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CB9 7LW

25/10/2023

**FAO:**

Andy Rutter  
Planning Case Officer

**OBJECTION TO SCC/0045/23SE**

Dear Mr Rutter,

I am writing to strongly **object** to application number SCC/0045/23SE for Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons at Land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW

There are many valid planning reasons to refuse permission for this proposal, and I aim to highlight those I feel are of greatest and most pressing concern in this letter.

• **Energy**

The nature of the proposed development uses natural gas as part of its operations. As per Suffolk climate change partnership:

*“In 2019 our Local Authority members each declared a ‘climate emergency’. As part of this, we are working together with partners across the county and region towards the aspiration of making the county of Suffolk carbon neutral by 2030.”*

The Suffolk Climate Emergency Plan states: *“industry needs to reduce its energy use and switch to zero carbon fuels such as solar, wind and hydrogen.”* It is inappropriate, therefore, to approve a scheme utililising natural gas on an industrial level, both for the climate aspect and that the operation would be redundant within 7 years as per the regional aim for carbon neutrality by 2030. The increased traffic movement would surely also see a rise in emissions and pollution locally.

In addition to this, the Haverhill Vision 2031 outlines aims to improve the resource efficiency of local business. To introduce an additional business that draws on natural gas supplies would be detrimental to this.

- **Transportation**

The site would likely see an increase in traffic (and thus pollution - please see the above section for environmental concerns) through deliveries and the like. The increase in movement and the introduction of a new junction on a main route is not suitable. Lorry and plant movements would increase traffic and also contribute to danger on either the busy main road between Haverhill and Cambridge (which I'd like to highlight already has numerous signs indicating it is a dangerous road), or through a quiet village route unsuitable for increased HGV loads. It is simply unsafe to increase movements and to introduce another junction on a busy, fast road and in nearby villages.

- **Disturbance**

There are numerous points to highlight with regards to disturbance locally within Haverhill and Withersfield. Firstly, a reduction in air quality and an increase in odour. Other similar sites are known in their local environs to produce disgusting and far reaching smells which really impact on the day to day enjoyment of the outdoors, not to mention the independent report commissioned by the EpiCentre has highlighted how Acorn's claims with regards to smell are categorically incorrect and there will be a far-reaching impact here.

Industrial activity on this scale is sure to produce an increase in ambient noise and vibration. Acorn have highlighted this will be a 24/7 operation with seasonal changes to operations as required. There is no guarantee that there will not be an impact from noise and vibration. In addition to this, it is impossible to reduce both noise and vibrations from the movement of lorries and plant for deliveries and other movements relating to everyday operations and thus these are likely to contribute further to this.

- **Adverse effect on residential amenity**

Haverhill Vision 2031 (10.12) "*Ensure new infrastructure is visually unobtrusive and does not adversely affect amenities of adjacent areas by reason of noise, smell, overshadowing or other form of pollution.*"

Acorn have claimed that the structures will be masked with trees, however the height of the structure is not easily obscured, and thus will have a visual impact on what is otherwise a countryside setting. Not to mention the industrial nature of the buildings are not in keeping with the countryside setting. The proposal will certainly adversely impact the character of the landscape.

Above points highlight disturbances from noise, vibration, odour, and traffic. All these also contribute negatively to the residential amenity of Withersfield and beyond.

The Haverhill Vision 2031 (14.6) outlines the lack of parks and accessible green space in Haverhill as an issue. One of these rare public open spaces is the Meldham Washlands, which will essentially be lost to the town as a POS if this proposal is approved as it will be rendered virtually unusable and completely unenjoyable as public amenity space due to the aforementioned odours and other issues impacting it, as well as through inappropriate design discussed below.

- **Design**

Put plainly, the design in the proposals is overbearing, out of scale, and certainly would have a visual impact on the surrounding area.

- **Historic and Archaeological Interest**

As all the above points highlight various ways in which the proposals have an impact on setting and residential amenity, for much the same reasons the proposals would highly likely impact on the setting of historic or remains of archaeological and historic significance.

The Scheduled Ancient Monument of the Moated Site 90m South of Barsey Farm (National Heritage List Entry no. 33268) is sited a mere 1.3km south of the proposed development. I would be keen to know the thoughts of Historic England on the impact of such an overbearing and odorous development on a Scheduled site of local significance. Much the same applies to the numerous listed buildings in the immediate local area that will be directly impacted and compromised as a result of inappropriate development.

The route of a potential Roman road (Margary 24) is recorded on the Suffolk Historic Environment Record (HER) as running parallel to the A1307 directly where the proposed development is sited. The development would not only destroy potential remains but certainly negatively impact their setting and the context within which they sit.

Chance finds and archaeological mitigation in the area of Haverhill suggests that there is potential for Anglo Saxon activity in the area, as well as potential evidence from other periods. The area on and around the proposed development site has been little studied archaeologically and thus it cannot be certain that it is not sited within an archaeologically and historically rich landscape that it would potentially irreparably impact and destroy.

- **Location**

The proposed development is sited in an area of flood plain. Where is Acorn's consideration for concerns raised by the Suffolk flood risk management partnership? Is the development in line with Suffolk's Flood Risk Management Strategy?

As per Haverhill Vision 2031 (10.6) "*Haverhill is located on the Stour Brook. Flood risk mapping has been carried out, which identifies areas at risk, including existing sites and properties. This*

*will be used to inform decisions about the form and location of future development.”* This absolutely must be taken into consideration upon review of this application. Is this location the right one for such an operation?

Residents of Haverhill and Withersfield do not want to see repeats of historic flooding, especially given the changing climate and the likelihood of unpredictable weather as a result. The recent Storm Babet served to highlight the waterlogging this area is subject to, and other similar sites across the country have demonstrated that the nature of such an operation increases the likelihood of contamination of water sources.

- **Other**

Acorn claims that five jobs will be created upon the construction of the plant, however this is only five jobs to potentially benefit Haverhill, and how many of these will require skilled and specialised labour and therefore need to be recruited from elsewhere?

It is worth noting also, the above concerns and their impact on the EpiCentre and the land adjacent that has been earmarked for further commercial development. These will be rendered undesirable for office and lab space, with businesses not wanting to set up shop in an area plagued by traffic, noise, and odours. It does not seem worth the maximum of five new jobs when considering the loss of business at the larger employment site here.

I appreciate you taking the time to read and consider mine and my neighbours’ outlined concerns and I strongly and heartily urge the planning committee to reject this application and any potential future appeals relating to the construction of such a plant here.

Yours sincerely,

Kerry Boughton