Acorn Bioenergy – anaerobic digestion plant

REF: Planning Application - SCC/0045/23SE
Tuesday, 31 October 2023

FAO: Andy Rutter – Case officer

I STRONGLY OBJECT TO THIS PROPOSAL AND IT's LOCATION.

In Summary: Given:

1. The risks of Odour, and drift of windborne poisonous gas exposure, fire debris towards Withersfield, Great Wratting and Thurlow.
2. The local risks to the Epicentre and housing near the site from the effects of fire/explosion/gas leakage.
3. The flood risk in the vicinity of the concreted area proposed by the development.
4. The traffic issues created by this development.
5. The inadequate information supplied by Acorn about its mitigation of the above risks.
6. Acorn proposal to deal with ALL risks AFTER CONSTRUCTION as stated in their letter [Acorn Site Safety Statement FINAL 181023] is not acceptable and I implore the Planning Authority to make it a condition that ALL Risks are dealt with during the planning stage and NOT AFTER CONSTRUCTION.
7. The lack of a clear written method of risk controls within the site including an independent review under the **COMAH** Regulations.
8. There is no acknowledgment in any of the risk statements that the "**Draft measures for biological treatment of waste**" published by the Environment Agency have been considered. See this link. /appropriate-measures-for-the-biological-treatment-of-waste

GROUNDS FOR OBJECTION TO THIS PROPOSAL:

1. Acorns mitigation and control methods are very unclear both from a design aspect and from an operational view, and that this plant would be operated with more concern for profitability than safety.
2. If safety was Acorns primary concern then they would submit voluntarily to an assessment under the COMAH regulations and their design should contain clearly defined protection methods to avoid fire, explosion and gas release.
3. It is notable that in their submitted documentation there is NO written **fire safety plan** or **Action plan fo**r dealing with **explosions or gas leakages**, or an **action plan** to deal **with accidental run off** site pollution accidently leaching into the adjacent water courses.
4. The latter **Site Safety statement** seems to have been an afterthought stimulated by the fire the Oxford Plant. This merely refers to documents that are not filed with the application e.g. "risk is managed accordingly in line with the site's health and safety management plan" but no health and safety management plan has been filed?
5. Given the area immediately next to the site is a KNOWN High **Flood Risk area** the assertion by Andrew Dannet in document [**ES Ch 10 Hydrology and Hydrogeology]** has to be questioned. His description of Meldham Washlands as "damp grassland surrounding a lake" is a travesty of its actual function. This is part of the Meldham Washlands flood alleviation scheme on the River Stour. The "LAKE" is actually a control reservoir with adjacent Newt Pond, so any impact on water flow in this area has significant implications downstream and on wild life.

SUPPORTING DATA and COMMENTS FOR MY OBJECTION

I have a background in fire protection within the commercial constriction trade where I have been a technical director of several companies responsible for ensuring that compliance with the latest standards is maintained. Whilst not directly involved in the Bio Gas industry there are many similarities in respect of Health and Safety, Fire Safety, Exposure limits for workers and protection of the environment. I have taken active interest in this planning application as I (along with many villagers) live north/west of the proposed development and are therefore directly exposed to whatever airborne leakage (accidental or due to poor management or maintenance).
When I research exposure limits, health risks in my profession I tend to look at research papers. Not just trade literature and test reports carried out by the manufacturers. As we learned in our industry following the Grenfell fire; tests reports, and assessments/ modelling based on them can be quite different from what is finally built. Professional reports prepared by experts funded by manufacturers of products can often be manipulated to the advantage of the company funding the report. This is where research papers can be less biased and gives a far more realistic view on outcomes.

With this approach I have spent a few weeks digesting the available data on anaerobic digestion plants. This appears to a much further advanced market in Europe and the USA and a relatively young market in the UK but there are clear alarm bells ringing over the way this industry has been allowed to develop with very little industry specific regulation on implementation, environmental impact and exposure limits.

As an example the planning application for the AD plant in Worton Farm Yarton (…yes that's the one that blew up earlier this month near Oxford) was originally filed in 2008
https://myeplanning.oxfordshire.gov.uk/Planning/Display/MW.013/08/#undefined
Looking at the supporting documentation from the planning authority [PLANNING & REGULATION COMMITTEE – 24 NOVEMBER 2008]. The only "safety" aspect mentioned in the application at the time was in the Cassington Parish Council objection
"Methane There is no mention of safety measures to deal with large volumes of generated and stored methane gas for the gas engine. Methane is a highly flammable gas."
And this was covered by the planning committee with this phrase:
"It is important to note that should planning permission be granted, the development would not be able to operate without an Environmental permit from the Environment Agency. ***The permit could further control other environmental aspects such as pests, gas safety measures and emissions so any planning permission need not have such conditions.***

An SR2008No3 permit was issued in 2012 but this did not require a fire prevention plan to be prepared or submitted by the operator. Clearly the Planning Committee did not see fire safety as their responsibility to consider for the proposed development at the time and the planning application was approved.

In January 2023 a planning application MW.0016/23 was submitted for this development
The applicant is proposing to erect one lightning protection mast at the existing AD facility at Worton Farm, Cassington. The lightning protection mast would comprise a slim 22m high metal column with a safe strike device at the top. The lightning mast would be a light grey colour and would be anchored via a reinforced concrete base measuring approximately 2.6m wide with a depth of 1.5m.
The proposed development is required in order to protect the AD Plant from a direct lightning strike. The selected location would ensure protection to digester tanks which contain gas generated as a result of the AD process and, in turn, reducing the risk of fire to the site and the immediate surrounding area.
So it took 11 years to conclude that a lightening strike could cause the digester to catch fire
The planning application of the lightening protection was approved in June 2023.

It seems that the Planning Committee should have thought of this at the time of the first application. As we now know the plant was struck on 2nd October 2023 (4 weeks ago).

ACORN PROPOSAL - SAFETY CONCERNS BACKGROUND DATA:

The following is taken from the Penn State university web site
https://extension.psu.edu/anaerobic-digestion-biogas-production-and-odor-reduction

Anaerobic - digesters Safety Hazards

Anaerobic digesters are *confined spaces* which pose a potential immediate threat to human life. They are designed to seal out oxygen, making death by asphyxiation possible within seconds of entry. Toxic gases such as hydrogen sulfide and ammonia accumulate inside a digester. Never enter an empty digester without extensive venting with mechanical fans, checking for toxic gases with gas detection equipment, and following safe entry procedures. Natural ventilation is not enough to remove toxic gases from the digester or to provide sufficient breathable air. Dense hydrogen sulfide gas will sink to the bottom of the tank, lighter ammonia will linger in the top of the tank, and neither gas will escape without mechanical ventilation. Moreover, methane is explosive when mixed with air in concentrations of 5 to 15 percent. A leak in a gas line will create a fire hazard.

Anaerobic digesters are at least as dangerous, if not more so, than manure pits. For more information about safety concerns associated with anaerobic digesters, call the National Institute for Occupational Safety and Health at 1-800-35-NIOSH. See Penn State Extension Fact Sheet, Manure Storage Hazards, for an outline of safety procedures for entering manure pits.

With the above I mind I have grave safety concerns about the proposed development just to the West of Haverhill. If this process is as safe as Acorn say, can they explain why in America they consider this process as a "high risk of Death" to anyone working in these facilities ? Towards the end of the link it states:

Because biogas is a potentially dangerous gas, safety devices such as gas detectors, flame traps, physical barriers, and warning signs (Figure 4) control and minimize the hazards of biogas and manure storage

Figure 4. Example of a warning sign placed outside an anaerobic digester.

WILL FIRE EVER HAPPEN

Clearly it can as the fire at Worton Farm Yarton Oxfordshire has demonstrated see:
https://www.youtube.com/watch?v=IGAdT-S5g0E

LEAKAGE VIA CRACKS or loose pipe connections in the PLANT

This German research paper also expresses concerns over the safety of Biogas Including explosion and poisoning.

https://www.sciencedirect.com/science/article/pii/S1877705814017548/pdf

One of its conclusions is the safety distance from accumulated cracks in the digesters system these can occur from poor maintenance or lack of a regular inspection regime.

In Fig. 10 the concentration of hydrogen sulfide for different crack length is shown as a function of distance. The ERPG-2-Threshhold of 30 ppm H_2S is marked as dotted line. Fig. 11 shows the concentration of biogas and the LEL, respectively. It is clearly seen, that the ERPG-2-Threshold requires a larger safety distance of about 180 m for a 4 m crack. For biogas with significant quantities of H_2S the danger of poisoning has priority with respect to the risk of explosion of the gas cloud in case of damage of fermenters and gas buffers.

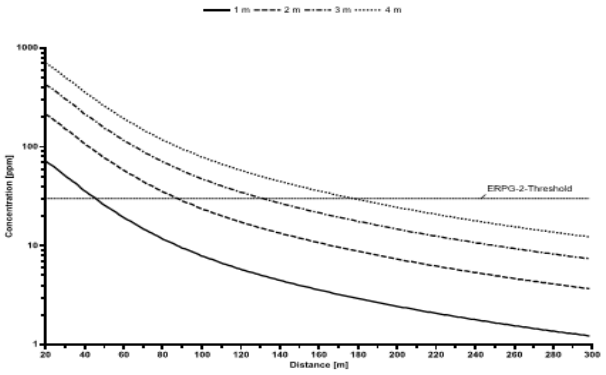


Fig. 10. Concentration of H_2S against distance for different lengths of cracks.

The Epicentre Office & research development is only 231m away from the site

The ACORN planning statements make no mention of the COMAH Regulations

COMAH15 implements the Seveso III Directive, except for the land-use planning requirements, which are implemented by changes to planning legislation. COMAH15 replaced the Control of Major Accident Hazards Regulations 1999 (COMAH99) and came into force on 1 June 2015.

It is fairly clear to me that an anaerobic digestion plant based on a design that has experienced a number of fire events across the world and been prone to leakage of gases that have led to the deaths of the workforce MUST be independently appraised under the COMAH Regulations. There is clearly many of the risks associated with the petro chemical industry present in this facility. It should therefore be assessed using the same regulations that apply to all industrial processes that produce and process **volatile gases with known risks to workers and visitors and residents around the plant**.

LIGHTNING PROTECTION:

Acorn Site Safety Statement FINAL 181023

It appears from this document that Lightning strike was not considered in the initial planning statement. Yet risk this was well known in the industry.

A research paper : **SYMPOSIUM SERIES NO 166 HAZARDS 29 © 2019 IChemE**

Says: "*There have, however, been further significant incidents in which fatalities could have occurred but were avoided. For example, in 2016, a commercial AD facility in Oxfordshire was struck by lightning causing loss of the biogas roof and a fire to start at the top of the digester. The plant did not have a lightning protection*

system installed, which may have prevented this. However, it did have a suitable secondary containment system that prevented loss of containment of the small amount of substrate entering the local water receptors"

The retrospective Acorn letter regarding Lightening protection dated 23/10/2023 says
Lightning strikes are extremely rare, and there is currently no statutory requirement in the UK to provide lightning protection to buildings. However, Acorn will prepare for this eventuality by designing the digester tanks with effective lightning protection. Acorn's sites will be voluntarily compliant with the BS EN 623051 standard for lightning protection as a critical part of these control measures. Further, whilst the explosion in Oxfordshire was unfortunate, there was no loss of life or damage beyond the gas site itself.

The only reason there was no loss of life is that the Oxford site was nowhere near residential properties (in an ex-quarry site.) What about the clouds of smoke and dust that caused the fire service to issue a "stay indoors" warning to any nearby inhabitants.

In its latest filed document Acorn goes on to say:

It is crucial to Acorn's values that we meet the highest health and safety standards throughout the operation of the proposed plant. In addition to the lightning protection referred to above, the site will undergo a DSEAR 2 study which accounts for gas presence on site, and how gas safety is managed on site. This includes quantities and likelihood of exposure which then designates ATEX 3 zones. Within these ATEX zones, risk is managed accordingly
in line with the site's health and safety management plan and only certified equipment for these zones can be installed and operated, which must be installed by trained & certified personnel. Once operational, only authorised personnel will be allowed into the ATEX zones, and they will be clearly marked on site. This includes areas around the gas domes,
key valves and gas processing line. This practice will control and prevent alternative sources of ignition, and particular attention will be given to the correct use of electrical equipment in these zones, for example, lighting, mobile phones and plant electrics. No smoking on site will be allowed and all footwear will be required to be anti-static.

There is no detail of how the lightening protection will be achieved or how Acorn will monitor drivers and staff to ensure they comply with the measures they have outlined.

There is no mention in the ACORN letter of a "*suitable secondary containment system that prevented loss of containment of the small amount of substrate entering the local water receptors"*

The ICHME **SYMPOSIUM SERIES NO 166 HAZARDS 29 © 2019 IChemE** paper goes on to say:

"The materials of construction of process tanks also impact environmental risk; these can vary from stainless steel, glass reinforced plastic or concrete poured in-situ. Due to the corrosive nature of the hydrogen sulphide in the biogas, specialist coatings are required within the headspace of tanks to protect them. The continuing inspection of these is not always followed stringently – especially if a vessel is insulated. Loss of containment can also arise due to foam formation within the digesters. As a biological process with gas generation, foaming cannot be eradicated, but a large amount of foam can lead to overflow of tank contents or the blocking of biogas pipes leading to overpressure within tank headspaces.

Controlling foam requires the close management of feeding and feedstock selection, as well as the addition of de-foaming additives when required. Some sites have installed specialist foam detectors to alert operators or automatically add de-foamer, but this is not universal practice. ***Fundamentally, not having the necessary controls commonly comes down to developers and designers pushing to reduce costs, although deficiencies in regulatory controls and lack of knowledge across the industry also plays its part****.*

For example, ***if an agricultural AD plant is only feeding farmyard manure and energy crops (i.e. not defined wastes), there is no regulatory requirement to install secondary containment*** *– hence it is rarely done.* ***While this may be shocking to some, the reasoning behind this is that a farmer building a new slurry tank would not have to install a bund, and the potential extra cost can be a significant barrier to preventing development"***

The above risks are exactly why this process should be sited well away from ANY other inhabitants that would be at risk from the explosion caused by lightning strikes. People are inherently lazy when it comes to obeying safety rules so to mitigate this you have to consider alternative methods of enforcement. There is no hint that such enforcement has

been considered by Acorn to implement its proposals to prevent staff or drivers using their mobile phones or other sources of ignition. How exactly does Acorn propose Anti-static shoes to work? This is not exactly a laboratory environment.

This is a note from an antistatic shoe supplier:

"MIL-HDBK-263B Appendix 1 page 101 40.1.2 states, "Conductive shoes, shoe covers, or heel grounders should be used to discharge personnel on conductive floors. These items should only be worn in the ESD protected areas and should be kept clean so that contaminants do not inhibit their conductive interface with the floor."

What I find deeply concerning about the ACORN latest letter (**Acorn Site Safety Statement FINAL 181023)** is the following statement:

*"To bolster our practice, **we will also consider, once constructed**, how climate change might affect our operational business. In line with UK government guidelines, our risk assessment will consider the impact of a 2°C rise in global average temperatures by 2050 and how will affect the resilience of each individual site. **This assessment will consider additional risks including but not limited to wildfires, power failure, heavy snow fall**. This risk assessment will be assessed by the Environment Agency as part of the Environmental Permit for each site and will contribute to our site safety management procedures."*

This is simply NOT acceptable these risks should be considered BEFORE CONSTRUCITON even BEGINS indeed is this not what Planning Approval should check on BEFORE construction starts.

ACRON PROPOSAL - SMELL – OR NO SMELL

https://www.odournet.com/environmental/industry-sectors/biofuels-and-ad/

Clearly there are odour issues and the above link is a site of a company that tests plants for odour If there was no risk there would be no need for this company's services.!!

These links are the experiences of several locations around the UK.

https://www.wiltshiretimes.co.uk/news/20212162.unpleasant-smells-malaby-biogas-plant-concern-locals/ The link is an example of the odour issue affecting local residents in Wiltshire.

Warminster Town Council is to contact the Environment Agency after residents living near Bore Hill Farm complained about the 'unpleasant smells' coming from the Malaby Biogas bio digester plant.

https://www.chroniclelive.co.uk/news/north-east-news/investigation-launched-over-foul-smell-27294284

A probe has been launched into reports of a "foul smell" from a Tyneside waste plant.
The Environment Agency (EA) is investigating the source of a stench around the Wardley Biogas Plant at the Follingsby Park industrial estate.
Jarrow MP Kate Osborne aired concerns about the smell on Monday, saying it was forcing nearby residents to stay indoors and could be detected as far away as Leam Lane and Felling.

https://www.mrw.co.uk/news/ad-plant-operator-fined-26000-for-odour-02-03-2023/

An anaerobic digestion (AD) company has been ordered to pay fines and costs totalling almost £26,000 after failing to control odour from one of its plants.
South Tyneside magistrates court heard that Bio Construct New Energy's plant at Wardley Colliery released unregulated gases into the air, affecting local residents.
Andrew Turner, area environment manager at the Environment Agency (EA) in the north-east, said:
"We understand how awful it is for residents to suffer when waste sites fail in their obligation to ensure there is no odour coming from their sites."
In June 2020, the EA received more than 25 complaints about smells coming from the plant, with officers attending to verify the reports.

ACORN - PROPOSED INCOMING WASTE UNLOADING AND STORAGE

Unlike the Anaerobic Digester at Worton Farm Yarton (the one that blew up recently) the proposed means of unloading and storing incoming waste ahead of processing is totally inadequate. Acorn proposes open air unloading into open "clamps". The "feedstock" will

held under a sheet in these clamps and the stench on a hot day will be significant. This is even before the process starts.

ACORN PROPOSAL – Waste storage issues, prior to Processing:

3.22 Feedstock would be unloaded into the three silage clamps, manure reception shed and straw building as appropriate.

3.23 Crop silage and grass would be unloaded and stored in the silage clamps, which would be constructed with pre-cast 3.16m high concrete U-shaped wall panels filled with earth for additional strength. ***The clamps will have a hard wearing and acid resistant rolled asphalt floor and be fitted with a protective sheet to preserve the feedstock and reduce odour. The clamps will have a liquid drainage and collection system for dirty liquid run-off and this would be pumped directly into the buffer tanks for feeding back into the process****.*

3.24 Loading shovels would also be used to transfer the crop silage from the clamps to the feed hoppers, which would be equipped with walking floors. Loading shovels would also be used to transfer feedstock from the chicken shed and straw bunker into the feed hoppers.

Exactly How does a protective sheet reduce odour ??? and where does the "run off" drain to when rain storms hit the site ? Asphalt is porous, soft NOT hardwearing and prone to damage by scraping so is NOT a suitable base. Leaching into the sub soil would be highly likely.

Manure Reception Shed	Storage of poultry litter and farmyard manures. To be partly clad in green under a fibre cement roof or clad using an alternative colour agreeable to the LPA.	26.0m x 19.5m x 6m to eaves, 8m to ridge
Straw Building	To be partly clad in green under a fibre cement roof or clad using an alternative colour agreeable to the LPA. Straw storage building including bunker and processing.	54.5m x 16.05 x 6m to eaves, 8m to ridge 18.7m x 16.05m
Silage Clamps (x3)	The three silage clamps will be constructed with pre-cast 3.16m high concrete U-shaped wall panels that are filled with earth for additional strength. The clamps will have a hard wearing and acid resistant rolled asphalt floor. The clamps will have a liquid drainage	Clamp 1,2,3 – 78.75m x 52.5m wide wide x 3.52m high

There are NO details about the Manure reception shed is this just a roof or is it open sided, how does the door seal to retain chicken litter odour during hot weather? **There is simply no information on odour control for the solid waste reception and storage.**

COMPARE THE ACORN PROPOSAL WITH THE WORTON FARM YARTON DIGESTER:

See Oxford CC planning application 08/01781/CM

The **Supporting Statement 97WFAD/1** states:

2.1. Solid waste would be delivered to the site in both refuse collection vehicles (RCVs) and bulkers. Liquid waste would arrive in tankers. All delivery vehicles would be weighed on the weighbridge and would then proceed into the reception building through speed doors. Sensors would identify an approaching vehicle and open the door, which would then automatically close once the vehicle is within the reception building. In this manner the negative pressure that the building and internal storage tanks are maintained under would be regained.

2.2. Solid waste would be delivered from the vehicle into a bunker with a moving floor. Once the load is deposited, the roof to the reception bunker closes and the moving floor would convey the waste to a screw conveyor and screw screen for pre-treatment before being pumped to the primary digester.

2.3. Liquid waste would be discharged from the tanker within the reception building via a pipeline to a storage tank. Fumes from delivering tankers would be extracted through the biofilter, and once the load has been

discharged the rear of the tanker and the pipework would be washed down if necessary.

2.4. Vehicles would leave the reception building through another speed door, which would close and the building would regain its negative pressure. The reception building would be subject to between two and five air changes per hour (depending on activity). The air would be treated through a wood and bark biofilter before venting to atmosphere.

In the planning application 08/01781/CM the planning statement says:

3.4.1 All transfer of waste materials from the reception building to the subsequent stages of the process would be within fully enclosed pipework. The externally sited tanks are completely sealed to facilitate gas collection and to eliminate odour release. No waste would be directly exposed to atmosphere. The only emission from an anaerobic plant would be from the biofilter at a rate of 1,200 odour units per cubic metre. For comparison purposes an open air composting operation would produce approximately 9,000 odour units per cubic metre. Once the product has been through the process it is virtually odourless.

The Worton Farm Yarton Digester was designed to process 26,000 tonnes of waste pa

Acorn is proposing to process 92,000 tonnes of waste pa, and yet the Acorn proposal for odour prevention is nowhere adequate given it is such a large AD.

ACORN PROPSAL LOCATION ISSUES

Flood risk

As can be seen from the Government flood risk map the site is in high flood risk area. Any flood would therefore naturally run through the site towards the adjacent water park to the east of the site.

This water park (arrowed) is the Haverhill Washlands flood storage reservoir.

See this link: Haverhill Washlands

"*The flood storage reservoir has proved to be a big success for the town. If it had not been there then Haverhill would have been badly flooded in 2001 when the reservoir came close to being full. This demonstrated just how much water was diverted from the town and its houses*".

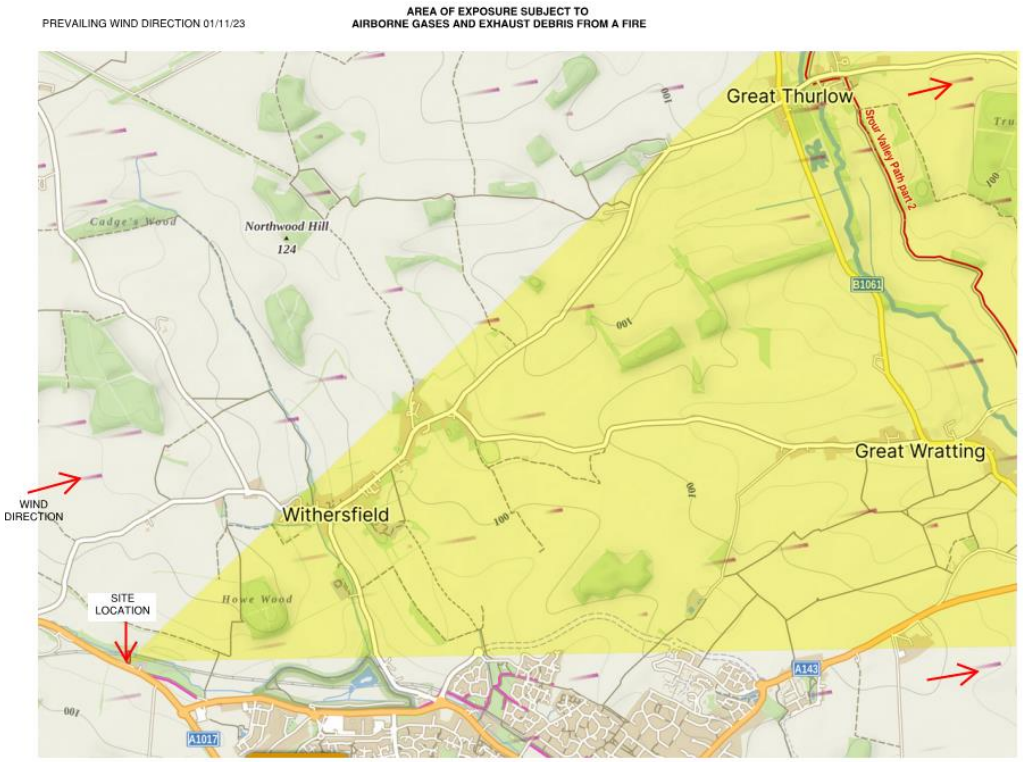
With the recent increase in flood events due to climate change it can only be even more important that that this floor prone area is not affected by this development.

However, covering 12.5ha of agricultural land with concrete is NOT going to help.
The Washlands also contains a NEWT POND and in 2020 this was threatened by the hot weather which significantly reduced oxygen levels in the pond Defra-Haverhil Newt Pond
And this site: fish rescue plan Haverhill NEWT POND

Air Quality issues: IMPACT on SURROUNDING AREAS

Withersfield, Thurlow, Haverhill NW. Great Wratting. Little Wratting.

All the above villages are in the prevailing downwind direction from this development.
Any leakage, Odour or gases/dust/debris from a fire/explosion at this development would be sent airborne directly towards these areas.
The predominate winds direction is from the West/south West towards the East/North East



ACORN - PLANNING STATEMENT

The proposed plant is south west of Withersfield, Great Wratting, Thurlow and NE Haverhill, and this is the predominant wind direction so any odours will directly impact these areas.

We had the same issue with the meat factory in Great Wratting had issues with animal waste smells when there was an easterly wind (until it burned down) so we are well aware of the potential issues of Odour.

No mention of prevailing wind conditions is made in the planning statement and as there is no mention of COMAH regulations being applied to the design **what are the risks of Hydrogen Sulphide leakage and fire and toxic smoke heading towards our homes.**

Acorn Bioenergy – anaerobic digestion plant

From Science Direct web site:

anaerobic digestion creates Hydrogen Sulphide

Hydrogen sulphide (H_2S) is a colourless gas with a strong odour of rotten eggs. Exposure to hydrogen sulphide may cause irritation to the eyes and respiratory system.

It can also cause apnoea, coma, convulsions; dizziness, headache, weakness, irritability, insomnia; stomach upset, and if liquid: frostbite. Workers may be harmed from exposure to hydrogen sulphide. The level of exposure depends upon the dose, duration, and work being done. Hydrogen sulphide is used in many industries. For example, it's used to produce textiles. Some examples of workers at risk of being exposed to hydrogen sulphide include the following:

- *Factory workers in plants where rayon textiles are manufactured*
- *Petroleum and natural gas workers involved in drilling and refining*
- *Workers in wastewater treatment industries*
- *Agricultural workers on farms with manure storage pits or landfills*

The half-life of hydrogen sulphide in the air is fairly short. It is photo chemically reactive so the exact half-life is dependent upon the time of day, the brightness of sunlight and the time of year. The time for half of the hydrogen sulphide to degrade typically ranges from around 12 hours to 36 hours. ***One of the biggest dangers of hydrogen sulphide is that it can saturate your odour receptors after which you no longer can smell the hydrogen sulphide until your odour receptors have a chance to reacclimatise after being removed from exposure****. Exposure to concentrations above 150 ppm will quickly eliminate your ability to detect hydrogen sulphide.* ***Prolonged exposure to 50 ppm can result in death.***

Yet this is the "rotten egg smell" that is most commonly complained about from such plants. However after short term exposure the smell appears to stop and this not because it has cleared but because the nasal receptors get saturated.

Villagers to the East/North East of the Acorn development may not be able to smell it even its' there!! This is what will be carried in the wind towards them should leakage occur. What reassurances can Acorn give about this given the location of the proposed plant and the prevailing wind direction?

VILLAGE TRAFFIC ISSUES

Potential Traffic Issues

Apart from the obvious traffic potentials particularly along the B1061 where farms between Newmarket and Haverhill are clearly going to use this route to the proposed plant and head down through Withersfield. Farms along the A143, between Bury St Edmunds and Haverhill will not go through Haverhill but probably turn into the B1061 and then left along Withersfield Road in Great Wratting and then through Withersfield. Many of these roads are over Victorian brick culverts that would be seriously structurally affected by heavy traffic

Regards

Lee A Roth

[redacted]

Naoussa House, Withersfield Road, Great Wratting, Suffolk, CB9 7HD