

Surridges Farmhouse
Hanchett End
Withersfield
Haverhill CB9 7RP

October 22nd 2023

Dear Andy Rutter

Planning Application SCC/0045/23SE, Acorn Biodigester

Whilst I understand the need to develop ways of producing green energy this should not be to the detriment of peoples' lives and the environment and I object very strongly to the construction of the Acorn Biodigester at Haverhill on the following grounds.

Location

On their website Acorn state that they choose rural locations away from residential areas and close to an injection hub. and in their planning application they state that the plant will be 3km from the centre of Haverhill.

What they fail to mention is that the site at Spring Grove Farm is actually about 300 m from the Epi-Centre and café, the Flying Shuttle pub, the Montessori Nursery school and 300 homes on the Arboretum. A large Sainsburys supermarket and houses in Hanchett End and Barsey Close are also nearby.

When answering the question 'can the proposed plant be seen from neighbouring roads', they have answered 'No'.

Have Acorn visited the site and the local area to see for themselves how close it is to a residential area and local businesses and how visible it will be from the A1307 and surrounding area?

The injection hub at Milton Keynes is a round trip of 134 miles. This doesn't fit with their statement that the biodigester should be close to an injection hub. The HGVs delivering the biomethane will also be burning bio-methane, a much worse greenhouse gas than CO2 because when burnt it releases CO2 and water vapour into the atmosphere. Both CO2 and water vapour are greenhouse gases that trap heat, so contributing to global warming.

Acorn state that the site will be screened by the existing trees and there will be further planting of native trees and hedges. Most of our native plants are deciduous so there will be no screening in winter when all the plants have lost their leaves.

Taylor Wimpey are currently constructing 150 homes on the Arboretum and no one will want to buy these once the planning application for the bio digester shows up on local searches. The biodigester will be visible from these houses and from the Epi-Centre.

The Epi Centre has been very successful in attracting businesses, but some are already threatening to leave if the bio digester goes ahead. The Biodigester will only employ 5 people on site, and the contractors used during the build stage will all be specialists, so they are unlikely to be local people.

When plans for the Business Park were being drawn up in 2010 the council wanted the Spirit of Enterprise roundabout and the new Epi Centre building on the Business Park to become the Gateway to Haverhill. A Biodigester on the A1307 in close proximity to the roundabout will completely destroy this vision. It will be detrimental to the area, to businesses and to the residents.

Traffic

In the Planning Application Acorn stress the importance of the proposed site being on the A1307. They are obviously not aware that the A1307 is the only main route into Cambridge and that a great many people living in Haverhill commute to Cambridge every day for work, school and college.

Haverhill is an expanding town with the 4th largest population in Suffolk but with very poor road links. The A1307 is the main artery for the town. This road will come under increasing pressure as more homes are built in Haverhill.

The A1307 is also the main route into Addenbrookes Hospital for the emergency services and for the No 13 bus that runs between Haverhill and Cambridge and provides the only public transport into Cambridge for the residents of Haverhill and the villages along the route.

This road was a high casualty route until the 50 mph speed limit and cameras were installed. It will become a high casualty route again if high numbers of slow-moving vehicles start using the road. Drivers will become impatient, and there will be serious accidents as they try to overtake.

All HGVs and tractors will have to turn left out of the site and the road surface at the Spirit of Enterprise roundabout will become badly damaged as vehicles complete a 360 degree turn within the tight constraints of the roundabout. This has happened in the recent past causing motorbike accidents from the uneven surface.

Slow moving vehicles will also be emerging onto a road with a 60mph speed limit, and this could cause accidents when the road is busy.

HGVs or tractors coming from the east and turning right into the site will have to slow down or stop whilst they wait to cross the oncoming traffic. This will cause traffic to back up to the roundabout and prevent vehicles entering the roundabout from the A1017 and A1307.

The Epi-centre, homes on the Arboretum and in Barsey Close and Hanchett End, children at the Montessori nursery school, the village of Withersfield and the Flying Shuttle and White Horse pubs will all be subjected to high levels of traffic and the associated noise and pollution. Windows will have to be kept shut and people will not be able to enjoy sitting outside in their gardens, at the pubs, or café.

The villages of Thurlow and Withersfield are already rat runs for rush hour traffic wanting to avoid the centre of Haverhill. These village roads are very narrow making it impossible for a large tractor or HGV and car to pass safely. The road surface and verges are already badly damaged by HGVs and farm vehicles along Silver Street and Skippers Lane

The roads in Withersfield are currently quite hazardous for pedestrians as there are no pavements. They will become more dangerous if there is an increase in tractor / HGV traffic. Roads could also become muddy and messy from spilt feedstock or digestate material

The Planning Documents suggest that the movement of feedstock across the Thurlow estate will be on existing farm tracks. The route to the bio- digester would then be the proposed upgraded track from Silver Street, adjacent to the White Horse pub. Presumably traffic would also return via these routes making the junction of Silver Street, Skippers Lane and Hollow Hill a very dangerous place. It would also create unacceptable levels of noise and pollution and the village would no longer be a pleasant place to live.

There will also be an increase in tractor / HGV movements when the solid digestate is taken off site. Will this all be used on the Thurlow Estate or will some of it be transported to other farms? We have not been given any information about this or the transportation of the CO2 in terms of distance and roads used.

In the Planning application there is no information about farms, other than those on the Thurlow Estate, that will be supplying chicken manure, maize and other feedstocks. It seems unlikely that the Thurlow Estate will be able to supply enough material to keep the biodigester going for 52 weeks a year. Only 50% of the feedstock can come from crops, the rest must be waste material. It would be helpful to know where these farms are located in relation to the bio-digester and which roads will be used to transport feedstock. I am not aware of any chicken farms in the immediate area so can only presume that chicken manure, to be used as feedstock, will be transported over long distances in diesel powered vehicles?

In another area of the country one farmer said that he had used 58,000 gallons of diesel a year transporting feedstock to a local bio-digester. Is this a green solution for West Suffolk?

There are no dual carriageways in the area and these vehicles will just increase the traffic on our already congested Suffolk roads.

Some of the documents used to support the Planning Application are generic and are obviously being used for several sites using a cut and paste approach. Some of the road numbers given in the Environmental traffic document are not Suffolk road numbers.

Environmental Issues

The National Planning Policy Framework states that ‘Policies and decisions should ensure that any new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development’.

The Joint Development Management Policies Document states ‘Development will not be permitted where individually or cumulatively there are likely to be unacceptable impacts arising from the development’.

In the documents supporting their planning application it states that the effects of the bio-digester, that is noise, traffic movements, air pollution from diesel fumes, particulates, odour, bad views, etc will be concentrated within 2 km of the site. That may be acceptable, if the biodigester is sited in an area well away from houses and businesses. This biodigester will be very close to homes, businesses, pubs and a nursery so the effects will be felt by everyone close to the plant.

Will Acorn be measuring and controlling the odours and particulates in the immediate area?

Pollution

The Environmental Agency site has a list of numerous environmental incidents at anaerobic digestion plants and associated facilities, and this should be a compulsory read for anyone considering the planning application for a biodigester. These are not only incidents of serious pollution at the actual plant but also cases where the use of solid and liquid digestates have caused pollution of local ditches and streams and the death of fish. The digestates are not as ‘organic’ as Acorn likes to suggest but contain high levels of nutrient pollutants that can cause harmful algal blooms, and eutrophication in local waterways, if not applied correctly. The environmental problems appear to be the same as those caused by the use of artificial fertilisers. Storage of feedstock materials on site can cause large quantities of silage effluent and this could run off into Stour Brook.

Where will any effluent on site drain to? Will there be any leakage or overflow from the lagoons that can seep into groundwater and pollute Spring Grove Brook, Stour Brook and land near Cadge’s Wood?

Will ditches or waterways on the farms become polluted during the application of solid or liquid digestate.

The area close to Spring Grove Farm is subject to flooding after heavy rain. This has occurred several times this year. If the water becomes polluted this would cause huge amounts of damage to the wildlife all along the route.

Explosions

There have been at least three reported cases, the latest in Oxfordshire, of lightning strikes causing explosions at anaerobic digester plants and this would be a real hazard in this residential area because methane gas is highly flammable.

What measures are Acorn taking to prevent this happening?

Odour

Whilst Acorn claim that the biodigester will not smell they give no indication of how the odour will be controlled over the whole site. They do not say how they will ensure that materials delivered to the site, moved around the site and then removed from the site are kept covered at all times.

Material including chicken manure, which contains large quantities of ammonia, animal manure and silage will be stored on site and moved around by loading shovels. The solid digestate will be taken off site by tractors or HGVs. All this material will therefore be exposed to the air and odours will escape. The prevailing westerly wind will cause these odours to be detected in the adjacent residential and business areas, the village of Withersfield, Meldram Wash and in Haverhill.

There are several areas in the country close to bio-digesters where local inhabitants are suffering due to the odour coming from these plants. The smell is literally spoiling their lives and people are unable to sell their houses.

Hydrogen sulphide, that smells of bad eggs, can also be released into the atmosphere if there is a fault at the processing stage.

How will the odour be managed and controlled at this Acorn plant and in the surrounding area?

Recreation and wildlife

There will be a large amount of damage and destruction to wildlife habitats during the construction of the bio-digester and the digestate pipeline.

The bio-digester will be right on the edge of Meldram Wash and will be very visible from the footpaths in the area. This is a recreational area that is currently enjoyed by walkers, joggers, dog walkers, fishermen, local families and residents. It is the only open area of land at this end of Haverhill. During the spring and summer it is full of wildflowers and attracts a wide range of birds, butterflies and insects. No one will want to use this amenity if the view to the west is of enormous tanks and the area has an unpleasant odour.

Planting new native trees, hedges and wildflowers on the site will be of no value to local residents if they are not able to access the area and enjoy them. It will be ten years before new trees and hedges provide any screening of the site or wildlife habitats.

Please take note that The National Planning Policy Framework states under Environmental Objectives 'that the planning system should protect and enhance our natural, built and historic environment'. It also states that developments in the countryside 'should contribute to and enhance the natural and local environment'. We should be protecting areas like Meldram Wash and the adjoining areas not damaging them.

I feel concerned that the lagoons on the estate, used to store liquid digestate, are very close to Cadge's Wood which is an area of ancient woodland. The pipeline is also very close to Lawn Wood an SSSI. Areas like this should be protected for future generations not damaged. Could Suffolk Wildlife Trust be consulted about these areas?

The lagoons are also very close to a public footpath.

It is a very long pipeline across the estate and wildlife habitats will be disturbed or destroyed during the construction phase. We should be protecting nature not damaging it.

Noise

Noise levels are cited as low for the Epi- Centre but the Arboretum, pub and nursery are not even mentioned. The movement of tractors and HGVs will create noise as will the unloading and loading of material at the site. There will be the sound of large loading shovels scraping up material on hard surfaces and a general increase in noise caused by operations at the digester. This is an industrial scale plant so it will be noisy and smelly.

Lighting

Artificial lighting will have to be used on dull days and during the winter months. This could cause light pollution.

Feedstock

There are many questions surrounding the production of crops to provide bio fuel.

Farmers will be growing crops such as maize to provide feedstock for this biodigester.

Should farmers be encouraged to use prime agricultural land to produce crops for use in the bio-digester at a time when food prices are at an unprecedented high? Surely, they should be growing food crops so that the country becomes more self-sufficient.

Should feedstock be transported over long distances in vehicles run on diesel?

Sustainability

Building and operating an anaerobic digester uses the earth's resources and these costs are not reclaimed when the facility is decommissioned.

Acorn make no mention of sustainability when building their bio-digesters but they will be creating vast areas of concrete and using other non-sustainable materials to build the hard standing areas, tanks and lagoons.

The CO2 produced in the construction phase will be greater than any savings of CO2 made from burning bio-methane during the 25 years of the biodigester.

In conclusion

Bio-methane burns at a higher temperature than natural gas so this could be used in processes that need a high temperature, but it should not be used to heat homes. Both natural gas and methane produce CO2, a major greenhouse gas so bio-methane with all its associated costs is not a green gas, neither is it carbon negative.

The World Wildlife Fund says 'We do not want to encourage growing crops for the sole purpose of producing Bio-gas. Burning methane impacts on the climate and adds to global warming'.

Do Acorn have plans in place for decommissioning of the site once it is no longer needed?

Who would be responsible for restoring the site or would it just be left as a permanent eyesore in the landscape?

Who would be responsible for the site if Acorn goes out of business?

These questions need to be put to Acorn. They have declined invitations to come to any of the local meetings and enlighten the residents.

Acorn have not as yet, built any bio-digesters in England so their planning and data is rather hypothetical.

Please do not allow Acorn and the Vestey Estate to damage our countryside, the local environment and the local community and to add further to global warming. This is not a green scheme but a way of making money for Acorn and the Vestey Estate.

Yours sincerely

Hilary Thomas