

Tom Ives
6 Colbeck Road
Haverhill
CB9 7RG
26th Oct 2023

Mr Andrew Rutter
Suffolk County Council

Dear Sir,

Reference: Planning Application SCC/0045/23SE

I object in the strongest possible terms to the proposed development, at Reference, of a Biodigester plant adjacent to the Spirit of Enterprise Roundabout in Haverhill. My family and I (husband and 3 young children) live about 1km from the proposed site, my father and my mother a little closer at just under a 800m and are therefore well within the 'zone of influence' of the proposal. I set out the reasons for my objection below:

Traffic

The site would generate many hundreds additional of HGV movements on the A1307 – a road already designated as a High Accident Risk/High Casualty route. These HGV movements would cause massive congestion around the turn-off to Spring Grove farm and around the Spirit of Enterprise roundabout. In addition, thousands of 'Farm Traffic' movements, many of those of HGV character would be using local farm tracks but they have to get on to those tracks from somewhere. Silver Street is too narrow and unsuitable for additional traffic. The proposal fails to properly address the requirements of the National Policy Planning Framework Para 113 to provide a complete transport plan.

Flooding

The developer's statement that the site is in a low flood risk area is incorrect. The site borders and touches on a high risk, Zone 3 area – this includes the turn off from the A1307 into Spring Grove Farm, which flooded on 20 Oct 2023 and the Stour Brook with, to my knowledge, 4 flood events within the last 12 months in Dec 22, Jan 23, Mar 23 and Oct 23.

Amenity, Heritage & Impact on Wildlife

Haverhill Vision 2031 calls for this entire area to remain agricultural and to focus on providing green corridors for wildlife and to enhance the value of the 2 adjacent SSSIs. The proposed site tramples on that vision. The near 2000-year-old Roman Road runs through the proposed site. Building the digester would destroy that history.

The Meldham Wash area adjacent to, and downstream from, the proposed development is extremely popular with fishermen, joggers, and walkers, especially with dog-walkers 100s of whom, including myself, my children and my parents, use the area every week. The proposal puts that amenity value at risk. No containment system is perfect, there will inevitably be leaks and spillages from the site itself and the associated digestate pipeline running up towards Silver St. Any release of additional nutrients into the environment will leach into groundwater. This will lead to the eutrophication of waterways, removing Oxygen from the water to the detriment of aquatic organisms and encouraging Algal blooms. These blooms are extremely detrimental and potentially fatal to wildlife and dogs that drink the water. This would make dog walking a very high-risk activity. A classic example of this leakage is the 2018 escape of silage liquor into a tributary of the Cam from the Pretoria energy biodigester site at Chittering. The operator was recently prosecuted and heavily fined for this crime.

Inappropriate location

Haverhill is the fastest growing town in Suffolk and also the most poorly connected in the UK with bad roads and no railway. Our future growth as a town depends on attracting well paid, high-tech, modern light industry such as those companies based in the EPI Centre. This proposal would provide only a very small number of low-paying manual jobs and in the process wreck the growth of the industries we need to attract. In addition, Haverhill is growing as a dormitory town for the high-tech jobs in Cambridge. In order to maintain this growth we need to improve our transport links, for example with a light railway and a cycle way connecting the town with Cambridge. These projects would be prohibited by the proposed industrial development.

Smell

The site would smell. Evidence from similar sites already operating supports this claim. The proposal would “cover up” the storage silos and lagoons. Feedstock and digestate transportation would not have the same coverage. Moreover, the prevailing wind direction in Haverhill is westerly; the site is proposed for the eastern edge of the town thus leaving the whole town exposed to the undesirable smells on the prevailing breeze. If Haverhill is to attract people to live in the houses being built to accommodate them the town needs to be an attractive place to live. The proposed site would severely reduce the towns attractiveness to potential residents.

Noise

The site would be extremely noisy. Again, evidence from similar sites already operating supports this claim. There would be 24hr HGV movements and machinery moving feedstock around. The proposal

states that during harvest season normal agricultural hours (ie 24 hr working) would apply. However, a normal agricultural harvest season is 1-2 months in late summer and early autumn. The feedstocks they propose using would be harvested from early-May to late-October, a 6-month period of 24 hr working. This is in contravention of the National Planning Policy on Waste Appendix B Para J.

Visual impact

This would be the largest such site in the UK, each of the 5 digesters being taller than the nearby EPI centre. It is nonsense to state that the site could be screened by trees. Perhaps in a 100 years' time tress could be tall enough but they would still shed their leaves leaving the site exposed in winter. This is in contravention of the National Planning Policy on Waste Appendix B Para C.

Industry/Agriculture

The site is designated for agriculture on the local plan and comprises very high quality, Grade 2, land which could and should be used for growing food for people or animals. Figures supplied by Acorn at various public meetings vary but range from 30% to 60% of green matter feedstock and none of the necessary manure feedstock coming from the Thurlow Estate. That such a large proportion of the feedstocks have to be trucked in from off-site demonstrates that this is actually an industrial waste facility and not, as stated, an agricultural development. Moreover, beyond the built-on land, large swathes of the highest quality agricultural land would now be given over to growing feedstocks rather than food for people and animals. Furthermore, Maize is proposed as a necessary input. Local soils are not really suitable for maize but if it were to be grown it would be harvested in October during the wettest month, leaving hard packed ground vulnerable to soil erosion and water runoff causing yet more flooding.

Agricultural law does not allow 'muck heaps' to be sited alongside watercourses. This is effectively one giant 'muck heap' right beside a watercourse.

Greenhouse Gas Emissions

The state purpose of the site is to reduce overall greenhouse gas emissions. Once the high CO₂ activities of pouring concrete, manufacturing the buildings and machinery, and constructing the site are complete. There remains the issue of the requirement for thousands of diesel burning vehicle movements every year. There will inevitably be Methane leaks from the plant and Methane, of course is orders of magnitude, a more potent greenhouse gas than CO₂. The replacement of food crops with green feedstock will increase the demand for food and animal feed imports. All these factors must make any calculation of overall benefit complex and call into question the green credentials of the site.

Errors in the Application

The application is riddled with errors. Some are probably 'cut and paste' errors such as the statement that "the site being well sited for access to the A43". Others appear designed to mislead. For example, it is stated that the site is 3.8km from Haverhill Town centre. This may be strictly true but it is disingenuous at best: it is less than 600m from the EPI Centre, 600m from a major (and growing) housing estate and public house, and within 1km of a major supermarket and thousands of homes and their occupants.

Safety

That the proposed site is so close to so many homes and businesses and alongside the major entry route into the town must give question to its safety. Methane mixed with the Oxygen in air is a powerful explosive. A similar but smaller site near Oxford was recently struck by lightning. Three digesters blew up. Local residents, within a 10km radius, were told to shut their doors and windows and remain indoors due to the risk of further explosion of the remaining plant. A 10km radius from the proposed site (which is bigger than the Oxford one) would take in not only all of Haverhill, Withersfield and Sturmer but all the surrounding Villages and Hamlets to the edge of Saffron Walden, Great Abington and Fulbourn. There are more examples of exploding digesters. One in Bristol in December 2020 killed 4 workers. Fortunately, both the Oxford and Bristol digesters were far enough away from populated areas to avoid mass casualties. The Haverhill proposal is inside a populated area.

Any one of these objections should be sufficient to deny planning consent. Taken together they provide overwhelming evidence of the wrong development, in the wrong place at the wrong time. I trust that the Council will swiftly dismiss the application.

Yours sincerely,

Tom Ives