

The Grange
Church Street
Withersfield
Suffolk
CB9 7SG

26th October 2023

Andrew Rutter AssocRTPI
Development Manager
Suffolk County Council
Growth Highways and Infrastructure

Via email to planning@suffolk.gov.uk

Dear Mr Rutter

Planning Application Reference: SCC/0045/23SE

I strongly object to the proposed Anaerobic Digestion Facility at Spring Grove Farm.

The Haverhill Vision 2031 document '*seeks to help development that secures economic social and environmental conditions in the area*'. This application fails on all three fronts.

Project E2 of the Vision identifies the opportunity to improve the '*gateway*' into Haverhill at the Spirit of Enterprise roundabout. Building one of the largest anaerobic digestion facilities in the country two hundred metres away hardly enhances the entrance to the town.

Policy HV10 of the Vision included provision to protect others from the much-delayed development of the Research Park. Ironically the words used in the Vision are now highly relevant for protection of the businesses and local residents that have evolved on the site in the past few years: '*The design and the development of the site should be sensitive to any sensitive environmental features and any potential adverse effects should be mitigated*'.

Amongst local businesses in close proximity are a children's nursery and The EpiCentre. It is very telling that the property developer behind The EpiCentre saw fit to commission an independent review of odour assessment after reading the report submitted by the applicant. That independent report, which has been submitted as an objection, commented that the applicant's Air Quality Assessment Report was based solely on an SPR approach. Whilst this is a suitable method of assessing odour implications, the independent experts point out that a single assessment method is not in accord with the Institute of Air Quality Management guidance. Furthermore, they challenge some of the findings of the applicant's submission - not least in the anticipated level of odour emissions from handling material such as chicken litter. The independent experts believe the risk of odours impacting residents and businesses close to the proposed development is higher than stated by the applicant. It is not surprising therefore that there is concern that the five long-term full-time jobs that may be created by the building of the anaerobic digestion facility are dwarfed by the likelihood of not only the loss of other jobs being created by companies deciding not to move to the Research Park, but also the risk of companies that have moved there leaving, thereby losing current, existing jobs in Haverhill.

The potential impact of odour emissions does not end there. The sheer scale of the development will require significantly more feedstocks than are currently produced in the surrounding area. Chicken litter and manure, in particular, will need to be transported relatively long distances to service the proposed anaerobic digestion facility. The risk of spillage from agricultural vehicles and HGV's on roundabouts and country roads, and the consequent smell, should not be under-estimated.

The applicant has stated on Page 2 of the Planning Statement that *'there are no foodstuffs included in the proposed feedstock mix.'* Foodstuffs are known to significantly increase odour issue risks. On Page 14 of the Planning Statement the applicant stresses how the *'availability of different feedstocks can fluctuate as a result of local and national economic conditions'* and that *'it will be important not to restrict any planning permission to specific amounts of specific feedstocks'*. In the unfortunate event of planning permission being granted I believe that all local residents and businesses would believe the contrary and be adamant that any consent is subject to a permanent exclusion of food waste.

The applicant has downplayed the risk of flooding, acknowledging that the main site entrance is in Zone 3 but highlighting that more of the site is in Zones 1 and 2. The application goes on to suggest that there is a one in one hundred years risk of a flooding incident on the site. The Muck Off Acorn group has photographic evidence of flooding on more than one occasion in 2023, let alone once a century. Haverhill endured disastrous flooding in the mid-20th century. The Wash Lands that encompass the application area were established to protect Haverhill from suffering a repeat of 1956. Transforming part of those Lands into an industrial waste management complex, for that is what this proposal is, is entirely incompatible with the accepted best way of protecting Haverhill from the threat of floods.

The applicant has also submitted a Traffic Statement. This in itself leads to more questions than answers. The number of additional vehicle movements identified to service the movement of 92,000 tonnes of feedstocks seem optimistically low. There is no Traffic Management Plan, beyond stating that traffic emerging from the proposed site would turn left onto the A1307. Given the claim that at least 40% of the feedstock will be manure or chicken litter and the lack of either large-scale herds or poultry farms within a ten mile radius, the transfer of feedstocks will impact on the local road network. An area of prime concern is Withersfield. Silver Street, Horseheath Road, Hollow Hill and Church Street are already extremely heavily used minor roads with many bends and many pot holes. The applicant acknowledges that traffic will increase in volume and beyond the normal hours of 07.00 - 18.00 Monday to Friday, 07.00 -13.00 Saturday during harvest periods. Those of us who live in Withersfield understand and by and large accept that there is increased agricultural traffic during the six to eight week period of harvest. However, the applicant's proposal identifies a much elongated harvest period, doubtless because of a change in cropping necessary in order to feed the proposed anaerobic digestion facility. There is a clear risk that the planned hours of operation will be extended for 'harvest reasons' from early June to mid October.

The applicant does refer to potential use of the Thurlow Estate track network for movements between the landlord's farm and the anaerobic digestion facility site. It is interesting that Thurlow Estate have separately applied to West Suffolk Council to change the agricultural access at 'Back White Horse Field' on Horseheath Road (application number DC/23/0572/FUL.) It is both disappointing and disrespectful to local residents that the application to West Suffolk makes no reference to the proposed anaerobic digestion facility, as it is patently obvious that this is linked to the concept of making greater use of the farm tracks and the intended radical increase in farm vehicle movement to service the anaerobic digestion facility (be they tractor/trailer or full-sized HGV's). It is hoped that there is a mechanism for Suffolk County Council and West Suffolk Council to consider the two applications together rather than in isolation. I do acknowledge that transferring traffic to farm tracks may take some pressure off Silver Street in particular. But the additional traffic between 'Back White Horse Field' and the Skippers Lane access to Thurlow Estate farmland will be additional traffic on an already busy rat run with a considerable number of existing HGV movements a day serving the storage depot and the furniture warehouse as well as farm traffic. The junction opposite the White Horse pub is already a white-knuckle ride, with HGV drivers often giving scant regard for the priority rights of smaller vehicles that they meet there. I assume that there are no proposals to bring additional tractors/HGV's down Church Street and over the small humped bridge beside the church. The hill is very narrow and bendy, and the bridge small. But I hope the question will be answered in a proper Traffic Management Plan when one is submitted.

In summary, the applicant's proposal is for the second largest anaerobic digestion facility in the country, an industrial sized agricultural waste management facility, to be built on land that is currently designated farm land that forms part of the flood protection measures instituted after the terrible floods in 1956, and for which the access is a Zone 3 designated flood risk that has flooded repeatedly in 2023. An independent expert has challenged the conclusions of the applicant's Air Quality Assessment Report, and identified a clear risk to the further growth of the Haverhill Research Park - a beacon for the progressive nature of Haverhill, and its position as the fastest growing town in Suffolk. Optimistic figures have been submitted in a Traffic Statement, but there is no proper Traffic Management Plan even though much of the projected feedstocks will need to be transported from over ten miles of the site resulting in reasonable and genuine concerns that neither local rural roads nor the A1307 will cope with the additional vehicle movements required to deliver 92,000 tonnes of feedstock per year nor the removal of both the gas and organic fertiliser products that result from the bio-degrading process.

As said above, I strongly object to this planning application.

Yours sincerely

A solid black rectangular box used to redact the signature of Sophie Wallis.

Sophie Wallis