

Your Ref: SCC/0045/23SE  
Our Ref: SCC/CON/3588/23  
Date: 19 October 2023  
Highways Enquiries to: [Highways.DevelopmentControl@suffolk.gov.uk](mailto:Highways.DevelopmentControl@suffolk.gov.uk)



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

Email: [planning@suffolk.gov.uk](mailto:planning@suffolk.gov.uk)

The Planning Officer  
For the attention of: Andy Rutter  
Suffolk County Council

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

Notice is hereby given that the County Council as Highway Authority cannot make a comment at this time due to a lack of information to make an informed decision. **The Highway Authority recommends a holding objection until further information and clarifications have been submitted.**

The Transport Statement indicates that 57% of the total number of trips are existing trips. This is 5600 trips from a proposed total of 9786 trips. The TS contains insufficient details about how the 5600 number has been calculated.

It is that the construction process would generate approximately 3,000 HGV trips across the whole period which equates to an average of 11 HGV trips per day (or 22 HGV movements, so 11 in and 11 out) across a 275 day year. We note the anticipated build length is 70 weeks so it is not clear the construction traffic movements correlate with the 275 day average. It is noted that the average figure is for construction HGVs and doesn't include non-HGV movements.

This matter could be addressed by a detailed Construction Management Plan.

It is noted that the proposal includes a 7.7m high gas flare. We would like to understand if the flare may be a distraction to highway users. We recommend that the operation of the flare is clarified along with an assessment as to how clearly it could be viewed from the highway.

The Highway Authority are concerned that the impact of the proposed number of operational trips will have a greater detrimental impact on the highway than has been considered. The A1307 is a very intensively used highway with average vehicle numbers in excess of 1000 movements per hour at peak times in a single direction. The 85th percentile speed recorded across the survey is 53 mph in the easterly direction. The westbound peaks are similar in volume and average speed but occur in the morning. The combined direction peak flows frequently exceed 1500 hourly movements.

We note the left turn only departure manoeuvre and agree that the design may be the most appropriate, but it will intensify use of the roundabout. We note that a left turn arrival only is unfortunately not readily achievable at this location.

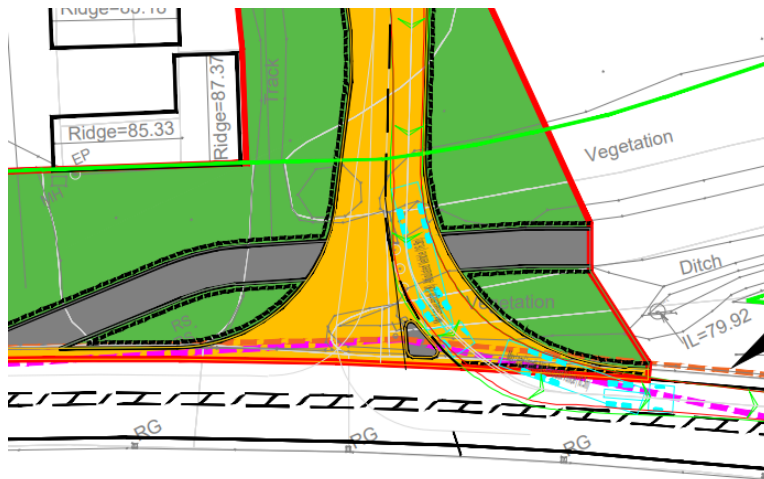
The proposed number of trips is high with exceptionally high seasonal peaks and we note that the HGV and tractor vehicles that will intensively use the access are slow moving and long meaning the turning manoeuvres require large gaps in oncoming traffic. The TS has not addressed the impact of vehicles waiting to turn right on the west bound lane. We recommend that an assessment of queue length should be provided along with consideration of the impact on highway safety. It would be appropriate for the assessment to consider if a right turn lane should be provided to reduce the impact of queuing. There would appear to be sufficient highway land for a turning lane to be provided.

It is not clear to the Highway Authority that the patterns of peak trip generation will be effectively managed by a Traffic Management Plan. We consider that an application of this scale should model the peak traffic impacts to establish what impacts may occur and consider how they could be mitigated.

We note that trip numbers include a proportion of trips which may not be necessary if some pumping of materials to the site occurs. The application doesn't include any infrastructure to facilitate pumping so we do agree that the proportion of trips should not be discounted.

It is not clear that the parking waiting and manoeuvring areas will be sufficient to accommodate all site traffic especially at peak times. The site plan reviewed Drawing No. 29351/P/101 Rev U is out of focus making interpretation difficult. Will tractors park with their trailers in bays 1 to 7 to await unloading. It is not clear where HGVs and tractors will be able turn on site, track plans for movements within the site should be provided.

The proposed access will cross a segregated pedestrian and cycleway. The design has not incorporated appropriate pedestrian and cycle crossing. This new hindrance is unacceptable because the development has not offered any measures or improvements to promote sustainable travel.



We note that a Stage 1 safety audit has been submitted and that it has identified the crossing as being a risk that should be mitigated. The safety audit has not addressed the risk of queuing on the carriageway.

At this time we do not consider that the application has established that the development will be in accordance with West Suffolk Local Policies or in accordance with National Planning Policy Framework (NPPF) paragraph 111.

Yours sincerely,

**Peter Bradfield**

## **Senior Transport Planning Engineer (West Suffolk)**

Growth, Highways and Infrastructure