

Mr Andrew Rutter
Suffolk County Council

Lucia Stephens
12 Mellis Close
Haverhill
CB9 7FL
21 Oct 23

Dear Sir,

Reference: Planning Application SCC/0045/23SE

I live close to the proposed development, less than a kilometre away and other members of my family live only slightly further away. I therefore would expect me and mine to be directly impacted by the development should it go ahead. I am particularly concerned about the potential impact on my and my grandchildren's quality of life and the prospects for town's future development. I set out my objections in more detail below:

Traffic

The site would necessarily generate many hundreds of HGV movements on the High Casualty route A1307. Congestion around the turn-off to Spring Grove farm and around the Spirit of Enterprise roundabout would be inevitable. I am also told by a driver familiar with agricultural HGVs that these vehicles using the roundabout would almost certainly 'slop' portions of their load causing a skid risk. Thousands of tractor/trailer 'Farm Traffic' movements, many of HGV character would also use local farm tracks and access to them from Silver Street. Silver Street is much too narrow and unsuitable for additional traffic. The proposal fails to properly address the requirements of the National Policy Planning Framework Para 113 to provide a complete transport plan.

Flooding

Despite the developer's assertions, parts of the site are in a high flood risk Zone 3, and the remainder borders this zone. The turn off from the A1307 into Spring Grove Farm flooded on 20 Oct 2023 and the Stour Brook with, to my knowledge, had 4 flood events within the last 12 months in Dec 22, Jan 23, Mar 23 and Oct 23.

Amenity, Heritage & Impact on Wildlife

Haverhill Vision 2031 calls for this entire area to remain green space, providing wildlife corridors and enhancing the value of the adjacent SSSIs. The proposed site ignores that vision. The historic Roman Road runs through the proposed site, building the digester would destroy that history.

The amenity value of the very popular Meldham Wash area adjacent to the proposed development is put at risk by the proposal. This area is used by hundreds of local residents.

It is unrealistic to expect containment of materials on the site and digestate pipeline to be perfect. The inevitable leaks and spillages will result in additional nutrients reaching groundwater and lead to a degraded environment for aquatic organisms and encouraging Algal blooms. These blooms are extremely detrimental and potentially fatal to wildlife and dogs that drink the water. The risk would make me reluctant to walk my dog in the area. An example of this kind of leak is the escape of silage liquor into a tributary of the Cam from the Pretoria energy biodigester site at Chittering in 2018 for which the operator was recently prosecuted and heavily fined.

Wrong Industry in the Wrong Place

To maintain growth and provide well paid jobs for my grandchildren Haverhill needs to grow and improve its transport connections. That growth needs to be well paid, high-tech, modern light industry such as those companies based in the EPI Centre not a bare handful of low-paying manual jobs offered by this development which would wreck the growth of the industries we need to attract. Haverhill is growing as a dormitory town for the high-tech jobs in Cambridge. In order to maintain this growth we need to improve our transport links, for example with a light railway and a cycle way connecting the town with Cambridge. These projects would be strangled before birth by the proposed industrial development.

Smell

The proposed site is on the eastern edge of town and the prevailing wind is westerly. Thus, any smell would be blown over the whole town. Evidence from similar sites already operating demonstrates that these sites don't just smell a little bit on an off day they stink every day. Anyone who is familiar with silage, poultry manure or the products of anaerobic decay would not be surprised. All these materials stink. According to the proposal the storage silos and lagoons would be covered and enclosed, how are they going to move feedstock and digestate around without uncovering them?

Noise

Evidence from similar sites already operating demonstrates that the site would very noisy. The proposal is a little coy about working hours; however, 'normal agricultural hours during harvest' when applied to their planned crops means 24hr working from late April to early November. That is 6 months of 24hr HGV movements and heavy machinery operating to move materials around the site. I believe that this is in contravention of the National Planning Policy on Waste Appendix B Para J.

Visual impact

The proposed site would be the largest Biogester site in the UK, each of the 5 digesters being taller than the nearby EPI centre. It is nonsense to state that the site could be screened by trees. Perhaps in a 100 years' time trees could grow tall enough but they would still be bare in winter. I believe that this is in contravention of the National Planning Policy on Waste Appendix B Para C.

Industry/Agriculture

The site is designated for agriculture on the local plan and comprises very high quality, Grade 2, land which could and should be used for growing food for people or animals.

Figures supplied by Acorn at various public meetings vary but range from 30% to 60% of green matter feedstock and none of the necessary manure feedstock coming from the Thurlow Estate. That such a large proportion of the feedstocks have to be trucked in from off-site demonstrates that this is actually an industrial waste facility and not, as stated, an agricultural development. Moreover, beyond the built-on land, large swathes of the highest quality agricultural land would now be given over to growing feedstocks rather than food for people and animals. Furthermore, Maize is proposed as a necessary input. Local soils are not really suitable for maize but if it were to be grown it would be harvested in October during the wettest month, leaving hard packed ground vulnerable to soil erosion and water runoff causing yet more flooding.

Agricultural law does not allow 'muck heaps' to be sited alongside watercourses. This is effectively one giant 'muck heap' right beside a watercourse.

Greenhouse Gas Emissions

The *raison d'etre* of the site is to reduce overall greenhouse gas emissions. Once the high CO2 activities of pouring concrete, manufacturing the buildings and machinery and constructing the site are complete. There remains the issue of the requirement for thousands of Diesel burning vehicle movements every year. There will inevitably be Methane leaks from the plant and Methane, of course is orders of magnitude, a more potent greenhouse gas than CO2. The replacement of food crops with green feedstock will increase the demand for food and animal feed imports. All these factors must make any calculation of overall benefit complex and call into question the green credentials of the site.

Errors in the Application

The application is riddled with errors. Some are probably 'cut and paste' errors such as the statement that "the site being well sited for access to the A43". Some being so egregious as to being close to deliberate lies. For example, it is stated that the site is 3.8km from Haverhill Town centre. This may be strictly true but it disingenuous at best: it is less than 600m from the EPI Centre, 600m from a major (and growing) housing estate and public house, and within 1km of a major supermarket and thousands of homes and their occupants.

Safety

That the proposed site is so close to so many homes and businesses and alongside the major entry route into the town must give question to its safety.

Methane mixed with the Oxygen in air is a powerful explosive. What the military call a fuel-air-bomb. A similar but smaller site near Oxford was recently struck by lightning. Three digesters blew up. Local residents, WITHIN A 10KM RADIUS, were told to shut their doors and windows and remain indoors due to the risk of further explosion of the remaining plant. A 10km radius from the proposed site (which is bigger than the Oxford one) would take in not only all of Haverhill, Withersfield and Sturmer but all the surrounding Villages and Hamlets to the edge of Saffron Walden, Great Abington and Fulbourne. There are more examples of exploding digesters, one in Bristol in December 2020 killed 4 workers. Fortunately, both the Oxford and Bristol digesters were far enough away from populated areas to avoid mass casualties. The Haverhill proposal is not, should it suffer the same fate.

Acorn have been less than forthcoming with details of their plans for the site and have frequently contradicted themselves at public meetings and in their literature and planning application. One notable example of the contempt in which they hold the local population is their refusal to engage with the objectors' campaign. Another their scheduling of their next public engagement on 1 Nov for a date after the closure of objections. That smacks of an arrogant belief that the decision is 'in the bag'. To put such a large and potentially dangerous and environmentally threatening site into the hands of speculative developers with no experience of building and running similar plants strikes me as the height of foolishness. Moreover, I am convinced that any one of my substantive objections

should be sufficient to deny planning consent. Taken together they provide overwhelming evidence of the wrong development, in the wrong place at the wrong time. I trust that the Council will swiftly come around to my point of view.

Yours sincerely,

Lucia Stephens

By email