

Our Ref: SCC/0045/23SE
Date: 21 November 2023
Enquiries to: Andy Rutter
Tel: 01473 263766
Email: Andrew.rutter@suffolk.gov.uk

Rhian Thomas,
SLR Consulting,
86 Princess Street,
Manchester,
M1 6NG

Dear Rhian,

**Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).**

Application No: 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.

I write in respect to the above site and the current planning application which is under consideration by Suffolk County Council ('the Council').

The Council believes that in order to satisfy the requirements of Regulation 18 (2) and (3) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) it is necessary for the submitted environmental statement to be supplemented with additional information. Therefore, the Council are requesting under Regulation 25 that further information to satisfactorily address **Appendix A** is submitted.

All of the consultation responses can be viewed on the following link and full consideration of these should be undertaken in addition to the clarifications sought below.

<http://suffolk.planning-register.co.uk/Planning/Display?applicationNumber=SCC%2F0045%2F23SE>

The Council requires the requested information to be provided within 30 days of this letter, or such other period to be agreed in writing.

Yours sincerely,

Andy Rutter

Andy Rutter
Development Manager
Growth, Highways & Infrastructure

Appendix A

No.	Subject	Consultee	Regulation 25 Request
1	Surface water drainage	Lead Local Flood Authority West Suffolk Council Planning	<ul style="list-style-type: none"> a) Submit a surface water drainage strategy that achieves the 4 pillars of SuD and utilises above ground SuDS wherever possible for collection, conveyance, storage, and discharge, providing multi-functional and benefits. b) A updated drainage layout which show the use of rain gardens and permeable paving within the development is required. c) Detailed SuDS drawings need to be included within the drainage strategy i.e. cross and long sectional drawings. All features should be designed in accordance with Suffolk SuDS guidance. d) A contour plan, exceedance routes and impermeable area drawings are required within the drainage strategy. e) Remove the calculations with the discharge rates and climate change which are not being used. f) The calculations need to be modelled as a network rather than source control. g) A sequential test is required.
2	Surface Water Drainage	Environment Agency	<ul style="list-style-type: none"> a) Identification of the impacts from nearby watercourses is required. b) Assessment of the impact of climate change using appropriate climate change allowances is required. c) Confirmation of the lagoon lining depth is required. d) Confirmation to whether lagoon leak detectors are proposed. e) Confirmation on the monitoring of the rising main to identify leaks is required. f) Confirmation on how confirmation of clean water will be prevents, specially in relation to the onsite clamps. g) Confirmation of contingency plan in the event of pumping station failure or mains power failure, resulting in dirty water not being pumped into the holding tanks. h) Confirmation on how the pump located within the tank bund will be managed. i) Consideration of the installation of a penstock on the outlet of the rainwater lagoon to isolate the site drainage in the event of a spillage or run off due to a fire.

3	Highways	<p>Cambridgeshire County Council (Transport Assessment Team)</p> <p>Cambridgeshire County Council (Highways Development Control)</p>	<ul style="list-style-type: none"> a) Data from Cambridgeshire County Council's accident data portal needs to be included within the transport assessment. b) Full trip generation assessment is required. c) Outline the daily AM and PM peak generation figures for the busiest period (e.g. the harvest period). Include trip generation from employees. d) Details of the distribution of trips to and from the site to understand the levels of trips on the A1307 within Cambridgeshire.
4	Highways	Suffolk County Council (Highways)	<ul style="list-style-type: none"> a) Clarification is sought to the calculation of how 5600 trips of the proposed 9786 trips are existing. b) Include non-HGV movements within the calculation of the construction traffic movements. c) Demonstrate how the proposed gas flare will not distract users of the highway when in operation. d) Further information to evidence that the proposed number of operational trips will not detrimentally affect the highway is required. e) Assessment of queue length for vehicles waiting to turn right into the site with consideration of highways safety is required. f) Investigation into the appropriateness of a right turn lane into the site is required. g) Modelling of peak traffic flows is required. h) Clarification on the space provided for parking, waiting and manoeuvring areas is required. i) Track plans, specifically for HGV and tractor movements within the site is required. j) Formal pedestrian and cycle crossing of the proposed access junction is required as the improved junction cross existing segregated pedestrian and cycleway. k) The stage 1 safety audit has not addressed the risk of queueing on the carriageway.
5	Highways	Suffolk County Council Planning	<ul style="list-style-type: none"> a) Clarification of this applications interaction with application DC/23/0572/FUL for an agricultural access improvement at Silver Street. b) Removal of reference to A43 within Planning Statement. c) Justification for including a hard standing 'dog leg' towards the gap in hedgerow to access the field to the north. This seems to imply vehicles will be travelling between the main site and field to the north.

6	Natural Environment	Natural England	<ul style="list-style-type: none"> a) Robust scientific evidence that supports the assumptions within the air quality assessment. b) The air quality assessment must include in combination effects with other plans and projects. c) Assessment of air quality impacts on Over and Lawn Woods Site of Special Scientific Interest (SSSI) in combination with other plans and projects. d) Clarification to whether ammonia sources and associated ammonia emission rate includes emissions from the silage feedstocks stored prior to the AD process. e) Detailed specification of the digestate lagoon covers is required. f) Robust scientific evidence is required to demonstrate that the 95% ammonia emission reduction rate is achievable. g) Clarification is sought to whether it would be more appropriate to model the emission rate for the digestate lagoons on the maximum storage capacity or the anticipated peak volume stored over a 12-month period. h) Robust scientific evidence and appropriate mitigation measures to justify an 80% ammonia reduction for digestate solids is required. i) Robust scientific evidence is required in relation to the 80% ammonia emission reduction from digestate solids by passive ventilation. j) Robust scientific evidence to justify the ammonia emission rate achieved by the manure shed abatement unit is required. k) Evidence of the performance criteria for the manure shed abatement unit is required. l) A nutrient management plan is required.
7	Natural Environment	<p>Suffolk County Council Planning</p> <p>Suffolk Wildlife Trust</p>	<ul style="list-style-type: none"> a) A lifetime carbon impact assessment is required.
8	Air Quality	<p>Suffolk County Council Air Quality Consultants</p> <p>West Suffolk EHO</p>	<ul style="list-style-type: none"> a) Pre pandemic 2019 data is required to evaluate existing PM10 concentrations. b) Track needs to be considered up to 500m from the site entrance(s). c) The Institute of Air Quality Management guidance on the assessment of dust from demolition and construction has been updated in August 2023, however, the 2014 version has been used.

9	Ecology	Suffolk County Council Ecology Suffolk Wildlife Trust West Suffolk Council Ecology	<ul style="list-style-type: none"> a) Water Vole and Otter surveys of nearby watercourses are required. b) The biodiversity net gain assessment needs to include consideration of hedgerows and watercourses which boarder the site.
10	Landscape and Visual Impact	Suffolk County Council Landscape	<ul style="list-style-type: none"> a) A landscape led approach to the design of the entire scheme is required. b) A landscape implementation, after-care and long term maintenance plan is required. c) All of the proposed fencing is industrial and is not suited to the countryside location. d) Fencing lines require clarification. e) The proposed changes to receptors to the east of the main site would be significant. f) Disagreement that by year 15, the proposed woodland would have mitigated the projects effect from negative to positive. g) Open views across the valley will be lost due to the proposal. h) Visual receptors to from Silver Street will have filtered views of the AD plant domes. i) The levels of reinforcement planting along southern, western and northern boundaries of the main site is unclear. j) The western boundary vegetation of the main site requires enhancement. k) Reshaping and integration into the existing landscape is required for the proposed bunding east of the main site. l) Reshaping and integration into the existing landscape is required from the proposed bunding to the north of the lagoons. m) Consideration needs to be given to the proposed eastern woodland to how it can mitigate impacts of the proposed development, but also afford some depth of view and vistas. n) Local green infrastructure and hedgerow enhancement should be considered along the pipeline route. o) Clarification around out of operational hour maintenance and the requirement for associated lighting is required.

11	Arboriculture	Suffolk County Council Landscape	<p>a) The orange line indicating removed vegetation is not clear and there is risk the contractor could cut back to the red line. Include a hatch area to indicate areas in which vegetation needs to be removed, which can be clearly legible in colour and black and white versions.</p> <p>b) Justification for the removal of vegetation around the new access from the A1307 is required.</p> <p>c) Justification to why the pipeline cannot avoid Grp 2 is required.</p>
12	Land Contamination	West Suffolk Council EHO	<p>a) Inclusion of the disused railway within the ground contamination investigation report.</p>
13	Statement of Community Involvement	Suffolk County Council Planning	<p>a) Update the statement of community involvement to remove references to Silver Street.</p>
14	Site Selection	Suffolk County Council Planning	<p>a) A comparison of the environmental effects of the reasonable alternatives as part of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Schedule 4 Part 2.</p>
15	Waste Availability	Suffolk County Council Planning	<p>a) An assessment of the current availability of appropriate waste products within the local market area, taking into account plans for facilities requiring the same waste feedstock in the surrounding area.</p>
16	Cumulative Impacts	Suffolk County Council Planning	<p>a) An assessment of cumulative impacts in relation to the current application CC/23/110/FUL Land at Streetly Hall Farm under consideration by Cambridgeshire County Council. The following subjects will need to be considered:</p> <ul style="list-style-type: none"> i. Noise. ii. Air Quality. iii. Odour. iv. Transport.
17	Risk of Accidents	Suffolk County Council Planning	<p>a) An assessment of the measures in place to avoid the risk of damage to human health and the environment if plant malfunction occurs (e.g. the pipeline between the main site and lagoon site).</p>