

Nick Timothy, Member of Parliament for West Suffolk



HOUSE OF COMMONS

LONDON, SW1A 0AA

29 April 2025

For the attention of: Andrew Rutter, andrew.rutter@suffolk.gov.uk

RE: Planning application reference number: SCC/0045/23SE

1. I am writing to express my concern about — and strongly object to — the submission by Suffolk County Council's (SCC) flooding and planning officer, dated 19 March, regarding planning application reference number: **SCC/0045/23SE**. As you know, this submission recommends approval of the proposal for a bio-digestion plant at **Spring Grove Farm** near Haverhill and Withersfield, subject to certain conditions, while other submissions have recommended the application be rejected.
2. As the officer will know, the proposed development would be constructed in close proximity to an area that has had recurring flooding problems over many years.
3. The Environment Agency (EA) objected to the proposal because the applicant has repeatedly failed to satisfy them that the flood risk had been mitigated. As the EA said in its submission dated 20 February 2025, *'the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater'*. The EA submission adds that the applicant needs to *'demonstrate that the development will not increase risk elsewhere and where possible reduces flood risk overall'*.
4. Haverhill's flood defences were constructed following a devastating flood in 1968 which saw 170 properties in the town damaged. To defend the town, specially-built sluice gates are required to close, holding water back to the east of the town. When this happens the flood park fills, as does a section of the land at the eastern edge of Haverhill. Serious flooding occurred on at least two occasions during the 1980s. On both occasions, the sluice gates were closed to protect the western part of Haverhill. More recently, the area saw flooding in 2020 and during the autumn of 2023.
5. The construction of the bio-digestion plant would concrete over a number of acres of land that would otherwise absorb a vast quantity of rainfall. The entrance of the planned facility would be constructed on an area designated as Flood Zone 3. Should there be a flood that restricts entry and egress to the site, it would cause traffic congestion, compromising road safety. If it is not possible for gas tankers to collect and leave with their twice-daily loads, the methane stored may exceed capacity and be flared off, potentially increasing the risk of explosion
6. It is worth noting that SCC's Senior Transport Planning Engineer submitted an objection to this application, dated 7 April 2025, noting that the *'application has not evidenced that safe and suitable access can be achieved for all users'*.

7. Should the new development itself be flooded, then stored feedstocks, hazardous chemicals, processed and semi-processed waste materials risk being washed into local waterways. The applicants have themselves said that *‘there is a limited area within the woodland to the south west of the main site where flood risk is marginally increased’*.

8. The National Planning Policy Framework, published in December 2024, says: *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).”* (p.49). It adds: *“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.”* I ask SCC to be particularly mindful of this guidance in considering this application.

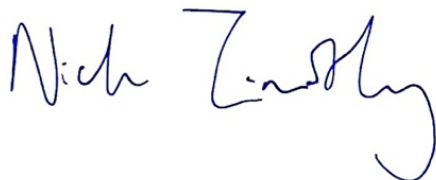
9. Installations requiring hazardous substances consent are not permitted to be built in Flood Zone 3. The bio-digestion plant would be an industrial waste facility which produces biogas, which requires hazardous substances consent — as indicated by the applicant on p.11 of their original application which is listed as the top document on the SCC planning portal under this reference number, dated 6 June 2023.

10. There are alternative possible sites for this development which would not pose so great a flood risk to inhabited areas. A location close to the A11 or A143 would be more suitable, and closer to feedstock areas as shown by the applicant’s own feedstock catchment area maps.

11. I note also that the likely effectiveness of measures proposed by the applicant to mitigate the flooding risk, namely channel drains and underground pipes that would be used to intercept and convey runoff across the site, has been questioned by the EA and by an independent report commissioned by residents — see report by Create Consulting Engineers dated 6 March 2025.

12. Given these concerns, alongside the EA’s own objection, there is a strong possibility that the flood threat to the local area would be worsened if this planning application were to be granted. I therefore point to it as a clear reason, although certainly not the only one, to reject the application.

Yours sincerely

A handwritten signature in blue ink that reads "Nick Timothy". The signature is written in a cursive, flowing style.

Nick Timothy
Member of Parliament for West Suffolk