

To: Andrew Rutter, Case Officer, Suffolk County Council

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 Sir,

As a resident of Withersfield living circa 600m from the site I wish to record my objection to the above application. I consider it likely that I may wish, if possible, to supplement my reasons for objection at a later date, but ahead of the committee meeting. The documentation is lengthy, detailed and complex for a layperson to understand and I wish to study it further. Also, there are issues related to the application which I wish to research in more detail.

The application is for a very large and unsightly industrial scale facility and I believe my arguments support the contention that granting permission would be inconsistent with the Suffolk Minerals and Waste Local Plan (2020) and with Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (Feb 2015). My objections primarily cover the poor choice of location. However, I also consider it important to offer reasons why I believe the benefits of anaerobic digestion are overstated as a means of explaining why there is no compelling reason to permit a development in contravention of the Minerals and Waste Local Plan and other planning requirements.

1. Setting a Precedent.

Many of the objections made by myself and others relate to issues with the location. Were the County Council minded to contravene the Minerals and Waste Local Plan and, on good quality agricultural land in close proximity to housing, locate what I believe would be at the time of construction the largest Anaerobic Digester Plant in the country, they would be setting a precedent. There are many better locations in Suffolk, more remote from settlements, for a facility of this nature. However, worse locations would be harder to find. If Suffolk is seen to be permissive in accepting such an application at such a location the County Council would find it difficult to justify refusals of further applications at locations similarly attractive to applicants and equally detrimental to nearby communities.

2. Exaggerated claims regarding screening.

The applicants make questionable claims in relation to the screening of the site. Five huge 17 m tall digester tanks are proposed, higher than four double-decker buses, which present a significant screening challenge even to mature trees. These large and unsightly structures will be wholly or partially visible from most surrounding viewpoints. The boundary of the area to be excavated and concreted over is drawn very tightly against the line of the mature trees and hedgerows which border the site.

This raises the issue of potential damage to the root systems of retained trees and hedgerows which could be sufficient to jeopardise survivability. Prior to determination of the application it would seem important to have access to a report from an independent arboriculturist with access to a clear and irrevocable delineation of the site boundary.

The existing trees and hedgerows, both of which contribute to the limited screening of the site, currently have no protection and, especially were consent to be granted, would be vulnerable to removal before or after commencement of construction. This would be especially the case if they were to deteriorate as a consequence of root damage. The trees and hedgerows are deciduous and so such screening as exists will be compromised during the Autumn and Winter. Claims regarding tree planting to improve screening are spurious. The site has an estimated service life of 25 years and new trees would have minimal screening effect for most of this time. The mature hedgerow trees to the north of the site are part of a very old field boundary but are nowhere near tall enough to provide adequate screening of tanks almost 17 m high from a substantial proportion of Silver Street, in part as a consequence of growing in the heavy clay soil identified in the Geology and Topography paragraphs in Chapter 11 of the Environmental Assessment.

There is no screening of the site when viewed from the East. To the west of the site it will be visible to traffic approaching the A1307 junction with Silver Street and very prominent when viewed from Silver Street itself in this vicinity.

Leaving Withersfield village via Silver Street the digester tanks will become clearly visible over a circa 500m section from the elevated position of the road as it passes Silver Street Farm. The application (Chaptert11) acknowledges that this viewpoint is in an elevated position and that the site would be visible.

However, Plate 16 appended to this chapter purports to show a view from near this location in the direction of the site. It shows a ridge with a section of dense woodland to support a claim that topography and tree cover provide meaningful screening. This photograph is actually taken from a location adjacent to Horseheath Road near the White Horse. It is a view to the east, not south toward the site and shows that Haverhill is not visible from this location courtesy of part of Howe Wood and the intervening ridge.

3. Landscape Destruction

The existing “Green Corridor” marking the approach to Haverhill from the West is not just aesthetically pleasing but, courtesy of the footpaths which pass close to the site and others in full view of it, represents an important leisure amenity that would be grotesquely disfigured by the insertion at its heart of a large and unsightly industrial- scale development. The site would be visible, and in some places prominent when viewed from the Fleam Dyke and Roman Road footpaths currently an attractive asset to walkers from within and beyond the local community.

There is a famous saying that “you only have one chance to make a first impression”. Currently, the Green Corridor creates a positive first impression of Haverhill to travellers. Severely blighting this asset is likely to have adverse economic consequences.

The town has explicitly sought to take advantage of the Green Corridor to help attract high value-added jobs, notably to the Epicentre and adjacent Technology Park which currently enjoy a pleasant view overlooking the application site.

In Chapter 11, Historic Environment, the application recognises that the landscape in the area has remained largely unchanged since the post-mediaeval period. Apart from the modern properties in t Hanchet End, for whom the landscape that would be disfigured has high amenity value, the built environment within 1 km of the site is also substantially unchanged being almost entirely devoid of visible post-Victorian properties. Within the 1km area there are 13 Grade II listings covering 18 properties plus the Withersfield Village Conservation Area. Tearing the heart out of this very rare

combination of both a substantially unchanged rural and built environment to accommodate a very large industrial eyesore would be a gross act of vandalism.

4. Decommissioning

The application notes that the proposed development has an anticipated service life of 25 years as its output will be superseded non-polluting alternatives such as hydrogen and green electricity. It is perfectly plausible that its life could be shorter and that towards the end of its life it will become increasingly less profitable. There is clear risk that near the end of its life the plant could be in ownership unable to fund its decommissioning. The application is devoid of any clear and unequivocal arrangement to create a source of ring-fenced funding sufficient to decommission the plant. Would, for example, the Vestey family, as a significant financial beneficiaries during the facility's operational years be willing to enter into a binding financial agreement and set aside funds to cover the cost of decommissioning?

5. Traffic

The potential issues regarding traffic pressures are well documented. Although the applicant cites the importance of A1307 it recognises that the logical route for many suppliers of feedstock could be via rural roads and proposes construction of a rear access that is dependent on significant new HGV/Farm tractor traffic. This route is very close to properties in the vicinity of the White Horse, and runs to the rear of properties on Horseheath Road and Silver Street sufficient to cause noise light and pollution nuisance which, especially at peak times, would extend into unsociable hours.

In addition to the issue of pressures on the road network the site itself is quite cramped and heavy equipment is needed on site for unloading and moving feedstock. Vehicles need time for weighing loading and unloading and there is a lack of space for vehicles to queue when necessary.

Vehicles arrivals and departures are not evenly spaced and while on site need to be weighed and unloaded or loaded. The site would not appear to have space for coping with several vehicles simultaneously and this could cause difficulties especially at peak times. This raises the spectre of the operators encouraging vehicles to enter the site via the rear entrance to avoid queuing on the A1307 and leaving space on site to facilitate exits via the A 1307. In addition to potential additional HGV/Farm Tractor traffic running through with Withersfield village it should be noted that there is currently an issue with HGV traffic on Silver Street and Skippers Lane, traffic to which these roads are inherently unsuited.

This relates to the historic planning consent granted for warehousing on the former RAF West Wratting site at a time when trucks were much smaller. The slightly longer, but more suitable, signposted route from the A1307, a planning condition at the time, has become disused with the advent of satnav. Current pressures are problematic and with the addition of further HGVs would become untenable. On Silver Street in particular there is no place where it is possible for two HGVs to pass without straying off the metalled part of the carriageway. This exacerbates potholing and creates deep ruts adjacent to the carriageway. In addition to destroying drainage and causing flooding these are a safety hazard.

The photograph below shows how a car seeking to pass an oncoming truck was deflected by its wheel being caught in a rut.



During wet weather deepening ruts can strand an HGV with its floor jammed against the carriageway



Recovery can be difficult and can block the road for some time

On Silver Street there is a stretch of over 100 m where it is not possible for oncoming vehicles to pass an HGV causing a need to reverse which can be especially complicated if two large articulated HGVs with vehicles behind them meet at this location. The blind bend at the end of this section which is shown in the photograph below is a safety hazard. On a recent occasion a car coming round this corner became wedged between an HGV and the hedgerow so tightly that it could only be extricated by exacerbating the damage to its offside. Fortunately the driver was unhurt



6. Health Issues and Odours

Operations of the nature proposed, which are dependent on surface-stored rotting vegetable matter and animal waste are prone to creating offensive odours that can drift for over a mile or more away from the facility. As the largest operation of its kind in the country the proposed Anaerobic Digester has the potential to create the greatest offence. The applicant's assurances are equivocal and unconvincing and are typical of those made by other applicants whose sites, smaller and usually affecting fewer residential properties, have subsequently created a public nuisance. For example;

- i. January 2019: Residents suffer 'unbearable odours' from AD plant in Ballymena
<https://www.ballymenaguardian.co.uk/news/2019/01/17/gallery/residents-complain-over-foul-odours-from-plant-2904/>
- ii. February 2020 County & Borough Councillors appeal to the Environment Agency to shutdown the AD plant near Farleigh Wallop due to a 'most unpleasant' smell affecting hundreds of homes for 'sustained periods'
<https://www.basingstokegazette.co.uk/news/18233295.councillors-call-anaerobic-digester-close-odour-pollution-reported/>
- iii. March 2023: Environment Agency fines AD plant operator in Stockton-on-Tees for failing to control odour
<https://www.gov.uk/government/news/north-east-company-fined-thousands-for-odour-issues>
- iv. May 2023: Councillor reports that the Fernbrook plant near Rothwell "certainly does smell and It's absolutely disgusting"
<https://www.bbc.co.uk/news/articles/cv240e5044xo>

While all such facilities have the potential to create smell the greatest offence is caused by those which use food waste. Change of use applications are not subject to local democratic decision-making, plant adaptations are not difficult to accomplish and the applicant's reassurances on this matter are unconvincing. Were the County Council to be minded at some point to approve one

or more Anaerobic Digester facilities with a view to future food recycling obligations it is essential that any such facility should be on a much smaller scale than the Acorn application and located much more remotely from residential accommodation.

There is peer-reviewed research evidence to suggest that AD facilities can create airborne particulates and spores that are a potential hazard to health. An independent expert risk assessment should be demanded. The applicant, the County Council and the Thurlow Estate have a duty of care to a community that is potentially at risk. This site is too close to residential areas, workplaces and community facilities, including a nursery school. The scale of the plant is greater than ADs currently in operation. This increases the scale of a potential hazard to which the people of Haverhill and Withersfield should not be subjected.

v. Food Security

International events have brought the need for UK food security into sharp focus. Many communities in Suffolk have objected to solar farms on the grounds that they are taking productive agricultural land out of cultivation.

The proposed AD plant would be built on productive agricultural land. However, even more significant is the large area of land which would switch from feeding people to feeding the bio-digester. This is comparable to switching all land within a 5 km radius from growing food crops to growing maize for bio-digestion. Solar farms need not be sited on productive agricultural land, AD feedstock production must be. There would be justifiable outrage if productive farmland were used for a solar farm taking a comparable of quality land out of food production. This application should be treated with equal opprobrium.

vi. Drainage

The Geology and Topography section notes that location of the site is at the bottom of the valley of the Stour Brook with the highest point of the sloping valley sides some 30 m above the lowest point on the site itself. Some of the water flowing down the slopes from the North is directed into a watercourse which bisects the site. The future of this watercourse is not specified but increasing the surface water would be undesirable. The valley sides are primarily high clay content soils with compromised drainage. At present, much of the surface water that drains directly into the fields at the bottom of the valley ends up on free-draining loamy soil over bedrock chalk southern portion of the construction site. Despite the benefit of this free-draining area the site and adjacent fields remain prone to flooding. The problems of increased run-off, even that arising from covering parts of gardens with drives, parking areas and patios is well documented. Covering in concrete almost the whole of a relatively free draining area that approximates to 12 football pitches at the base of slopes with compromised drainage would seem to significantly exacerbate flood risks. This concreted area slopes downwards to the Stour Brook. Even at times of high rainfall insufficient to cause flooding, water falling directly onto the site, and on slopes to the north with compromised drainage, will wash across the site. This would contaminate the brook with decomposed organic residues to the detriment of the natural environment in or near the site itself and further downstream in the Stour Valley.

vii. Historic Environment

The environment within 1km of the site combines an agricultural landscape which the application acknowledges to be substantially unchanged since the post-mediaeval apart from changes to field boundaries with a built environment which, with the exception cluster of more modern properties in

Hanchett End, is almost entirely devoid of any visible post-Victorian dwellings with listed properties in the majority..

Planning legislation requires the protection of both listed assets and their settings. This historically rich built environment encompasses 13 Grade II building listings covering 18 properties plus the Withersfield village Conservation Area. It is therefore possible to appreciate not just the immediate settings of the listed heritage assets but to understand their context within a wider all-encompassing landscape setting which, apart from a major road not directly visible from almost all the heritage building, remains remarkably similar to that of centuries past.

To deposit a large, conspicuous, unsightly and malodorous industrial eyesore on land designated for agricultural use at the heart of this rare heritage landscape would be a gross act of desecration.

viii. Poor documentation.

The application is made unnecessarily difficult for lay readers to scrutinise. While the documentation is necessarily lengthy it can be difficult to follow as a consequence of, for example, unnecessarily lengthy and complex dialogue and the use of specialist terminology, often in the form of an abbreviation, without glossary or explanation.

By way of illustration, Chapter 11 of the Environmental Statement is presented as no less than 10 files which could easily have been consolidated into a single PDF.

The document "Chapter 11 Historic Environment" has no title page. All other file names are prefixed "App 11a". It takes some time to establish that it is the "Heritage Desk-based Assessment" which is the actual appendix and all other files are appendices to this appendix. This latter also has two appendices embedded in the text but a blank space where Appendix 3 should be. Two of the other files, though not identifiable as such from their title page, are both versions of this appendix 3, the Geophysical Survey. They are identical except that one of them has an abstract declaring it to be a survey of a cemetery in Shirebrook Derbyshire. The remaining files are historic maps referencing the location of different historic assets identified in the Archaeological and Heritage Baselines. These are identified in a minute font size superimposed on the dark background of the original maps and are difficult to read without enlarging the file to a point where the whole drawing is not visible on a typical laptop screen. With more thought to design and presentation it would have been perfectly feasible to have embedded these drawings at an appropriate point within the text rather than having to skip from one file to another and navigate a diagram enlarged beyond one's screen size in an attempt to understand the document and the drawings. One drawing that is embedded in the text, the site plan, has labels identifying the particular features which are not legible.

Had this chapter been presented to me as a management report when in industry I would have rejected it immediately and would not have circulated to colleagues. Had it been presented to me as a student assignment during my time as an academic the student would have failed. From the perspective of a lay reader I consider this a barrier to proper democratic scrutiny of the proposal.

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