

PUBLIC

23/10/2023

FAO Andy Rutter
Development Manager
Suffolk County Council
Fifth Floor, Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Dear Mr Rutter

SCC/0045/23SE – PROPOSED ANAEROBIC DIGESTION FACILITY - LAND NORTH OF SPRING GROVE FARM, WITHERSFIELD, SUFFOLK CB9 7SW

Oxford Innovation Space is the managing operator of 'The Epicentre' in Haverhill, [The EpiCentre | Flexible workspace in Haverhill](#). The building is located at its closest point only 150 metres to the south of the proposed anaerobic digestion (AD) facility at Spring Grove Farm, Withersfield.

The EpiCentre opened in November 2020 and is an innovation centre and incubation facility for small businesses, which has had considerable success in attracting emerging and growing businesses to this edge of town location. The siting of the Epicentre was seen as a key location by West Suffolk Council, at the entrance to Haverhill from the north-west, and a suitable, high quality 'landmark' building was designed to reflect this. It also capitalises on its location by creating extensive countryside views from its upper floors in almost every direction, including to the north and to the site of the proposed AD facility. The occupiers of the building – our customers – are in the hi-tech/science/research sectors and value the location and outlook of the building.

An AD facility so close to will impact on its perceived edge of countryside location and if odours become an issue, new occupiers will inevitably be put-off. This building is also naturally ventilated, so relies on open windows to achieve a through-flow of fresh air.

The concerns about the potential impact of odours from the proposed AD facility are such that our client and building owner, Jaynic, commissioned independent odour consultants to assess the planning application and its supporting technical information against established good practice and guidance, and to consider whether there is a risk of unacceptable odour conditions which would affect The EpiCentre site. The report, by Michael Bull & Associates Ltd (MBAL), concludes that:

- The proposed development includes the delivery, storage and handling of material that can be highly odorous including chicken litter and farmyard manure. While the actual process of anaerobic digestion is enclosed and is likely to have low odour emissions, the storage and handling on site of this material will result in fugitive emissions of odour which have not been assessed.*
- No information is provided regarding the frequency that stored material will be disturbed, how frequently it will be moved around site and how odours would be controlled during these activities.*
- The odour assessment has been based on a single assessment method, namely the SPR approach; this is a*

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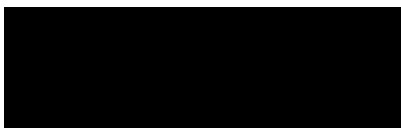
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suitable method but is a qualitative approach largely based on professional judgement. In MBAL's view, some of the source odour potential and the pathway effectiveness to The EpiCentre have been underestimated.

- *The EpiCentre is promoted as a high-quality working space and as such, should be considered to be a highly sensitive receptor. Where there are large odour emissions, such as from handling of material such as chicken litter, there is the potential for a high level of impact from the proposal development upon The EpiCentre.*
- *The use of a single assessment method is not in accord with the IAQM guidance which suggests that a multitool approach should be used. Other methods that could be applied include a detailed FIDOR/FIDOL assessment and indicative dispersion modelling based on published emission data for available sources.*
- ***Given the lack of such assessments and the potential for high odour emissions to occur from some activities, it is concluded that there is a risk of significant adverse odour impacts at The EpiCentre.***

Given these professional findings we believe the proposed site for the AD facility is far too close to The EpiCentre. **In the light of all the above, we would like to register our objection to this proposal, as the risk of high odour emissions from the proposed AD facility are likely to occur at key stages of the AD process, which would have a significant and detrimental impact on the operation, letting and management of The EpiCentre.**

Yours sincerely,



Tim Smith
Deputy Managing Director