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February 2025

To Case Officer, Suffolk County Council

**RE: Planning Application Number: SCC/0045/23SE. Proposed construction and operation of anaerobic digestion facility, associated infrastructure and new access road**

*A re-consultation submission by Nick Timothy, the MP for West Suffolk, both referencing the initial application and the applicant's further reply to a regulation 25 request by Suffolk County Council — i.e. its Environmental Statement Addendum (henceforth "ESA") and appendices*

1. I am writing to reiterate previous strong objections to proposals for construction of an anaerobic digestion facility, associated infrastructure and new access road north of Spring Grove Farm, near Haverhill / Withersfield.

2. I understand the main work of the facility would be receipt of 92,000 tonnes per annum of feedstock from local farms which would be subject to a process of controlled decomposition (anaerobic digestion).

3. My previous objections, submitted to Suffolk County Council in January 2024, covered points under seven sub-headings:

- i) Health and safety concerns
- ii) Traffic safety concerns
- iii) Smell, noise and air pollution
- iv) Harmful impact on the future prosperity of the area
- v) Impact on public rights of way
- vi) Other environmental concerns
- vii) Harm to residents' quality of life and enjoyment of the surrounding rural landscape

4. Having read the ESA and associated appendices submitted by the applicant, and published on the Suffolk County Council website on 16 January 2025, it is clear to me that each of these grounds of objection still stands. In the below text, I re-examine them.

**i) Health and safety concerns**

5. The proposal is for this facility to be built next to housing, amenities and a dynamic business innovation hub in the fourth largest town in Suffolk (population: 29,000). The new main document recently submitted by the applicant explains its process for considering alternative sites and rejecting them. The applicant also states on p.48 of the ESA that the site will be designed '*in a way that prevents the risk of harm wherever possible, or in such a way that potential impacts are reduced to as low as reasonably practicable*'. The recent submissions by the applicant do not remove concerns about the potential risks of the proposal for those living and working nearby. The anaerobic digestion process produces highly flammable methane gas, which will be removed by tanker twice per day in addition to one tanker of CO<sub>2</sub>.

6. Methane reportedly caused an explosion at a barn in the central German town of Rasdorf in 2014. On May 9, 2022, the Rhein-Neckar Zeitung reported an explosion at a biomass thermal power station in Sinsheim, Germany. In the UK, there was an explosion at the Severn Trent Green Power Plant in Oxfordshire in 2023 following a lightning strike. Given the proximity of the Spring Grove site to many



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homes and businesses, I am not convinced by the applicants' various submissions that they can guarantee the safety of people in Haverhill and Withersfield. In this context, it is relevant to note that Acorn energy lack an extensive track record of having demonstrated safe operation of this type of plant. The applicant itself notes on, p.26 of the ESA, the proposed site's *'intervisibility with the urban fringe of Haverhill, including [the] Epicentre [business hub] and medium-rise housing'*.

## ii) Traffic safety concerns

7. The National Planning Policy on Waste (2014) states that the topics to be considered in deciding whether an application is to be approved should *'include the suitability of the road network'*. The applicant has stated that average daily HGV tractor trips to and from site would run at 25-29 journeys per day, both via the main road and through nearby villages. The A1307 is already a heavily-used road and the only major commuter artery for drivers travelling to and from Cambridge from Haverhill. It is a well-known accident red route but is not a Suffolk Strategic Lorry Route. The applicant's latest main documentary submission acknowledges that the proposal *'will cause a change in traffic volumes on the approaches to and at the site access'* — p. 13 of the ESA. However, it believes that the anticipated number of development-related peak hourly trips — which it states to be equivalent to circa. 0.8-0.9% of traffic during the peak period — *'would have an imperceptible impact on the operation of the local highway network'*.

8. The description 'imperceptible' is inappropriate given that the applicant's admission in its transport statement that trips by full-size articulated lorries occurring during peak harvest period delivery hours *'would be in line with standard agricultural harvest-time activity'*, i.e. possibly all night. Moreover, the congestion caused, on an already heavily used commuter artery — and the fact that it is a road that has a high risk of collisions — means that any notable increase in use of this route, and surrounding rural roads, by heavy lorries is not desirable.

9. The applicant has stated that large vehicles will approach the site entrance every four minutes during a period of ten hours per day, leading to a risk that lorries and tractors will meet at this location repeatedly, leading to queues on a busy, windy road on which heavy commuter and other traffic often drives at high speeds. In addition, heavy use by HGVs on narrow roads near Withersfield are likely to lead to damage on very narrow tracks that lack pedestrian pathways.

10. It is also notable that planning permission has been granted for a smaller but similar plant at nearby Streetly Hall Farm. This will result in a greater number of lorries having to ferry waste products from other locations as the two facilities work to obtain material from the same stock of farm waste. Since composting feedstock is reportedly not available locally, it would need to be transported into the area — with a knock-on increase in the number of large vehicles using the A1307.

## iii) Smell, noise and air pollution

11. As the Environment Agency noted in its [February 2025 submission](#), the May 2023 Air Quality Assessment, aimed at considering ammonia emission sources arising from this proposal, appears to have been based on *'the anticipated peak volume of liquid digestate stored over the year'* (20,000 tonnes) rather than the maximum storage capacity of the digestate lagoons'. This suggests the assessment does not reflect the potential impact should the digestate lagoons be regularly filled to their maximum.



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12. The Spring Grove facility would be one of the largest of its kind in the country, with a strong possibility that it would emanate a pungent odour, both from silage and digestate. The applicant states that the plant ***'will be operational on a continuous basis'*** (p. 31 of the ESA). And, although the applicant has said feedstock would typically comprise energy crops, straw, poultry litter and farmyard manure, I am concerned that this site might eventually be used for food waste also, in part because of Government guidance, issued in February 2024, which stated that — under the Environment Act 2021 — all councils must provide food waste collections by 31 March 2026.

13. Food waste processing plants can have strong accompanying smells. Since February 2015, the Bygrave Lodge anaerobic digestion plant — located off the A505 between Royston and Baldock in Hertfordshire — has processed 45,000 tonnes of food waste each year. The unpleasant aroma is notable for anyone travelling through the area but the site is basically rural and relatively sparsely populated. This is not the case with the Spring Grove Farm proposal. The applicant has confirmed that the feedstock for the Spring Grove Farm plant will include poultry litter and farmyard manure.

14. In 2023, it was reported that residents of the village of Gelligaer in Caerphilly said the smell from a sustainable waste disposal plant nearby was so noxious that it was not possible for windows to be opened. As a result, residents who had tried to sell their homes were apparently not able to do so.

15. The applicant for the Spring Grove farm facility states that it assessed cumulative air quality impacts. It concludes, on p. 47 of the ESA and in [Appendix U](#), that the impact on humans would not be significant. Appendix U focuses on air quality but rather skates over the question of odour, only suggesting that the cumulative impact of Streetly Hall Farm and this site would be unlikely to converge. This lack of adequate consideration of the odour question is not acceptable. If odour does result, as seems probable, the impact would likely be perennial and pervasive. This would be reason enough to reject the application. The north-westerly and south-westerly prevailing winds mean the unpleasant smell having a deleterious effect for a range of amenities near the site, including a pub with outdoor seating, a Montessori nursery, housing, businesses at the EpiCentre, and pedestrians who are enjoying and walking in the nearby countryside.

#### **iv) Harmful impact on the future prosperity of the area**

16. Recent business closures in Haverhill have highlighted an already-present challenge of attracting and retaining investment in the town. In 2024, the town centre lost Lloyds Bank, and this year already WH Smith has announced the closure of its branch. Meanwhile, one of the most promising places for business investment in an area that many consider to be the western gateway to the town is at the EpiCentre — which acts as a modern hub of hi-tech start-ups. It is very close to the site of the proposed bio-digestion plant. One business tenant at the EpiCentre has stated that ***'the noise and smell [resulting from this proposal] will be detrimental day to day to [our team]... We hold meetings with international investors, clients and scientists'***. They add that building the bio-digestion plant here ***'will affect our ability to recruit and retain staff. It will also make it a far less attractive venue to hold client meetings'***. It is imperative that nothing be done to further imperil investment in Haverhill. This is yet another good reason why this proposal should be rejected.



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**v) Impact on public rights of way**

17. In response to the suggestion by Suffolk County Council that an *‘open view across the valley will be lost due to the proposal’*, the applicant states on p. 28 of the ESA that *‘the close-range view across ... the valley from the adjoining section of the Public Right of Way would be lost... and would be unavoidable’*. Additionally, the proximity of the facility to the Stour Brook on the edge of West Town Park would pose a potential threat to both wild habitats and public space.

**vi) Other environmental concerns**

18. There is a strong possibility of flooding in the site — with the area designated as Flood Zone 3. The planned location is next to the river Stour/Stour Brook and Haverhill flood plain, and is not far from the flood storage reservoir. This latter facility was completed in 1972 following heavy rainfall in September 1968 which caused flooding of 155 properties in Haverhill. Similar incidents have occurred frequently during the past two decades. In their latest document submission, the applicant states (in Appendix D) that the site is partially located in an area of high flood risk. As a result, the huge concrete apron (the size of 15 football pitches) that is to be constructed in the context of the site being raised will need to be cleansed of waste materials produced as part of the plant’s operation. This risks residual chemical overspill, including possibly hydrogen sulphide, into the Stour Brook and Flood Park, and the contamination of the local River Stour system.

**vii) Harm to residents’ quality of life and enjoyment of surrounding rural landscape**

19. This facility would clearly be an industrial development on agricultural land. However, industrial development is not in line with the Haverhill Vision 2031 document. It would be just 600 metres from The Arboretum housing development and the Epicentre, and on the edge of a conservation village, Withersfield. I note that Withersfield Parish Council has also strongly objected to this proposal, as has Haverhill Town Council. The unsustainable level of extra traffic, the likely unpleasant odour, a potential increase in insects and rodents resulting from the presence of so much manure and waste, the threat of methane escape and potential risk, the light and noise impacts from a facility in operation at all hours of the day, the risk of flooding and loss of picturesque countryside alongside potential harm for local wildlife all combine to make it clear that this proposal would have an acutely negative the quality of life for those who reside and work in the area. On balance, the costs far outweigh the benefits of building this facility here.

20. For the above reasons, I reiterate my strong view that this application should be rejected. Indeed, the case against approval is overwhelming.

Yours sincerely

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**Member of Parliament for West Suffolk**