

Scrutiny & Monitoring Development Section
Suffolk County Council
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Case Officer: Daniel White
[REDACTED]

Application No: DC/23/1726/CCES

14 November 2023

Proposal: County consultation - county application SCC/0045/23SE - Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons.

Location: Land North Of Spring Grove Farm, Cambridge Road, Withersfield, Suffolk,

The application in respect of the above-mentioned proposal has now been considered by West Suffolk Council as Local Planning Authority and I write to inform you that this Council objects to the proposal and has the following comments:-

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| Contamination | <p>West Suffolk Council – Environmental Protection Strategies (Consultant on behalf of West Suffolk Council) - No Objection recommend conditions</p> <p>These comments have been prepared by EPS, on behalf of West Suffolk Council.</p> <p>Submissions Reviewed:</p> <p>1) Environmental Statement (ES) – Chapter ‘Land Quality’</p> <p>2) <i>Preliminary Land Quality Risk Assessment</i> – SLR Consulting Ltd, Ref: 404.11923.00002, February 2023 with associated appendices.</p> <p>The ES utilises the findings of the SLR report, but also adds some useful context to the overarching requirements and framework around the management of contaminated land. It also ties in the risk assessment outcomes to overall impacts on land quality by the development.</p> <p>The SLR report represents a Phase I Desk Study in accordance with the National Planning Policy Framework (NPPF), which requires adequate site</p> |
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| | <p>investigation information, prepared by a competent person (paragraph 183c). It should be noted that any geotechnical and waste classification/management aspects have not been reviewed, as they are outside of the remit of this department.</p> <p>The report concludes that the northern extent of the site represents a moderate/low risk of contamination impacts to human health associated with the former RAF use. A Phase II Site Investigation in this former RAF/proposed digestate lagoon area is recommended to assess if there is a risk to construction and future site workers from potential contaminants in shallow soils. Council held records also indicate this section of the site extends into the former RAF base (RAF Wratting Common) so that recommendation is welcomed.</p> <p>No further investigation or remediation is recommended for the remainder of the proposed development, but a watching brief should be maintained for potentially unexpected contamination during development, which is supported.</p> <p>Through the Preliminary Qualitative Risk Assessment, the report indicates the remainder of the site represents a low risk to human health and controlled waters as no potentially significant sources have been identified.</p> <p>Although the end use is not sensitive in terms of contamination, there are some relatively low risk potential sources identified in the report in the southern main section which warrant targeted investigation. Typical sources of agricultural contamination associated with Spring Grove Farm in this area, including oil storage (even if the current storage is internally bunded) and typical sources associated with farms like made ground. The area also includes a section of disused railway, which is a potentially contaminative feature. Whilst only a small area of development covers this area and it will mostly be access road, the land does fall within the redline boundary and therefore some site investigation of these potential sources is also recommended and should be added to the scope intended for the northern section.</p> <p>Both reports are thorough and the Conceptual Site Model (CSM) in Section 5 of the SLR is broadly agreeable subject to the point above about the southern area. The 'Summary of Impact Assessment' included in Table 9-5 of the ES is logical although it does assume that any subsequent remedial requirements are satisfactorily implemented.</p> <p>The Environment Agency may wish to have some input on these assessments with regards to risks to controlled waters, and it is likely the proposed future usage including the lagoon will be the main interest, rather than any existing legacy contamination.</p> |
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| | <p>Both reports are therefore considered acceptable and to cover the remaining site investigation (and any remedial requirements), the following conditions must be applied to the decision notice.</p> <p>CONDITIONS</p> <p>1. No development approved by this planning permission shall commence until the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:</p> <p>i) A site investigation scheme, ii) The results of a site investigation based on i) and a detailed risk assessment, including a revised Conceptual Site Model (CSM), iii) Based on the risk assessment in ii), a remediation strategy giving full details of the remediation measures required and how they are to be undertaken. The strategy shall include a plan providing details of how the remediation works shall be judged to be complete and arrangements for contingency actions.</p> <p>2. No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works as set out in the remediation strategy is submitted to and approved, in writing, by the Local Planning Authority.</p> <p>3. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.</p> <p>Reason (for all three conditions)</p> <p>To protect and prevent the pollution of controlled waters, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 174, 183, 184, Environment Agency Groundwater Protection: Principles and Practice (GP3), Policy CS2 (Sustainable Development) of the Core Strategy and Policy DM14 of the Joint Development Management Policy.</p> <p>This condition requires matters to be agreed prior to commencement since it relates to consideration of below ground matters that require resolution prior to further development taking place, to ensure any contaminated material is satisfactorily dealt with.</p> |
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| Air Quality | <p>West Suffolk Environment Team – No Objection - Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons - Land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW .These comments have been prepared by EPS, on behalf of West Suffolk Council.</p> <p>Submissions Reviewed:</p> <ol style="list-style-type: none"> 1. Air Quality Chapter within Environmental Statement prepared by SLR Consulting, dated May 2023. This constitutes an overview of the air quality impacts discussed within the below assessments. 2. Air Quality Assessment prepared by SLR, dated May 2023. This constitutes a Detailed Air Quality Impact Assessment in accordance with relevant guidance and the National Planning Policy Framework (NPPF). 3. Pipeline Air Quality Assessment prepared by SLR, dated March 2023. This constitutes a Detailed Air Quality Impact Assessment for the pipeline connecting the two sites in accordance with relevant guidance and the NPPF. <p>Air Quality Assessments:</p> <p>Construction Phase Assessment:</p> <ul style="list-style-type: none"> • The Institute of Air Quality Management’s (IAQM) ‘Guidance on the assessment of dust from demolition and construction’ (v1.1, February 2014) has been used to assess the dust risk in the area surrounding the site and to calculate the sensitivity. Trackout should be considered 500m from the site entrance in each direction, rather than 250m in each direction. • Since submission of this report, the IAQM have updated the construction dust assessment guidance (v2.1, August 2023) which could potentially change the dust emission magnitudes for this site. As the trackout impacts need to be updated, it would be prudent to update the entirety of the construction dust assessment to meet the current guidance. • To ensure dust mitigation measures are undertaken, a Dust Management Plan or Construction Environmental Management Plan (CEMP) should be submitted in support of the application. <p>Operational Phase Assessment:</p> <ul style="list-style-type: none"> • Assessment seems appropriate and the correct choice of meteorological station has been used by paying attention to the similarity in elevation with the site and need for low wind speeds to accurately represent a worst-case scenario. <p>Odour Assessment:</p> <ul style="list-style-type: none"> • The Institute of Air Quality Management’s (IAQM) ‘Guidance on the assessment of odour for planning’ (v1.1, July 2018) has been used and the assessment appears fair considering the distance between highly sensitive receptors and the proposed measures to minimise odour (enclosed or |
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| | <p>partially enclosed storage, vacuum pump during liquid digestate removal etc.).</p> <ul style="list-style-type: none"> • EPS have not reviewed the odour nuisance potential and input from the Council's Environmental Health Officers would be required on that aspect. <p>Dust Impact Assessment:</p> <ul style="list-style-type: none"> • IAQM 'Guidance on the Assessment of mineral dust impacts for planning' (v1.1, May 2016) has been followed and mitigation measures have been implemented into the operations plan, particularly, the loading of trailers will be carried out within a building. <p>Traffic Screening Assessment:</p> <ul style="list-style-type: none"> • Although the proposed development's predicted impact is considered not significant, the planning process presents the opportune moment to introduce measures to improve the development to encourage a low emission approach. These could include measures such as the use of Euro VI HDVs, electric vehicle charging points and car share schemes for future employees. <p>Bioaerosols Assessment:</p> <ul style="list-style-type: none"> • A bioaerosols assessment has been screened out as although sensitive receptors are located within 250m of the site boundary, the sensitive receptors are located more than 250m from the potential sources of bioaerosols. <p>Ammonia Impact Assessment:</p> <ul style="list-style-type: none"> • An ammonia impact assessment has been carried out using the AERMOD model in accordance with the Air Emissions Risk Assessment guidance and the additional guidance provided by the Air Quality Modelling & Assessment Unit of the Environment Agency which did not find any significant impacts to result from the proposed development. <p>Pipeline Air Quality Assessment:</p> <ul style="list-style-type: none"> • The Institute of Air Quality Management's (IAQM) 'Guidance on the assessment of dust from demolition and construction' (v1.1, February 2014) has been followed to assess the dust risk and sensitivity of the area surrounding the proposed pipeline. As discussed previously, to ensure dust mitigation measures are adhered to, a Dust Management Plan or Construction Environmental Management Plan (CEMP) should be submitted in support of the application. A joint Dust Management Plan or CEMP for the pipeline and main sites should suffice. <p>In summary, the construction phase and operational phase assessments included within the Air Quality Assessments for the main anaerobic digester site and the associated pipeline appear to have appropriately</p> |
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| | <p>assessed the potential impacts of the development. On the basis of impacts on local air quality, there does not appear to be any justification for objecting to the scheme.</p> <p>EPS would recommend a condition is attached to the decision notice requiring a Dust Management Plan or Construction Environmental Management Plan to ensure nuisance resulting from construction is kept to a minimum and the minor updates to the Construction Phase Assessment described above could be undertaken alongside. EPS would also encourage a condition relating to electric vehicle charging facilities providing the Council's policy position supports it. It is assumed that input on odour management will be sought from the Council's Environmental Health Officers and when operational, emissions from the facility will be regulated though the environmental permitting regulations.</p> |
| Environmental Health | <p>West Suffolk Private Sector Housing and Environmental Health Team – No Objection - In coming to this opinion, I have had specific regard to the following:</p> <ul style="list-style-type: none"> • SLR Planning Statement, SLR Ref: 404.11923.00002, dated April 2023; • SLR Environment Statement, SLR Ref: 404.11923.00002, Version No: Final, dated August 2023, specifically: <ul style="list-style-type: none"> ○ Chapter 4 'Noise', and ○ Chapter 7 'Air Quality' (the latter with reference to odour and dust as potential nuisances) • SLR Air Quality Assessment, SLR Ref: 404.11923.00004 Phase 14, Version No: v1.7, dated May 2023 (also with reference to odour and dust as potential nuisances) • Strenger Lighting Assessment, Date: May 2023. <p>Overall, I am satisfied the various assessments are robust and their respective methodologies / conclusions are likely to be valid, as such it is unlikely in my opinion that there will be a significant adverse impact on residential or commercial receptors in the vicinity of the proposed development. However, this is subject to appropriate conditions to ensure the development is designed, implemented and operated in accordance with the documents submitted in support of this application.</p> <p>I would recommend that, where appropriate, one or more of these include post-completion verification checks / assessments by suitably qualified / experienced practitioners with a requirement for further mitigation where deemed necessary from these in order to adequately protect local amenity in terms of noise, odour and light.</p> |
| Ecology | <p>Place Services (on behalf of West Suffolk Council) - Holding Objection – I have reviewed the submitted documents, including Chapter 8 of the Environmental Statement (Ecology) supplied by the applicant, relating to the likely impacts of development on designated sites, protected &</p> |

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| | <p>Priority species and habitats and identification of proportionate mitigation.</p> <p>We are not satisfied that there is sufficient ecological information available for determination of this application.</p> <p>We have reviewed DEFRA's geographic information tool MAGIC which indicates this application requires further consultation from Natural England prior to determination. Stating: <i>"LPA should consult Natural England on likely risks from the following: Combustion: General combustion processes >20MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion."</i> This application relates to anaerobic digestion, therefore, falls within this category. We have reviewed the Biodiversity Net Gain Assessment (Appendix 2 of Chapter 8). The site is bound by hedgerows and a nearby watercourse, shown to be a tributary of Stour Brook, however, the BNG Assessment has not included an assessment of these habitat types, only area habitats have been assessed. In terms of Area Habitat Units (HU) we are satisfied the assessment has been carried out appropriately, with sufficient justification regarding the proposals. The document estimates an onsite net gain of approximately +3.17 HU (+12.13%). Linear Hedgerow Units (LU) border the site and River Units (RU) which are within 10 metres of the site need to be considered within the assessment. Therefore, further information relating to Biodiversity Net Gain is required prior to determination.</p> <p>This information is therefore required to provide the LPA and will enable the LPA to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006.</p> <p>Additionally, no biodiversity enhancement measures are identified in the documents provided. We recommend that, to secure net gains for biodiversity, as outlined under Paragraph 174d and 180d of the National Planning Policy Framework 2023, bespoke biodiversity enhancement measures will need to be provided.</p> <p>This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006. With regard to the information provided relating to likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation, we are satisfied that there is sufficient ecological information available. Should the LPA be minded to grant permission, we recommend the precautionary measures detailed within Chapter 8 Ecology of the Environmental Statement are secured by a condition of any consent.</p> <p>This includes:</p> |
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| | <ul style="list-style-type: none"> • Construction Environmental Management Plan (CEMP): Biodiversity), detailing protection measures for trees with bat roost potential, standard pollution prevention measures and precautionary measures relating to Badgers; • Farmland Bird Mitigation Strategy, detailing the location of the proposed offsite compensatory habitat on land within the applicant's ownership; • Ancient Woodland Site Management Plan; • Landscape Ecological Management Plan; and • Wildlife Sensitive Lighting Scheme. |
| Impact on Trees | <p>West Suffolk Tree Officer - review the arboricultural documents submitted for the above application (CBA11636PL v1A & CBA11636 v1B) as well as associated layout plan 29351/P/101 REV U.</p> <p>Both of the submitted Arboricultural Impact Assessment (AIA) reports appear to offer a sound assessment of the predictable impact of the proposals whilst it is noted that CBA11636 v1B clearly highlights the absence of a detailed scheme of above and below ground services which will inevitably be associated with the scheme.</p> <p>The relatively minor impacts shown as a result of the proposed pipeline route in CBA11636PL v1A are insufficient cause to raise objection to this element of the scheme, however it should be noted that no landscaping details are provided along the pipeline route, and this would seem like a missed opportunity to offer real benefit in hedgerow restoration/improvement that would enhance connectivity and commitment to improving the environment.</p> <p>For the main site area addressed by CBA11636 v1B the arboricultural impact appears to be limited to the effect of widening an existing agricultural access cutting through the disused railway embankment necessitating removal of trees from Grp1 (BS5837 Cat B) and W1 (BS5837 Cat A). Loss of trees from such high value landscape features would ordinarily give reason for objection to the proposal but in this instance it is clear that this offers the most practical access solution and the impact of alternative means of access is likely to be more severe. Provided that the indicative planting of trees and vegetation shown on the proposed layout can be ensured through applying a pre-commencement condition for a detailed scheme of landscaping the tree losses incurred should be sufficiently mitigated.</p> <p>N.B. The acceptability of tree losses discussed is in purely arboricultural terms and does not consider potential loss of habitats or degraded connectivity along the valley floor and this will require ecological advice. The proposed scheme appears to meet the requirements of the relevant development management policies (DM2, DM12 and DM13) and is</p> |

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| | <p>broadly in line with arboricultural elements of the NPPF; as such from an arboricultural standpoint there is insufficient reason for objection.</p> <p>In the event that the proposed scheme is granted consent it is strongly recommended that pre commencement conditions are applied to ensure that trees are effectively protected for the duration of development activity and that any tree planting is effectively established and maintained in perpetuity. Whilst the precise wording of conditions may need to be adjusted to reflect the specific nuances of the scheme, I would initially recommend the use of standard condition 10G – Submission of Arboricultural Method Statement (AMS), which should be amended to include a requirement for a system for systematic monitoring, supervision and reporting of tree works, tree protection measures and all activity within RPA's. The details of the AMS should be embedded within any CEMP for the project to ensure there is no conflict of approved activity and the commitments made within the AMS should be overseen through a watching brief by an appointed Project Arboricultural Expert.</p> |
| Heritage | <p>West Suffolk Conservation Officer – No Objection - Taking into account topography distance and contribution made by wider setting towards the significance of the above ground heritage assets identified (archaeology excluded), I concur with the findings re the impact on the setting of the listed buildings within the 1km radius the majority of which have been scoped out of the assessment.</p> <p>Whilst the proposals may result in possible changes to views experienced from Silver Street Farmhouse, the heritage asset identified as potentially affected, it is likely these changes will be relatively minor affecting peripheral views only towards the south.</p> <p>The development would not obscure important views of the asset or affect its appreciation or understanding in its immediate landscape. I therefore concur with the findings and raise no objections from a conservation point of view.</p> |
| Economic Development | <p>Economic Development thinks that West Suffolk Council should object to the consultation for the following reasons.</p> <p>The creation, attraction and growth of high skilled businesses in Haverhill has been a long-term ambition for West Suffolk Council.</p> <p>Part of this aspiration, which includes the delivery of Haverhill Research Park and the landmark innovation centre, The Epicentre, took in excess of 10 years to deliver.</p> <p>With a difficult start during the pandemic, The Epicentre, supported by the Council, is starting to thrive, attracting some brilliant businesses which now proudly call Haverhill their home. Economic Development notes the</p> |

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| | <p>comments submitted by those at The Epicentre and fully supports their objections.</p> <p>Whilst Economic Development supports the development of Green infrastructure, it must be in the right place. This proposed development is not only on an unallocated site, but its visible impact is likely be detrimental to the long-term success of Haverhill Research Park, The Epicentre and the wider economic development of the town.</p> |
| Planning Policy Team | <p>Policy considerations</p> <p>The planning statement submitted with the proposal accurately sets out national and local planning policies. These are not repeated here, save for a short discussion on the policies that are particularly relevant to the proposal.</p> <p>National Planning Policy Framework (NPPF)</p> <p>In terms of considering this proposal, the most relevant parts of the NPPF quoted in the Planning Statement are paragraphs 7 and 8, and particularly the first parts of paragraph 15:</p> <p>“When determining planning applications for renewable and low carbon development, local planning authorities should:</p> <p>a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions;</p> <p>b) approve the application if its impacts are (or can be made) acceptable.”</p> <p>Development plan documents</p> <p>The current Development Plan for the former St Edmundsbury area of West Suffolk comprises:</p> <ul style="list-style-type: none"> • St Edmundsbury Core Strategy (December 2010) • Joint Development Management Policies document (February 2015) • Former St Edmundsbury Policies Map Book area (February 2015) • Bury St Edmunds Vision 2031 (September 2014) <p>These documents, together with current national planning policy are material considerations to be taken into account when accessing the above application.</p> |

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| | <p>St Edmundsbury Core Strategy (December 2010) and Haverhill Vision 2031</p> <p>No sites were identified or allocated in the St Edmundsbury Core Strategy or the Haverhill Vision 2031 plan for renewable or low carbon energy production.</p> <p>Joint Development Management Policies Document (2015)</p> <p>Policy DM5: Development in the countryside</p> <p>The application site is outside the settlement boundaries of Withersfield and Haverhill and is therefore in the countryside which, as set out in Policy DM5 is protected from unsustainable development. Given the description of the proposed development in sections 1.3 and 1.4 of the Planning Statement and its end use <u>it cannot be considered as being for a purpose directly related to agriculture</u>. It does not fall in any of the other acceptable forms of development in the countryside listed a. to g. in Policy DM5.</p> <p>The policy continues to consider proposals for economic growth and expansion of all types of business and enterprise “that recognise the character and beauty of the countryside”. If the proposal were to be considered as economic growth, or more logically, considered to support economic growth, the three criteria would need to be satisfied. The first of these is that the development will not result in the irreversible loss of best and most versatile agricultural land (BMV). The Planning Statement confirms that the land is Grade 2 which is considered BMV. Whilst the land used for growing energy crops can revert to growing food crops, the use of land and the capital required for the buildings and site area would not be considered reversible.</p> <p>Even if the first criterion were to be considered satisfied and the proposal is considered as economic growth, the proposal would need to satisfy the remaining two criteria in order to be considered acceptable.</p> <p>Policy DM6: Flooding and Sustainable Drainage</p> <p>Part of the application site (along the southern boundary) is in Flood Zone 3. It is noted that a flood risk assessment has been carried out, and it is for the Environment Agency to comment on this aspect of the proposal.</p> <p>Policy DM8: Low and Zero Carbon Energy Generation</p> <p>This policy encourages all proposals for generation or recovery of low carbon or renewable energy subject to three criteria being satisfied. In</p> |
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| | <p>addition to these three criteria, proposals are required to demonstrate due regard has been given to a further three areas of concern. One of these applies only to wind turbines.</p> <p>Conclusion</p> <p>Although Policy DM8 encourages proposals for low carbon and renewable energy production <u>these developments are not listed as a permissible exceptions in Policy DM5</u> so criterion a. is potentially the key consideration for this proposal.</p> <p>“a. proposals will be required to demonstrate the new carbon saving benefit that they will create, taking into account both carbon dioxide savings from renewable energy generation and any additional carbon dioxide generation that results from the proposal;”</p> <p>This is further strengthened by considerations d. to f. and the final paragraph of this policy.</p> <p>“d. the impact of off-site and on-site power generation infrastructure including achieving underground connections to the electricity grid system; and</p> <p>e. in respect of proposals for wind turbines, current standards relating to noise emission, shadow flicker and other negative effects such as interference to television transmission and air traffic control systems and the effects on public health; and</p> <p>f. soil quality is not affected adversely by either construction or the operation or decommissioning of the development.</p> <p>In the case of proposals in nature conservation sites, or within or visible from Conservation Areas or other heritage assets, the developer or operator must be able to demonstrate to the satisfaction of the Local Planning Authority that the proposal represents the highest standards of siting and design appropriate to the location.”</p> |
| | <p><u>West Suffolk Planning Officer Comments</u></p> <p>This proposal would have a detrimental impact on the countryside and landscape, due to the proposal not being landscape led and it fails to consider the wider landscape and local context. The site is situated in a very rural, heavily landscaped area and the addition of an AD Plant in this location would be a significant industrial intrusion in the landscape and would cause significant harm to the character and appearance of the countryside and landscape.</p> |

The failure to take a landscape led approach to this site has culminated in a site which would have a detrimental impact on the countryside and landscape and therefore it is considered that the proposal would conflict with West Suffolk Local Plan Policies DM2, DM5 and DM13 and Core Strategy Policies CS4 and CS13 and the NPPF.

The proposal would also have a detrimental impact on ecology, due to insufficient information to identify what ecology is present on the site, and therefore it is not possible to assess the impact on the ecology, consideration of biodiversity enhancements and any necessary mitigation for the site.

The failure to provide sufficient ecology information for the site would therefore be contrary to West Suffolk Local Plan Policies DM5, DM10, DM11 and DM12 and the NPPF.

Noting the concerns raised by other consultees on this proposal (Cambridgeshire and Suffolk Highways), the proposal is considered to have a detrimental impact on highway safety. The applicants have failed to take into consideration appropriate accident data from relevant districts, together with the proposal failing to provide a full trip generation assessment.

Paragraph 104 of the NPPF states “Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- (a) the potential impacts of development on transport networks can be addressed;
- (b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- (c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- (d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- (e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

The failure to provide sufficient highway information (sufficient accident data and undertake a full trip generation assessment) for the site would therefore be contrary to West Suffolk Local Plan Policy DM45 and Paragraph 104 of the NPPF.

The proposed site is also situated within Flood Zone 3 and therefore has a high probability of flooding, and the applicants have failed to provide a drainage strategy for the site.

It is also noted that the NPPF Paragraph 159 states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk

(whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 160 of the NPPF states that “Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards”. Paragraph 161 states that “All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property”.

Taking Paragraphs 159-161 of the NPPF into consideration, it is considered that the applicants have not undertaken a sequential test for the site, and therefore the site could have a detrimental impact on flooding until a sequential test is undertaken and the report analysed by the LFFA.

The failure to provide a sufficient sequential test, together with not providing a drainage strategy would have a detrimental impact on the flooding and be contrary to West Suffolk Local Plan Policies DM6 and the NPPF.

It is therefore contrary to West Suffolk Local Plan Policies, Haverhill Vision 2031 and the NPPF and should be recommended for refusal. It is also noted that a number of members of the public have commented on the application and the concerns raised in these comments should be given careful consideration.


Rachel Almond
Service Manager (Planning - Development)