

From: Maureen Haldane [REDACTED]
Sent: Thursday, October 26, 2023 9:04 PM
To: Andrew Rutter [REDACTED]
Subject: Application Number: SCC/0045/23SE

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To: Andrew Rutter, Case Officer, Suffolk County Council

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

Dear Sir,

I wish to place on record my objection to the above application. I have a number of concerns which are detailed below, but wish to place specific emphasis on the impact on the **historic environment**.

1. Chapter 11 Historic Environment-

The chapter is presented as 10 separate files (one of which is included in error) which could very easily have been consolidated into a single PDF. This makes it extremely difficult for any reader, especially a lay reader, to follow complex and lengthy documentation and presents an unreasonable and unnecessary barrier to proper democratic scrutiny.

a) Geology and Topography

The description of the Geology and Topography raises questions which may be addressed elsewhere in the application. These relate to the excavated area of the site being very tight to the boundaries of retained hedges and mature trees raising questions as to possible significant damage to root systems which could jeopardise their survivability. The proposed development is located at the base of the valley within which the Stour Brook flows. The valley sides have soils with a high clay content that have compromised drainage but the flood risk to the Brook, adjacent fields and the wider high flood risk area is at present mitigated by well-drained loamy soil over chalk bedrock in the base of the valley an asset which the proposal would involve concreting over. The site has a downward gradient towards the Brook that would cause pollutants from the site to wash over into the Brook at times of high rainfall.

b) Archaeological assets.

The Archaeological Baseline describes the 1 km around the site as being very rich in archaeological heritage. It identifies 37 historic landscape features including seven farmsteads and 14 findings of artefacts some of which involve the discovery of multiple objects. It should be noted that the applicant recognises that construction on the site, the pipeline route and lagoon area would obliterate any remains.

The geophysical survey conducted covered less than half of the footprint of the site itself and did not address the route of the pipeline or the lagoon area. Given the richness of archaeological remains in the area and findings of artefacts in adjacent fields by amateur metal detectorists this would seem a somewhat cursory investigation.

This limited survey identified anomalies within the site attributed as possibly associated with the Roman road, but these anomalies dismissed as fragmented.

In fact a photograph within the documentation of the most likely route of the Roman road shows this to be just outside the boundary of the site and therefore any geophysical anomaly within the site is likely to require an alternative explanation. Since the pipeline will cut across the route of the Roman Road further work to confirm the route and the nature of the remains that would be destroyed appears necessary. The Roman Road (Via Devana/Worsted Way) is identified in the documentation as being of interest for potentially contributing to the East of England Research Framework. While most of the route between Haverhill and Cambridge is well known it is in proximity to the site where its alignment becomes uncertain.

It would seem prudent to demand a more rigorous geophysical survey covering the entire site including pipeline and lagoon and to involve independent archaeologists in an assessment of potential remains given that these would be obliterated were consent to be granted.

c) Heritage assets

The planning guidance in relation to heritage assets relates to the impact on the “setting” of the asset. In most circumstances this relates to the appreciation of the asset by an observer in the immediate vicinity but also includes the approach to and exit from the vicinity of the building *“including inward and outward views”* .

The planning grounds for heritage objections in this instance are somewhat dependent on interpreting the impact on heritage assets most of which are almost 1km away from the site.

For example local planning guidance in relation to Conservation Area refers to; *“its setting, and views into, through and out of the area; ...”*

The South Cambridgeshire Local Plan applicable to part of the 1km radius from the site refers to proposals being supported if;

They sustain and enhance the special character and distinctiveness of the district's historic environment including its villages and countryside and its building traditions and details.

The documentation identifies 13 Grade II listings covering 18 properties within 1 km of the site plus the Withersfield village Conservation Area. What is remarkable is that, aside from the cluster of more modern properties in Hanchett End, the built environment almost devoid of 20th or 21st-century buildings visible from the street apart from the bungalow to the west of Limberhurst Thatch and the conversion of traditional barns on Silver Street. The application recognises that, apart from changes to field boundaries the agricultural landscape is also substantially unchanged since the post-mediaeval period. That the application proposes placing a huge industrial eyesore right at the heart of this rare combination of unchanged rural environment and unchanged built environment is a desecration.

The proposed major industrial scale development would be clearly visible from the East, from the A1307 in the vicinity of its junction with Silver Street and from Silver Street itself on the approach to or exit from Withersfield it is clear that wider landscape setting of the listed heritage assets will be drastically altered. The applicant chooses to single out Silver Street Farmhouse (now 7/8 Silver St) for more detailed analysis this being closest to the site apart from Limberhurst Thatch. This building marks the point on Silver Street where the site would become visible when leaving Withersfield. The applicant claims that the AD complex would constitute a “slight” impact on the setting of the building as result of partial topographic and tree/hedgerow screening. In fact, as the documentation recognises the AD complex would, owing to the elevated position of this building, come into prominent view immediately after entering or leaving the property. By virtue of its effect on the approach to and egress from the building this represents a material effect on the setting of the property.

The claim of slight impact is supported by the false attribution of a photograph, Plate 16. Purporting to show a view toward the site from this part of Silver Street it actually shows a view from Horseheath Road near the White Horse looking toward Haverhill, the view of the town being entirely obscured by a ridge and part of Howe Wood.

The singling out of Silver Street, Farmhouse means that there is no discussion in the document of the impact on the “setting” of The White Horse, other listed properties nearby and the Conservation Area by the creation of a private road

for HGVs and large agricultural vehicles in the immediate vicinity. While this impact has been well documented in the context of traffic issues it is also relevant as detrimental to the setting of heritage assets.

While many villages can boast a Grade II listed pub these have invariably been encroached upon by modern infill development within the village concerned. The built environment both in the immediate vicinity of the White Horse and in the village conservation area unusually rich in heritage assets, mostly listed. This means that the setting of this former coaching inn, located within a rural landscape broadly unchanged, apart from hedge boundaries, since the post-mediaeval period, is reminiscent of that not just of decades past but of centuries past. To superimpose a new route through adjacent fields for HGVs and agricultural tractors that would also add deleterious additional traffic to local roads that are little more than lanes is damaging to the setting of the pub, the cluster of nearby heritage assets and the Conservation Area.

2. Other Objections

in addition to my objections in respect of the Historic Environment I also wish to endorse the following grounds for objection:

A study conducted over the last 8 years of 964 plants in the UK and Germany found that 85% of the plants were suffering from biogas leakage, described in litres per hour. A quarter of these leaks were deemed significant in terms of their leakage, 50% had minor leakages and the remainder were considered medium.

When calculating the methane discharge attributed to these leaks, this means 200 plants are emitting 1,000 litres of methane per hour! Methane is considered to be 34 times more potent than CO₂ as a greenhouse gas.

The combined impact of mal odours and methane will significantly reduce the air quality and will have a devastating effect on the surrounding area.

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.

The cause of the bad odours is rotting vegetation and poultry waste. These materials, by their nature, 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.

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 effective 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 'material' polluting the lake and surrounding water courses is considerable. The impact on local wildlife will be catastrophic.

The flood park is 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.

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.

Local residents can expect to experience short-term and long-term disruption and inconvenience as a result of this development. In the first instance, the construction period will be lengthy. Heavy construction machinery will need to excavate the site in preparation for concreting over the 31 acres; 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. 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 at all times of the day and night (there will not be any operational time restrictions for this plant). The noise is horrendous (chalk on a blackboard).

As the site is not time constrained it will be operational at light, 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.

Objections to the location can, but are not exclusively, focused mainly on concerns for the health and safety of local residents caused by bad odours and chemical release, the increased risk to road users travelling on the A1307 caused by slow moving and HGV traffic (including those travelling to and from school), and the risk of flooding and discharge into the Stour Brook and flood park area.

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"You can show that you've heard someone by repeating their words; you can show that you've listened by taking action!"

