to an acceptable level. The independent experts concluded that the Epicentre will be affected by odour, and also nearby residents such as myself who live in close proximity to the proposed development. I am concerned that odours relating to the delivery, storage and handling of farmyard and chicken manure will impact on my enjoyment of my outdoor space and, like the Epicentre, my home is also naturally ventilated, and so my amenity would be greatly affected. I find it problematic that the applicant did not conduct an adequate odour assessment of the delivery, storage and handling of biowaste, and it concerns me that their proposal may contain many other inaccuracies and omissions, such as relating to noise and vibration, emissions to air, and pests. The applicant also neglected to include receptors such as footpaths at risk from their planned site – there are a number of Public Rights of Way in close proximity. **The**

proposed AD plant will adversely affect the amenities of adjacent areas through odour, noise and pollution.

Traffic, noise and safety The proposed AD plant will generate significant additional traffic requiring constant deliveries of 92,000 tonnes of feedstocks and the export of products to Milton Keynes, with what seems like a conservative estimate of up to 148 HGV/Tractor movements per day. This involves a significant increase in HGV movements on our local road network – exporting Biomethane, Digestate, Co2 to other counties, and importing manure from great distances because there is no local supply. The A1307 and public roads through the surrounding villages and Haverhill will become less safe and more congested, and there will be increase damage to road surfaces, and also a risk of spillage, which will impact on road safety. I am concerned about the impact on the A1307 which is already a busy and dangerous road. Also, the narrow rural roads around Withersfield are not suitable for the purpose of industrial and commercial waste transport. Please see below a photograph of a lorry approaching Withersfield from the A1307 on Silver Street, demonstrating the narrowness of this road and its unsuitability for routine HGV traffic. Not only will these potential increased HGV movements impact on other motorists, but they will endanger pedestrians heading along Silver Street towards or from walking paths such as the Roman Road.



Internal Farm tracks. The applicant appears to consider internal farm track suitable for the use of deliveries of feedstocks. These farm tracks currently support agricultural traffic, however, it is problematic to assume that these tracks are also suitable for delivering feedstock for the purpose of an industrial commercial waste processing plant. The applicant omits to assess the risks or costs associated with using farm tracks for an industrial purpose. The scale and quantities of traffic movements would be significantly higher, generating a heavier use of HGV's or tractors across the rural landscape, not for the purpose of farming, but for the purpose of an industrial commercial waste processing facility. This comes with greater visual impact on the landscape, risk to safety - to motorists, pedestrians, cyclists, also through increased risk of spillages on the road network, and risks of increased noise and pollution. I am concerned about the risks to other road users, pedestrians accessing public rights of way which intersect or are shared with farm tracks, and also the impact on wildlife. There is no Traffic Plan to show how these single farm tracks will support the proposed deliveries to the AD plant and back again, and also the applicant fails to provide

information on how these internal farm tracks will be accessed. It appears that the current application is linked to a separate application the developer submitted for an access for Spring Grove Farm via Horseheath Road (application number DC/23/0572/FUL). This was presented as an application for an access which the applicant categorically denied would be for the purpose of industrial processes or waste management processes. It is problematic if these farm tracks are in fact to be used for the transport of waste deliveries to a commercial and industrial waste processing plant, if these tracks are not intended for or suitable for use other than agricultural. There would be heavy use of these farm tracks, and also on the minor public roads leading up to these farm tracks.

The proposed AD plant will adversely impact on traffic and safety, and adversely affect the amenities of adjacent areas through noise and pollution.

Risk of flooding and water pollution The applicant proposes to concrete over this agricultural area of greenbelt. The site is located within a flood zone 3 area. This contradicts policy set out in Haverhill Vision 2031, 10.12e (p.52) “Locate all new development away from areas at greatest risk from flooding”. Siting an industrial waste processing plant in a flood risk area increases risk and burdens the local population. There is a real risk to flooding and also water contamination to groundwater and surface water from run off. **This risk to flooding is an unacceptable risk which can only be mitigated by selecting another site.**

Risk of industrial accidents and explosion There has recently been an explosion in Oxford (October 2023) of an Anaerobic Digester plant, and there have been other industrial accidents in the past, both in the UK and abroad. This AD plant is proposed near hundreds of family homes and the Epicentre, and this **danger of explosion poses an unacceptable risk which can only be mitigated by selecting another site further away from housing and the Epicentre.**

Water consumption. The applicant describes in their proposal that anaerobic digestion is a water-intensive industrial process. Haverhill is situated in the driest region in the country and relies on a borehole for its water (Haverhill Vision 2031). It has an average rainfall of around 600mm, less than half the national average. Anaerobic digesters are not well suited to areas of low water availability. This high water consumption goes against the local policy that the provision of infrastructure and services helps to meet the growing needs of the town, at a time when water supplies are coming under pressure from increased demand and more frequent droughts and floods. **There is a risk of ground water and surface water being contaminated in a region where water supplies are under pressure.**

To summarise, local policy, outlined in Haverhill Vision 2031 (p. 52), sets out to “Ensure new infrastructure is visually unobtrusive and does not adversely affect amenities of adjacent areas by reason of noise, smell, overshadowing or other form of pollution” (Haverhill Vision 2031, p. 52). The proposal does not meet any of these criteria - the site is unsuitable, the development would adversely affect amenities of adjacent areas and would burden many people, and it will have a lasting negative impact on the economic prosperity and future of this region. The risks and costs cannot be mitigated for (safety, health, amenity, impact on landscape and environment). There are more suitable sites elsewhere which do not carry these significant adverse effects, risks and costs to so many. As said above, I strongly object to this planning application.

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