

Mrs Dorothy Phillips
1 Hollesley Ave
Haverhill
CB9 7WS

22nd October 2023

Mr Andrew Rutter
Planning, Growth, Highways & Infrastructure
Case Officer, Suffolk County Council
Endeavour House
8 Russel Road
Ipswich
IP1 2BX

Dear Mr Rutter

Ref 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

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

Location:

Local residents can expect to experience short-term and long-term disruption and inconvenience as a result of this development. The construction period will be 72 weeks, according to the application. Heavy construction machinery will need to excavate the site in preparation for concreting over the 31 acre site; construction will then involve dozens, if not hundreds, of HGV movements in and out of the site. Once completed, the plant will operate on a 24/7 basis. This means local residents will have to endure constant disruption from odour, noise, increased traffic and loss of enjoyment, at absolutely zero value to themselves.

The proposed site adjoins Meldham Washlands, an area hugely popular with the residents of Haverhill, being, as it is, one of the main green areas used for recreation. In the event of a successful application, its use will almost certainly be lost.

Continued.....

There is little evidence supporting any in-depth assessment of alternative sites. That which does exist is scant and is easily dismissed should the Council choose to examine it, which I believe they are obliged to do as part of their assessment of the application.

Odour:

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 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.

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 night, 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.

Traffic:

The 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."

Continued.....

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 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."

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.

Flood Risk:

The site is designated as Flood Zone 3, most notably at the entrance from the A1307. Recent photographic evidence demonstrates that without the site floods in many areas, especially to the east of the site where the clamps are to be situated. This causes an unacceptable risk of flooding. Flooding will lead to the local watercourse being polluted, seriously damaging the local environment. It will pose a risk to human health and that of the wildlife that inhabits Meldham Washland. Often referred to as the flood park, 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. If the Acorn plant is there when that happens the risk of flooding to Haverhill and beyond will rise to an unacceptable level.

Evidence of recent flooding of the area can be viewed on the Muck Off Acorn website and Facebook page. It has published many photos of flooding around the area of Spring Grove Farm on its web site and Facebook page.

The risk of flooding should not be allowed to be easily dismissed.

Employment:

The application claims that 15 jobs will be created by this site and approximately 100 during the construction phase. The construction is specialised so the vast majority will not be sourced locally. That which is likely to be local 'trades'. This will further disadvantage the local community during construction, depriving them of local services they rely on.

The application goes on to say that, once operational, the site will have 5 full time employees. This indicates the remaining 10 will be located elsewhere, so total local employment will rise by 5. Unfortunately, the plant will cause many local businesses to close and move elsewhere as they will not be able to attract suitable employees or investment due to the issues associated with the operation of the plant – odour, noise, views, traffic etc. The result will almost certainly be a net loss in employment and a damage to Haverhill's economy.

Continued.....

Methane:

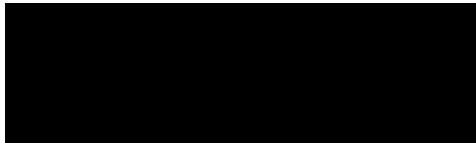
Methane is known to contribute to greenhouse gasses at 25 times more than CO₂. It is at risk of explosion when not properly mitigated, as evidenced by the recent lightning strike in Oxfordshire. The applicant has not provided any evidence to demonstrate sufficient mitigation to the same event, preferring 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.

Yours sincerely



Mrs Dorothy Phillips