

Planning Application No: SCC/0045/23E. – Acorn Bioenergy

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

Please find below my objections and comments in respect of:

Acorn's Regulation 25 Environmental Statement Addendum- Highways Sections 3

3. Response to Cambridgeshire County Council Transport Assessment Team & Highways Development Control

a) Data from Cambridgeshire County Council's accident data portal needs to be included within the transport assessment.

This is considered in Paragraphs 7.2-7.7 of the Transport Addendum (Appendix G) which reviews accident data. No significant patterns or trends have been observed that would be exacerbated by the Proposed Development (the Proposed Development would change the volume of traffic by less than 1%).

Objections:

- The accident data included in Acorn's Transport Addendum only covers a very limited section of the A1307 and a limited section of Silver Street.
- More data is required for the whole of the A1307 in Cambridgeshire and also for the whole of Silver Street and the surrounding rural roads, as traffic will be generated from a 10-mile radius for silage and even further for manures.
- The area selected by Acorn is far too restricted to reflect the accident profile of the area and has failed to answer the question.

b) Full trip generation assessment is required

This is considered in Paragraphs 2.8-2.16 of the Transport Addendum (Appendix G) which concludes that a traditional TRICS assessment is not possible due to lack of similar surveyed sites. Therefore, a first principles approach has been applied based on the processing and export volumes that are expected to be achieved.

Objections:

- This response statement is unacceptable.
- TRICS rates allow the true impact of a new development on local highways to be assessed, it is the industry standard and vital in assessing this application.
- A TRICS rate should also be specifically generated for the new Northern gate entrance which is identified on the new plan (see 5c & Image 4).
- A full Transport Assessment is required before planning permission is considered, to ensure that transparency on where traffic will access the site and what the effect will be on all roads around the site not just a small section of the A1307.

c) Outline the daily AM and PM peak generation figures for the busiest period (e.g. the harvest period). Include trip generation from employees.

This has been calculated with the Transport Addendum (Appendix G) and outlined on Paragraphs 2.8.2.16 of the document. The anticipated number of development-related peak hourly trips is equivalent to circa. 0.8-0.9% of traffic during the peak periods. This would have an imperceptible impact on the operation of the local highway network

Objections:

- This response only considers traffic flows on the A1307
- There needs further analysis of farm traffic from the north
- The site plan (**see image 4**) shows a new entrance gate to the North of the development; therefore, a new assessment is required for traffic coming from the farm areas to the North West, North and North East which will make up the bulk of traffic movements of Silage Waste and potentially manures to the site.
- Acorn's estimate in the updated Planning Statement 4.6.1 states: "the site will be served by approximately 9134 HGV tractor trips per year " in the original Planning Statement in Table 5.3 it was 9786 trips. Trips are only one way so this equates to 19122 extra traffic movements the bulk these will be at peak during harvest periods. This will have a major impact on the operation of the local highway network

d) Details of the distribution of trips to and from the site to understand the levels of trips on the A1307 within Cambridgeshire

Expected AD suppliers (local farmers) currently generate a number of vehicle trips of which, a proportion of which these existing trips would involve the disposal of agricultural products and waste which would be redirected to the AD plant. Therefore, these movements would already exist on the local highway network, of which, depending upon the locations of the farms and end destinations, would already be using the A1307. This will cause a change in traffic volumes on the approaches to and at the site access and the impacts of this is assessed within Section 4 of the Transport Addendum (Appendix G).

Objections:

This statement is incorrect for the following reasons:

- Section 4 of the Transport Addendum Appendix G only covers statistics for the junction into the plant, which is in Suffolk.
- There is no data that covers the full area of the A1307 in Cambridgeshire that would be affected.
- Acorn have had over 2 years to calculate accurate traffic movements, to say in **4a)** that "**at this stage is difficult to predict accurately**" is unacceptable.
- As Acorn have acknowledged that they are unable to clarify their calculation of 5600 existing trips, the data they have used is incorrect and should not form part of their report.
- The data of proposed 9786 trips should be viewed as 19121 vehicle movements as a trip is 2 ways.
- The idea that traffic flows to one location can offsite traffic flows to a different location is totally flawed.
- Therefore, the response doesn't answer the question.

4. Response to Suffolk County Council (Highways)

a) Clarification is sought to the calculation of how 5600 trips of the proposed 9786 trips are existing.

This is considered in Paragraphs 2.2-2.3 of the Transport Addendum (Appendix G) which states determining these existing proportions of traffic already using the A1307 at this stage is difficult to predict accurately. However, in order to provide a particularly robust assessment, the junction capacity assessment of the proposed site access (detailed in Section 4) has not accounted for any 'netting off' of vehicle trips, – i.e. the assumption is of all trips being new notwithstanding, it is important to recognise the relationship between the proposed development and the existing vehicular trips on the local highway network.

Objections:

This statement is incorrect for the following reasons

- Acorn have had over 2 years to calculate accurate traffic movements, to say that "**at this stage is difficult to predict accurately**" is unacceptable.
- As Acorn have acknowledged that they are unable to clarify their calculation of 5600 existing trips, the data they have used is incorrect and should not form part of their report.
- The data of proposed 9786 trips should be viewed as 19121 vehicle movements as a trip is 2 ways.
- The idea that traffic flows to one location can offsite traffic flows to a different location is totally flawed.

c. Demonstrate how the proposed gas flare will not distract users of the highway when in operation

This is considered in Paragraph 7.1 of the Transport Addendum (Appendix G) which discusses gas firing. The proposed flare location is circa. 220m from the highway; considering this distance combined with existing buildings and vegetation, it is unlikely the flare will have an impact.

Objections:

- The proposed flare is 9 metres in height, (should be at least 12.19 meters), the proposed height would be visible above the foliage on the north site of the site and therefore clearly visible on Silver Street and Horseheath Road.
- The trees that line the highway are deciduous and in winter, when the flare would be most visible, provide no screening what so ever for the A1307.
- The trees that line the highway are not on land owned by Acorn or Thurlow Estate and therefore they do not have control over the trees.
- The flare would be clearly visible not only from the A1307, but also from the A1017 as traffic comes down the hill onto the Spirit of Enterprise roundabout and from Cambridge Road.
- The problems with the flaring of methane are not restricted to distraction of users on the highway. Washington State University and the EU have release various papers on the dangers to human health of flaring methane in proximity to urban areas, with data showing that people up to 60 miles away can experience respiratory distress because of flaring. I will provide more information in a separate objection.

d. Further information to evidence that the proposed number of operational trips will not detrimentally affect the highway is required.

This is considered in Paragraphs 4.1-4.7 of the Transport Addendum (Appendix G) which discusses a junction assessment that has been undertaken. It is concluded that the proposed access arrangement design will have a negligible impact on the operation of the local highway network.

Objections:

- *Paragraphs 4.1-4.7 of the Transport Addendum (Appendix G) only deals with the proposed traffic site access on the A1307 and access modelling, it does not give number of operational trips or consider traffic coming to the site along the full length of the A1307 or the minor access roads onto the A1307 of Silver Street ,Horseheath Road, Hollow Hill, A1017 and Cambridge Road towards the Spirit of Enterprise roundabout.*
- Acorn's estimate in the updated Planning Statement 4.6.1 states: "the site will be served by approximately 9134 HGV tractor trips per year " in the original Planning Statement in Table 5.3 it was 9786 trips. Trips are only one way so this equates to 19122 extra traffic movements the bulk of these will be at peak during harvest periods. There is no *"information to evidence that the proposed number of operational trips will not detrimentally affect the highway"*
- The Assessment completely ignores the new north gate entrance on the latest site plan (**see image 4**). What traffic will access from the north and where will that intersect the rural road network?
- Acorn's original Planning Statement proposes that all movements will go through the gate on the A1307 but the new drawing of the site *Appendix P- GGP- 29351-P-150-B- Site Fencing Layout* shows a Double Sentry Gate *Refer to Drg No 29351/P/2016* which is the same drawing number as the A1307 entry gate. Will it be the same design as the A1307 gate and where is the traffic analysis for traffic coming through this gate?
- Acorn have failed to show that the proposed number of trips will not detrimentally effect the highway.

e. Assessment of queue length for vehicles waiting to turn right into the site with consideration of highways safety is required.

This is considered in Paragraphs 3.1-3.6 of the Transport Addendum (Appendix G), which makes reference to the junction modelling undertaken in Section 4. It is concluded that queue lengths for vehicles waiting to turn right into the site would be less than 1 vehicle during the peak periods based on a peak development assessment. The delay to vehicles seeking to turn right would be minimal. On the basis that the junction modelling identifies there is no capacity constraint, that would have a significant impact upon highway safety.

Objections:

- The data used for these calculations is flawed. With the site generating 19121 vehicle movement per year on average and with all traffic entering at the one A1307 gate there will be a problem at the gate entrance in peak harvest and rush hour periods when average volumes will double.
- *"4.3 The distribution development trips have been based on the information presented in TAR (Table 6.2) whereby 75% of Trips have been assigned to the west and 25% of trips have been assigned to the east."* Therefore only 25% of the trips are assigned to make the right hand turn across the oncoming traffic flow. What data supports this?

f) Investigation into the appropriateness of a right turn lane into the site is required.

This is considered in Paragraphs 3.1-3.6 of the Transport Addendum (Appendix G), which makes reference to the junction modelling undertaken in Section 4. It is considered unnecessary for a ghost right turn lane to be provided, on the basis that the junction modelling identifies there is no capacity constraint. Therefore, the not providing a right turn lane is acceptable.

Objections:

- The data used for these calculations is flawed. *“4.3 The distribution development trips have been based on the information presented in TAR (Table 6.2) whereby 75% of Trips have been assigned to the west and 25% of trips have been assigned to the east.”* Therefore only 25% of the trips are assigned to make the right hand turn across the oncoming traffic flow. What data supports this?
- The data used for these calculations is flawed. With the site generating 19121 vehicle movement per year on average and with all traffic entering at the one A1307 gate there will be a problem at the gate entrance in peak harvest and rush hour periods when average volumes will double.

g) Modelling of peak traffic flows is required.

Junction capacity modelling has been undertaken for the site access. This is based on the peak trip generation presented in the TAR and the ATC data. The modelling demonstrates that the site access will operate well within capacity during the future scenario 2029 as identified by low RFC values and queues during the AM and PM peaks. The junction modelling identifies that there will be less than 1 vehicle queuing to turn right into the site access and therefore the proposed access arrangement design will have a negligible impact on the operation of the local highway network.

Objections:

- This analysis needs to be challenged because the only modelling has been based on the A1307 site access.
- This modelling does not consider the new north entrance to the site as detailed in 5c).
- Paragraph 3.3 Access Appraisal of the Transport Addendum (Appendix G) States “148 two-way HGV/tractor trips, plus 10 two-way staff trips, equating to a **daily** total of 158 vehicle trips during the busiest operational times of the year”. This refers to trips and each trip equals 2 movements.
- The data does not address traffic movements on Silver St, Horseheath Road ,Hollow Hill and Cambridge Road. Some of these roads are narrow and any increase to traffic volumes will be dangerous
- Acorn’s estimate in the updated Planning Statement 4.6.1 states: “the site will be served by approximately 9134 HGV tractor trips per year “ in the original Planning Statement in Table 5.3 it was 9786 trips. Trips are only one way so this equates to 19122 extra traffic movements the bulk these will be at peak during harvest periods.
- Silage will be generated over an area of 10 miles radius and 20 miles or more for manures, biomethane and CO₂, therefore data is required on a larger area of the highway network .

h) Clarification on the space provided for parking, waiting and manoeuvring areas is required.

This is considered in Paragraphs 5.2-5.4 of the Transport Addendum (Appendix G) which discusses the internal layout of the site. Given a maximum of 5 staff will be on-site at any one time and therefore

there will be sufficient parking provision. The application site will also be managed such that the number of vehicles at any one time does not exceed the number of trailer bays.

Objections:

- The analysis in Paragraph 5.2-5.4 of transport (Appendix G) does not take into account the HGV and Tractor Trailer movements through the proposed northern entrance gate identified on the new site plan (**image 4) referred to in 5c below.**
- The bulk of silage trip traffic will access this gate from a 10-mile radius around the north of the site through the local highway network as per *Appendix P Feedstock*
- *Transport Addendum (Motion) Appendix C withing Appendix G Page 16 drawing 2401110-TK01 (See image 3 below)* This illustrates the entry and exit manoeuvre within the site for vehicles parking in the trailer bays coming from the A1307 but does not show a north gate or show the north gate structure. **Referred to in 5c) below.**
- *Appendix P – GGP-29351-P -2016-B Fencing Gate Drawing No 29351/P/150 Rev B (Image 4)* shows the north gate with the entrance to the parking area.
 - This will result in vehicles from the north gate having to cross vehicles coming from the A1307 south gate. How will this be managed so that vehicles do not enter from both gates at the same time?
 - Tractor/trailers and HGV's will also have to pass each other to access the weighbridge, parking areas and silage clamps, how will this be managed?
- If the site is managed so that vehicles do not cross each other and the number of vehicles does not exceed the number of trailer bays, vehicles will inevitably backup on the highway at peak times.
- The application doesn't contain an up-to-date and consistent site plan, so how can vehicle movements be modelled effectively?
- A clear traffic management and safety site plan is needed, the current plan is unsafe, dangerous and inadequate.

i) Track plans, specifically for HGV and tractor movements within the site is required.

This is considered in Paragraph 5.5 of the Transport Addendum (Appendix G) which discusses the internal layout of the site and refers to swept path analysis which has been undertaken (Appendix C of the Transport Addendum). The analysis indicates the largest expected to require access to the Application Site, can readily access, egress and turn within the Application Site without excessive manoeuvring or safety concerns.

Objections:

- The analysis in Paragraph 5.2-5.4 of transport (Appendix G) does not take into account the HGV and Tractor Trailer movements through the proposed northern entrance gate identified on the new site plan (**image 4) referred to in 5c below.**
- The bulk of silage trip traffic will access this gate from a 10-mile radius around the north of the site through the local highway network as per *Appendix P Feedstock*
- *Transport Addendum (Motion) Appendix C withing Appendix G Page 16 drawing 2401110-TK01 (See image 3 below)* This illustrates the entry and exit manoeuvre within the site for vehicles parking in the trailer bays coming from the A1307 but does not show a north gate or show the north gate structure. **Referred to in 5c) below.**
- *Appendix P – GGP-29351-P -2016-B Fencing Gate Drawing No 29351/P/150 Rev B (Image 4)* shows the north gate with the entrance to the parking area.

- This will result in vehicles from the north gate having to cross vehicles coming from the A1307 south gate. How will this be managed so that vehicles do not enter from both gates at the same time?
- Tractor/trailers and HGV's will also have to pass each other to access the weighbridge, parking areas and silage clamps, how will this be managed?
- If the site is managed so that vehicles do not cross each other and the number of vehicles does not exceed the number of trailer bays, vehicles will inevitably backup on the highway at peak times.
- The application doesn't contain an up-to-date and consistent site plan, so how can vehicle movements be modelled effectively?
- A clear traffic management and safety site plan is needed, the current plan is unsafe, dangerous and inadequate.

j) Formal pedestrian and cycle crossing of the proposed access junction is required as the improved junction cross existing segregated pedestrian and cycleway.

This is considered in Paragraph 3.7 of the Transport Addendum (Appendix G) which discusses access to the Site. A revised access design has been developed, which has given consideration to its interaction with the cycleway and is contained within Appendix A of the Transport Addendum.

*Paragraph 3.7 A revised access design is included at **Appendix A** which has given consideration to its interaction with the cycleway. It is proposed to provide a 'Copenhagen' style crossing at the access to prioritise pedestrian and cycle movement across the access. This includes setting back and realigning of the cycleway which allows for a 16.5m articulated vehicle to give way to pedestrian/cycle movements without blocking the mainline carriageway of the A1307.*

Objections:

- This proposal would create an unacceptably dangerous crossing for cyclists. Cyclists will have to re-join the carriageway just at the point when vehicles turn right into the site.
- A dismount sign is not adequate. At peak times in summer, there could be up to one vehicle per minute accessing and leaving the site. The area is very popular with cyclists, there are many local cycling groups, and this will be dangerous to cyclists potentially causing many accidents.
- Haverhill and West Suffolk together with Suffolk County Council are trying to encourage people to cycle in the area to reduce short car journeys this is going to stop cycling in the area.

k) The stage 1 safety audit has not addressed the risk of queueing on the carriageway.

This is considered in Paragraph 6.2-6.3 of the Transport Addendum (Appendix G) which discusses road safety. The information provides within sections 3.0 (access appraisal), 4.0 (junction assessment) and 5.0 (internal layout) comprehensively addresses the potential for queueing and implications for highway safety for which the Highway Authority can conclude there is neither a risk of queueing or associated risks for users of the carriageway.

Paragraph 6.2-6.3 states In accordance with GG119, a road safety audit team are required to raise any road safety matters that they identify. As such, because the issue of queue lengths has not been specifically referred to in the Stage 1 RSA accompanying the planning application, it is not evidence that this issue has not been considered, rather that the audit team does not consider it to be a road safety problem

Objections:

- This final sentence in Paragraph 6.2 “*As such, because the issue of queue lengths has not been specifically referred to in the Stage 1 RSA accompanying the planning application, it not evidence that this issue has not been considered, rather that the audit team does not consider it to be a road safety problem*” doesn’t make and doesn’t answer the question.
- Paragraph 6.3 refers to Paragraph 4.2 which sates: The distribution of development trips has been based on the information presented in the TAR (Table 6- 2) whereby 75% of trips have been assigned to the west and 25% of trips have been assign to the east. There is no data justification for assigning trips in this way results in only 25% of the total trips being assigned to turning right across the A1307. The data analysis is therefore flawed. And does not answer the question.
- If the internal site is managed so that the number of vehicles does not exceed the number of trailer bays and vehicles do not entre from both gates at the same time vehicles this will inevitably backup on the highway A1307 at peak times. (**See points h & i above**).
- Acorn’s estimate in the updated Planning Statement 4.6.1 states: “the site will be served by approximately 9134 HGV tractor trips per year “ in the original Planning Statement in Table 5.3 it was 9786 trips. Trips are only one way so this equates to 19122 extra traffic movements the bulk these will be at peak during harvest periods. The data does not account for all these movements.
- The stage 1 safety audit has therefore still not addressed the risk of queueing on the carriageway.

5. Response to Suffolk County Council (Planning)

a) Clarification of this applications interaction with application for an agricultural access improvement off Silver Street

As previously discussed between the applicant and case officer the proposed AD facility subject of this planning application and EIA has no relationship with the above-mentioned planning application for an agricultural access improvement off Silver Street.

Objections:

- Acorn's response in 5c contradicts the above response. They write "*Access will continue to be provided to the field to the north to enable the harvest to be transported directly to the main AD site, avoiding having to be transported long a longer route via roads to minimise trips on the public highway.*" If the "harvest" is to be transported across the field to the north then the vehicles used will need an access gate from either Silver Street or Horseheath Road.
- Thurlow Estate and Acorn have failed to define the use of the access improvement on Silver Street correctly. They define the use as "agricultural" when it is commercial silage and manure waste that would be transported to the North Gate of the proposed AD facility described in 5c below. They also refer to transporting "harvest" in 5c when it is commercial silage waste.
- This is a theme that runs through the whole application, Acorn and Thurlow Estate are trying to claim this is an "agricultural" operation rather than the Commercial Waste operation it is classified as.
- Thurlow Estate states on their Planning Application form to West Suffolk Planning that this entrance will not be used for Commercial or Waste management but is "agricultural", in light of the new Acorn site plan with a northern gate entry (see 5c below), this should be challenged.
- If this entrance is not going to be used for commercial silage and manure waste then another entrance on Silver Street will be required for the AD plant and this would need Planning Permission and be subject to the overall planning application process for commercial waste disposal.
- Building a road/track or access improvement dedicated to commercial waste haulage significantly alters the land use and requires planning permission.
- Increased traffic from heavy silage and manure waste vehicles raises concerns about environmental impacts necessitating a planning application to assess the potential issues.
- Acorn informed people at their 14th Sept 2023 "drop in" that an upgraded gate on Silver Street would be used for silage transport to the proposed AD. This is confirmed again in **Instinctif's updated Statement of Community Involvement Appendix R Table 6.1 Table of Acorn Bioenergy's Response to Comments Received** "*Many vehicles will follow the A1307 and enter the site through the Spring Grove Farm access point coming off the A road. Farmyard vehicles will use farm tracks wherever possible and cross at an upgraded junction on Silver Street to enter from the north of the site*".

5c) 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.

“Access will continue to be provided to the field to the north to enable the harvest to be transported directly to the main AD site, avoiding having to be transported long a longer route via roads to minimise trips on the public highway.”

Objections:

- There is no mention in Acorn's Planning Statement about an access gate to the north of the proposed site. The “Harvest” is commercial waste in the form of silage or manure waste.
- Acorn's original Planning Statement proposes that all traffic movements will go through the gate on the A1307 but the new drawing of the site Appendix P- GGP- 29351-P-150-B- Site Fencing Layout **see Image 4 below** shows a Double Sentry Gate Refer to Drg No 29351/P/2016 which is the same drawing number as the A1307 entry gate. Will this gate be the same design as the A1307 gate and where is the traffic analysis for traffic coming through this gate?
- Acorn's **Transport Statement Table 6-2 Local Traffic Distribution Considerations** shows the silage distribution areas North of the main AD site and which ones will access “established farm tracks”. It is clear that 6 of the 9 Farm Hubs are to the North of the AD site and would use this new gate entrance . This would be a large percentage of the 19,121 traffic movements show in **table 6-1 HGV/Tractor Traffic Forecast**. How many vehicles will access from the north? It therefore needs a new Transport Assessment or TRICS trip analysis for traffic coming to this gate.
- The bulk of silage trip traffic will access this gate from a 10-mile radius around the north of the site through the local highway network as per **Appendix P Feedstock** and analysis needs to be undertaken on the impact on the wider highways network.
- If as the new site plan suggests, the AD Plant would have two entrances; one to the A1307 and one to the field to the north, there would be a traffic management problem within the site where Tractor Trailer and HGV vehicle will have to cross to gain access to the weighbridge. The traffic management plan doesn't address this.
- There are currently no farm track/road connections from the north gate to the field to the north of the proposed AD. If one is built it will need planning permission
- Any road or farm track that is built for the purpose of transferring commercial silage waste to the AD must be subject to a Planning Application, Traffic Management Plan, TRIPS and Prior Approval.
- The assumption that any road/track from the proposed AD's north gate to any access gate onto Silver Street for the delivery of silage in commercial quantities is “agricultural” is flawed.
- Acorn informed people at their Sept 2023 “drop in” that the upgraded gate on Silver Street would be used for silage transport to the proposed AD . This is confirmed again in **Instinctif's updated Statement of Community Involvement Appendix R Table 6.1 Table of Acorn Bioenergy's Response to Comments Received** states “*Many vehicles will follow the A1307 and enter the site through the Spring Grove Farm access point coming off the A road. Farmyard vehicles will use farm tracks wherever possible and cross at an upgraded junction on Silver Street to enter from the north of the site*”. However, there is no information on how many vehicles will access through the northern entrance gate.
- **Instinctif's updated Statement of Community Involvement Appendix R Table 6.1 Table of Acorn Bioenergy's Response to Comments Received** also states: “*There are no significant impacts on traffic and access to the local area. The overall amount of traffic is to be confirmed, this will be detailed in the transport statement. The vehicle movements will consist of cars for five workers arriving and leaving the site, HGV's bringing the CO2 and Biomethane out of the plant as well as trucks depositing the feedstock for the plant and taking the digestate away.*” There is no transport statement within the application that

includes any vehicle movements through the north entrance or even mentions “an upgraded junction on Silver Street”. With an estimated extra 19121 traffic movements on the local highways there will be a significant impact on traffic in the local area. This application fails to establish where that impact will be. The application is therefore missing vital details on vehicle trips and where they will intersect with the road network to the north of the plant.

- A full Transport Assessment is required before planning permission is considered, to ensure that there is transparency around where all traffic will access the site and what the effect will be on all roads around the site not just a small section of the A1307. The basic assumptions are flawed.
- Acorns Updated Planning Statement contains the following references:-

5.8.1.1 Access Design “it is noted that the largest area of farmland is located to the north/north-east of the application site. This area of farmland, particularly during intense harvest periods, would be serviced by the internal farm track network to the north of Spring Grove Farm, in the north extent of the Thurlow Estate. These tracks offer direct access across private land using established routes.”

There are no farm tracks currently capable of providing direct access to the proposed AD facility in the plan or, in reality, from the north.

 - The network of internal farm tracks, where they exist, mainly link to the Thurlow Farm Hub on the airfield. There are no current farm tracks that link directly to the north entrance gate on the site plan.
 - The tracks where they exist, are not capable of delivering the volume of traffic that would be needed from the areas identified in the original Planning Statement Table 6-2 of the Local Traffic Distribution Considerations which was left out of the updated Planning Statement.
 - Building a road/track dedicated to commercial waste haulage significantly alters the land use and requires planning permission
 - Increased traffic from heavy waste vehicles on existing tracks raises concerns about environmental impacts, necessitating a planning application to assess the potential issues. Therefore, any new tracks/roads or improvements to farm tracks used for the transport of commercial silage waste will need planning permission
 - The current farm tracks used by Thurlow Estate all eventually end on the road network somewhere.
 - Most existing tracks are shingle laid on earth, single track and would not stand up to heavy use. Two vehicles HGV or Tractor Trailers could not pass without encroaching on the fields. The current tracks are totally unsuitable for the transport of large amounts of silage **see Image 1 and Image 2 below** taken 25/1/2025 on the existing farm track by the Stour brook that links West End Lane/Withersfield Road, to Skippers Lane.
- Thurlow estate drivers are currently instructed to take the shortest route to their destinations which means travelling on the road network and through villages.
- Silage deliveries would be from at least a 10mile radius and from more farms than just Thurlow Estate with manure deliveries from even further there are no existing farm tracks that can be used for this network.
- The reality is that silage traffic would have come to the proposed AD down Skippers Lane, Silver Street or through Withersfield which is the only current viable access route from the farming areas to the North West North East and North. These roads are not suitable for this traffic load. The Withersfield relief Road has not yet been built.
- Acorns trip estimate in the updated Planning Statement 4.6.1 states: “the site will be served by approximately 9134 HGV/tractor trips per year” in the original Planning Statement in Table 5.3 it was 9786 trips. Trips are only one way so this equates to 19122 extra traffic movements. The bulk of these will be at peak harvest periods from land to the north of the

site. The plans fail to identify how these movements will affect rural road to the north of the site leading to Silver Street, Horseheath Road and Hollow Hill.

Conclusions

The application as presented is inconsistent, flawed, unsafe, unworkable and totally detrimental to the local area and highway network. The dangerous increase in traffic on the local road network would have **“an unacceptable impact on highway safety and the residual cumulative impacts on the road network would be severe.”** As per National Planning Policy Framework:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf

In addition: **Suffolk Minerals & Waste Local Plan Adopted July 2020 Appendix A Policy GP4 General environment criteria states:** *“Minerals and waste development will be acceptable so long as the proposals, adequately assess (and address where applicable any potentially significant adverse impacts including cumulative impacts) on the following”: b) vehicle movements, access and wider highway network*

Acorn failed to adequately assess the potentially significant adverse impacts on the wider road network and particularly on opening a new access entrance gate on the north of the site. The application should therefore be rejected.



Image 1



Image 2

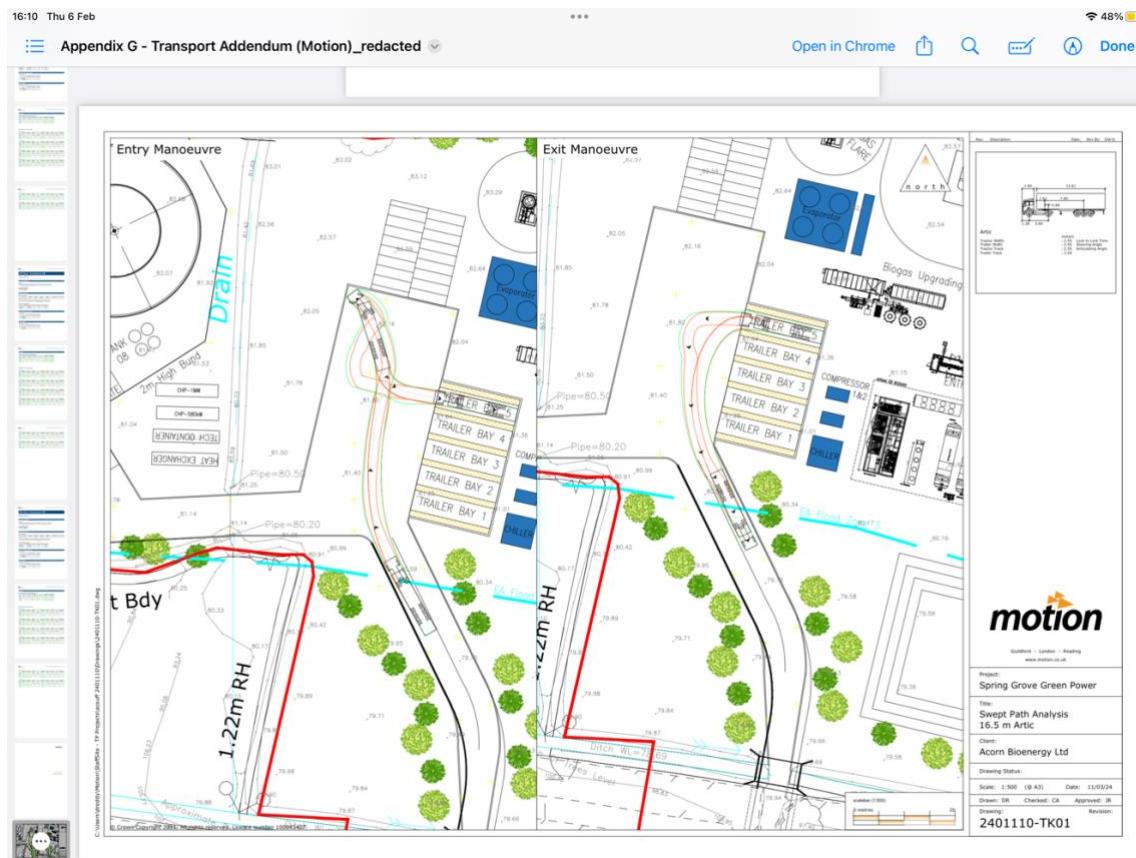


Image 3

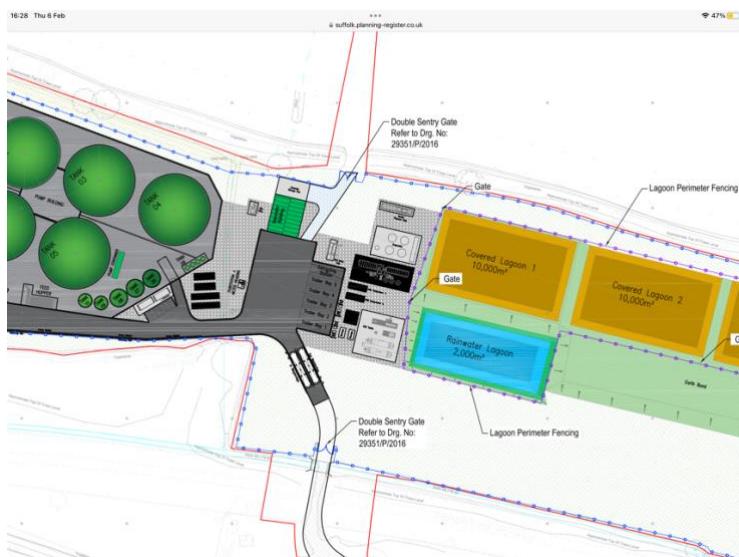


Image 4

Frank Eve
Hillbrow,
Hollow Hill,
Withersfield

Vice Chairman, Withersfield Parish Council