

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

January 2024

I am writing to express my objection to the proposals for the construction and operation of an anaerobic digestion facility, associated infrastructure and new access road north of Spring Grove Farm, Withersfield, Haverhill.

The reasons for my objections are summarised in the seven sub-headings below:

- 1. Health and safety concerns** - Legitimate concerns have been raised by residents about health and safety issues relating to the proposal, including an explosion at a similar facility following a lightning strike. This occurred in October 2023 at the Severn Trent Green Power bio-gas facility in Cassington, Oxfordshire, and led to a major fire which had to be attended by approximately 40 fire and rescue personnel. If such an incident occurred at the proposed site it would pose a serious risk to the public. The limited experience of Acorn Bioenergy in constructing and operating such a site is relevant. Residents have also raised concerns about the potential risk of Avian Flu linked to the movement of chicken manure.
- 2. Traffic safety concerns and congestion on an already busy and dangerous road** – Construction would take place over a long period of time leading to major movements of HGVs to and from the location. Meanwhile, at busy periods in the summer the applicant has said there would be 148 extra arrivals and departures by vehicles each day on roads approaching the site. There would be a vast increase in traffic by heavy goods vehicles, many through Withersfield village, every week – which would harm residents' quality of life and increase safety concerns and potentially damage property and roads. This facility – once constructed – would require the constant arrival of deliveries of chicken and other animal manure to the outskirts of Haverhill – with a knock-on impact on congestion and commuters trying to get to and from work, or parents and children going to and from school. The heavily-used A1307 is the main route to Cambridge for commuters and is already a 'high casualty route'. Additional access and egress at this point on this artery would interrupt the flow of the already-intensive traffic and the additional HGV movements will lead to jams on a route that already suffers from tailbacks and heavy congestion during rush-hour periods. The site's proximity to a busy roundabout is also a material concern.
- 3. Smell, noise and air pollution** - Another serious concern has been raised about the risk of this site leaking methane. This would lead to unpleasant smells, especially during summer months, across Haverhill and Withersfield. There is also the risk that insects and animals will be attracted by the smell.

Construction of a bio-digestion facility would lead to a major rise in noise and air pollution. The applicant says that the site will operate 24/7. There is concern that noise and light pollution and vibrations (not just from the site but also from related traffic to and from the site – including from open-top HGVs containing animal waste) will be a constant source of disturbance for nearby residents and for local wildlife, including bats and owls. There would also be significant noise from the day-to-day operation of the site as JCBs scrape delivery vehicles and storage tanks for waste. Floodlights during use of the site at night would also cause light pollution. The applicant has argued that the plant will be screened by trees that already exist on the site. But these trees are largely deciduous in nature, and for many months each year they would not provide adequate screening. On top of the pollution concerns, this could lead to the site looking unattractive, especially from roads and from the upper floors of the EpiCentre.

It is not right for the chosen location to be so close to residential areas. There is a pre-school nursery and a pub close to the site, as well as two large residential estates (one under construction) and amenity land including West Town Park and Howe Wood and surrounding farmland. Construction of the facility would be incompatible with existing land uses. The site is earmarked as agricultural but the use if this application is approved would be industrial.

- 4. Harmful impact on the future prosperity of the area** - There is also the risk that construction of this plant could affect the economic future of Haverhill, Withersfield and surrounding areas. Bad smells from the plant, and a worsening traffic situation, are likely to deter businesses and entrepreneurs. It is likely that these proposals would adversely affect the EpiCentre's ability to attract innovative, hi-tech and high value companies to this area.
- 5. Impact on public rights of way** - There are many public rights of way that run directly adjacent to the site, particularly the footpath that runs from Withersfield to Haverhill directly along the edge of the proposed construction area. This development would be detrimental to the recreational use of the footpaths.
- 6. Other environmental concerns** – The proposal would involve the building of an industrial-sized edifice on a flood plain and the paving over of many acres of agricultural land. There may be potentially dangerous run-off – causing potential harm to residents, wildlife and pets. The Stour Brook runs adjacent to the site and there is significant local concern about the potential risk posed to the water quality of the River Stour from waste contamination, including possibly hydrogen sulphide. Should the risk of flooding arise in the area surrounding Haverhill again – as it did previously in 1987 and 2001 – then the harm for local wildlife would be serious as there would be a significant risk of rotting vegetation and poultry waste polluting the flood storage reservoir situated at the confluence of Spring Grove Brook, Stour Brook and Hanchett End Brook. The danger of flooding is a serious concern: this area is designated Flood Zone 3.

- 7. Harm to residents' quality of life and their enjoyment of surrounding rural landscape** – Residents' quality of life is directly related to their ability to enjoy the local rural landscape. This application does not fit in with the surrounding landscape, nor the character of the area. Planning policies and decisions should promote the effective use of land. Given that Haverhill is Suffolk's fastest growing town, there are many far better ways in which this land could be used – for example as a site for more amenities or services for residents.

To summarise, I am convinced – for the reasons outlined above – that this is the wrong location for this proposed development. It would not only be one of the largest facilities of its kind in the UK but would also be unusually close to huge numbers of families and other residents living in thousands of homes within only a radius of only two kilometres. I therefore call on the Planning Committee to reject it in the interests of local residents.

Yours sincerely

Nick Timothy