


From: Frank Eve [REDACTED]
Sent: 13 October 2023 13:25
To: Savannah Cobbold; Andrew Rutter
Cc: SCC Planning Mailbox
Subject: Planning Applications DC/23/0572/FUL & SCC/0045/23SE

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Dear Savanna and Andy,

I object to the two Planning Applications identified above in the strongest possible terms. The Applications are linked as I will highlight below and show that the impact of increased farm traffic flows on the rural roads of Skippers Lane, Silver Street, Hollow Hill and Withersfield village are unacceptable and fall well outside the guidelines of the **National Planning Policy Framework**

The Application for the new gate access via Silver Steet/Horseheath Road into Black White Horse Field states that it will not be used for **commercial purposes or the transport of waste material** but is needed for safety reasons. Acorns Planning Statement for their Anaerobic Digester contradict this statement in a number of areas:-

Acorn's 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.**"*

5.8.1.4 Access Design

*"The proposals seek to upgrade the east access junction and close up the access junction between the buildings, to minimise points of access off the A1307. **Access to the buildings can then be gained from the north via the upgraded internal access road.**"*

Statement of Community Involvement prepared by Instinctif & Partners page 10

This part of the planning documentation contains reference to the entry point:-

*"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.**"* Please see location map.



There will therefore be an access point on the north side of the AD facility which will link to the farm tracks across the estate via an upgraded junction on Silver Street/Horseheath Road. The northern entry point to the site is at same point as gestate pipeline enters the site. This can be seen on the application site plan in the applicants documentation.

The Planning Statement does not show where the upgraded farm tracks will go or where they will intersect or use the highway. However, they must use and intersect with Skippers Lane Silver Street Horseheath Road or come through Withersfield via Hollow Hill to get access to the ***“upgraded junction on Silver Street to enter from the north of the site”***.

Most of the Estate is to the north and east of the site and will therefore use farm tracks to access the site from the north using the northern access point.

Acorns Planning statement Table 6.2

In this Table Western Woods, Great Bradley and Thurlow farm hubs will all use **“Direct Access across private land using established paths”** this traffic would have to flow through to Skippers Lane, Silver Street or through Withersfield to an entry gate in Horseheath Lane or Silver Street.

The farm hubs at Great Wrating, Kedington, Horseheath, Dotterel and Rectory are also North, North East or North West of the facility and could also have Direct Access through farm tracks if required accessing Skippers Lane, Silver Street, or through Withersfield to the facility via **“Direct Access across private land using established paths”**

Acorns Planning statement Table 6.3

This table indicates that there is potential for at least 5036 farm traffic/HGV movements per year which could access or leave via the gate at Silver Street/Horseheath Road.

The junction of Skippers Lane, Silver Street, Horseheath Road, Hollow Hill and Withersfield are a sensitive area where a 20MPH Speed Zone has been approved for the village of Withersfield because of the tight bends, lack of pavements and rat run traffic speeding between Haverhill and Cambridge. In this sensitive area traffic flows should not be increased.

The highest volume of HGV/Tractor traffic will be at harvest times in June and October. October is also when the Jelly Warehouse on Skippers Lane fills the warehouse with stock for Christmas and it's HGV's are constantly coming up from the A1307 via Silver Street and Skippers Lane. The junction of Horseheath Road, Skippers Lane and Hollow Hill is the epicentre of rat run traffic and HGV traffic to the Jelly Warehouse on Skippers Lane. These Roads are already dangerous where only a single HGV can use and if two HGV's meet it causes a traffic jam. These are small rural roads that pot hole in winter and have tight bends. Please see photo below

Acorns Planning statement Accident History Fig 3-9



This section does not include the full length of Silver Street, Skippers Lane, Horseheath Road or Hollow Hill. The intersection of these roads is the epicentre of HGV and rat run traffic from Haverhill through to Cambridge. The Planning Statement does not contain a Traffic Management Plan (This should be a mandatory requirement)

Even without the TMP it is clear from the Planning Statement that the impact of farm traffic on the roads around Withersfield and the surrounding environment would be severe, would endanger walkers on the farm tracks, intersect the road network at various points and the volume of farm

traffic in this area would be unacceptable.

Acorn Planning Statement 1.6

“Whilst the proposed traffic will be new to the application site itself, a large proportion of the generated movements are already on the local network as the proposed Ad facility will service existing local farms which have an existing

traffic generation. This has been qualified as approximately 5600 annual loads, which makes up a large proportion (57.2%) of the proposed 9786 annual loads. The proposed increase would equate to an average of 11 additional HGV/Tractor loads per day in the local area."

This statement is incorrect for the following reasons

- The current crops are Wheat, Barley, Beans and Rape Seed cropped once a year in rotation. If the Estate start to grow silage it would be part of that rotation therefore the majority of the crops and traffic will stay the same.
- The current crops of Wheat and Barley are harvested for the grain the hay is left on the fields to be baled and then stored on the fields.
- The current harvest is taken to a central location on the airfield the majority of the silage crop from the estate will all go through ***an upgraded junction on Silver Street to enter from the north of the site.*** All the traffic from the north having to access one gate.
- Silage would be harvested twice a year which would cause twice the traffic. Silage creates more volume per acre than wheat or barley, therefore more truck loads per acre. The impact on farm traffic on the roads around Withersfield and the surrounding environment would be severe and the increased volume of farm traffic in this area would be unacceptable.

The Estate does not grow silage crops, breed chickens or beef cattle at present. There is therefore, no current agricultural need for an industrial scale Anaerobic Digester for waste disposal.

Acorn Planning Statement 3.4 *"The application site is located in a rural setting on the outskirts of Haverhill, the town centre of which is approximately 3.8km away by road".*

The above statement is misleading

- The Site is 600m from a major housing developments in Haverhill and at the Arboretum.
- The site is 600m from Haverhill's premier office complex – The Epicentre
- The site is 600m from the Sainsburys super store
- The site is inside the Parish of Withersfield, a conservation village
- The site is within the Haverhill Town boundary which is the worst connected town in the county but the fastest growing town in Suffolk.

The Suffolk Local Transport Plan 4.88 (2006-2011)

The plan contains local objectives towards achieving a sustainable transport network.

"The problems of traffic congestion in the market towns of Haverhill and Bury St Edmunds is noted, as is the high number of daily vehicle movements passing through Haverhill due to out commuting to Cambridge.

"Other roads in the borough which are part of the Primary Route Network are carrying large volumes of traffic. Where they pass through villages, the local environment is being put under significant pressure. Increased levels of traffic between Bury St Edmunds and Diss on the A143, between Bury St Edmunds and Thetford on the A134 and between Haverhill and Cambridge on the A1307 are of particular concern."

The junction of Skippers Lane, Horseheath Road, Hollow Hill and Withersfield is already a sensitive area because of the tight bends, lack of pavements and rat run traffic, dog walkers, cyclists and horse riding. In this sensitive area HGV and farm traffic traffic flows should not be increased.

National Planning Policy Framework:

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

With a **potential extra 5036 Tractor/HGV traffic movements** on these rural roads there **“would be an unacceptable impact on highway safety and the residual cumulative impacts on the road network would be severe.”** Both these applications should therefore be rejected.

I will send further objections on these applications as I read through the 500+ pages of documentation on the following topics:- Location, Traffic, Environmental impact, Health, Site Safety, Flood Risk.

Frank Eve

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