

To: Andrew Rutter, Case Officer, Suffolk County Council

Application Number: SCC/0045/23SE Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons

Applicant: Acorn Bioenergy Limited/Thurlow Estate

Dear Sir,

I strongly object to the above mentioned application for the proposed development of an anaerobic digester at Spring Grove Farm, Haverhill based on the risks to the environment.

The Environment Agency's report, A Review of Environmental Incidents at Anaerobic Digestion (AD) Plants and Associated Sites between 2010 and 2018 dated September 2019, available at [Document template: green report \(environment-agency.gov.uk\)](https://www.environment-agency.gov.uk/document-templates/green-report), highlights over thirty environmental incidents involving anaerobic digesters.

The report highlights how human error led to pump being left on overnight and 300m³ of digestate being lost from an overflowing storage tank, with up to 100m³ being lost offsite. It also details how a pipe that had broken free while digestate was being pumped resulting in liquid digestate being lost into a local ditch, and at the same site, secondary containment measures had failed to contain 3,500m³ of digestate that was overpumped from a digester.

This evidence shows that the risk from human error, mechanical and infrastructure failings are possible. With the streams that flow through the Spring Grove Farm site, any loss at all has a high probability to enter the water way and into Stour Brook, placing a risk to stream ecosystem as well as people and animals that come into contact with it, and thus the consequential impact of such failings being high.

The same report uses the quote below from an HSB Engineering Insurance Limited document titled Anaerobic Digestion: Plant Operation Risk Management. A Guide to Loss Prevention:

"Anaerobic digestion plants may experience significant loss events during operation resulting from damage to operational equipment, structural collapse, fire, flood or theft. These events can often result in lengthy periods of process downtime, with a consequential loss of revenue, clean-up costs, risk of local pollution and a resulting drop in local community confidence and support for the project; which can be difficult to rebuild."

Whilst the Environmental Agency's report was produced to help industry understand root causes of failure so that they can review their own operations in order to prevent incidents and pollution, the lack of Acorn Bioenergy's ability to point to a track record of delivering safe operations without such incident is cause for grave concern.

Yours sincerely,

David Harfield