

From - Councillor Indy Wiienavaka
[REDACTED]

To - Andrew Rutter
[REDACTED]

Objection to Planning Application - SCC/0045/23SE Land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW.

26/10/2023

Dear Andrew Rutter,

I am Ward Councillor for Withersfield Ward, and Portfolio Holder for Growth at West Suffolk District Council. I am also a resident who lives within 500m of the proposed site. After thoroughly reading the associate documents, I object to Planning Application - SCC/0045/23SE Land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW. I object in the strongest possible terms, and further reserve a right to further outline my objections in the future.

I object for the following reasons -

General

- If SCC is minded to consider this as an agricultural operation as the applicant is requesting, then this application must be returned for determination by West Suffolk Council to consider the adverse impacts on the Local Plan and the Growth Strategy of West Suffolk. The applicant has selected a location that would run counter to the Suffolk Waste and Minerals Plan (SWMP) policies of **WP7, WP3, GP2, GP3** and **GP4**. It also runs counter to the **Haverhill Vision 2031**.
- SCC must refuse this application as the proposal is a change of use which will take agricultural land out of use. It should also be considered in combination with the West Suffolk District Council Local Plan for options to better maximise the potential if there should be a change of use. This application will also see the removal of a house from the market. This house has recently been on the rental market.
- The applicant is trying to paint a picture that the area is a vastly rural one and whilst that maybe considered true for parts of the area, the applicant also appears to be downsizing areas by referring them to as hamlets, when in fact they are large villages.
- The applicant also seem to be disregarding and downplaying the adverse impacts that it will have on residents and employers, due to the close proximity of housing of Withersfield village and the housing development of the Arboretum Phases 1 and 2, which accounts for hundreds of dwellings, including blocks of flat, and the commercial buildings, such as the EpiCentre, the Flying Shuttle Pub, the White Horse Pub and the Montessori Preschool Nursery.

- The additional facility at Cadge's Wood is also an unacceptable development as it will leave part of a wooded area with an industrial style development adjacent to it and will see this area be subjected to an increase in farm traffic.
- The applicant has only reviewed sites within the Thurlow Estate landholding where the Thurlow Estate has made a judgement of an appropriate locations; this should not be deemed acceptable, and the applicant must look for other locations not owned by the Thurlow Estate as well in order to have credibility regarding a location review.

Impact on Growth of the area

- As portfolio holder for Growth at West Suffolk District Council I am unequivocal that the applicant is giving misleading statements regarding growth and that their proposal will run counter to benefiting the local economy. The applicant's statements regarding the benefits to West Suffolk must be dismissed. The site that the applicant has been granted access to by the Thurlow Estate is along the main route between Haverhill and Cambridge. This area is considered to be the Gateway to Haverhill and has the "Spirit of Enterprise" to signify the cutting-edge technology and enterprise that Haverhill is currently developing, and the EpiCentre is an excellent example of site. As Portfolio Holder for Growth at West Suffolk Council I have deep concerns that the AD facility put forward by Acorn on the land owned by the Thurlow Estate will destroy any further growth to the area and diminish the gains we have made with companies leaving the EpiCentre. If SCC is minded to approve this application SCC must also consider the potential funding needed to offset the loss of economic growth to the area. This loss of economic growth will far outweigh any potential benefits that the applicant is making. This area will lose more jobs than it will gain. This application must be seen as detrimental to the Growth Strategy of the area.

Traffic

A1307

- The applicant claims the site is appropriate for HGV access, however I believe this chosen location will lead to further increases in the risk of road traffic accidents due to the nature of the location and the speed at which vehicles currently drive when using the A1307 road. The A1307 is a main route between the A11, M11, Cambridge, Essex and the wider Suffolk area and adding to the high number of HGVs using this location should be seen as unacceptable. The existing lay-by is frequently used by HGVs and this leads to high-risk incidents so to increase this will compound the danger.
- The applicant will also increase the traffic by having HGVs access the A1307 at this point as the HGV will be starting from a low speed on to a 60 MPH road. The visibility splay also seems inappropriate for the type of road being accessed. Their HGVs will turn left on to the road and use the Spirit of Enterprise roundabout to go in the direction of the A11. These factors will increase the traffic to this already congested area.
- The applicant needs to be clear on where they will transport the CO2 in order to understand how these traffic movements will impact the local area. The applicant is using an average of 1 HGV vehicle movement per day during

construction phase, this is clearly misleading as no construction site operates in this manner.

A1307, Withersfield Village and local road network

- The applicant also needs to be clear about the number of vehicle movements from the various feedstocks that the area will be subjected to, of which they are too ambiguous regarding this vitally important issue due to impacts on residents' quality of life and local business' prosperity. The applicant claims that the farm traffic will be similar to what the area currently experiences; this is a wholly misleading statement as the current farm traffic does not travel to a single point in this area. This application would create a brand-new point to which large, fully loaded heavy vehicles will travel en-masse across the district to supply the AD plant. Acorn have not been able to categorically state that Withersfield village and its surrounding narrow roads would be avoided as they would not be in control of the transportation of the feedstocks to their facility.
- The applicant is also unclear about the amount of feedstock, silages and manures, that will be transported by HGV. The applicant has failed to sufficiently outline the full vehicle movements. This needs to fully account for all HGV movements, farm vehicle movements and staff and visitor vehicle movements. They claim that the site could serve approx. 9134 HGV and Farm vehicles, this would be an average of 50 per day, I believe this is far too much for the A1307 and the surrounding roads, and also is an underestimation, especially during harvest season which spans a 6 month period, as they indicated during the online Haverhill Town Council Meeting on the 16th October, therefore their estimation can only be seen as 50% accurate, and that their submission is misleading or inaccurate.
- SCC must not approve this application with this level of ambiguity. If SCC is minded to approve this application, SCC must be prepared to fund highway mitigation works to the satisfaction of residents and independent road safety experts. The application will lead to an unacceptable impact on highway safety and also cumulative impacts on the local road network. This application will run contrary to SCC SWMP GP3 as this is not Ipswich, Lowestoft or Bury St Edmunds, and the site will impact the A1307.
- The applicant appears to have only done a desk-based analysis of the area and failed to correct a fundamental mistake by referring to the A43, which is not in the area, and has led to confusion when reading their report. Are they using the A43, if so the local authority for that area needs to be consulted.

Odour, Noise and Light Pollution

- The operations that the applicant is proposing will lead to unacceptable levels of odour, noise, and light pollution. When the movements and loading of silages, manures and digestates are carried out within the site this will lead to particulates being atomised into the air leading to the unacceptable levels of odour to the nearby housing which accounts for hundreds of dwellings, the EpiCentre, the Flying Shuttle Pub, the White Horse Pub, the Montessori Preschool Nursery, as well as local walkers using the footpath that runs along the site. These movements and also the pumping and cleaning of gases will lead to an increased in noise pollution that should be deemed by SCC as unacceptable due to the impact on the residents, especially those within a

500m radius which account for hundreds of residents. The use of Liquid Feedstock is not farmyard manure, it is a livestock slurry comprised of urine and faeces and will cause significant odour. The applicant continually states that odour, noise, and light pollution will be negligible but, in my opinion, offers evidence that is not credible and chooses to have no regard to the proximity of local residents and businesses.

- The site will operate on a potentially 24hr basis and requires lighting, which will impact the residents yet further. This could also mean 24/7 vehicle movements. This is clearly an industrial process, especially with the magnitude of gas production equipment on site. The site will also need 24hr safety monitoring. During the hours of 7:00 – 18:00 Monday to Sunday this is monitored on-site, however outside of these hours monitoring is done remotely, and potentially outside of the country. I feel that this leads to potential risk and lack of emergency response, and an unknown latency in reaction time. It also exposes the site to a security breach due to hacking, especially as the applicant has stated in their opinion that it is part of national infrastructure. The applicant claims that the gas flaring is be a rare event, yet offers no evidence to prove this, and they also claim the flame will be shrouded from view, I believe this to be difficult in practise due to the variable nature of the gas being burnt, they cannot truly control the visibility of the flame.

Flood Risks

- The applicant makes claims that the site is completely in Flood Zone 1, however this is misleading at parts of the site, including the critical area of the entrance point being in Flood Zone 3. The application is completely the wrong location and will have a knock-on impact to the surrounding areas by increasing the flood risk. As outlined by the recent LLFA response to this application, the applicant has not given sufficient detail regarding flooding concerns and I believe this application will lead to considerable strain on the nearby flood park and defences. I believe the applicant has not sufficiently accounted for their flood impact to nearby areas and if SCC is minded to approve this application, SCC must be prepared to fund flood mitigation works immediately and mitigation works commencing prior to completion of the facility.

Ecology

- It is disappointing to read that the applicant has only consulted with the EA about the Priority Habitats and not Natural England, meaning that the applicant will be missing key information regarding the ecological impact of the facility especially regarding the impacts on air quality on Ancient Woodlands from ammonia emissions.
- I believe that the air quality assessment impacts by nitrogen and ammonia critical loads and levels of the Ancient Woodland Irreplaceable Habitats have been carried out incorrectly, as the NPPF states that there should be no deterioration of Irreplaceable Habitats, therefore it needs to be independently verified that the Nitrogen and Ammonia emissions would not have this level of damage. The applicants report indicated that the damage will be high but

draws a conclusion that the damage would be acceptable. They have used outdated calculations that are not backed by the NPPF.

- The applicant appears to have conducted only a desk-based review of the local area, and at best only visited on a few occasions.
- I am disappointed that it appears that the SCC Ecologist has insufficiently scrutinised the applicant's work on their Environmental and Ecology Statements in respect to the impact of ammonia emissions associated with both the main site and the remote site next to Cadge's wood. The applicant has omitted to include a Schedule 1 Bird, namely Barn Owls, which are known to use the area to range over, there is no mention of the nest boxes that have been installed at the nearby washlands. The applicant has also omitted Tawny Owls that are known to be present on the site.
- The impacts to bird populations such as Skylark should not be seen as acceptable, there is no guarantee that the mitigations are in the control of the applicant. Under these circumstances these mitigations should be seen as inadmissible. To inform appropriate mitigation, a breeding bird survey of the area should be carried out, by an independent body, so that it is clear what birds are actually nesting on this land.
- The applicant is underestimating the impact their buildings will have on the bat population. Whilst trees may not be being felled, I believe the AD plant that they are proposing will disturb bat foraging and commuting routes and will lead to noise and light disturbance.
- Regarding the Great Crested Newt survey there are no maps with the survey report on the planning portal so it is not clear where the waterbodies are and which ones have been surveyed. A more comprehensive survey for Great Crested Newts must be properly carried out at multiple times a year to conclusively identify the risk associated with the facility to Great Crested Newts. The report that they have written is confusing and contains typographical errors that lead to misinterpretation.
- The applicant has not sufficiently mitigated the impact to the Ancient Woods, an ambiguous statement of long-term management should not be considered a mitigation especially as there appears to be some sort of management scheme in place already according to the Forestry Commission's Land Information Search mapping tool.
- The applicant is claiming that digestate is beneficial to the soils, this is in my opinion misleading as digestate is known to be variable in quality and can cause harm to earthworms by being too nutrient-rich. This nutrient-rich product should not be stored near any nutrient sensitive catchment area, such as the several headwaters of the Stour Brook, leaching from both the silage and the digestate lagoons as it has the potential to cause a serious pollution issue to the Stour Brook. In these headwater locations, should a leak or spillage occur it would be disastrous for the wildlife in the watercourses as being headwaters there is no dilution effect from water from further upstream.
- The Environmental and Ecology statements has been prepared by SLR, who are paid by the applicant to promote the site, this is in my opinion a clear

conflict of interest, and the Environmental and Ecology Statements should have been prepared by an independent body.

Green Credentials

- Whilst councils up and down the country have rightly declared climate and nature emergencies, this application does not provide sufficient evidence that the plans will support the fight against climate change. The applicant in my opinion is over stating their claims to being a carbon negative operation as there are no clear details about the carbon emitted during the construction phase, or the operational phase, with the number of HGV, farm vehicle movements and the CHP required to operate.
- Biomethane is between 4 and 28 times more potent a greenhouse gas than carbon dioxide, and has a resultant emission of carbon dioxide, thereby still emitting a greenhouse gas. Methane remains in the atmosphere for at least 12 years, that's the equivalent of 3 local elections, and SCC must consider what they are committing their residents to, should SCC be minded to approve this application.
- SCC should not be promoting the production of methane as a sustainable and long-term process. The applicant states the number of cars they can take off the road, but this is becoming an increasingly redundant comparison during the increase of hybrid and electric vehicles. The adoption of biomethane will also hinder the adoption of further electric vehicles, particularly electric HGVs that mainstream manufacturers are developing. The applicant's claims of being carbon negative cannot be seen as credible in my opinion based on the evidence presented. The applicant does not clearly outline the amount of carbon dioxide that will be sequestered and is at best ambiguous around the amount of carbon dioxide that will be emitted during the construction and operational phases. Therefore, if SCC is minded to approve this application, this will in my opinion run contrary to SCC SWMP **GP2**.

Water Resources

- The applicant states that the operation of the AD facility is water intensive, and indirectly states that 30% of the water demand will need to come from the mains system. As East Anglia is normally very low regarding our water resources with very little resource to spare, if not over-abstracted, it is my view that this should not be permitted anywhere in East Anglia. As the applicant has stated they operate a hub and spoke operation, they should find a more suitable area where they can capture 100% of their water demands through rainwater run-off. If SCC is minded to approve this application, SCC must also put in place mitigation and funding for water storage facilities to offset the increase in water demand from this application.

Energy and Food Production

- The applicant makes misleading claims with statements of stable energy production. This energy production is dependent upon a reliable grasses/maize harvests, and subject to the clear climate change that is already happening. With unpredictable weather patterns, harvests have failed and caused food shortages therefore this facility has the real potential to cause competition

between food and energy. SCC must not promote this unintended consequence. The break crops should be used for food production not for energy creation, which can be sourced elsewhere. The applicant is claiming that the break crops used will increase biodiversity; this is a false claim compared to using break crops such as herbal leys, as highlighted by DEFRA and their Future Farming initiatives.

- The applicant claims that this AD plant will enable a reduction in energy prices. This is again misleading as the gas produced will be injected into the National Gas Grid to be sold at international prices to the energy consuming companies. The applicant has no control over the supply from other producers.

Public Engagement

- As ward member at the District Level, I am disappointed with the lack of face-to-face public engagement. For example there should be been a public exhibition between the period of the application being validated (18th Sept 23) and the closure of the public consultation (26th Oct 23). The applicant has only engaged the public on a minimal basis. The applicant has since increased the size of the area they are operating since the first public exhibition and public meeting in September 2022 by an extra 1.5ha with the addition of the remote digestate storage facility in Cadge's Wood and the 3km pipeline that will also need to be channelled through the Parish. The remote digestate storage facility and the associate pipeline should be subject to a separate application as this will also cause a significant impact to the Parish. Acorn and the Thurlow Estate failed to represent themselves during the recent Withersfield Parish Council meeting where vital questions were raised and could not be answered due to their absence.

Safety and Environmental Pollution Risks

- The applicant states that they will follow various standards, however other operators who equally state they operate to certain standards have been involved in various safety issues, including explosions, odour and water pollution incidents resulting in fines. It appears that the industry is under-regulated at present and therefore this site must be deemed inappropriate at this time due to the close proximity to residents, businesses and the Stour Brook. If SCC is minded to approve the application, SCC must consider the potential impact to residents, and the nearby Stour Brook, and be ready to mitigate environmental damage to the Stour Brook.
- The applicant is unclear in my view about how they will dispose of the sulphur that will be generated during the process of digestion. The applicant has not detailed the need to add propane to the biogas, why is this step needed and does it present another unknown risk, and will they add an odour to the propane to ensure leaks can be detected?
- The shallow ground investigation, as outlined in section 5.5.4 of the planning statement, must be carried out prior to any decision being made by SCC, in order to assess the feasibility of the proposal and to ensure that Unexploded Ordnance is not disturbed.

Visual Impact

- The applicant states that the 5x fermentation tanks will be 16.6m tall, however drawing number 29346 would appear to indicate that the fermentation tanks are 17.05m tall. The applicant also stated that trees in the area are in the region of 10-15m, these trees will not sufficiently screen the site. The applicant states that the target time to take for screening to grow will be 10 years, this means the site will not be adequately screened for at least 10 years. I request SCC must clarify these points, if SCC is minded to approve this application.
- The applicant is trying to misleading the public with visuals that look more green than what will be delivered, as per 4.4.1 of their planning statement where they quote that the majority of the site will form new impermeable area, predominantly formed of the hardstanding footprints.
- The applicant is disregarding the potential risks of having trees surround the site. Whilst they hope this will screen the facility, although this will have limited effect for people at evaluated positions, such as the EpiCentre above the first floor, residents of the Arboretum and along Silver Street, and walkers on the nearby rights of way and pavements, the trees could pose a threat should these fall during high winds, and puncture the digester domes membrane. This risk must be fully assessed if SCC is minded to approve this application.
- The applicant has underestimated the light that will be reflected from the domes of the fermentation tanks, this will have an impact on residents, businesses, and sensitive nature receptors.
- The applicant is underestimating the impact the proposals will have on the views of the residents within 500m of the site, particular those on the Arboretum, especially at 1st and 2nd floors and residents living in the apartment block on the corner, and it will take 10 years to establish any meaningful screening to mitigate this impact.

Summary

If SCC is minded to approve this application, it will cause lasting damage to the area and impact an unacceptably large proportion of residents and businesses.

The location is unacceptable due to the impact it will have on traffic and the road infrastructure. It is also too close to residential and commercial areas. This must be refused. If SCC is minded to approve this application, I call upon the Suffolk County Councillors in this area to work up a mitigation plan immediately to ensure that they mitigate the economic, environmental and residential impact this will cause.

Councillor Indy Wijenayaka
Councillor for Withersfield
Portfolio Holder for Growth
West Suffolk Council

