

**From:** STEVE WHYARD [REDACTED]

**Sent:** Sunday, December 3, 2023 4:12 PM

**To:** Andrew Rutter <Andrew.Rutter@suffolk.gov.uk>

**Subject:** Objection to Planning Application Objection to Planning Application: SCC/0045/23SE: Construction and operation of an anaerobic digestion facility on land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW

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## *Objection to Planning Application: SCC/0045/23SE*

*Land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons.*

Dear Mr Rutter,

I am writing to inform you of my very strong objection to Acorn's application to build an industrial scale biodigester facility on land to the North of Spring Grove Farm, Withersfield. I find the use of the electronic planning portal difficult and I am therefore providing my objection to you via email, I hope this is acceptable.

Let me first say that I wholeheartedly agree with the written objections already provided by Withersfield Parish Council and the Muck Off Acorn Campaign group. However I have further objections that I will provide under the headings below.

### Definition of Waste

In Acorn's application they refer in a number of places to some of the materials being used in their proposed anaerobic digestion process as not being waste. They class some of these materials as not being waste essentially because they have an economic value. However it is clear from the Environment Agency's Guidance: 'Check if your material is waste' (last updated 6 January 2022 – ref: <https://www.gov.uk/guidance/check-if-your-material-is-waste>) that all of these material are indeed waste as they have been disposed of by their original holder as requiring reprocessing in order to produce the Methane, CO<sub>2</sub> and fertilizer/soil conditioner end of waste products of the digestion process.

Simply having an economic value does not of itself make the reprocessing feedstocks non-waste materials. For Acorn to suggest such materials are not waste is misleading.

### Odour from the Proposed Anaerobic Digestion Plant

Acorn state that the operation of their Anaerobic Digestion facility will not lead to a significant negative impact on people that live and work nearby. In particular their application indicates that there will be no appreciable odour emanating from the site. This is a deliberate attempt to mislead the public, specifically those that live and work nearby as well as the Planning Authority.

On 22 September 2023 I drove past an Anaerobic Digestion (AD) plant approximately 2 mile south east of Chatteris on the A142 in Cambridgeshire. This plant processes agricultural waste materials and although much smaller than Acorn's proposed site at Spring Grove Farm it is a similar bio-digestion facility using both an ensiling process for vegetable matter and 4 large domed anaerobic digesters.

On 22 September a large number of tractors and trailers were delivering what appeared to be shredded maize to the facility. The vehicles were travelling full from beyond Ely to the plant and returning empty on the A142 presumably to collect more shredded vegetable matter. On this date there was a gentle (15 to 20 kph) breeze from the west/north west which carried the odour of the digestion facility down the A142. When travelling south east down the A142 and away from the AD facility the smell of rotting and fermenting vegetable matter was very strong and very unpleasant at 1 mile from the facility. At a distance of 2 miles the smell was still unmistakable and still strong.

Almost all of Withersfield and about ¼ of Haverhill's residential estates are within 1 mile of the proposed Spring Grove Farm site whilst 2 miles from the plant engulfs most of Haverhill and Horseheath (Cambridgeshire) too. By Acorn's own admission at least 4 weeks of the year (2 weeks in late spring a 2 weeks in autumn) would be devoted to trucking crops onto the site, as I witnessed at Chatteris. They do not mention how many days during the year the site would receive chicken or other farmyard wastes.

Given a westerly or south westerly wind, Haverhill and Withersfield would be under a pall of stink during those times when feedstock is being delivered to the site – and not just during the 4 week peak period noted by Acorn in their planning submission!

### Traffic

During my drive down the A142 on 22 September 2023 (described further in the previous section) we travelled approximately 10 miles between the Chatteris Anaerobic Digestion plant and Ely. During this journey we passed at least 10 tractors and trailers driving towards the plant. Each was travelling at about 30mph and each had a 100 to 200 yard tailback of vehicles behind it. Indeed, we were travelling at a similar speed, stuck in a tailback of traffic behind an empty returning, tractors and trailer.

In Acorn's application they mention the number of HGVs that they estimate will enter and exit the Spring Grove Farm site from the A1307; they do not give any estimate of the number of tractors and trailers that will access the site nor do they state how these farm vehicles will enter and leave the site. Acorn have indicated in their public meetings that the number of farm vehicles used will be essentially the same as the Vesty Estate already use to move agricultural produce from the fields to the farms. What Acorn do not make clear is that instead of these vehicles moving to locations spread across the Thurlow estate they will all be converging on Withersfield and Spring Grove Farm during relatively concentrated periods of time. Acorn do not say how many such tractor and trailer movements there will be nor which farm tracks or other road routes they will take.

Acorn have provided insufficient and incomplete information regarding the movement of farm and other vehicles to and from the site and it seems to me have tried to obfuscate the true and full impact of traffic on

residents of Withersfield and those using the surrounding road network with the limited and incomplete information that they have provided thus far.

### Noise

Acorn refer to the noise pollution likely to emanate from the site as not significant. They provide no specific estimates of sources of noise e.g. vehicles compacting organic material into silage clamps or moving silage and other organic wastes to feed the digesters will have reversing beepers and will scrape their buckets along concrete aprons to pick up feed material – such noise will carry for considerable distances, as will the noise from methane flaring, lorry and tractor engines, pumps, compressors, fans/blowers and other mechanical equipment. From Withersfield the noise of traffic on the A1307 is already a significant intrusion, noise from the proposed digester site will be 24/7 and will add to the noise already coming from that direction.

### Why Spring Grove Farm

Acorn's application does not detail which alternative sites have been considered, nor do they provide the criteria they have used to decide why other sites were dismissed in favour of the proposed site. It seems clear that the proximity of the proposed site to major centres of population and the impact on local residents and businesses was not considered to be a priority, neither was the safety of people living or travelling close to the proposed industrial site.

### Fire and safety

Between 2010 and 2018 government figures show there were 3 fire incidents at biogas plants, including one incident of a lightening strike (ref: Daily Mail Article, 03 October 2023). The recent explosion at the Yarnton Oxfordshire biogas site caused the closure of the nearby A40. What would be the impact on traffic passing on the A1307 or on nearby residents and businesses in the Arboretum and Hanchett End of a similar explosion at the proposed Spring Grove Farm site.

The A1307 is just metres from the proposed location of the bioreactors in Acorn's planned facility – what might be the impact on people travelling passed the site should a lightening strike cause a similar explosion so close to the road.

### Location

Clearly Acorn's site location assessment criteria should be reviewed and further safety and realistic people/business impact criteria introduced and honestly and openly evaluated.

Acorn say that the Spring Grove Farm location is ideally situated to receive organic feedstocks from surrounding farms but provide no details as to the source of the materials or how far they will need to travel or the routes they will use to arrive at the site. There is no traffic impact assessment for the roads and routes that will be used (save the limited assessment for the HGVs using the A1307) nor is there any assessment of the CO<sub>2</sub> impact of these traffic movements.

### Gas Flaring

Flaring of gas from the plant will be necessary during plant maintenance and breakdown. Acorn give no estimate of the likely frequency or duration of flaring.

According to BBC News on 27<sup>th</sup> November 2023, pollutants from gas flaring include particulates (PM2.5), Ozone, NO<sub>2</sub>, and benzo(a)pyrene which at high levels or continued exposure have been linked to strokes, cancer, asthma and heart disease according to international experts including the World Health Organisation (WHO). Acorn should quantify the pollutants likely to be present in

the flared gasses and provide a detailed assessment of the worst case exposure and health impacts for people (including children) living and working at various distances from the proposed plant

Should you wish to contact me or request further details or background to my objections I would be very happy to hear from you

Regards

Yours sincerely

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