

Our Ref: SCC/CON/0371/25

Date: 7 April 2025

Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk

All planning enquiries should be sent to the Local Planning Authority.

Email: planning@suffolk.gov.uk

The Planning Department
Suffolk County Council

For the attention of: Andy Rutter

Dear Andy,

TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: SCC/0045/23SE

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

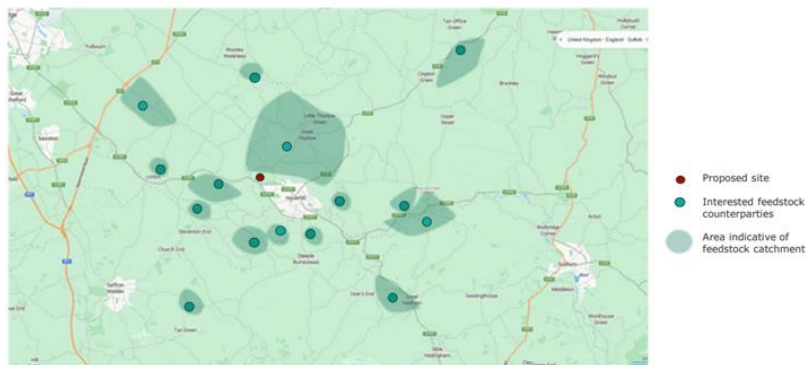
LOCATION: Land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW

Thank you for your reconsultation on the above application for a biowaste power generation facility accessed from the A1307 to the west of Haverhill. This correspondence is further to the Highway Authority's holding objection response dated 19 October 2023 in which highway concerns were raised.

We have reviewed the Transport Addendum and note 4.3 which states that operational trips are split with 75% assigned to the west and 25% assigned to the east. This split was not included in the earlier Transport Note. There is no clarification or data to evidence why there is a such a large disparity between the west and east direction. The 75%/25% split does not appear to be supported by the recently submitted Spring Grove Proposed Feedstock Availability Analysis which provides an indicative plan showing the parties that may utilise the facility (see snip below).

The plan suggest that the majority of potential clients will be generally to the east of the site which does not support the assigned 75%/25% trip direction. This is an important consideration, as the split is used on to forecast the queue data and derived junction modelling. This data is then used to support the assertion that the proposed access design will have a negligible impact on the operation of the local highway network because the queue lengths for vehicles waiting to turn right into the site would be less than 1 vehicle during the peak periods.

Distribution of Interested Purpose Grown and Residue Feedstock Counterparties Spring Grove Green Power:



The Spring Grove Proposed Feedstock Availability Analysis identifies in the Minimum Mass Interested to Supply table a potential mass of 115,500 tons per year. This is a 25% increase over the 92,000 tons per annum that was stated in the 2023 Transport Note. The number of estimated 9786 trips has not proportionately increased. It would be reasonable to assess 25% more trips.

The Distribution of Feedstock plan indicates the location of Interested feedstock counterparties but a number of these are more than 10 miles from the development site. It also states that within a 10-mile catchment area there is a reasonable expectation that there is potential for 2,000,000 tons. The snip below is taken from the Spring Grove Proposed Feedstock Availability Analysis page 1 with our highlights added.

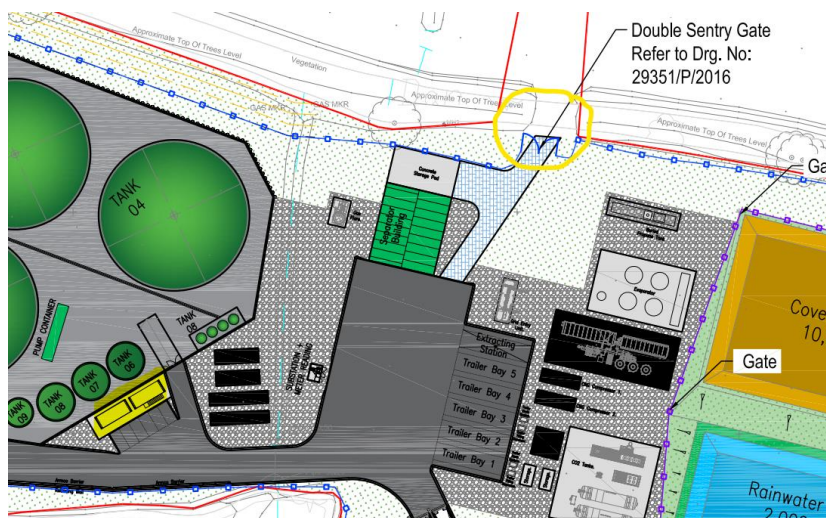
- Within a 10-mile initial feedstock catchment radius, assuming total farming land use is given over to a single crop, we might reasonably expect there to be the potential for c.2,000,000t of maize, whole crop silage or grass. Alternatively, there could also be the potential for 250,000t of straw.

We would like to understand better the potential for site operational growth, so that we can have confidence that the stated number of trips will remain broadly stable. Is there a planning condition that would prevent growth up to the theoretical maximum potential?

The Transport Addendum estimates that the development could generate a peak daily total of 158 trips on the site access arm of the access junction during the busiest operational time of year. Because this estimate is below 300 trips the report states that it is considered unnecessary for a ghost right turn lane to be provided and concludes that on this basis that the junction modelling there is no capacity constraint and therefore, that the absence of a right turn lane is acceptable. The Highway Authority notes how this assumption is related to the estimated trip generation methodology.

We have reviewed the Internal Layout information and the site layout shown on the Site Fencing Layout Drawing No. GGP-29351-P-150 Rev B. We note 5.2 which confirms that 6 staff carparking spaces will be provided for a shift complement of 5 staff. There is usually staff overlap at shift changes so it would be beneficial if more parking spaces could be provided. The snip below shows a area adjacent to the car parking spaces (highlighted). Is this a cycle parking area? If it is this should be labelled on the drawing. If this is not cycle parking, then it should be clarified that staff cycle parking will be provided in accordance with Suffolk Guidance for Parking (SGP) requirements.

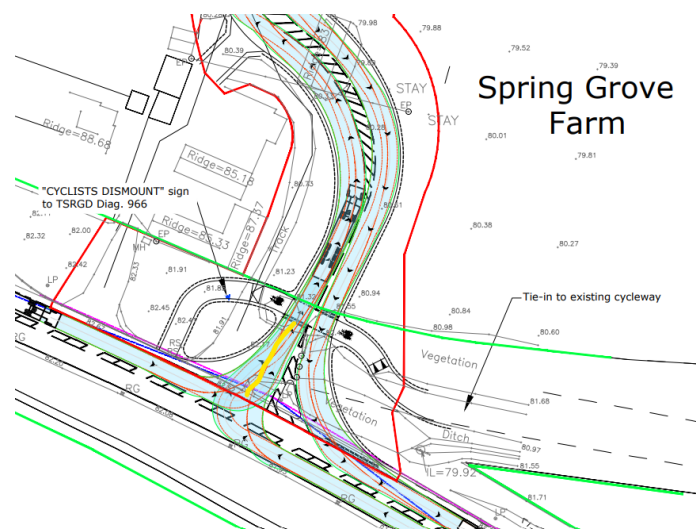
We note from the Site Plan that an access is proposed on the site's northern boundary shown by the yellow circle. What traffic will used this gate?



We note 5.3 which assess the trailer parking capacity. It states, “The Application Site will be managed such that the number of vehicles on site at any one time does not exceed the number of trailer bays. It is unclear how arrival times will be managed. A site visit turn around for vehicles of 15 minutes is predicted but there are no details to explain how such a short turn around time will be achieved. Will there be a booking service and allocated arrival slots?”

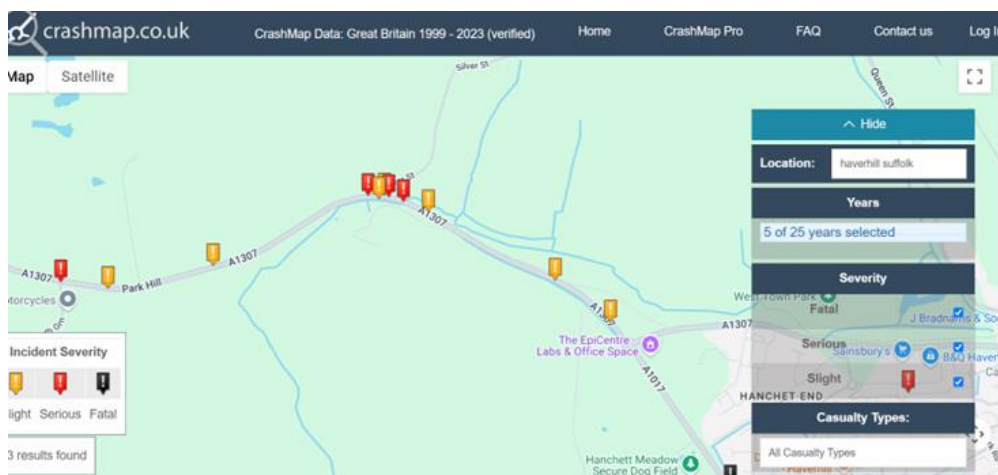
We note the HGV track plan Drawing No. 2401110-TK01 which evidences that there is sufficient space for HGV to manoeuvre in and out of the trailer parking spaces as long as that manoeuvring space is not blocked by parked vehicles. Will HGV’s need to manoeuvre in the vicinity of the Ark Clamps 1 – 3 in the western part of the site or will that space be reserved for site operational vehicles?

We have reviewed the Proposed Site Access Drawing No. 2401110-01 B. There does not appear to be sufficient length for an arriving HGV to pull clear of the main road, if the HGV needs to give way at the proposed cycle crossing point. That distance should be evidenced on the drawing so this can be clarified. The area of concern is shown by the yellow line in the snip below of the drawing. It is not acceptable for there to be any overhang of vehicles on to the main road.



The suitability of the site layout in terms of the number of trailer bays is intrinsically related to the number of trips. Uncertainty around trip generation means that it is not possible for the Highway Authority to be confident that the proposed site layout parking arrangements are acceptable.

The snip below is taken from CrashMap and shows the number of incidents that happened on the A1307 in the 5-year period 2019 to 2023. We note with concern the cluster of accidents at the Silver Street junction. The application has not evidenced that a similar pattern of accidents will not occur at the proposed access junction.



We also note the road verge High Casualty Route sign which is a very short distance from the access to the development site.



The Transport Addendum section 6 responds to our earlier query about the RSA not considering the risk of queuing vehicles on the highway by confirming that the audit team does not consider that to be a road safety problem. That conclusion is based on the assumed queue length derived from the unreliable trip estimates. As we have indicated in this letter the Highway Authority does not consider the trip generation estimates to be robust and therefore, the explanation that the audit team does not consider highway queuing be a problem is not acceptable.

The Transport Addendum addresses our concern about the possible distraction a gas flare would have on users of the highway in section 7.1. Because of the 7m height of the flare tower the clarification provided has not reassured the Highway Authority that gas flare will not be a significant distraction to highway users in the area including the future users of the new relief road that is currently under construction to the west of Haverhill.

The Highway Authority recommends that this application should not be determined until there is more clarity and robustness around the trip estimates.

If the Planning Authority are inclined to determine the application, then at this time the Highway Authority recommends refusal of the application because it has not been evidenced that the development will not have an unacceptable impact on highway safety or that the development would not have a severe cumulative impact on the road network, so the application is not in accordance with NPPF 2024 paragraph 116.

The application has not evidenced that safe and suitable access can be achieved for all users, so it is not in accordance with NPPF paragraph 115b.

The application has not evidenced that the proposal will allow for the efficient delivery of goods, so it is not in accordance with NPPF paragraph 117d.

Yours sincerely,

Peter Bradfield
Senior Transport Planning Engineer (West Suffolk)
Growth, Highways and Infrastructure