From: Frank Eve[redacted]
Sent: Wednesday, October 25, 2023 10:41 AM
To: Andrew Rutter[redacted]
Subject: Planning Applications SCC/0045/23SE

Dear Andy, **Re: Planning Applications SCC/0045/23SE**
I object to the Planning Application identified above in the strongest possible terms. The proposed location of this industrial sized Anaerobic Digester is in a completely inappropriate position for the following reasons:-
Transport links and Traffic (This is referenced to previous objection 13/10/23)
Haverhill dates back to the Doomsday Book of 1069 and now has a population nearing 30,000. It has a unique position sitting in the south western corner of Suffolk and bordered closely by Cambridgeshire and Essex. It has become a commuter town to Cambridge which has seen and continues to see huge investment in its science and technology industries.
Haverhill on the other hand has not seen the investment that it needs to capitalise on its close proximity to Cambridge because of its lack of good road connection. *The 2019 report by the Ministry of Housing and Local Government showed that almost two thirds of the town experienced more economic deprivation than 4 years previously and the position has significantly worsened due to Covid and the cost-of-living crisis.*
The stumbling block for economic growth in Haverhill is it's transport links, it is the worst connected town in England, despite being identified as experiencing the fastest population growth in Suffolk. An additional 5,000 houses are planned to be built over the next 10 years, which will increase the pressure on the A1307. The A1307 is also the Gateway for all of Mid Suffolk through the Stour Valley. The only way to improve transport links for Haverhill and Mid Suffolk is to improve the A1307 not **increase** the number of HGV's travelling along it.
However, the Greater Cambridge Partnership drives the current strategy for the A1307 and their focus has been on reducing accidents and to provide cycle routes out of Cambridge. This strategy increases travel times and works at odds with the needs of Haverhill and Mid Suffolk. This strategy forces traffic off the A1307 onto the minor country roads of the villages northwest of Haverhill such as Withersfield, which are not suitable for this volume or speed of traffic and will also be heavily impacted by this application.
This application will create 10,000 new HGV or tractor trips in and around the A1307 and will make this situation much worse, jamming the Spirit of Free Enterprise roundabout and changing the "Gateway" into Haverhill into a bottleneck. The continuing housing development at the Arboretum which is 350 metres from the AD and the completion of The Haverhill Relief Road will also drive traffic

from the new housing estates in North Haverhill either onto the Spirit of Enterprise roundabout or through the village of Withersfield to Cambridge. Causing more congestion in this area.

Haverhill Vision 2031 Document Section 7 states:-

"People need to travel to reach their homes, places of work, schools, health services and leisure facilities. Haverhill's location on the border of three counties means that coordination of future passenger and freight transport services is crucial to maintain its social and economic vitality. Many people commute out of the town, especially to Cambridge, which puts great pressure on the town's roads, particularly the A1307"

The A1307 is a very intensively used highway with average vehicle numbers in excess of 1000 movements per hour at peak times in a single direction. The 85th percentile speed recorded across the survey is 53 mph in the easterly direction. The westbound peaks are similar in volume and average speed but occur in the morning. The combined direction peak flows frequently exceed 1500 hourly movements. The planned location of the AD will only put further pressure on the A1307 and The Spirit of Enterprise Roundabout with an anticipated extra 10,000 traffic movements a year and 78 per day in the harvest period. This Application is therefore not within the West Suffolk Local Policies or within the National Planning Policy Framework (NPPF) paragraph 111.

Green Infrastructure and Flood Risk

The proposed AD will harm the Green Infrastructure, an asset which provides a catalyst for sustainable growth of Haverhill, creates a strong sense of place, attracts inward investment, promotes sustainable travel, supports the local economy, protects sensitive habitats, and conserves and enhances local variations in landscape character. It will also harm the strategic flood risk mitigation at Meldham Washlands (West Town Park) and be contrary to the aims of avoiding any development in areas within Flood Zone 2 and 3. It is also important, as set out in the Haverhill local plan Haverhill Vision 31, to keep separate the town of Haverhill and Withersfield to protect the distinct character of both.

The St Edmundsbury Green Infrastructure Project Strategy (2009) identifies the Stour Brook Valley Green Corridor in Haverhill as a key multifunctional route in and around the town. This Green Corridor is where Acorn's proposed site is located, yet they make no mention of this in their assessment. The Green infrastructure vision also includes the Meldham Washlands Green Space (West Town Park) and the Spirit of Enterprise Landmark Gateway to and from Haverhill.

The St Edmundsbury Green Infrastructure Project Strategy policy document states:-

"Green Infrastructure assets (new and existing) *"provide a catalyst for reinvigoration and sustainable growth of market towns and local centres, creating a strong sense of place, attracting inward investment promoting sustainable travel, supporting the local economy, protecting sensitive habitats and conserving and enhancing local variations in landscape character."* Green Infrastructure is described in this policy document as contributing to a high quality of life and allows access to nature, wildlife to thrive, culture and communities to flourish and adaptation to climate change for people, habitats, and wildlife species. Green Infrastructure also is regarded by this policy document as contributing to maintaining the distinctiveness and separate identity of the surrounding villages. It is therefore considered a valuable and precious asset, more since Haverhill is reported as having an accessible green space deficiency." The Green Infrastructure includes cultural landscape and ecological assets/habitats along with concepts such as sustainable water and resource management. The report states that:-

"Strategic Flood Risk Assessment (SFRA) identifies Green Infrastructure as a key opportunity to provide strategic surface and fluvial water management measures to assist in reducing the levels of flood risk across the catchment." The specific opportunities it identifies in relation to the Stour Brook Valley Green Corridor include: Strategic flood risk mitigation at the Meldham Washlands, north of Haverhill (also known as West Town Park).

The proposed location is within a Flood Risk Category 3 Zone. The applicant by default is promoting the location, the Stour flood plain and Meldham Wash Lands as Zone 1. The Wash Lands, which encompass the application area, were constructed to protect Haverhill from flooding following the disastrous floods of 1956 which engulfed the town and have gates that hold back the flood water to protect the town as it did in 1981 and 2001. When this happens again and this application is approved the choice would be flooding the town or having an environmental disaster at the Anaerobic Digester site.

National Planning Policy Framework:https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf

Para 167*. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.*

Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

a) ***within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;***

b) ***the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment****;*

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) ***any residual risk can be safely managed****.*

Suffolk Minerals and Waste Local Plan*: https://www.suffolk.gov.uk/asset-library/imported/chapters-1-to-18-smwlp-adopted-july-2020.pdf*

Policy GP4: *General environmental criteria Minerals and waste development will be acceptable so long as the proposals, adequately assess (and address where applicable any potentially significant adverse impacts including cumulative impacts) on the following:*

a) ***pluvial, fluvial, tidal and groundwater flood risk***

m) the local water environment;

Forest Heath &St Edmundsbury Development Management Policies:*https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/JDMPD-FINAL-for- website-error-amended.pdf*

Policy DM6*:* ***Flooding and Sustainable Drainage Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage will be managed so as not to cause or exacerbate flooding elsewhere.*** *Examples include: rainwater harvesting and greywater recycling, and run-off and water management such as Sustainable Urban Drainage Systems (SUDS) or other natural drainage systems.*

Environmental Risk

There are huge environmental risks with the development of this facility in this location.

A Review by the Environment Agency of Environmental Incidents at Anaerobic Digestion Plants 2010 to 2018 states:-

"The Environment Agency has responded to a significant number of incidents which have caused or had potential to cause pollution. We have undertaken routine compliance visits that have identified serious failures which posed a serious risk of pollution or harm to human health. These have occurred at permitted, exempt and non-waste AD plants (non- regulated). These incidents ranged from partial or complete collapse of primary containment and associated loss of digestate, water pollution from storage of feedstock or digestate, significant odour, loss of biogas, fires and explosion. The water industry has the longest historical experience in managing AD. However, these processes have also

presented us with some challenging incidents despite the technical experience of the sector. According to a leading AD plant insurer, ***"Anaerobic digestion plants may experience significant loss events during operation resulting from damage to operational equipment, structural collapse, fire, flood or theft. These events can often result in lengthy periods of process downtime, with a consequential loss of revenue, clean-up costs, risk of local pollution and a resulting drop in local community confidence and support for the project; which can be difficult to rebuild. It is essential that all plant operators, and those involved in its maintenance, fully understand the risks that are present on an AD plant, and why these safety and control features are provided. They need to be aware of the consequences of safety feature failures, incorrect plant operation and not following set procedures. Human error is often the root cause of many major loss or damage events."***

An Anaerobic Digester exploded after it was struck by lightning recently and shows how dangerous this type and size of plant can be. Lightning strikes have a 1 in 200 chance of striking a house this would be much less for a 20-acre AD site and devastating when so close to a town of 30,000 people would be unthinkable.

The Gestate "Pipeline"

There is a lack of transparency about the pipeline to the gestate Lagoons and how it will look. There is mention of the pipeline being visible where it crosses Silver Street, yet earlier it is claimed that the pipeline will be buried and not visible. Will the southern part will be buried and the northern part exposed? Further, this paragraph is very dismissive of properties in the area. Given the position of the AD plant at the gateway to Haverhill, the entrance to Withersfield through Silver Street, and the loss of amenity from West Town Park, the direct visibility of the AD plant from the Epicentre, the Arboretum Phase 1 and Phase 2, and from the Flying Shuttle pub, the White Horse pub, and the nursery, and the network of footpaths, all road users coming into and out of Haverhill on the A1307, classifying the development as medium impact is a misrepresentation. This will affect the amenity of the whole village of Withersfield and impact on the amenity of Haverhill

Gas Flaring

Acorn is proposing the construction of a Gas Flare which will stand higher than the fermentation tanks over 56 feet tall and would burn off excess gas at unspecified times day and night being monitored off site from a site unspecified in the application. These flares will be seen for miles especially at night and will pollute the surrounding area. It is not acceptable that there are no details of how long they will go on for or how many times this flaring will happen. In such close proximity to the Epicentre, Sainsbury Super Store and residential housing is totally unacceptable.

Environmental Health Risk of Chicken Waste

The transportation of chicken waste over large areas is also a health risk at a time of a Bird Flu pandemic. There is a risk that avian influenza viruses may transmit from birds to humans and result in severe human disease. The risk of transmission is higher in areas where people come into contact with bird manure

European Centre for Disease Prevention and Control and The National library of medicine - National Centre for Biotechnology information make the following statements on their websites:-

"Humans are usually infected (with Bird Flu) through close contact with infected birds, bodily fluid droplets, or other contaminated material. Birds shed influenza viruses in their faeces and therefore contact with bird droppings is also a possible transmission route. The upper respiratory tract and the eyes can serve as an entry point for viruses to infect people. Influenza viruses evolve and can increase the risk of human transmission either through acquiring mutations within the genome that confer to mammalian adaptation or also through the exchange of genome segments between different viral subtypes from different species (reassortment). Both situations could lead to the generation of new pandemic strains that are transmissible to and among humans. Most avian influenza viruses do not cause disease in humans, or cause only mild illness, such as fever or conjunctivitis. A few avian

influenza viruses are known to cause severe disease with mortality in humans, notably, A(H5N1), A(H5N6), and A(H7N9) with mortality rates of up to 50%. Sporadic human cases infected with other avian influenza viruses such as A(H6N1), A(H7N2), A(H7N3), A(H7N4), A(H7N7), A(H9N2), A(H10N7) or A(H10N8) have been reported with varying severity. Birds shed influenza viruses in their faeces and therefore contact with bird droppings is a possible transmission route. The upper respiratory tract and the eyes can serve as an entry point for viruses to infect people. The virus was found to survive up to 8 weeks in dry and wet faeces. Contaminated equipment, vehicles, feed, cages or clothing - especially shoes - can spread the virus in between farms. Furthermore, there is a possibility of contaminated dust particles spreading via wind from one farm to another, in close proximity. The virus can also be mechanically carried by other animals, such as rodents." **It is therefore an environmental health risk to transport 40,000 tons of chicken manure long distances and dump it within 350 metres of residential areas.**

Decommissioning

There is no evidence that the applicant has considered how the plant would be decommissioned at the end of its service life. It is likely that the economic lifespan of the plant would not exceed 25 years, at the end of which time the community would be left with a permanent scar on the landscape and a potential source of ongoing pollution. At the very least the applicant should be required to address the decommissioning and demolition of the plant at the end of its life and to identify how this is to be financed. The site would have to be returned to farmland, as it is today. The decommissioning of the plant may have to be brought forward if the proposed technology is overtaken before the plant reaches the end of its natural economic life. The contribution that this proposal would make to national and regional renewable energy generation targets is small, with any benefit being transported out of Haverhill.

The Net Zero Claims

The applicant also states in the Planning Statement that the production of biomethane is a critical step towards our commitment towards carbon net zero *"Use of biomethane in 'hard-to-abate' sectors is a critical step in the world's journey to carbon net zero. It is a mature and well understood fuel that can be used today while hydrogen and electrification solutions are developed*." By implication this is therefore accepted as an interim solution to generate green energy not the 25year life stated in the documentation..

The application fails to take into account that the biomethane will be generated by using 100's of 1000's of acres of valuable farmland to switch from growing food to growing silage. The silage will be transferred from the farms surrounding the plants by 100's of diesel lorries or agricultural vehicles increasing local traffic problems and causing environment pollution. The AD plants themselves are on such a vast scale they are both environmentally disruptive and present environmental danger to the local area where it is situated. The rapid expansion of biomethane plants across the country will reduce the country's ability to feed itself at a time when we are finding increased pressures on the farming community to provide food security at a reasonable price. The negative effect on the environment and pollution during construction should also be taken into account as well as transportation of the feedstock, the gas and the import of the chicken waste from who knows where all add to the negative impact on the environment. The biomethane will be fed into the National grid and then burnt off producing more damaging greenhouse gases. Biomethane is not sustainable. Burning silage and manure-produced biomethane emits the same air contaminants as the combustion of fossil fuels. To make matters worse, the factory farms that produce the biomethane can emit harmful pollutants into the air and discharge nitrates into groundwater. It will also have a detrimental effect on the environment where these huge Digesters are sited and also produce as much greenhouse gases as burning fossil fuel when transferred to the nation gas grid. In effect we have a system where the Government is paying businesses through the Non-Domestic Renewable Heat

Incentive Scheme to reduce the available farmland and thus reducing our food security whilst at the same time producing ever more greenhouse gas and local environmental pollution.

Conclusions

There are no exceptional circumstances which justify the building of such an industrial scale anaerobic digestion facility in this location, on Grade 2 farm land, only 350 meters from offices, a nursery, and housing. At the 'Gateway to Haverhill' and close to a protected conservation area around Withersfield and Haverhill. The increase in HGV and Agricultural traffic "would be an unacceptable impact on highway safety and the residual cumulative impacts on the road network would be severe." At 8.45 hectares (over 20 acres) the development would cover almost the same area as 12 football pitches. The five digesters are each 17m (56 feet) tall, a similar height to four double-decker buses stacked on top of each other. The span of this group of digesters alone would be around the same width as the front of Buckingham Palace. So, the development would be out of scale with the existing buildings in the area and would become the dominant feature of the landscape. The proposed process is unstable and hazardous. The introduction of such an industrial site in such a location would bring absolutely no benefit to the community of Haverhill, Withersfield and surrounding villages and would harm the Green Infrastructure, an asset which provides a catalyst for sustainable growth of Haverhill, creates a strong sense of place, attracts inward investment, promotes sustainable travel, supports the local economy, protects sensitive habitats, and conserves and enhances local variations in landscape character. It will also compromise the strategic flood risk mitigation at Meldham Washlands (West Town Park) and be contrary to the aims of avoiding any development in areas within Flood Zone 2 and 3.

The Application should be rejected.

Frank Eve
Vice Chairman Withersfield Parish Council
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24/10/2023