

Nick Timothy, Member of Parliament for West Suffolk



HOUSE OF COMMONS  
LONDON, SW1A 0AA

Philip Duffy, Chief Executive  
Environment Agency

2 December 2025

Dear Mr Duffy

**Re: Potential planning appeal - Proposed Anaerobic Digestion Facility at Spring Grove Farm, Withersfield, West Suffolk**

**Objection on Flooding, Drainage, and Access Grounds**

I am writing regarding the potential appeal by Acorn Bioenergy against the rejection by Suffolk County Council (SCC) in June 2025 of a proposed anaerobic digestion (AD) facility at Spring Grove Farm, near **Haverhill** and **Withersfield** in West Suffolk. The evidence now available makes the case against any such appeal even stronger.

As confirmed in a letter from the EA to SCC, dated 20 February 2025, the EA objected to the application in the absence of information connected with a Flood Risk Assessment but ultimately left it to SCC to determine.

However, when it published its rejection in June 2025, SCC did not cite flooding concerns as one of the bases of its decision. I am writing to the EA, as the body responsible for managing flood risk, to request that it re-issues and renews its objection to the proposal being approved during any potential appeal.

This letter draws on independent technical analysis, local flooding records, and recent developments concerning the new Access Road approved for the estate. Taken together, these matters demonstrate that the proposed development is unsound, unsafe, and incompatible with National Planning Policy.

**1. A site in the functional floodplain – and repeatedly flooded in reality**

Attached to the email enclosing this letter you will find comment from Paul Zanna of Create Consulting Engineers Ltd, dated 13 November 2025, which followed their full report published earlier this year. This letter is intended to be read in conjunction with it.

Local records show that Spring Grove Farm flooded at least five times between September and November 2023. I understand the EA issued flood warnings on 20 October 2023 and 2 November 2023. Photographs from multiple dates in 2023 and 2024 show extensive flooding across the proposed development area.

This corroborates what has long been known: the site sits within Flood Zone 3 and forms part of the functional floodplain designed to protect **Haverhill**. When sluice gates are closed, something that I understand occurred in 1981 and 1987, water is deliberately held back westwards, directly onto the land now proposed for the UK's largest biodigester and onto land outside the Red Line application area into Cambridgeshire and Horseheath. Mr Richard Haylock, who farms some 200 acres adjacent to the proposed site, made this point when the application came before committee in June: he can attest that the land floods, based on a lifetime of farming land in Cambridgeshire and Suffolk.

Acorn, the EA and the Thurlow Estate, who sponsor this scheme, do not accept this fact, either by intent or lack of knowledge. I was also disappointed this issue failed to be adequately considered by SCC when the matter came before the committee that rejected the application in June 2025. The applicant, Acorn Bioenergy, has neither addressed nor even acknowledged the consequences of this fact.

Should the sluices close again, the entire AD facility, including stored feedstock, digestate, chemicals, and partially processed waste, would be inundated, contaminating local watercourses and causing irreparable environmental damage. Yet the applicant dismisses this risk with the extraordinary claim that only '*a limited area within the woodland to the south-west*' might be affected. This is demonstrably false.

## **2. The Flood Risk Assessment is fundamentally flawed**

An independent review by Create Consulting Engineers, dated 6 March 2025, identified serious and numerous deficiencies in the Flood Risk Assessment (FRA):

Groundwater is as shallow as 1.59m below ground level, yet the proposed attenuation basin would be 2.5m deep, placed directly within groundwater-bearing strata. There is no assessment of groundwater displacement or flood risk to neighbouring land.

- The FRA provides no clarity on whether the basin is lined, or whether groundwater ingress has been accounted for.
- The applicant's hydraulic modelling applies a wholly inadequate 8% climate change allowance. **[See Create document attached, 13 November 2025: Bullet point 1].**

Further, in regard to the EA's clear responsibilities and obligations [see **Create document attached, 13 November 2025: Paragraphs 3 through 12**].

I would also draw your attention specifically to Para 12 of the Create document, which deserves extraction from the commentary: *"It is unclear how the Planning Authority justified the 25-year plant life span when the evidence base (as set out by the EA) confirms 75 years is the norm which would fundamentally change the conclusion on flood risk."*

- The model lacks the required wide-scale impact grid, meaning the applicant has not demonstrated nil off-site impact, a basic national-policy requirement. [See **Create document attached, 13 November 2025: Bullet point 5**].
- The FRA does not identify Flood Zone 3b, despite the likelihood large parts of the site, including the crucial access road, are within it. [See **Create document attached, 13 November 2025: Bullet points 6-8**].

Create Consulting concludes that the modelling cannot be deemed fit for purpose and that the drainage strategy is effectively void until corrected. No responsible planning authority could rely on the applicant's current assessment.

### **3. The development is incorrectly classified and should not be permitted in Flood Zone 3**

The applicant has attempted to classify the AD facility as '*Less Vulnerable*'. This is untenable. [See **Create document attached, 13 November 2025: Bullet point 2**].

The Environmental Statement confirms the need for Hazardous Substances Consent. Under the National Planning Policy Framework (Technical Guidance, March 2012: Table 2), such development is Highly Vulnerable.

Highly Vulnerable development is not permitted in Flood Zone 3. This should be decisive.

### **4. The development will increase flood risk elsewhere, contrary to national policy**

The National Planning Policy Framework, dated December 2024, paragraph 181, is unambiguous: *Planning authorities must ensure that flood risk is not increased elsewhere.*

Yet the applicant's own model shows 5–50mm increases in flood levels immediately upstream. No data is provided for the wider catchment.

Further, the proposal would concrete over 30 acres of land that currently absorbs heavy rainfall. This will accelerate runoff into the River Stour system and increase pressure on Haverhill's defences. These impacts are predictable, avoidable, and unacceptable.

## **5. Surface water drainage proposals are non-compliant**

The Create Consulting report highlights the following serious issues:

- The proposed discharge rate is six times higher than the correct rate (30.4 l/s proposed vs. 4.97 l/s calculated).
- The applicant wrongly claims Sustainable Drainage Systems (SuDS) cannot be used, contrary to Suffolk Lead Local Flood Authority guidance.
- The access road drains directly into a watercourse without treatment or attenuation, breaching both flood and pollution safeguards.
- No proper SuDS assessment has been provided despite multiple requests.

These are not minor omissions. They are fundamental failures in a development of industrial scale located in a floodplain.

## **6. The Sequential Test has been manipulated and is not credible**

The applicant arbitrarily restricted its search for alternative sites to a 5km radius. This is wholly inconsistent with its own Feedstock Availability Analysis, which states that inputs must be drawn from up to ten miles away, with some as far as 50 miles.

Thurlow Estate controls approximately 16,000 acres locally, including land adjacent to the A11, A143 and A1307, all with better transport access and lower flood risk. Yet none of these locations were considered.

A simple review of flood maps shows that Spring Grove Farm is the only high-risk floodplain site among obvious alternatives.

The conclusion is unavoidable: the Sequential Test has been engineered to justify a predetermined choice of site.

**[See Create document attached, 13 November 2025: Paragraphs 22 through 24].**

Worthy of note is the following comment from Create Consultancy: *“The Planning Officers’ position regarding flood risk is potentially misleading and did not provide the opportunity for the Planning Committee or interested parties to comment.”*

## **7. The newly-approved Access Road raises further questions of intent and safety**

On 5 November 2025, West Suffolk Council approved a new access for Thurlow Estate off Horseheath Road. It has been described by a local councillor as ‘over-engineered’ for ordinary agricultural use. The timing coincides with Acorn’s continued commitment to an appeal.

The design - initially 45 metres wide, later reduced to 16.5 metres - still appears far beyond what is needed for farm access to a single field. It raises legitimate concerns that the access is being prepared in anticipation of the AD facility, despite being permitted under a separate application.

If used for the AD plant, this access road would lie within land that floods. Should floodwater block access, heavy tanker movements would be halted. Methane storage would exceed capacity, leading to flaring and heightened environmental and safety risks. Local traffic and road safety would be compromised.

It is essential that Suffolk County Council assess this ‘agricultural’ access road in light of the appeal and in the context of national guidance, which requires access and evacuation routes to be part of any Sequential Test.

## **8. Flooding cannot be viewed in isolation**

The risks associated with this development compound and reinforce one another:

- Flooded access routes would paralyse Heavy Goods Vehicle movements;
- Gas tankers unable to collect biogas would cause methane to build to unsafe levels;
- Flaring would increase emissions and raise explosion risk;
- Floodwater would disperse hazardous material across the landscape and into watercourses;
- Traffic congestion on narrow rural roads would worsen road safety;

This is not a marginal or manageable problem. It is a systemic risk to public safety and the environment.

## **Conclusion**

The evidence is overwhelming and consistent:

- The site is inappropriate for development in flood risk terms;
- The applicant’s assessments do not meet national policy standards;

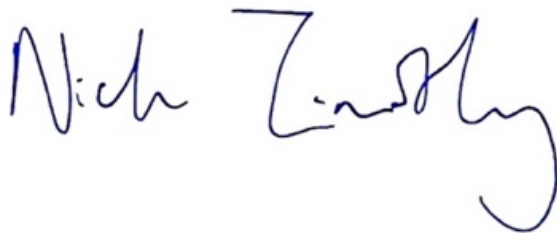
- The Sequential Test has not been properly undertaken;
- The new Access Road approval appears to be part of a wider development strategy not presented transparently to the public;
- The risks to Haverhill, to local watercourses, and to the community are unacceptable and avoidable.

Create Consulting Engineers conclude that the applicant has not demonstrated compliance with either local or national policy on flood risk or drainage, and recommend that the application should not progress.

For all these reasons, I urge the EA to recommend strongly against allowing any appeal.

I look forward to your response.

Yours sincerely

A handwritten signature in blue ink that reads "Nick Timothy". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

**Nick Timothy**  
**Member of Parliament for West Suffolk**