

Planning Application - SCC/0045/23SE

Land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW

Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons.

RESPONSE FROM WITHERSFIELD PARISH COUNCIL

The Parish Council objects to the application on a number of grounds, which are listed below.

The Parish Council has consulted widely with local residents including through a special meeting of the Parish Council attended by some 75 parishioners. It is a great disappointment that the applicant failed to attend this meeting to present their case, hear local concerns and answer questions. The Parish Council considers that this was at best a discourtesy and at worst a disregarding of the statutory consultee status of the Parish Council.

Overall Summary

Withersfield Parish Council, following consultation with residents strongly OBJECTS in the strongest possible terms to the proposed biodigester at Spring Grove Farm as the proposal conflicts with local and national planning policies and will cause significant and demonstrable harm to our parish and the lives of its residents.

Furthermore, whilst we recognise there may be some very limited benefits, these are significantly and demonstrably outweighed by the adverse impacts of the proposal. Suffolk Country Council are therefore, urged to refuse the application. The Parish Council's grounds for objection are set out below.

It is also noted that the information supplied by the applicant is in many instances conflicting, inaccurate or in some instances not related to this application site at all. The Parish Council have invited the applicant on more than one occasion to explain the project and answer questions to clarify issues, but it has declined to do so.

Instead, the applicant sought a "private meeting" with Parish Councillors, which we considered to be inappropriate, as we follow rules of good governance and transparency. Such a private meeting in our view would have conflicted with the Nolan "Seven Principles of Public Life"; selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

Whilst the applicant held a public event on the 1st November 2023 its representatives were unable to offer any detailed information that clarified issues raised by residents or in the applicant's application submission documents. In the circumstances Parish Council would question whether the applicant has portrayed the proposal and its impacts or alleged benefits accurately. Should further information be submitted prior to the determination of the application then the Parish Council may submit further comments to the Council.

Consulted policies as grounds for objection:

In assessing the application, the Parish Council has had regard to the policy context that the

application must be assessed against. This included the following:

- St Edmundsbury Core Strategy, adopted 2010 (CS)
- Haverhill Vision 2031, adopted 2014 (HHV)
- Rural Vision 2031, adopted 2014 (RV)
- Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document, adopted 2015 (JDMPD)
- West Suffolk Council Strategic Flood Risk Assessment, April 2021.
- National Planning Policy Framework, September 2023
- Planning Policy Guidance – GOV.UK
- National Design Guide, January 2021
- National Planning Policy for Waste, October 2014
- Overarching National Policy Statement for Energy (EN-1), July 2011
- Powering Up Britain, H M Government, March 2023
- Powering Up Britain: Energy Security Plan, H M Government, March 2023
- Powering Up Britain; The Net Zero Growth Plan, H M Government, March 2023
- Renewable National Policy Statement plus 5 revised NPS including Gas Generation
- National Food Strategy (Rec 8-10 relate to making best use of land)

The Parish Council is aware that St Edmundsbury Core Strategy and Joint Development Management Policies Document have been subject to a policy review undertaken by West Suffolk Council in July 2020 to determine compliance with national planning policy. We understand that the policies in both the Core Strategy and JDMPD were found to have a high degree of compliance with national policy and therefore, we would contend that great weight should be attached to the policies in decision making – and in particular in respect of this application.

We have also had regard to the Withersfield Draft Neighbourhood Plan, which is currently subject to final consultation prior to its adoption.

Potential Benefits of a biodigester proposal:

The Parish Council acknowledge that there may be some very limited benefits arising from the proposal. Environmental benefits include the generation of biomethane from farm waste and the production of fertiliser from the digestate. However, this is discounted by the need to transport feedstock from a wide area by vehicles and the resulting biomethane to Milton Keynes. If the vehicles were powered by bio methane this would reduce the amount of biomethane that would be added to the national energy supply. Furthermore, good quality agricultural land would be taken out of food production to grow the feed stock. Consequently, the environmental benefits are likely to be substantially less than stated by the applicant.

In terms of any economic benefits, the proposal would create very few jobs and, from similar plants elsewhere, it is highly likely the majority would not be located locally or even in this country. Furthermore, existing local businesses have indicated they would consider relocating if the proposal was allowed, thus leading to a potential net loss of jobs. It is also considered that any temporary benefits arising from construction of the plant would be limited since the specialist nature of the development would be likely to be built by specialist constructors rather than local builders. The economic benefits are therefore extremely limited.

There are no social benefits of the proposal. A biodigester located close to a major gateway to one of Suffolk's major towns and close to a large existing and forthcoming residential development would not help to support a strong, vibrant or healthy community. The site is located within an area that is utilised by local residents for informal recreation and the development would not reflect current or future community needs or support the community's health, social or cultural well-being.

The Parish Council therefore contends that the actual benefits arising from the proposal are very limited and, as set out below, that the adverse impacts of the proposal would significantly and demonstrably outweigh the benefits. In accordance with paragraph 8 of the NPPF, when assessing the proposal against all of the policies in the NPPF taken as a whole, and the development plan the application should therefore be refused.

Grounds for Objection:

The Parish Council has carefully considered the proposal and sets out below our objections under a number of topics.

Compliance with national statutory planning frameworks, policies and guidance:

The proposal conflicts with policies in the St Edmundsbury Core Strategy and Local Plan, the National Planning Policy Framework and other (national) planning guidance. The adverse impacts of the proposal would significantly and demonstrably outweigh the purported benefits claimed by the applicant for the reasons set out below.

1. The Local Plan

The proposal is contrary to the policies set out in the St Edmundsbury Local Plan. The proposed development is a large industrial scale waste processing and power generating facility which is inconsistent with the designation of the land within the Local Plan.

It is also inconsistent with the Haverhill 2031 vision document and with the St Edmundsbury Environmental strategy which designates the area as part of or bordering the Stour Brook Green Corridor.

2. Location and landscape:

The site of the proposed industrial development is on land which is outside of the settlement area, is designated as agricultural within the countryside and we believe should therefore be protected from developments. It is not allocated for any form of development and is clearly not envisaged, designated nor considered appropriate for industrial development.

CS Policy CS4 sets out the policy for settlement hierarchy and identity and the supporting text acknowledges a high proportion of new housing and employment development in the borough will be located in rural areas. However, it goes on to state that additional growth in the rural areas will be dependent upon the capacity of the natural and built environment to accommodate development without unacceptable environmental harm being caused.

The CS also recognises the need to protect settlement identity and the danger of erosion of the separation of between settlements. Policy CS4 and the accompanying Proposal Map shows the site to be in the countryside.

The Withersfield Parish is a mix of conservation village, isolated historic farms and heritage buildings and an area of modern family housing bordering a research park. No part of the Parish has been considered appropriate to be zoned for development of industrial, waste management or power generation plants. This proposed AD development would introduce a large commercial and industrial development into rural countryside with intrinsic character and beauty. The buildings are not of a traditional design but are large industrial structures

alien to this rural location. The proposed lagoons would also be incongruent within the rural environment. This would have a severe and lasting adverse impact on rural character and appearance of the area. The proposal is therefore contrary to CS policy CS 4.

Furthermore, the site is adjacent to the principal entrance road to the town of Haverhill from Cambridge, the M11 and A11. As such it is a gateway site where the National Design Guide advocates the need for development that responds to existing local character and that “are visually attractive and aim to delight their occupants and passers-by”. The scale of the proposed development and its location close to the A1307, together with its functional and industrial design means the development would have an adverse visual impact in this gateway location and would not reflect the local character. It therefore conflicts with the National Design Guide, the NPPF which seeks to ensure well designed developments and Policies DM2, DM5 and DM6 of the JDMPD.

In addition to the proposed site not being designated within planning policies for such a development, the Parish Council believes that the applicant has not sufficiently met the test of demonstrating why this site, rather than others has been selected for this facility. We believe that the applicant should be required to undertake and submit a full sequential site assessment which clearly sets out the requirements and evaluates a range of potential sites against these criteria. That assessment should also assess the potential disbenefits and harm associated with each potential site. The site appears to have been selected by the applicant based primarily on the benefit this location offers the developer in terms of access to a major road to facilitate transportation of materials to and from the plant. However, the applicant fails to consider that the proposed site is situated in Flood Risk Zone 2 and Flood Risk Zone 3. As an installation requiring hazardous substance consent, this site is regarded as unsuitable for such a development. The applicant also fails to review other potential sites, as is required as a condition of the Environmental Impact Assessment.

Whilst access to a major road to facilitate transportation of materials to and from the plant, may be a criteria, the proximity to significant residential areas, including a day nursery and park lands should also be considered.

The Parish Council believes that such an assessment would identify numerous sites, closer to the major road networks to which the applicants say that they need access (i.e. the A11, M11, A505) where the disbenefits and potential harm caused by siting the plant at Spring Grove Farm could be avoided.

There are concerns that the proposed development will have substantial adverse effects on the landscape and impact on amenity. The proposed development would be incongruent with the rural landscape, affecting the countryside’s intrinsic character and beauty. As such, the proposed development is incompatible with both local and national plans.

We have read the objection raised to the development by the Suffolk County Council Senior Landscape Officer, the summary of which states:

“The approach to the delivery of the project is currently too engineering-led and not appropriate for the countryside location. While elements of the submitted Landscape Strategy are welcome, opportunities for the creative integration of the proposals into the landscape are being missed. Therefore, I cannot support the proposals in their current format, in landscape terms. In order to make the proposals acceptable in landscape terms, the integration of the scheme into the landscape should be based on landscape-led design that is appropriate for the

landscape and in proportion to the proposed scheme, provided by a suitably qualified Landscape Architect”

We also note that the Cambridge City Council objection to the proposed development strongly argues that the value of the landscape and the sensitivity of receptors has been understated by the applicant.

Furthermore, Suffolk Minerals and Waste Local Plan (July 2020) Policy GP4 states that minerals and waste development will be acceptable **so long as** the proposals, adequately assess (and address where applicable any potentially significant adverse impacts including cumulative impacts) on the following:

- a) pluvial, fluvial, tidal and groundwater flood risk;
- b) vehicle movements, access, and the wider highways network;
- c) landscape character, visual impact, setting, and designated landscapes including Areas of Outstanding Natural Beauty and the Broads;
- d) biodiversity including Natura 2000 sites, ancient woodlands, and trees;
- e) geodiversity;
- f) historic environment, archaeology, heritage assets and their setting;
- g) public rights of way;
- h) neighbouring land-use;
- i) soil resources including the best and most versatile agricultural land;
- j) noise and vibration;
- k) air quality including dust and odour;
- l) light pollution;
- m) the local water environment;
- n) land instability;
- o) airfield safeguarding;
- p) the differential settlement of quarry backfilling;
- q) mud and aggregates on the road;
- r) litter, vermin, and birds;

The Forest Heath and St Edmundsbury Local Plan February 2015, Policy DM5, highlights that “Development in the Countryside Areas designated as countryside will be protected from unsustainable development.” Policy DM5 (g) states: there will be no significant detrimental impact on the historic environment, character and visual amenity of the landscape or nature conservation and biodiversity interests.

The AD plant, pipeline, and lagoons present a significant detrimental impact of the historic environment, character, and visual amenity of the landscape and are not compatible with these policies:

MAIN SITE

In their assessment of the landscape, the applicant categorises the landscape value as undesignated and as having community value only. This misrepresents the value of this location and the landscape which has in fact been identified in local policy (Policy HV18 in Haverhill Vision 2031) as strategic green infrastructure, and specifically identified as the Stour Brook Valley Green Corridor, to be maintained, protected and enhanced. Thus, the applicant’s proposal does not reflect the landscape strategy for this gateway area which is to conserve the rural nature of the landscape and limit further urbanising influences. To detail this further, St Edmundsbury Green Infrastructure Project Strategy policy states that “*Green*

Infrastructure assets contribute to a high quality of life and allows access to nature, wildlife to thrive, culture and communities to flourish and adaptation to climate change for people, habitats, and wildlife species". It highlights the opportunity to improve the 'gateway' into Haverhill at the Spirit of Enterprise roundabout and emphasises that the area around Spring Grove Farm should focus on conserving and enhancing the network of woodland and hedgerows. Green Infrastructure is considered a valuable and precious asset, particularly because Haverhill is reported as having an accessible green space deficiency. The proposed development would contravene this. The Green Infrastructure policy also seeks to extend the coverage and connectivity of the Stour Brook Valley Green Corridor, conserving and enhancing the Meldham Washlands greenspace, as a cultural landscape and ecological asset/habitat, and also in order to address sustainable water and resource management. This makes the location highly salient in terms of flood risk management, and the applicant's proposal would also contravene this, since the development involves converting agricultural fields located within Flood Zone 2 and Flood Zone 3 to impermeable hardstanding.

The report states that *"Strategic Flood Risk Assessment (SFRA) identifies Green Infrastructure as a key opportunity to provide strategic surface and fluvial water management measures to assist in reducing the levels of flood risk across the catchment."* The specific opportunities it identifies in relation to the Stour Brook Valley Green Corridor include strategic flood risk mitigation at the Meldham Washlands, north of Haverhill (also known as West Town Park). Crucially, the SFRA advises the borough to avoid any development in areas within Flood Zone 2 and 3. These areas are promoted as ideal green infrastructure sites and particularly if any development is considered. The applicant's proposal sites the AD plant substantially within Flood Zone 3, as is shown in their Flood Risk Assessment and Surface Water Drainage Statement Strategy (10/09/2023). This contravenes the Strategic Flood Risk Assessment which advises against any development in areas within Flood Zone 2 and 3.

The proposed AD will harm the Green Infrastructure, an asset which provides a catalyst for sustainable growth of Haverhill, creates a strong sense of place, attracts inward investment, promotes sustainable travel, supports the local economy, protects sensitive habitats, and conserves and enhances local variations in landscape character. It will also harm the strategic flood risk mitigation at Meldham Washlands (West Town Park) and be contrary to the aims of avoiding any development in areas within Flood Zone 2 and 3. It is also important, as set out in the Haverhill local plan Haverhill Vision 2031, to keep separate the town of Haverhill and Withersfield to protect the distinct character of both.

The site is adjacent to the main access to Haverhill and is therefore a Gateway Site, which should be considered in relation to the overall impact that such a development would have on Haverhill. An industrial development of this scale and in this location would adversely impact on the gateway to Haverhill, one of Suffolk's fastest growing towns. Investment has been made in the creation of the Research Park and Epicentre landmark building. These will be overshadowed by the massive structures and expansive footprint of this facility just a few hundred metres away.

LAGOONS AND PIPELINE

The pipeline's route would take it through the Ancient Woodlands of Howe Wood, Lawn Wood, Over Wood, Little Wood, and Cadges Wood. The two lagoons will be the size of eight Olympic swimming pools, these being over 2.5 m (over 8 feet) above existing levels does not appear to be low level, particularly when the height of the fencing is included, which will likely be another 2.5-3m.

As the **Suffolk County Council Senior Landscape Officer** stated in their objection to the development (available on the planning portal):

The proposed development, as it is currently presented, would introduce industrial elements to both site areas, which would, in both locations, erode the rural local landscape character.”

This is agreed by **Cambridge City Council** in their objection to the Acorn development (available on the planning portal):

“The lagoons would be in open countryside. There is a risk that the engineered features and boundary treatments would have a harmful effect on the "intrinsic character and beauty of the countryside.”

References on policy context for this section. We refer to specific policies and requirements set out in the Suffolk Minerals and Waste Plan – July 2020 which we believe to be particularly pertinent to this application:

Suffolk Minerals & Waste Local Plan – July 2020

- *Question of need – under national planning policy for waste, there has to be a demonstration of need. The Suffolk Waste Study (www.suffolk.gov.uk/planning-waste-and-environment/minerals-andwaste-policy/suffolk-minerals-and-waste-plan) confirms that there is no identified shortfall in waste management facilities at the present time;*
- *Policy WP7: Anaerobic digestion Anaerobic digestion facilities may be acceptable on land: a) within the uses identified within Policy WP3 (Existing or designated land-uses potentially suitable for waste development)*
- *Policy WP7: General waste management facilities (other than landfill sites and water recycling centres) may be acceptable within the following areas: a) land in existing waste management use; b) land in existing general industrial use (B2 use class) or in existing storage or distribution use (B8 use class) (excluding open air composting); c) land allocated for B2 and B8 purposes in a local plan or development plan document (excluding open air composting); d) within or adjacent to agricultural and forestry buildings; e) agricultural and forestry land (open air composting only) excluding ancient woodland or planted ancient woodland sites; f) brownfield land (excluding open air composting); g) former airfields (open air composting only); h) water recycling centres (including composting and anaerobic digestion) and; i) current and former mineral workings (open air composting and construction, demolition and excavation waste recycling only). Proposals must also comply with the environmental criteria set out in Policy GP4.)*
- *Policy GP4: General environmental criteria Minerals and waste development will be acceptable so long as the proposals, adequately assess (and address where applicable any potentially significant adverse impacts including cumulative impacts) on the following: a) pluvial, fluvial, tidal and groundwater flood risk; b) vehicle movements, access and the wider highways network; c) landscape character, visual impact, setting, and designated landscapes including Areas of Outstanding Natural Beauty and the Broads; d) biodiversity including Natura 2000 sites, ancient woodlands and trees; e) geodiversity; f) historic environment, archaeology, heritage assets and their setting; g) public rights of way; h) neighbouring land-use; i) soil resources including the best and most versatile agricultural land; j) noise and vibration; k) air quality including dust and odour; l) light pollution; m) the local water environment; n) land instability; o) airfield safeguarding; p) the differential settlement of quarry backfilling; q) mud and aggregates on the road; r) litter, vermin and birds; s) The use of alternative forms of transport including the use of rail freight shipping should be considered; or t) military and civil aviation. Proposals should meet or exceed the appropriate national or local legislation, planning policy or guidance for each criterion, including reference to any hierarchy of importance. Proposals should aim to achieve a biodiversity net gain. Proposals should demonstrate that when considering the potential for significant adverse impacts upon features of acknowledged environmental importance, that the hierarchy of firstly avoidance, then mitigation and finally compensation has been followed.*
- *Policy GP1: Presumption in favour of sustainable development The County Council will take a positive approach to minerals and waste development that reflects the presumption in favour of sustainable development. It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure minerals and waste development that improves the economic, social and environmental conditions in the area.*
- *Policy GP2: Climate change mitigation and adaptation. New minerals and waste management facilities should through their construction and operation minimise their potential contribution to climate change through reducing carbon and methane emissions, incorporate energy and water efficient design strategies and be adaptable to future climatic conditions.*

- *Policy WP 17: Design of waste management facilities* Waste management facilities will be considered favourably where they incorporate: a) designs of an appropriate scale, density, massing, height and materials; b) safe and convenient access for all potential users; c) schemes for the retention of existing and provision of new landscape features; d) measures which will protect, preserve and where practicable enhance the natural, and historic environment including the setting, landscape and built environment, and: e) comply with Policy GP2.

3. Visual Impact and light:

The design of the plant appears to have been driven entirely by function, with no regard to its appearance and fit with the surrounding area. All the structures are of a massive scale and wholly industrial in nature. The plant would have a detrimental impact on its surroundings and to Withersfield due to its scale and industrial nature.

The Suffolk Senior Landscape Officer describes it thus:

“Neither the Suffolk Minerals and Waste Local Plan nor the West Suffolk Local Plan include an allocation for a development of this nature at the proposed locations. The proposed development is industrial in nature, and without an appropriate landscape-led approach to mitigate the potential adverse effects in landscape and visual terms, there is a high potential that the development would not be in keeping with the local landscape character, which is transitional from settlement edge to rural. Landform and the existing boundary vegetation around the main site provide a good starting point and useful opportunities to embed the development within the landscape in a considered and sympathetic manner.”

The location is alongside the Stour Brook and adjacent to Meldham Wash/West Town Park, which are areas of note from an environmental perspective. Users of these areas – ramblers, occasional walkers, dog walkers etc. will see their usual rural vistas completely dominated by this massive plant with its 5 massive digester tanks, storage clamps, electricity generating plant, concreted yards, storage facilities, a pumping station to service the proposed digestate pipeline, and a metal chimney for venting and flaring off methane.

The site will be visually intrusive to many residents of the Arboretum estate, changing current views of countryside and fields with a large industrial plant. (photo below taken from the proposed site looking towards the Arboretum estate.)



The digester tanks at more than 17 metres in height would also be visible from parts of the village, as will the even higher flame chimney. This is particularly the case in respect of

properties in Hanchett End and in Silver Street, including heritage properties at Silver Street farm.

The current uninterrupted views across the hills of Essex which have been enjoyed by heritage properties in Silver Street (listed buildings dating back some 600 years) would be significantly impacted upon by this view being blighted by the tops of the massive digester tanks and the and by the flare-off chimney.

The Environmental Impact Assessment wrongly claims neither impact nor harm but with no evidence to support this assertion. Indeed, even the evidence presented is flawed. A photograph (plate 16) on page 44 of the Desktop Heritage Assessment document purports to show a view from Silver Street farmhouse towards the Spring Grove Farm. It does not. The photo is taken from Horseheath Road about 100 metres to the northeast and looking towards Howe Wood to the east. This is disingenuous and must call into question the overall validity of the Desktop Heritage Assessment.

Security fencing and site lighting all add to the negative visual impact, and claims that existing planting will hide from view the facility are not credible, particularly given that all trees are deciduous, resulting in the plant being completely unmasked during autumn and winter months.

Given the design, location, scale and proximity to the gateway to Haverhill and a nearby residential area the proposal is contrary to the National Design Guide, the NPPF which seeks to ensure well designed developments and Policies DM2, DM5 and DM6 of the JDMPD.

References on policy context for this section. We refer to specific policies and requirements set out in the National Planning Policy for Waste and the Suffolk Minerals and Waste Plan – July 2020 which we believe to be particularly pertinent to this application:

National Planning Policy for Waste:

- *Appendix B c. landscape and visual impacts Considerations will include (i) the potential for design-led solutions to produce acceptable development which respects landscape character; (ii) the need to protect landscapes or designated areas of national importance (National Parks, the Broads, Areas of Outstanding Natural Beauty and Heritage Coasts) (iii) localised height restrictions.*
- *Appendix B j. noise, light and vibration Considerations will include the proximity of sensitive receptors. The operation of large waste management facilities in particular can produce noise affecting both the inside and outside of buildings, including noise and vibration from goods vehicle traffic movements to and from a site. Intermittent and sustained operating noise may be a problem if not properly managed particularly if night-time working is involved. Potential light pollution aspects will also need to be considered.*

Suffolk Minerals & Waste Local Plan – July 2020

- *Policy GP4: General environmental criteria Minerals and waste development will be acceptable so long as the proposals, adequately assess (and address where applicable any potentially significant adverse impacts including cumulative impacts) on the following: c) landscape character, visual impact, setting, and designated landscapes including Areas of Outstanding Natural*

4. Traffic and impact on road system

Our residents are particularly concerned at the potential impact on our roads resulting from the substantial number of traffic movements – both HGV and tractor/trailers.

The access and egress onto the A1307 would require substantial works to create appropriate deceleration and acceleration lanes to accommodate safe joining to the busy highway.

HGVs leaving the site and heading west will have to head east towards Haverhill and then negotiate a full rotation of the Spirit of Enterprise roundabout in order to continue their journey. We have serious concerns that the design and size of this roundabout is not suitable

for such manoeuvres, particularly as these will be frequent and continuous. Residents of the Arboretum estate are also concerned that this increased use of the Spirit of Enterprise roundabout is likely to result in frequent tailbacks of traffic along Cambridge Road towards Three Counties Way, thus exacerbating already difficult access and exit from the estate onto the main road system.

Large vehicles transporting quantities of the planned for chicken waste and farmyard manure are likely to be travelling from the east, potentially through Haverhill and having to make a right turn across the busy A1307 to enter the site.

These factors indicate that there would be a substantial increase in risks on this road, which is already identified as a road which has a high number of road traffic accidents and associated casualties.

In addition, we fear that there would be significant displacement of traffic on to our village roads. Silver Street in particular is a country lane of around 4 metres in width. It is already misused by HGV traffic heading towards the West Wrattling warehouses – despite clear signposting in the A1307 directing HGVs to the approved route. We fear that this plant would generate additional traffic movements which would use Silver Street, Skippers Lane, Hollow Hill, Church Street, Turnpike Hill, Thurlow Road, Queens Street and Withersfield Road as alternatives to the advised routes.

A second entrance to the site, at an expanded farm track access point in Silver Street is a particular concern as it implies that there will be a vast increase in the numbers of farm vehicle movements concentrated on the edge of our village, and causing significant damage and danger to Silver Street, and impact significantly on residents of Silver Street, Horseheath Road, and Hollow Hill, including the White Horse public House and its clientele. This is clearly demonstrated with reference to the applicant's planning statement below:

The Applicant's Planning Statement contains the following references:-

5.8.1.1 Access Design

*"it is noted that the largest area of farmland is located to the north/north-east of the application site. This area of farmland, particularly during intense harvest periods, would be serviced by the internal farm track network to the north of Spring Grove Farm, in the north extent of the Thurlow Estate. **These tracks offer direct access across private land using established routes.**"*

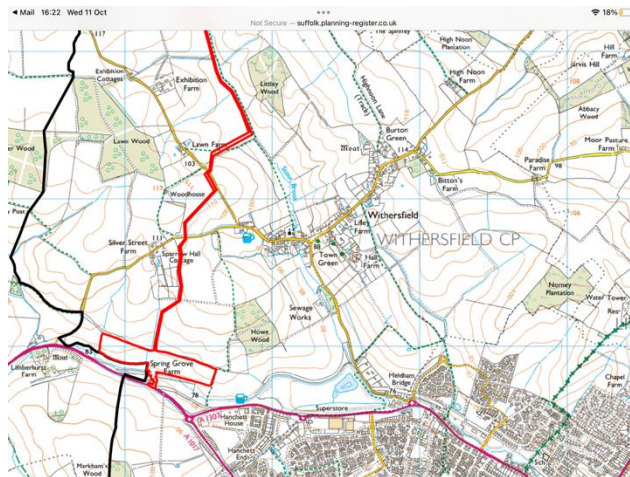
5.8.1.4 Access Design

*"The proposals seek to upgrade the east access junction and close up the access junction between the buildings, to minimise points of access off the A1307. **Access to the buildings can then be gained from the north via the upgraded internal access road.**"*

"Statement of Community Involvement" prepared by Instinctif & Partners page 10

This part of the planning documentation contains reference to the entry point:-

"Farmyard vehicles will use farm tracks wherever possible and cross at an upgraded junction on Silver Street to enter from the north of the site." Please see location map.



There will therefore be an access point on the north side of the AD facility which will link to the farm tracks across the estate via an upgraded junction on Silver Street. Whilst it remains unclear exactly where the upgraded farm access point on Silver Street is proposed, it is presumed that it is to be at the same point of entry as the gestate pipeline, which crosses not Silver Street, but Horseheath Road.

The Planning Statement does not show where the upgraded farm tracks will go or where they will intersect or use the highway. However, they must use and intersect with Skippers Lane, Silver Street, Horseheath Road or come through Withersfield via Hollow Hill to get access to the ***“upgraded junction on Silver Street to enter from the north of the site”***.

Most of the Estate is to the north and east of the site and are therefore most likely use farm tracks to access the site from the north using the northern access point.

The Applicant’s Planning statement Table 6.2

In this Table Western Woods, Great Bradley and Thurlow farm hubs will all use **“Direct Access across private land using established paths”** this traffic would have to flow through to Skippers Lane, Silver Street or through Withersfield to an entry gate in Horseheath Lane or Silver Street.

The farm hubs at Great Wratting, Kedington, Horseheath, Dotterel and Rectory are also North, North East or North West of the facility and could also have Direct Access through farm tracks if required accessing Skippers Lane, Silver Street, or through Withersfield to the facility via **“Direct Access across private land using established paths”**

The Applicant’s Planning statement Table 6.3

This table indicates that there is potential for at least 5036 farm traffic/HGV movements per year which could access or leave via the gate at Silver Street/Horseheath Road.

The junction of Skippers Lane, Silver Street, Horseheath Road, Hollow Hill and Withersfield are already a sensitive area where a 20MPH Speed Zone has been approved for the village of Withersfield because of the tight bends, lack of pavements and rat run traffic speeding between Haverhill and Cambridge. In this sensitive area traffic flows should not be increased.

The highest volume of HGV/Tractor traffic will be at harvest times in June and October. October is also when the Jelly Warehouse on Skippers Lane fills the warehouse with stock for Christmas and it's HGV's are constantly coming up from the A1307 via Silver Street and Skippers Lane. The junction of Horseheath Road, Skippers Lane and Hollow Hill is the epicentre of rat run traffic and HGV traffic to the Jelly Warehouse on Skippers Lane. These Roads are already dangerous where only a single HGV can use and if two HGV's meet it causes a traffic jam. These are small rural roads that pot hole in winter and have tight bends. Please see photo below

The Applicant's Planning statement Accident History Fig 3-9

This section does not include the full length of Silver Street, Skippers Lane, Horseheath Road or Hollow Hill. The intersection of these roads is the epicentre of HGV and rat run traffic from Haverhill through to Cambridge. The Panning Statement does not contain a Traffic Management Plan (This must be a mandatory requirement)



Even without the TMP it is clear from the Planning Statement that the impact of farm traffic on the roads around Withersfield and the surrounding environment would be severe and the volume of farm traffic in this area would be unacceptable.

The Applicant's Planning Statement 1.6

"Whilst the proposed traffic will be new to the application site itself, a large proportion of the generated movements are already on the local network as the proposed Ad facility will service existing local farms which have an existing traffic generation. This has been qualified as approximately 5600 annual loads, which makes up a large proportion (57.2%) of the proposed 9786 annual loads. The proposed increase would equate to an average of 11 additional HGV/Tractor loads per day in the local area."

We contend that this statement is incorrect for the following reasons:

- The current crops are Wheat, Barley, Beans and Rape Seed cropped once a year in rotation. If the Estate start to grow silage it would be part of that rotation therefore the majority of the crops and traffic will stay the same.
- The current crops of Wheat and Barley are harvested for the grain the hay is left on the fields to be baled and then stored on the fields.
- The current harvest is taken to a central location on the airfield the majority of the silage crop from the estate will all go through **an upgraded junction on Silver Street to enter from the north of the site**. All the traffic from the north having to access one gate.

- Silage would be harvested twice a year which would cause twice the traffic. Silage creates more volume per acre than wheat or barley, therefore more truck loads per acre. The impact on farm traffic on the roads around Withersfield and the surrounding environment would be severe and the increased volume of farm traffic in this area would be unacceptable.

We understand that the Thurlow Estate does not currently grow silage crops. Neither does it breed chickens or beef cattle at present. There is therefore, no current agricultural need for an industrial scale Anaerobic Digester for waste disposal, as is required by the Suffolk Waste and Minerals policy, which specifies there has to be a clear need.

The Applicant's Planning Statement 3.4 *"The application site is located in a rural setting on the outskirts of Haverhill, the town centre of which is approximately 3.8km away by road".*

The above statement is misleading:

The site perimeter is:

- 300m from major housing developments in Haverhill and at the Arboretum.
- 200m from Haverhill's premier research/office complex – The Epicentre
- 600m from the Sainsburys superstore

The site is inside the Parish of Withersfield, a conservation village.

The site is adjacent to Haverhill, which is known to be the worst connected town in the county but the fastest growing town in Suffolk.

The Suffolk Local Transport Plan 4.88 (2006-2011)

The plan contains local objectives towards achieving a sustainable transport network.

"The problems of traffic congestion in the market towns of Haverhill and Bury St Edmunds is noted, as is the high number of daily vehicle movements passing through Haverhill due to out commuting to Cambridge.

"Other roads in the borough which are part of the Primary Route Network are carrying large volumes of traffic. Where they pass through villages, the local environment is being put under significant pressure. Increased levels of traffic between Bury St Edmunds and Diss on the A143, between Bury St Edmunds and Thetford on the A134 and between Haverhill and Cambridge on the A1307 are of particular concern."

The junction of Skippers Lane, Horseheath Road, Hollow Hill and Withersfield is already a sensitive area because of the tight bends, lack of pavements and rat run traffic, dog walkers, cyclists and horse riding. In this sensitive area traffic flows should not be increased.

With a potential extra 5036 Tractor/HGV traffic movements on these rural roads there *"would be an unacceptable impact on highway safety and the residual cumulative impacts on the road network would be severe"* contrary to the requirements within the National Planning Policy Framework.

The proposal will result in a significant increase in vehicle movements on the rural area as well as additional vehicles on the A1307. JDMPD Policy DM31 which relates to farm diversification states inter alia that proposal should have regard to the local road network and associated traffic movement should not compromise highway safety of the free flow of traffic.

In addition to an increase in vehicles, even if some use private farm road, most vehicles will have to cross one or more public highways at some point and will bring addition mud onto the highway that will further prejudice the safety of car drivers, motorcyclists and cyclists.

The proposal will therefore adversely impact on highway safety contrary to the NPPF, and the JDMPD.

References on policy context for this section. We refer to specific policies and requirements set out in the National Planning Policy Framework, National Planning Policy for Waste and the Suffolk Local Transport Plan which we believe to be particularly pertinent to this application:

National Planning Policy Framework:

Considering development proposals:

- *Para 110. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*
- *Para 111. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*
- *Para 112. Within this context, applications for development should: give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; address the needs of people with disabilities and reduced mobility in relation to all modes of transport; create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards; allow for the efficient delivery of goods, and access by service and emergency vehicles; and be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*
- *Para 113. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.*

National Planning Policy for Waste:

- *f. traffic and access: Considerations will include the suitability of the road network and the extent to which access would require reliance on local roads, the rail network and transport links to ports..*

The Suffolk Local Transport Plan (2006-2011) contains local objectives towards

- *achieving a sustainable transport network. The problems of traffic congestion in the market towns of Haverhill and Bury St Edmunds is noted, as is the high number of daily vehicle movements passing through Haverhill due to out commuting to Cambridge.*
- **4.92** *Other roads in the borough which are part of the Primary Route Network are carrying large volumes of traffic. Where they pass through villages, the local environment is being put under significant pressure. Increased levels of traffic between Bury St Edmunds and Diss on the A143, between Bury St Edmunds and Thetford on the A134 and between Haverhill and Cambridge on the A1307 are of particular concern.*
- **4.94** *Haverhill lies on the A1307, less than 20 miles from Cambridge and 16 miles from the M11 to London. It is part of the wider M11 corridor and is near Stansted Airport. There are aspirations to reinstate a rail link between Haverhill and Cambridge. The A1017 south east of Haverhill provides important links to the east coast and there is a need for appropriate measures to improve this route.*

5. Impact on local footpaths and pedestrians:

The site of the plant would impact on current footpaths and walkways used by residents, dog walkers, and ramblers. There are many public footpaths in the area serving the village of Withersfield and the surrounding areas. There is a recognised Quite Lane into the village at Wratting Road designated to promote exercise and other forms of travel for visitors and locals to enjoy the natural surroundings. The Quite Lane promotes activities such as cycling, horse-riding, jogging and walking. It is often used by families with younger children and older people to exercise safely.

There are no designated footpaths in the village and it is commonplace for pedestrians, dogwalkers joggers and families with younger children to be walking on the peaceful rural roads enjoying the views of the village and surrounding countryside, enjoying the beautiful views, nature and fresh air. This needs to be protected and the benefit sustained for future generations. The village also has its own Cycling Group (Withersfield Wheelers) and is part of a designated cycle route for races etc.

In addition, the proposed enlarged farm entrance and widened farm track required to take the volumes of silage and farm traffic will adversely impact on the current footpath from Horseheath Road heading towards Howe Wood and the Roman Road, which is a popular designated walking route at Silver Street and there is a Public Right of Way which would directly pass the proposed site.

The plan further appears to cut off an existing public footpath along the old road adjacent to the A1307 and the works to create the entry/egress to the site obstructs access to farm land to the north of the A1307 which is owned and operated by an independent farmer.

The views and tranquillity of the existing rural landscape would be blighted by a large-scale industrial waste plant. The safety of the road users would also be jeopardised from the constant and increased vehicles using farm tracks and HGV's crossing the Public Right of Way. We are also concerned at the increased likelihood of damage to footpaths due to use by heavy farm machinery at key crossovers, and to the impact of spillage of silage and digestate from vehicles along these public rights of way.

"The landscape offers recreational opportunities to ramblers using the Roman Road and the London to Walsingham Pilgrimage route which links the Roman Road to Withersfield via Silver Street. The views and tranquillity of the rural landscape are a valuable amenity and would be disturbed by the presence of the proposed AD site"

6. Impact on local economy

The applicant claims that the plant will generate employment opportunities locally. We dispute this claim. Whilst there are minimal jobs created (the applicant cites 5 on site and 10 at remote locations) – similar plants are managed and monitored remotely by computer links to distant overseas locations. Hence the benefit to the area in relation to jobs is negligible. In fact, the likely impact of the plant on the research park would be negative.

The Parish Council has been made aware of growing high-tech companies that will seriously consider relocating if this industrial plant is developed in this location. The net impact on jobs and to our local economy is therefore likely to be a negative one.

We have heard of concerns from a number of small businesses about the potential negative impact of this development on their viability and future. This includes two public houses; the White Horse in Withersfield village and the Flying Shuttle at the Arboretum, the day nursery on Three Counties Way as well as the EpiCentre and a number of their current business tenants.

In addition, there is likely to be a significant impact on the local housing market. Already there are signs that the proposal is resulting in reluctance of purchasers to commit to purchasing properties in the vicinity. The impact on the current development of 150 new

homes just a few hundred yards from the site, at the Arboretum is likely to be considerable, with a potential negative impact on our local economy.

7. **Impact on local area and living conditions – Noise, Odour, emissions and Disturbance.**

Odours: The Parish Council is concerned at the potential impact of odours coming from the plant. Our visit to a smaller but similar facility at Euston, near Thetford, did not reassure Councillors who perceived the presence of strong odours, particularly when mechanical diggers were disturbing silage and chicken waste from clamps and loading into the hoppers that feed the digester tanks. The prevailing winds will inevitably carry any odours towards the village and across the neighbouring Arboretum estate.

The applicant's offering to enter into an agreement with the owner of the site to prevent the import of food waste to the biodigester is meaningless as it is unenforceable by the local planning authority.

The Parish Council has read and considered the representation made by the Jaynic Property Group, who commissioned a "Review of Odour Assessment". This report concludes that "There is a risk of significant adverse odour impacts at the Epicentre." We believe that this assessment indicates that the applicant has not adequately assessed the potential for harm through the generation and transmission of odours across Withersfield and the Arboretum estate.

We have also been made aware of the potential for the emission of toxins and particulates from the proposed plant, particularly at times when flare-offs would be required. Our visit to the Euston plant confirmed that flare-offs were a regular occurrence, used to regulate pressure in the tanks.

We are concerned that such emissions close to the Arboretum estate, which has many young families, and a day nursery and children's playground would be an unacceptable risk. Currently, a major attraction of the nursery to local parents is its safe outside play space. Each room has its own space for the children to use and they are actively encouraged to be outside as much as possible. The noise and odour from the plant would completely change this environment and undermine the benefits that young children currently enjoy from being able to enjoy these spaces.

The production of methane from a 24 hour facility, at this scale is unprecedented. It requires a constant supply of waste, including, poultry waste, slurry and feedstock material. This will be significantly detrimental to the air quality and create extremely unpleasant odours in the immediate vicinity. It is irrefutable that the development will emit odours from both the delivery of waste and the production process itself generates air pollutants, including carbon monoxide (CO), nitrogen oxides (NOx) and sulphur dioxide (SO₂). These emissions and particulates into the environment will increase a risk of harm to the health. In addition to this, the significant increase in vehicular movements servicing the plant will only increase carbon emissions further.

The lagoon site proposed will expose several properties to unacceptable levels of odours from the 22500m³ of stored digestate with a surface area of over 3600m². It is well documented that local communities are blighted by odours described as being "unbearable", "most unpleasant" "absolutely disgusting" and for "sustained periods" for example Farleigh Wallop, Ballymena, Rothwell. This has been raised by other Parish Councils

in their objections to each of these applications and the detrimental impact those proposed plant would have on their communities.

Noise

Based on evidence from Parish Councillors' visit to Euston, we are concerned at the impact of noise coming from the proposed plant from several sources.

The site would be continually accessed by several different types of vehicles, including tractors with trailers delivering agricultural crops, silage, and large vehicles transporting poultry waste from over 30km away. In addition to the delivery of waste for processing, there will be HGVs attending the site to collect digestate for transporting to Milton Keynes. It is expected there will be traffic movements every 15 minutes to and from the site for approximately 9 hours per day.

There is a concern as to the noise levels generated by large vehicles and HGV's accessing the proposed plant through the village using rural roads. The proposals state farm vehicles will use established farm tracks, however this will be on a greater scale than for agricultural purposes and there is also a real risk that this will include large HGVs as a planning application by the landowner has been made to expand the entry site / junction at Horseheath Road/Silver Street.

The impact of the noise generated by HGVs and larger vehicle using rural roads cannot be underestimated. The plant would effectively operate 24 hours per day, 7 days a week. Whilst it is proposed HGVs would only access the site between the hours of 7am-7pm, Monday to Saturday, these access times will be increased during peak periods, such as harvest (June – July and September - November). The significant and continual increase in vehicle and HGV movements would result in constant noise and disturbance to residents.

The Statutory Guidance prepared by the Environment Agency have classified there is a "medium risk" to local residents from the nuisance, loss of amenity and in particular loss of sleep. This risk is unacceptable and significantly impacts the quality of life for residents and destroys the peaceful tranquillity of the village.

In addition to the above, the operation of the plant will generate significant noise disturbance. Diggers are required to feed digestors with waste from concrete storage bays on a regular and frequent basis. Parish Councillors witnessed firsthand the mechanical noise associated with this operation, from diesel engines running on plant machinery, reversing alarms, and the general noise associated with depositing waste into hoppers; including the sounds of digger buckets scraping across the concrete bases. The noise levels and from the plant required to purify methane, separate and clean CO2 and generation of electricity is also continuous. The proposed installation of a pipe line to pump digestate from Spring Grove Farm will also require a powerful pumping source, again inevitably adding to the overall continuous noise levels from the site.

This particularly impacts residents living in the immediate vicinity during the day, in the evenings and at weekends, causing direct and unreasonable levels of noise disturbance. Residents will simply never be able to have any peaceful enjoyment of their home.

The proposal will adversely impact on nearby residents and those residents living close to vehicular routes to and from the site and it therefore conflicts with NPPF and JDMPD Policy DM2.

8. Flood risk, ground, and surface water risk

The proposed AD plant and lagoons contravene both national and local policy rules on flood risk, risk to ground surface water, and the threat of pollution to water courses.

8.1 Flood risk:

The site of the proposed plant is located within Flood Zones 3 and 2, which are the highest categories of flood risk. This has been shown recently with the site flooding five times between September and November 2023. Most recently, The Environment Agency issued flood warnings between Haverhill and Sturmer on the Stour Brook on 20th October 2023 and 2nd November 2023 (see below)



Flood warning for The Stour Brook from Haverhill to Sturmer

Updated 11:26am on 20 October 2023

 [View map of the flood warning area](#)

This message has been issued because flooding of homes and businesses is likely today, Friday 20th October 2023. River levels are expected to continue to rise. Areas most at risk are riverside properties in Haverhill and Sturmer, and the A1307 and A143. It is likely that we may need to issue more warning messages for a wider area, over the next few hours. The forecast is for further unsettled weather through the weekend. Take care on riverside footpaths, and don't put yourself in unnecessary danger. We are monitoring the situation and not expecting the situation to escalate. We will update this message by 5pm, Friday 20th October or as the situation changes.

Flood warning area: The Stour Brook from Meldham Bridge in Haverhill to Linnetts Lane in Sturmer.

[Find a river, sea, groundwater or rainfall level in this area](#)

 [Get flood warnings by phone, text or email](#)

Could this information be better? [Tell us how to improve it.](#)

The National Planning Policy Framework (NPPF) section 14, paragraph 159 states:
“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)... development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in the area with a lower risk of flooding”

If sites of lower risk not available, then an exception test will need to be applied. S14: para 164 states:

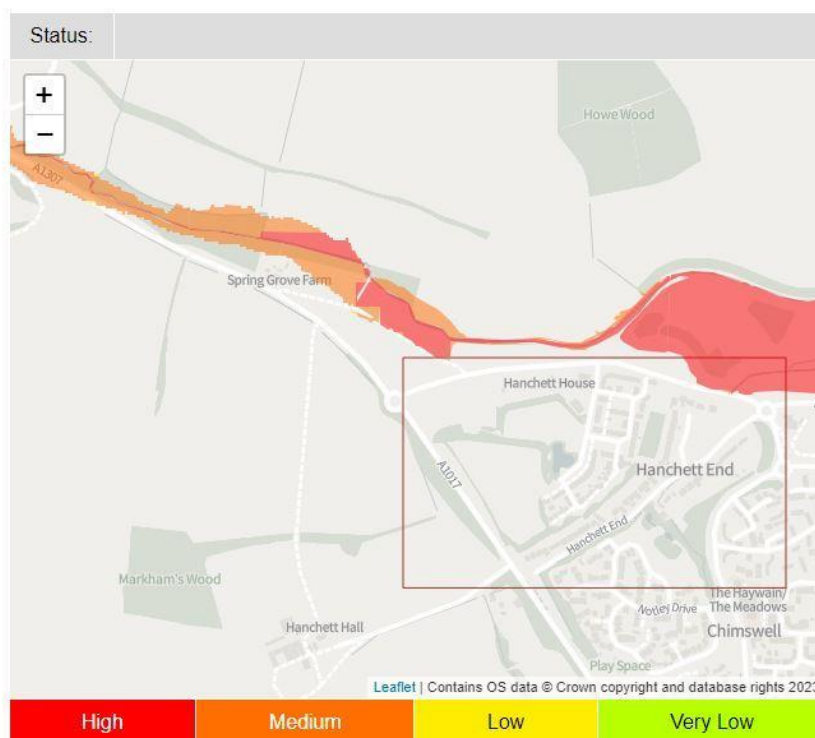
“The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the

application stage. To pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. 165. Both elements of the exception test should be satisfied for development to be allocated or permitted”

The applicant’s proposal fails (a) since the flood risk is very high and there are no wider benefits to the community that would outweigh the flood risk. It would fail on (b) since the flood risk would increase along the Stour Brook to Sturmer and beyond (see map below).

Hanchett End Flood Map

Map of Hanchett End (Haverhill, Suffolk) flood risk areas, which includes areas of high and medium flood risk, plotted on a Hanchett End flood map.



The applicant has not addressed the exception test, which aims to direct inappropriate development away from areas of highest risk. The applicant has also failed to provide a robust assessment of other sites outside the high-risk zones. The only sites looked at appear to be those of the Thurlow Estate.

The applicant wants to rely on a clause that states ‘waste treatment’ facilities are classified as ‘Less Vulnerable’ developments. But the purpose of the applicant’s proposal is for an industrial waste facility which produces biogas, which requires hazardous substances consent (as indicated by the applicant in section: Other Environmental Effects, section 12.10 of their application). This would place it in the “Highly vulnerable” category in the Flood Risk Vulnerability Classification identified in the Technical Guidance to the National Planning Policy Framework (March 2012: Table 2).

An installation requiring hazardous substances consent is not permitted on Flood Zone 3 (see Table 3), On this basis alone, the proposal should not be permitted.

Table 2: Flood risk vulnerability classification

<p>Essential infrastructure</p> <ul style="list-style-type: none"> • Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood. • Wind turbines.
<p>Highly vulnerable</p> <ul style="list-style-type: none"> • Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Caravans, mobile homes and park homes intended for permanent residential use³. • Installations requiring hazardous substances consent⁴. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as “essential infrastructure”)⁵.

An installation requiring hazardous substances consent is not permitted on Flood Zone 3 (see Table 3)

Table 3: Flood risk vulnerability and flood zone ‘compatibility’

Flood risk vulnerability classification (see table 2)	Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Flood zone (see table 1)	Zone 1	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓
	Zone 3a	Exception Test required	✓	x	Exception Test required
	Zone 3b functional floodplain	Exception Test required	✓	x	x

Key: ✓ Development is appropriate.
 x Development should not be permitted.

On this basis alone, the proposal should not be permitted.

The site location in Flood Zone 3 also contravenes policy set out in Haverhill Vision 2031, 10.12e (p.52), to “Locate all new development away from areas at greatest risk from flooding”.

The Stour Brook from Meldham Bridge in Haverhill to Stumer is an official Flood Warning Area (051FWFEF1B). The West Suffolk Council Strategic Flood Risk Assessment, section 7.2.4.7 Green Infrastructure Strategy (April 2021) states:

“A green infrastructure strategy helps to ensure that green spaces and the environment are protected and enhanced as development occurs... Watercourses feature heavily in the strategy, with proposed green corridors alongside the Black Bourne, Stour Brook and Little Ouse”

The strategy defines ‘action zones’:

Action Zone E: Haverhill highlights the role of SuDS in new developments as well as the part that new green space will provide in offering opportunities for flood management. (E1) Improve and expand the Meldham Washlands site. Conserve water management function in limiting flows through Haverhill.

The risk of flooding in this area is only going to increase. According to the West Suffolk Council Strategic Flood Risk Assessment (April 2021) section 6 on climate change:

“In the UK extremes of weather are becoming more common. West Suffolk is located in one of the driest regions of the UK where the rainfall which does occur tends to fall in high intensity events resulting in significant flood management challenges”

The Suffolk Climate Action Plan²⁷ highlights increased flood risk due to climate change as a key issue for Suffolk, highlighting the need for businesses and communities to adapt to these changes.

The applicant has not provided an analysis of the effects of climate change with respect to the unique challenges faced by this region specifically, in their application. They also misleadingly claim the entrance to the site is in Flood Zone 1, but ignore the fact the entire plant will be Flood Zones 2 and 3.

The Suffolk Minerals and Waste Local Plan (July 2020) Policy GP4 highlights general environmental criteria. The Policy states that Minerals and waste development will be acceptable so long as the proposals adequately assess (and address where applicable any potentially significant adverse impacts including cumulative impacts) on the following: (a) pluvial, fluvial, tidal and groundwater flood risk and (m) the local water environment.

The applicant’s proposal outlines industrial processes which involve use of considerable amounts of water. Haverhill is located in the driest region of the country and obtains its water from a borehole (Haverhill Vision 2031, p. 51) with a limited supply. This AD facility will therefore use up precious resources instead of providing a service which meets the needs of the town, contrary to Aspiration 14 of Haverhill Vision 2031 (p. 51).

8.2 Ground and surface water risk

The National Policy framework (2023), section 15, paragraph 174 states: Planning policies and decisions should contribute to and enhance the natural and local environment by: (e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

The proposal clearly contravenes this principle. The possibility of pollution arises from three main sources. First, spillage from the silage clamps leeching into the water course. Second, leakage from the AD process itself, including risk of leaking tanks. Third, the use of digestate on fields flowing into the water course. Any one of these possibilities would be catastrophic for the water sources, sending highly toxic pollutants into the Stour Brook, endangering fish,

dogs being walked, and children playing in the water. According to a recent national policy document (Scottish Government consultation paper on River Basin Management Plans - silage, slurry and anaerobic digestate improving storage and application" January, 20th , 2021) :

6. *Silage storage.*

6.1 *Control of silage effluent.*

Silage effluent is potentially the most potent source of pollution on the farm. Even when a small amount enters a watercourse, it can have a rapid and devastating effect on fish and plant life for a long distance downstream...even in very small quantities, its effects can be highly destructive. This is because: it is at least 200 times stronger than untreated domestic sewage. It kills fish and the tiny organisms they feed on, through starving them of oxygen. It can affect water abstractions. It can pollute groundwater, springs, wells and boreholes, endangering public, and private, water supplies.

Silage effluent is highly corrosive - so much so that over a period it can dissolve cement.

Haverhill relies on a borehole for water. The applicant, by their own admission, state (section 9.87 of Application) that the operation of the plant may produce some small-scale spills. Even small-scale spills would be devastating to the water course and the entire Stour Brook, polluting the entire green corridor.

The National Planning Policy for Waste (October 2014), (Appendix B, Locational Criteria, A, Protection of water quality, and resources and flood risk management) states that:
"Consideration will include the proximity of vulnerable surface and groundwater or aquifers... The suitability of locations subject to flooding with consequent issues relating to the management of potential risk posed to water quality from waste contamination, will also need particular care."

This will also apply to the lagoons site, which would be located near to Cadges Wood with a leachate pipe to the AD plant. This proposed pipeline closely follows the Stour Brook, a fact confirmed in the applicant's own risk assessment (Executive Summary). Any breach or leakage from the pipe would have serious consequences for pollution into the Stour Brook and the green corridor.

In section 9.47, the applicant identifies that the main site generally slopes down towards the Stour Brook, further increasing the risk of pollution through spills and runoffs. The applicant admits that groundwater sensitivity is 'moderately high' within and adjacent to the site, especially due to the Stour Brook. This should read 'at risk', and this is due to the development.

In section 9.90 the applicant concludes that there are no potential significant risks to soil, water courses or human health by way of the plant's operation, and that impact will be 'negligible.'

Given the applicant's own admission that there will be some spills, with the consequent highly damaging effects of pollution, we strongly challenge this statement.

In the applicant's flood risk assessment (Executive Summary) it is stated that the "site will consist of c 4.6 ha of impermeable hardstanding." This will significantly exacerbate the problem of surface water flooding from the site. The applicant claims they expect to use rainwater for "100% of the process water demand" (FRA, Executive Summary). In another part of the application, they claim 70% (Planning Statement, section 4.2.7, page 17: Water Management). It is also not clear what average rainfall figures the applicant is using. If they

are using national figures clearly this would be inappropriate, since Suffolk has half the average annual rainfall than many parts of the country.

The Stour Brook is located within a total catchment groundwater source protection zone (SPZ.3), as classified by the Environment Agency.

A Source Protection Zone is an area where:

- *Groundwater supplies a third of our drinking water. In some areas of southern England, up to 80% of the water you get from your taps is from groundwater. It also keeps many of our rivers flowing.*
- *The Environment Agency must protect groundwater sources used to supply drinking water from pollution. Sources include wells, boreholes and springs.*
- *Zones which show the level of risk to the source from contamination. This could be from any activity that might cause pollution in the area. For example, storing pollutants like petrol underground, soakaways from septic tanks to the ground. The closer the activity, the greater the risk.*

A Total Catchment Area – SPZ.3 – is described thus:

This is the area around a supply source within which all the groundwater ends up at the abstraction point. This is the point from where the water is taken. This could extend some distance from the source point.

The applicant admits that the site is in SPZ.3 (Application, section 9.59). The site is directly beside the supply source. Even the smallest spill or leakage will render the water unsuitable for drinking.

In summary, the proposed AD plant, lagoons, and pipeline constitute a major flood risk and a major risk to ground surface water through pollution from spillage and leakage. West Suffolk Council Strategic Flood Risk Assessment, section (April 2021) (section 8.2) states that *“Inappropriate and poorly managed development has the potential to increase surface water runoff to watercourses, alter groundwater recharge regimes and remove essential floodplain storage.”* The applicant’s proposal represents a highly significant detrimental risk to these elements. It would be an industrial installation producing a hazardous substance and so would directly and explicitly contravene the National Planning and Policy Framework principle of not siting such a plant on Flood Zone 3.

9. Environmental impact and harm

In addition to the noise, odours, dust and loss of grade 2 farmland currently producing crops for food, there would be a negative impact on the local environment. The Stour Brook green corridor would be severely compromised, views from West Town Park (Meldham Wash) and from Withersfield village would be negatively affected, and there would be significant disturbance to wildlife and plant species in the woodlands surrounding the site. We also consider that the site, which would operate 24 hours a day 365 days a year would have an impact on the night sky. It is feared that there will be a continuous glow from the site in an area where until now there has been no artificial lights at all.

The proposals put forward by the applicant are contradictory to the National Policy Planning Framework (NPPF), at Section 2 Para 8c an environmental objective –

“to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

The proposals are contrary to the Suffolk Waste and Minerals Local Plan (SWMLP) particularly regarding Aim 2 Objective 7, which aims to:

“To avoid, minimise and mitigate the impact of minerals and waste development on the environment by:..... Objective 7 including environmental protection policies for the consideration of waste proposals that make reference to the impact upon water quality, flood risk, land instability, landscape character, visual impacts, nature conservation, historic environment, traffic and access, dust, air quality, odour, vermin and birds, noise, light vibration, litter, land-use conflict and cumulative impacts”

GP1, GP2, GP4, WP1, and WP17 which specifies that Waste Management facilities will be considered favourably where they incorporate:

- a) designs of an appropriate scale, density, massing, height and materials;*
- b) safe and convenient access for all potential users;*
- c) schemes for the retention of existing and provision of new landscape features;*
- d) measures which will protect, preserve and where practicable enhance the natural, and historic environment including the setting, landscape and built environment.*

The proposals are also contrary to the Haverhill Vision 2031 document particularly regarding Objectives 5, 8 and Policy HV18 which sets out the Green Infrastructure Plan for Haverhill.

The Parish Council believes that the applicant is putting forward a proposal that will compromise our natural environment and we are concerned that the Environmental Assessment has not been undertaken by an independent agency.

The applicant claims that the proposals will be aligned to the fight against the Climate and Nature Crisis, however the applicants’ statements are misleading, confused and in many instances simply not true, for the following reasons -

- The production of methane is the purpose of the facility proposed. Methane is between 4 -28 times more potent Greenhouse Gas and has a resultant emission of Carbon Dioxide once burnt.
- The applicant is misleading and ambiguous regarding the frequency of the Gas Flaring which causes light pollution, despite the claims by the application that it is fully shrouded. The Gas Flare will lead to Carbon Dioxide emissions.
- The applicant has not clearly calculated and outlined the Carbon Dioxide emission that will be emitted during the construction phase.
- The applicant has not clearly calculated and outlined the Carbon Dioxide emission that will be emitted during the operational phase, particularly emitted through feedstocks being produced, including the sowing and ploughing of selected crops, and the requirement to travel from unspecified locations.
- The applicant has also failed to calculate the Carbon Dioxide emissions emitted through the use of the resultant products of the methane and digestate.
- The existence of the plant in the area will alter farming practices, changing crop cycles and rotation. It will discourage practices such as an herbal ley, which has been proven to be more environmentally and ecologically friendly. If local farmers sign contracts with the applicant this would bind these farmers to a practice that they may need to move away from in the very near future if and when government introduces measures aimed at ensuring that farmers contribute to help tackle the Climate and Nature Crisis.

- The impact of any potential change to crop rotations needs to be understood in order to fully understand the impact the applicant will have on the local Ecology.
- There are concerns about the use of digestates and its impact on soil life. The applicant makes claims that digestate will benefit the soil however the impact of digestate on soil life is poorly researched. A recent report from the University of Reading highlights the need for further research to be undertaken before such claims can be scientifically proven.
- The applicant is unclear and ambiguous about the number of houses and HGVs that could be powered by the resultant methane.
- The applicant's proposals compete against true renewable energy such as Solar, Hydro and Wind power, as the applicant is injecting the resultant product into the Gas Grid, therefore this proposal must be seen as contrary to the move towards renewable energy.
- The close proximity to the Stour Brook increases the pollution risk to the watercourse.
- The applicant cannot demonstrate a 0% spill rate, they state they can only - "Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods." This cannot be seen as an acceptable risk to the Stour Brook, and the "wet cleaning methods" may pose a further risk over and above the original spillage.
- The applicant is storing silage and poultry wastes on site, these further add to the risk to the Stour Brook through the leachate of other these materials. Combined with heavy rains and an insufficient drainage plan the risk of highly nutrient enriched leachate flowing into the Stour Brook potentially destroy the flora and fauna of the Stour Brook and must be deemed unacceptable.
- The Stour Brook at the location of the proposed site could be an ideal site for wildlife regeneration at it has been known for a number of species, such as Water Vole, Kingfisher, Grey Heron and Little Egret. The site is also known to support Great Crested Newts acting as a corridor, and the potential to support the reintroduction of Otter is extremely high. The proposals will put at risk the wildlife that depend upon the health of the Stour Brook.
- The Stour Brook running along the site should be recognised as a "Green Corridor", therefore the proposals should be seen as unacceptable as there are no credible mitigation plans put forward as the application does not seem to be aware of the significant impact the proposals will have on the Stour Brook.

The applicant states that the operation of the AD facility is water intensive. Whilst they claim they can harvest up to 70% of their demands, this means 30% of the water demand will need to come from the mains system. As East Anglia is normally very low regarding our water resources with very little resource to spare, if not over-abstracted, the Parish Council questions the advisability of siting a plant such as this within the region. As the applicant has stated they operate a hub and spoke operation, they could operate such a facility in an area where 100% of their water demands can be captured from rainwater run-off.

The applicant has failed to survey sufficiently the impact that they will have on the Gas Mains Pipeline and the Oil Pipeline by the Digestate Pipeline that runs through to the proposed Digestate Lagoons to Cadges Wood. Further details plans must be drawn up prior to any permission being granted.

The site and the surround area is prone to significant flooding, as stated previously the Parish Council believes the applicant has submitted an insufficient drainage plan, this could impact the surrounding area and water table with highly nutrient enriched water.

The applicant is giving scant regarding to the Ecology of the Parish and has submitted an insufficient Ecology Statement as it has several major issues associated with it –

- The Riparian Mammal Survey Ch8 App 4 states the surveys were undertaken in, August and September 2022, which would be insufficient to appropriately assess the presence of Riparian Mammals. However, the main Ecology Report, which references out to the Riparian Mammal Survey, states the survey was undertaken in May and September 2022.
- The application demonstrates an unacceptable lack of detail and cannot be considered valid unless backed up by a further survey in 2024 at the appropriate times by an independent body. If an independent body is not allowed to carry out a survey as the appropriate times, there will be a risk to the following species – Water Vole & Otter
- The report on Great Crested Newts shows a disregard to the importance of the species and appears to disregard the wider impact the proposals will have on the species around the parish. The survey includes no maps, so is unclear where the waterbodies are and which ones have been surveyed. A more comprehensive survey for Great Crested Newts must be properly carried out, by an independent body, at multiple times a year to conclusively identify the risk associated with the facility to Great Crested Newts. The report is confusing and contains typographical errors that lead to misinterpretation.
- The Ecology Report fails to outline the presence of a significant number of bird species, notably – Kestrel, Barn Owl, Tawny Owl, Kingfisher, Little Egret, Buzzard, Red Kite
 - Impacts to bird populations such as Skylark should not be seen as acceptable. The mitigations are not in the control of the applicant and cannot be delivered.
 - The Ecology Report underestimates the impact on Bat and Owl populations (Barn and Tawny Owl have been omitted by the applicant), as the site will operate on a 24hr, 7 days a week, 365 days a year basis, the light and noise pollution will force Bats to change behaviour and foraging routes, particularly over the Stour Brook.
 - Fermentation tanks will also bounce light back up leading to an unacceptable glow at night time.
 - Air quality assessment fails to take into account the background Air Quality regarding the damage that the digestate lagoons will cause. They will lead to an unacceptable level of nitrogen and ammonia to the local environment.
 - The Ancient Woodland sites in the area, notably Cadge’s Wood which will see two digestate lagoons adjacent. Cadge’s Wood, Howe Wood, Lawn Wood and Over Wood will be impacted by the proposals put forward due to nitrogen and ammonia levels, leading to leaf discolouration, increase in early bud burst, increase in tree diseases, increase in leaf mass without increases in root mass, increasing sensitivity to drought due to overgrowth, leading to an increase in instability and tree fall and also killing off the lichen living on the trees.
- The NPPF states at Section 180 c) that there should be no deterioration or loss of irreplaceable Habitats, therefore it needs to be independently verified that the Nitrogen and Ammonia emissions would not have this level of damage. The applicants’ report indicated that the damage will be high but draws a conclusion that the damage would be acceptable. They have also used outdated calculations that are not consistent with the NPPF.
 - The increase in nitrogen and ammonia will also impact the trees surrounding the proposed site, leading to an unacceptable risk associated with tree falls and due to the close proximity of the site, particular the fermentation tanks that house the highly explosive methane.
 - This application must not be considered to represent “Nationally significant Infrastructure” and must not be seen as outweighing the loss of habitat.
- The applicant has failed to take into account the potential risks for their feedstock sources using tracks through ancient woodlands, (e.g. Lawn and Over woods) these needs to be understood and considered before any approval is granted.

- The applicant claims to achieve Biodiversity Net Gain. However, it is claimed to be achieved largely through the planting of further trees. Such newly planted trees will not achieve the required net gains until about the 15-year mark, this should not be seen as acceptable in light of the losses that would be experienced.

The Parish Council also supports the statements put forward by the Haverhill Wildlife Group, the Suffolk Wildlife Trust and Natural England.

References on policy context for this section. We refer to specific policies and requirements set out in planning documents which we believe to be particularly pertinent to this application:

National Planning Policy Framework

- *Section 2, para 8c (environmental objectives)*
“to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

Suffolk Minerals & Waste Local Plan 2020

- **Aim 2, Objective 7**
“To avoid, minimise and mitigate the impact of minerals and waste development on the environment by:..... Objective 7 including environmental protection policies for the consideration of waste proposals that make reference to the impact upon water quality, flood risk, land instability, landscape character, visual impacts, nature conservation, historic environment, traffic and access, dust, air quality, odour, vermin and birds, noise, light vibration, litter, land-use conflict and cumulative impacts”

Haverhill Vision 2031:

- **POLICY HV18: GREEN INFRASTRUCTURE IN HAVERHILL**
In and around the town of Haverhill the integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced, which includes the creation of new habitats, through the implementation of the St Edmundsbury Green Infrastructure Strategy.
- *Opportunities to extend the coverage and connectivity of the strategic green infrastructure network should be undertaken in association with new development, where appropriate.*
- *Green Infrastructure projects will: a. enhance the character of the Green Infrastructure Action Zones identified in the Green Infrastructure Strategy; b. enhance woodland planting to the A1017 bypass; c. conserve and enhance the Meldham Washlands greenspace; d. provide new community parkland/country park on the strategic growth area to the north east of the town, the areas for which will be determined at the concept and masterplan stage; e. connect multifunctional green infrastructure routes/corridors in the town to existing and future green spaces; f. make urban river corridor improvements to the Stour Brook Valley Green Corridor; and g. promote access to, and appreciation of, local history and heritage assets within the landscape as part of a multi-functional approach.*
- *The council will work with its partners to develop the green infrastructure network and implement proposed network improvements including those set out in the Green Infrastructure Strategy.*
- ***Planning permission for development that would harm the green infrastructure network will only be granted if it can incorporate measures that avoid the harm arising or sufficiently mitigate its effects.***

10. Health & Safety concerns:

The Parish Council has seen evidence to confirm that Anaerobic Biodigester plants are potentially hazardous.

We have also seen the report of the Environment Agency reviewing serious incidents including explosions and leakages from similar plants across the UK.

(A Review of Environmental Incidents at Anaerobic Digestion (AD) Plants and Associated Sites between 2010 and 2018)

This report provides substantial evidence of the potential risks associated with operating such plants and underlines the inappropriateness of its proposed location, in such close proximity to homes and water courses.

Recent examples of explosions at similar plants have caused residents to become fearful and anxious. This demonstrates the hazardous impact of a lightening strike on high pressure methane tanks at Spring Grove Farm, sited so close to hundreds of homes on Withersfield's Arboretum estate, and countless other homes in Hanchett Village and Hanchett End would be. We have seen nothing within the applicant's proposal to reassure us that such an event could not take place just as readily as it did in Oxfordshire just a few weeks back.

In addition, we are concerned at the potential harm caused by particulate emissions from the operation of such a plant, including during flare-offs of surplus gas. This further calls into question the appropriateness of siting such a facility in close proximity to homes and nursery at the Arboretum development and to the Epicentre.

It does nothing to reassure us that the oversight and monitoring of the facility is undertaken remotely – at the Euston plant which the applicant were keen to show us as a comparator, this was in Eastern Europe.

11. False Green credentials

Finally, we are concerned that this proposal is being presented as “green” technology, which will positively contribute to reducing the country's reliance on carbon fuels and hence help to combat global warming.

We refute this. This proposal will take valuable Grade 2 agricultural land out of use to develop the plant.

In addition, it will result in more grade 2 agricultural land being taken out of the production of food and feedstuffs in order to produce silage and non-foodstuff crops in order to feed the digestors and to produce methane to burn to generate electricity. This does not equate to a positive benefit, unlike solar and wind generation – which can be achieved without many of the harms associated with this industrial plant.

Conclusion

For the reasons set out above Withersfield Parish Council strongly OBJECTS to the application. The benefits of the proposal, as demonstrated above are overstated and do not outweigh the significant and demonstrable harm that the proposal would cause. The proposal is contrary to both the NPPF, National Design Guide and the development plan, and planning conditions would not negate the harm identified. The Parish Council therefore request the application is refused.

Addendum

It has been brought to the Parish Councils attention that there is another Planning Application for an anaerobic digester of similar size to the Acorn Application currently with Cambridgeshire County Council at Streetly Hall Farm West Wickham CCC/23/110/FUL

This proposed Digester is less than 2.5 miles from the Acorn site with its main access point also on to the A1307. If both were approved, they would both have to find 40% of their input from cattle slurry or chicken manure from an area that does not have any major cattle or chicken stocks. The Streetly Application states in section 5.21 of their Planning Statement that only 50% of feedstock could be provided by the applicants Farm and partner farms in the area. With the only other major estate in the area being Thurlow there is not enough available land to provide the silage to both digesters. There is no agricultural or strategic need for either of these facilities and two anaerobic digesters of this capacity would be an environmental disaster for this area. The Parish Council suggests that Cambridgeshire and Suffolk planning departments should be in contact to exchange details on these applications.