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Sent: Friday, October 20, 2023 11:02 AM
To: Andrew Rutter <Andrew.Rutter@suffolk.gov.uk>
Subject: Planning Application SCC/0045/23SE Spring Grove Farm

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objection:

1. Compliance with national statutory planning frameworks, policies and guidance:

The Parish Council believes that this application is contrary to a range of statutory planning policies including the St Edmundsbury Local Plan.

The site is agricultural land within the countryside and is not designated for development for industrial use. The development is a large industrial scale waste processing and power generating facility which is inconsistent with the designation of the land within the Local Plan.

It is also inconsistent with the Haverhill 2030 vision document and with the St Edmundsbury Environmental strategy which designates the area as part of or bordering the Stour Brook Green Corridor.

2. Location:

In addition to the site not being designated within planning policies for such a development, The Council believes that the applicant has not sufficiently met the test of demonstrating why this site, rather than others has been selected for this facility.

We believe that the applicant should be required to undertake and submit a full sequential site assessment which clearly sets out the requirements and evaluates a range of potential sites against these criteria. That assessment should also assess the potential disbenefits and harm associated with each potential site.

Whilst access to a major road to facilitate transportation of materials to and from the plant, may be a valid criteria, the proximity to significant residential areas, including day nursery and park lands should also be considered.

The Parish Council believes that such an assessment would identify numerous sites, closer to the major road networks to which the applicants say that they need access (i.e. the A11, M11, A505) where the disbenefits and potential harm caused by siting the plant at Spring Grove Farm could be avoided.

The site will have a significant impact on the gateway to Haverhill, one of Suffolk's fastest growing towns. Investment has been made in the creation of the Research Park and Epicentre landmark building. These will be overshadowed by the massive structures and expansive footprint of this facility just a few hundred metres away.

3. Visual Impact

The plant will have a detrimental impact on its surroundings and to Withersfield due to its scale and industrial nature. The location is alongside the Stour Brook and adjacent to Meldham Wash/West Town Park, which are areas of note from an environmental perspective. Users of these areas – ramblers, occasional walkers, dog walkers etc. will see their usual rural vistas completely dominated by this massive plant with its 5 massive digester tanks, storage clamps, electricity generating plant, concreted yards, storage facilities, a pumping station to service the proposed digestate pipeline, and a metal chimney for venting and flaring off methane.

The site will be visually intrusive to many residents of the Arboretum estate, changing current views of countryside and fields with a large industrial plant.

The digester tanks at more than 7 metres in height will also be visible from parts of the village, as will the even higher flame chimney.

Heritage properties in Silver Street which currently enjoy uninterrupted historic views across the hills of Essex will have this affected by the tops of the digester tanks and by the flare-off chimney.

4. Traffic and impact on road system

Our residents are particularly concerned at the potential impact on our roads resulting from the substantial number of traffic movements – both HGV and tractor/trailers.

The access and egress onto the A1307 will require substantial works to create appropriate deceleration and acceleration lanes to accommodate safe joining to the busy highway.

HGVs leaving the site and heading west will have to head east towards Haverhill and then negotiate a full rotation of the Spirit of Enterprise roundabout in order to continue their journey. We have serious concerns that the design and size of this roundabout is not suitable for such manoeuvres, particularly as these will be frequent and continuous.

Large vehicles transporting quantities of the planned for chicken waste are likely to be travelling from the east, potentially through Haverhill and having to make a right turn across the busy A1307 to enter the site.

These indicate that there is likely to be a substantial increase in risks on this road, which is already identified as a road which has a high number of road traffic accidents and associated casualties.

In addition, we fear that there will be significant displacement of traffic on to our village roads. Silver Street in particular is a country lane of around 4 metres in width. It is already misused by HGV traffic heading towards the West Wrating warehouses – despite clear signposting in the A1307 directing HGVs to the approved route. We fear that this plant will generate additional traffic movements which will use Silver Street, Skippers Lane,

Hollow Hill, Church Street, Turnpike Hill, Thurlow Road, Queens Street and Withersfield Road as alternatives to the advised routes.

A second entrance to the site, at an expanded farm track access point in Silver Street is a particular concern as it implies that there will be a vast increase in the numbers of farm vehicle movements concentrated on the edge of our village, and causing significant damage and danger to Silver Street, and impact significantly on residents of Silver Street, Horseheath Road, and Hollow Hill, including the White Horse public House and its clientele.

5. Impact on local economy

The applicant claims that the plant will generate employment opportunities locally. We dispute this claim. Whilst there are minimal jobs created on-site, most are at remote locations – similar plants are managed and monitored remotely by computer links to distant overseas locations. Hence the benefit to the area in relation to jobs is negligible. In fact the likely impact of the plant on the research park will be negative. The Parish Council has been made aware of growing high-tech companies that will seriously consider relocating if this industrial plant is developed in this location. The net impact on jobs and to our local economy is therefore likely to be a negative one.

6. Impact on local footpaths and pedestrians:

The site of the plant will impact on current footpaths and walkways used by residents, dog walkers and ramblers.

In addition the proposed enlarged farm entrance and widened farm track required to take the volumes of silage and farm traffic will adversely impact on the current footpath from Horseheath Road heading towards Howe Wood and the Roman Road.

7. Potential Harm caused by emissions:

The Parish Council is concerned at the potential impact of odours coming from the plant. Our visit to a smaller but similar facility at Euston near Thetford did not reassure Councillors who perceived the presence of strong odours, particularly when mechanical diggers were disturbing silage and chicken waste from clamps and loading into the hoppers that feed the digester tanks. The prevailing winds will inevitably carry any odours towards the village and across the neighbouring Arboretum estate.

We have also been made aware of the potential for the emission of toxins and particulates from the plant, particularly at times when flare-offs are required. Our visit to the Euston plant confirmed that flare-offs were a not uncommon occurrence used to regulate pressure in the tanks. We are concerned that such emissions close to the Arboretum estate, which has many young families, and a day nursery and children's playground would be an unacceptable risk.

8. Noise

Based on evidence from Parish Councillors' visit to Euston, we are concerned at the impact of noise coming from the plant. This will come from the operating of mechanical

diggers on a regular and frequent basis, and from the plant required to purify methane, separate and clean CO2 and generation of electricity.

The noise levels are likely to be significant and continuous and cause significant detriment to residents.

9. Risk of Flooding

The site borders the Stour Brook and land that is identified as Level 2 & 3 flood risk. Over the last year these areas have flooded on a number of occasions. The proposed plant will involve concreting over an area of some 11 hectares resulting in a significant volume of rain water runoff that would otherwise have been absorbed by farm land, potentially overwhelming the brook.

10. Environmental impact and harm;

In addition to the noise, odours, loss of grade 2 farm land currently producing crops for food, there will be a negative impact on the local environment. The Stour Brook green corridor will be compromised, views from West Town Park (Meldham Wash) and from Withersfield village will be negatively affected, and there will be significant disturbance to wild life and plant species in the woodlands surrounding the site. We consider that scant regard has been paid to the impact on owls for instance.

We also consider that the site, which will operate 24 hours a day 365 days a year will have an impact on the night sky. It is feared that there will be a continuous glow from the site in tan area where until now there has been no artificial lights at all.

11. Health & Safety concerns:

In addition to the potential harm caused by particulate emissions, we are concerned at the risk posed by the siting of high pressure gas tanks of this scale so close to our homes. Recent examples of explosions at similar plants have caused residents to become fearful and anxious. What would be the impact of a lightning strike on high pressure methane tanks at Spring Grove Farm, sited so close to hundreds of homes on Withersfield's Arboretum estate, and countless other homes in Hanchett Village and Hanchett End.

We have seen nothing within the applicants proposal to reassure us that such an event could not take place just as readily as it did in Oxfordshire just a few weeks back.

It does nothing to reassure us that the oversight and monitoring of the facility is undertaken remotely – at Euston this was in Eastern Europe.

12. False Green credentials

Finally, we are concerned that this proposal is being presented as “green” technology, which will positively contribute to reducing the country's reliance on carbon fuels and hence help to combat global warming.

We refute this. Taking agricultural land out of the production of food and feedstuffs in order to generate methane to burn to generate electricity does not equate to a positive

benefit. Solar and wind generation – which can be achieved without many of the harms associated with this industrial plant.

In summary, we believe that the harms and benefits of this application should be carefully weighed up. We believe that the harms far outweigh any benefits and that the application should be rejected.
