

COMMENTS IN RELATION TO APPLICATION SCC/0045/23SE

**APPLICATION 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

ON BEHALF OF PETER BURRELL OF 5 HOMESTALL CRESCENT, CB9 7SB

I write in respect of the above application which has been submitted 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.

The site is located within the countryside and designated as such within the Development Plan (St Edmundsbury Area). The application site and wider area forms part of a wider area of agricultural land including small 'County Wildlife Site' to the east of the proposed access.

Core Policy CS13 (Rural Areas) confirms that development outside settlements (defined within policies elsewhere in the plan) which applies to the application site will be strictly controlled with priority to protecting and enhancing the character, appearance, historic qualities and the biodiversity of the countryside whilst promoting sustainable diversification of the rural economy.

Forest Heath and St Edmundsbury Local Plan Joint Development Management Policies Document February 2015 Policy DM5: Development in the Countryside seeks to protect the countryside from unsuitable development subject to a number of criteria. Whilst suitable development does include purposes directly related to agriculture and forestry given the large scale importation and exportation of products it is not directly related to agriculture at this location. Furthermore, the policy seeks to ensure there is no loss of best and most versatile agricultural land, no significant detrimental impact on the historic environment, character and visual amenity of the landscape or nature conservation and biodiversity interests; and there will be no significant adverse impact on the local highway network. Guidance on farm diversification is set in out policy DM31 but relates to subsidiary development or relative small scale development which does not apply to this application.

Significant concerns are raised about highways and the traffic generated from the site and its impact on both the A1307 and local roads in and around Withersfield and beyond. These concerns are supported by many local residents and businesses but also Suffolk Highways as Local Highway Authority and Cambridgeshire CC Highway Department. There appears to be a lack of detail on traffic generation with a large proportion claimed to be existing HGV/tractor traffic and it is not clear how the existing traffic has been assessed. The summer traffic generation peaks are extreme and could have a very detrimental impact on the highway network. Until these concerns have been resolved, which appear unlikely given the extent of objections, the application can not be progressed to a positive determination.

The development will undoubtedly change the appearance and character of the area which is rural and agricultural in character with conservation villages and scattering of rural properties. This significant change in character with its associated changes in activity including traffic, noise, pollution (both lighting and air pollution including odours) with impacts on local residents and also biodiversity and geodiversity, is unacceptable and contrary to policy. There are also concerns about unacceptable risk to water quality or flooding on the Stour Brook as evidence has been provided in the objections

of how the area to be developed naturally accommodates water in peak rain falls and this capacity will be removed.

The issues of odours is a significant concern to local residents and businesses. The Air Quality report does not appear to take into account the development currently being built at The Arboretum, which would lie between 240m and 320m from the site. The Report also fails to consider odours from transportation of the waste products beyond just the operational site. This is a genuine concern and would significantly impact on the character of the area and residents amenity. The claims of the applicant are not supported by evidence of other similar developments in the Country.

It is therefore considered that the proposal is contrary Policy CS13 (Rural Areas) and Development Management Policies DM5 and DM31, along with the NPPF which seeks to protect the best and most versatile agricultural land, whilst protecting the wider environment and amenity with consideration to highway safety. The application should be refused.