

Forest Heath District Council

**DEVELOPMENT
CONTROL
COMMITTEE**

2 MARCH 2016

DEV/FH/16/006

Report of the Head of Planning and Growth

**PLANNING APPLICATION DC/15/2109/FUL - BAY FARM,
WORLINGTON**

Synopsis:

Application under the Town and Country Planning Act 1990 and the Planning (Listed Buildings and Conservation Areas) Act 1990 and associated matters.

Recommendation:

It is recommended that the Committee determine the attached application and associated matters.

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Committee Report

App. No:	DC/15/2109/FUL	Committee Date:	02 March 2016
Date Registered:	04 November 2015	Expiry Date:	03 February 2016
Case Officer:	Christine Flittner	Recommendation:	APPROVE planning permission with conditions
Parish:	Worlington	Ward:	Manor
Proposal:	Planning Application – Installation of on farm anaerobic digestion plant to produce biogas with digesters, silage clamps, lagoons, pipeline to gas grid, landscaping and associated infrastructure		
Site:	Bay Farm, Worlington		
Applicant:	Strutt and Parker Farms Ltd/Upton Suffolk Farms Ltd		

BACKGROUND:

This application is referred to the Development Control Committee because it is for 'major development' and raises issues which are in the public interest.

The application is recommended for APPROVAL.

APPLICATION DETAILS:

1. This is an application for full planning permission, for the installation of an Anaerobic Digestion (AD) plant with a gas pipeline and associated infrastructure that will generate renewable energy in the form of biogas.
2. The application comprises of details which show the following elements of the proposal;
 - Silage Clamps (4 - 90m x 25m)
 - Feedstock Hopper
 - 2 x Digester Tanks
 - 1 x Post Digester Tank
 - Technical Building
 - Compressor
 - Gas cooling Grid

- CHP Base
 - Transformer
 - Oil Tank Base
 - Digestate Storage Area
 - Weighbridge Cabin
 - Weighbridge
 - Emergency Flare Base
 - Propane Tank Base
 - Gas Upgrading Compound
 - Surface Water Infiltration Pond
 - Digestate Storage Lagoon
 - Lined Testing Lagoon
 - Access Ramp
3. There are 3 digesters within the proposal and these are the domed tanks which are characteristic features of AD plants. Two primary digesters and one secondary digester are situated towards the western boundary of the site to ensure they are grouped with the existing farm buildings which will provide a backdrop to their setting. They have diameters ranging from 30m – 38m and the tank walls are 7.4m in height with the domes taking the overall height of the digesters to 14.4m.
 4. The feedstock which consists of maize, sugar beet, agricultural by products and manures will be stored in four silage clamps to the east of the site which measure 90m x 25m with 3m high walls. Each clamp has a capacity of 40,000m³.
 5. The digesters are equipped with electric stirrers which keep the feedstock moving in the airtight tanks. A feed hopper is located in close proximity to one of the digesters and this will hold a day's capacity of feedstock and chop it to the optimum size for digestion before it enters the digester.
 6. To the north of the digester tanks, close to the northern boundary of the site is a digestate storage lagoon. This is in place to hold the digestate until the spreading season. The lagoon is capable of storing a total of 28,000 tonnes of digestate. A digestate separator and store is also proposed and located between the lagoon and digester tanks. The separator squeezes the liquid from the solid digestate so that the majority, which consists of the liquid (80%), can be distributed through the farm's irrigation system and the solid (20%) can be spread like traditional manure.
 7. The management system for the AD plant consists of a number of structures which are grouped within the site. These consist of technical buildings, compressor, gas cooling grid, combined heat and power unit (CHP unit), transformer, oil tank base, emergency flare base, propane tank base and gas upgrading compound.
 8. At the site entrance in the south west corner of the site a site office and weighbridge is proposed.
 9. Concrete containment bunding of a height of 1.5m around the digesters and a landscaped bund of 3m along the northern site boundary are proposed.

10. A pipeline of approx. 1km is proposed from the AD plant to link to the high pressure main to the North. The route of this pipeline follows an existing farm track.

OVERVIEW OF THE ANAEROBIC DIGESTION PROCESS

11. AD is a natural process in which micro-organisms break down the organic matter present within a feedstock to produce a methane rich gas capable of being exported to the National Grid.
12. It is a renewable source of energy which proposes the use of around 40,000 tonnes of feedstock which will consist of sugar beet, maize, agricultural by products (such as sugar beet pulp and vegetable outgrades) and animal manures which are already imported to the farm.
13. It is proposed that the AD plant will produce approximately 40GW hours of biogas per year. It is predicted that around 20% of the biogas will be used to run a 500kW generator at Bay Farm which will be for general farm use and will also heat the digesters.
14. The derivative of the AD process is called digestate. This takes both liquid and solid form and it is estimated that the proposed AD plant will produce 35,000 tonnes of digestate of which around 7000 tonnes is likely to be of the more solid type and 28,000 tonnes of liquid. The digestate is a nutrient rich fertiliser which will be used on the farm and replace the use of bought in artificial fertiliser.

AMENDMENTS AND ADDITIONAL INFORMATION:

15. During the course of the application, the proposal has been amended. The main amendment is that the gas compound, which was proposed to be located close to Golf Links Road, has been removed from the scheme. This is because the National Grid has confirmed to the agent that the compressors can be located within the AD plant complex. The agent has confirmed that the re-located compressors can be housed within the proposed management buildings, therefore no amendments to the site layout are needed to accommodate these changes.
16. An area of proposed feedstock supply has been removed from the original submission. This consists of a parcel of 100 hectares of land which is situated between Barton Mills and Worlington. The removal was suggested by the agent in response to concerns that traffic movements may increase through Worlington and Barton Mills as a result of the use of that parcel of land to supply feedstock.
17. Additional information has been supplied in the form of a landscaping plan, a badger survey, results of archaeological work and a farm irrigation plan.
18. A full re-consultation exercise has been undertaken in respect of these amendments and additional items.

APPLICATION SUPPORTING MATERIAL:

19. The application is accompanied by the following documents:
 - i. Application forms and drawings.
 - ii. Planning, Design and Access Statement including Transport
 - iii. Environmental Report including Air Quality and Odour, Landscape and Visual, Ecology, Heritage, Noise,
 - iv. Flood Risk Assessment and Surface Water Drainage Strategy
 - v. Landscaping Plan
 - vi. Badger Survey
 - vii. Feedstock Areas Plan
 - viii. Irrigation System Plan

SITE DETAILS:

20. The application site is an irregular shaped parcel of land covering 7.30 hectares. The main body of the site houses the AD plant and lies to the east of the group of farm buildings and dwellings which consist of Bay Farm. The site slopes from the west down to the farmyard in the east and is currently arable farmland.
21. The southern boundary of the site is bordered by the operational solar farm and the A11 lies to the south of the solar farm. The eastern boundary benefits from a mature tree belt which provide the site with natural screening. The northern boundary is open and will be demarcated with a 3m high bund and proposed landscaping which will form the site boundary.
22. The remainder of the application site is formed by the access to the highway/visibility splays and the pipeline which will transport the gas to the National Grid. The access to the site will make use of the current entrance into Bay Farm from the C610 – Worlington Road and pass through the farmyard to the south western corner of the plant complex. The proposed gas pipeline runs parallel with an existing farm track north across open farmland to a point agreed by the National Grid as being an appropriate connection point.
23. The application site lies outside the closest Site of Special Scientific Interest (SSSI) which is Cherry Hills and the Gallops at 1.5km to the east. The Breckland Special Protection Area (SPA) is over 3km from the site.
24. The nearest scheduled monument to the site is known as Bowl Barrow on Chalk Hill which lies at a distance of 270m to the north east of the site. The barrow sits in a prominent location on top of Chalk Hill.

RELEVANT PLANNING HISTORY:

25. **DC/15/1549/EIASCR** – An EIA screening opinion was carried out for this proposal prior to the submission of the application. It concluded that the proposal is not EIA development and therefore an Environmental Statement was not required to accompany the application.

26. **DC/15/2551/VAR** – Variation of condition 3 of planning permission F/2005/0040/FUL (agricultural building for onion storage) Approved 03.02.16.
27. **DC/15/0879/FUL** – Farm office with associated car parking and landscaping. Approved 21.8.15
28. **F/2012/0464/FUL** – Installation of a 7.5MW Solar Farm. Approved 30.11.12.

CONSULTATIONS:

29. Members of the public and statutory consultees were consulted in respect of the scheme as submitted. The following is a summary of statutory comments received in relation to the scheme as originally submitted and as amended.

Original scheme submitted with the planning application:

30. **Anglian Water – No Comment.**
31. **Natural England – No objection.** The site is outside the recommended 1.5km buffer zone established to protect the interest features of the Breckland SPA, however in the absence of records on Stone Curlew within 1km of the site it is agreed that the avoidance of work in the bird breeding season as recommended in the Environmental Report should be observed. After reviewing the Air Quality Chapter of the Environmental Report it is considered unlikely that the development will lead to significant impacts on any designated sites due to changes in air quality. The recommendations for ecological enhancements within the Ecology chapter of the Environmental Statement are supported and should be implemented.
32. **West Suffolk Public Health and Housing Officer** – No objection subject to conditions relating to construction works, waste material, security lights and sound proofing
33. **Suffolk County Council Archaeological Service** – Site lies close to a group of Bronze Age round barrows and is situated in a topographically favourable location for early activity. The applicant should be required to provide for an archaeological evaluation of the site before a development brief is prepared. A geophysical survey and trial trench evaluation should be undertaken in the first instance. The up front work was completed and it has been confirmed that no further archaeological investigations will be required at this site either prior to the determination of this application. However, it is advised that permission should be granted subject to a condition to secure the reporting of the archaeological investigations at this site.
34. **West Suffolk Environment Officer – No objection.** The plant will require an Environmental Permit to be issued by the Environment Agency.
35. **Suffolk County Council Highways** – No objection. Recommends conditions. Initial concerns raised due to the likelihood that a large number of shorter, local vehicle trips will be required to supply the AD plant. As a result further information was requested to establish routes that tractor/trailers and HGVs will use. Further information was provided by the agent and this has resulted in the

suggestion of conditions to require the submission of a Traffic Management Plan 3 months prior to the use of the plant; improvements to the surface of the Bay Farm access and the submission of a Deliveries Management Plan relating to the construction period.

36. **Suffolk County Council, Flood and Water Manager – No objection.** The drainage strategy submitted is acceptable and the approach to use infiltration techniques is satisfactory and that only clean water will be allowed to discharge to the ground as the area is located in an outer source protection zone.
37. **Environment Agency - No objection subject to conditions.** These conditions require the submission of remediation measures to deal with the risks associated with contamination; a scheme for surface water disposal; a scheme for the provision and implementation of pollution control to include full details of the leachate storage tanks, reservoir and pipework; surface and foul water drainage and prohibition of the use of penetrative piling, foundations and investigation boreholes. An Environmental Permit from the Environment Agency is required.
38. **West Suffolk Tree and Landscape Officer –** there is no landscape scheme for the site which is fundamental to the acceptance of the proposal and it should include the measures recommended in the Biodiversity Study; the impact of the gas connection compound has not be addressed; the ecology report requires that work within 30m of the eastern tree belt requires a badger survey to be undertaken.
39. **Historic England –** The proposed development would adversely impact on the setting of the Bowl Barrow on Chalk Hill (Scheduled Monument) and it is recommended that mitigation is required to reduce the impact upon the setting of the scheduled monument and harm to its significance. As a minimum this should include increased screening on the north eastern site boundary.

Comments received as a result of the amended information received as set out at paragraphs 15 – 17.

40. The following consultees have responded to say they have no additional comments to make; **Environment Agency, West Suffolk Environment Officer, Suffolk County Council Highways and Suffolk County Council Flood and Water Manager.**
41. Comments are awaited from **West Suffolk Tree and Landscape Officer, Historic England, West Suffolk Conservation (in light of the Historic England comments)** and these will be reported verbally at the meeting.

REPRESENTATIONS:

42. The site lies within the parish of Worlington, but it was considered that it could also be seen to impact upon the surrounding villages of Freckenham, Red Lodge and Herringswell as a result of the importation of feedstock. The four parish councils have been consulted.

43. **Worlington Parish Council (comments summarised)**

Scheme as originally submitted – Reservations expressed - the need for a transport plan containing details of traffic movements to and from the site is considered necessary prior to the consideration of the application by the planning committee; concerns and questions regarding the storage and transportation of the liquid digestate and the potential for odour; the possibility of feedstock being sourced from farms to the North of Worlington and how this can be controlled in the future.

Scheme after amendments and further details – comments awaited and will be reported verbally at the meeting

44. **Freckenham Parish Council (comments summarised)**

Scheme as originally submitted – Objection on grounds of traffic flow as the road from A11 to Worlington not designed for heavy traffic; proposed site is too close to residential areas; an EIA should be undertaken and on grounds of likely odour to the surrounding area.

Scheme after amendments and further details – subject to the following we would not object; All routing has to come via the A11, Red Lodge/Worlington junction only – no serious increase in lorry movements. Other than this we have no objection . Our concerns are lorry movements through our village.

45. **Red Lodge Parish Council (comments summarised)**

Scheme as originally submitted – Strongly Object – the main objection is around transport in and around Red Lodge and concerns over the location of a new primary school; the landowners have not liaised with RLPC at an early stage as claimed in the submitted information; inconsistency in the submitted information concerning the transport of digestate and whether it will be used solely on Upton Suffolk Farms; account must be taken of the potential for future growth in Red Lodge and traffic routes should be agreed with the parish council; smell and noise experienced at the Euston visit raises concerns given the close proximity of the plant to the village.

Scheme after amendments and further details - comments awaited and will be reported verbally at the meeting

46. **Herringswell Parish Council (comments summarised)**

Scheme as originally submitted – Object until further information is received on grounds of the scale of the plant and question if it is a small scale self contained on-farm facility; a full and clear transport assessment is required to enable the impact of the proposal to be assessed; a plan of the irrigation system to spread the liquid digestate should be supplied.

Scheme after amendments and further details - comments awaited and will be reported verbally at the meeting.

47. **Third party representations** have been received from residents of the following properties:

27 Laburnam Close, Red Lodge
3 Ivy Court, Red Lodge
25 The Street, Worlington
Links Bungalow, Worlington

and

The Royal Worlington and Newmarket Golf Club

48. The following is a summary of the issues raised:
- Concerns over fly and insect infestation
 - Concern over seepage from deliveries which may be toxic or poisonous
 - Concern over potential odour and its impact on nearby homes
 - Traffic calming measures should be provided in the villages
 - Concern over increase in traffic on roads which are not suitable
 - Impact of increased traffic on Golf Links Road
 - Concern as to which access points to the farm are to be used
 - Lack of detail regarding the construction traffic
 - Concern that use of the A11 junctions with no slip roads will be detrimental to highway safety
 - The gas compound is inappropriately sited and unclear if it will be noisy and impact on the golf course
 - Lack of mitigation measures to reduce impact of gas compound which cannot be considered a discreet structure due to its size
 - Applicant has failed to demonstrate that safe and suitable access to the site can be achieved

Following reconsultation a further representation was received from the residents of Links Bungalow which reiterated their original objection to the scheme.

POLICIES:

DEVELOPMENT PLAN

49. The Development Plan for Forest Heath comprises the following:
- The Forest Heath Local Plan (1995) as 'saved' by the Secretary of State in September 2007 and as subsequently amended by the adoption of the Forest Heath Core Strategy in May 2010, and the Joint Development Management Policies in February 2015.
 - The Forest Heath Core Strategy adopted in May 2010, as amended following the High Court Order which quashed the majority of Policy CS7 and made consequential amendments to Policies CS1 and CS13.
 - The adopted policies of the Joint Development Management Policies Document (JDMP) Local Plan Document (February 2015).

50. The following Development Plan policies are applicable to the application proposal:

Forest Heath Core Strategy 2010

Spatial Objectives:

- **ENV1** – Habitats and landscapes and improving biodiversity
- **ENV2** – Climate change and reduction of carbon emissions
- **ENV3** – Promotion of renewable energy and energy efficiency

Policies

- **CS1:** Spatial Strategy
- **CS2:** Natural Environment
- **CS3:** Landscape Character and the Historic Environment
- **CS4:** Reduce Emissions, Mitigate and Adapt to Future Climate Change
- **CS5:** Design Quality and Local Distinctiveness

Joint Development Management Policies Document 2015

- **DM1** – Presumption in Favour of Sustainable Development.
- **DM2** – Creating Places – Development Principles and Local Distinctiveness.
- **DM5** – Development in the Countryside
- **DM6** – Flooding and Sustainable Drainage.
- **DM8** – Low and Zero Carbon Energy Generation
- **DM10** – Impact of Development on Sites of Biodiversity and Geodiversity Interest.
- **DM11** – Protected Species.
- **DM12** – Mitigation, Enhancement, Management and Monitoring of Biodiversity.
- **DM13:** Landscape Features
- **DM14** – Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards.
- **DM16** – Heritage Assets and Listed Buildings.
- **DM20** – Archaeology.
- **DM31** – Farm Diversification
- **DM45** – Transport Assessments and Travel Plans.

Other Planning Policy

Emerging Development Plan Policy

51. **Single Issue Review and Site Allocations Document:** The next stage of the Single Issues Review is imminent, with a 'preferred options' consultation to take place in April 2016. A stand alone Development Plan Document has also been prepared alongside the Single Issue Review, and was last subject to public consultation in August 2015. The Local Planning Authority has taken the decision to consult on the documents in tandem in the next round, in early 2016.

52. The Examination of the 'submission' Core Strategy Single Issue Review (CS7) and Site Allocation Local Plan documents is not expected before early 2017, with adoption in mid-2017.
53. At the present time, the Single Issue Review and the Site Allocations Document carry limited weight in the decision making process, although the published evidence underlying the SIR still has weight.

National Planning Policy and Guidance

54. Planning law requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) is a material consideration for planning decisions and is relevant to the consideration of this application.
55. Paragraph 14 of the NPPF identifies the principle objective of the Framework:

'At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision taking this means:

- *Approving development proposals that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies out-of-date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole;*
- *Or specific policies in this framework indicate development should be restricted'.*

56. This presumption in favour of sustainable development is further reinforced by advice within the Framework relating to decision-taking. Paragraph 186 requires Local Planning Authorities to *'approach decision taking in a positive way to foster the delivery of sustainable development'*. Paragraph 187 states that Local Planning Authorities *'should look for solutions rather than problems, and decision takers at every level should seek to approve applications for sustainable development where possible'*.
57. The Government published its National Planning Practice Guidance in March 2014 following a comprehensive exercise to view and consolidate all existing planning guidance into one accessible, web-based resource. The guidance assists with interpretation about various planning issues, and advises on best practice and planning process. Relevant parts of the NPPF are discussed below in the officer comment section of this report.
58. Paragraph 215 of the NPPF states that due weight should be given to relevant policies in existing plans according to their degree of consistency with the

framework (the closer the policies in the plan to the policies in the Framework, the greater weight that may be given).

59. Paragraph 14 of the NPPF states that where the Development Plan is absent, silent or relevant policies are out of date, development proposals should be determined in accordance with the relevant test - that is whether *'any adverse impacts...would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'*.

OFFICER COMMENT

60. The application is submitted by Strutt and Parker Farms and Upton Suffolk Farms. The Strutt and Parker Farms business manages over 8,000 hectares of which 3,000 are in Suffolk where a wide range of crops are grown including wheat, sugar beet, oilseed rape, potatoes, linseed, oats, barley, maize, lucerne and rye. Upton Suffolk Farms is a compact, irrigated farm which crops over 500 hectares and is bisected by the A11.
61. The proposal will result in a change to the business operated at Bay Farm as it is likely that maize will replace the cereals grown on the farm, whilst the sugar beet crop of approx. 12,000 tonnes will remain on the farm to be used in the AD plant instead of being transported to the British Sugar factory at Bury St Edmunds.
62. The liquid digestate (80% of the total digestate) produced at the end of the digestion process will not leave the farm and will be distributed through the current irrigation system which covers both sides of the A11. A proportion of the solid digestate is likely to leave the farm as backloads to the suppliers of feedstock for the AD plant. The use of the digestate will eliminate the current practice of importing fertilizer to the site.

The key considerations when determining this application are:

Principle of Development

National Policy Context

63. The National Planning Policy Framework (NPPF) seeks to encourage the use of renewable energy sources and sustainable development, whilst ensuring that any adverse visual or other impacts are satisfactorily addresses. It also seeks to support economic growth in rural areas and recognizes that the diversification of agricultural businesses can contribute to this.

Development Plan Policy Context

64. The application site lies in a rural location. Policy CS10 of the Core Strategy supports the diversification of existing rural enterprises where a rural location is environmentally or operationally justified subject to there being no significant detrimental impacts.
65. Policy DM1 of the Joint Development Management Policies Document confirms the presumption in favour of Sustainable Development set out in the NPPF, whilst Policy DM5 seeks to permit proposals for economic growth and expansion

for business/enterprises in the countryside subject to criteria to ensure that development does not have an adverse impact on the landscape, biodiversity and the local highway network.

66. Encouragement for proposals which generate renewable and low carbon energy is stated in Policy DM8 and again the support for these proposal is caveated by the need to meet criteria which seek to demonstrate that any impacts of the proposal can be appropriately mitigated, particularly where the development will be located in close proximity to heritage assets and nature conservation sites. Policy DM31 covers farm diversification and requires proposals to meet the listed criteria to ensure there is no significant detriment to the surrounding landscape or nearby residents.
67. Both national planning policy and development plan policies offer support for the principle of the development. Other material considerations such as impact on the landscape, ecology, the highway, the historic environment; noise and odour and flood risk and pollution must also be considered. The remainder of the report examines these.

Landscape and Visual Impact

68. A Landscape and Visual Impact Assessment (LVIA) has been submitted with the application which acknowledges that this is a sensitive landscape. It provides an assessment of the potential impacts of the AD plant on the landscape.
69. The site lies within the Estate Sandlands Landscape Character Area which is described as 'a landscape of large geometric fields, plantation woodlands and remnant heathland'.
70. It has been demonstrated how the siting, form and orientation of the structures within the AD plant have been considered in the overall design process in order to minimise its visual impact on the landscape. This is achieved through the location of the buildings on the lower part of the site to be grouped with the existing farm buildings; the use of materials to blend with the existing buildings and the utilisation of any excavated material to form a landscaped perimeter bund planted with woodland.
71. The Council's Tree and Landscape officer requested a detailed landscape plan to ensure the planting proposed along the northern site boundary would be effective in mitigating the impact of the development. It is considered that the proposal is not likely to have a significant visual impact within the surrounding landscape provided the correct level of planting is secured. The final comments on the revised landscaping plan are awaited and these will be reported verbally at the meeting.

Ecology

72. A Phase 1 Habitat Survey and protected Species Scoping Survey of the land at Bay Farm has been undertaken. Natural England has confirmed that they have no objection to the proposal given that the Survey recommends various mitigation measures, such as the need for further survey work for reptiles and roosting bats if identified during the development; consideration that work is undertaken outside the bird breeding season; the use of native planting species

in the landscaping scheme; the introduction of bat boxes on retained trees; creation of reptile hibernacula in the landscaping scheme and the use of hedgehog friendly fencing.

73. The Council's Tree and Landscape officer has requested that the above measures are incorporated into the revised landscape scheme.

Noise and Odour Control

74. A Noise Assessment report has been submitted as part of the Environmental Report. It assesses the noise effects of the proposal on existing sensitive receptors. Bay Farm Cottages are the nearest dwellings to the site and these are occupied in association with Bay Farm.
75. The report identifies the noisiest parts of the operational process as the CHP motor and exhaust stack; the solid feed system; the gas upgrade system and the propeller mixers.
76. The CHP unit is proposed to be situated in an insulated container and the solid feed system will typically be in operation for 2-3 hours during the daytime, but a greater time period was used for assessment purposes to give a worst case scenario. The motors and mixers are also housed within structures.
77. The result of the report indicates that there is very little likelihood of an adverse impact in terms of noise from the proposed plant. Conditions relating to sound proofing and the timing of construction works have been suggested by Public Health and Housing Officers and as a result no objection to the proposal is raised in terms of noise impact.
78. Taking into consideration the existing farm operations that occur at Bay Farm, including associated traffic movements, the proposal is not considered likely to have an adverse impact on the amenities of the closest residential properties to the site.
79. The Air Quality, Dust and Odour chapter of the Environmental Report contains a full assessment of the potential emission sources from the proposal. It concludes that odours from the AD plant would be classified as likely to be similar to livestock farming and composting processes. The main activities that are likely to lead to the generation of smell would be the transfer of feedstock from the clamps to the feed hoppers and emissions from the storage lagoons.
80. As a result of extensive modelling within the assessment the predicted odour levels, at the nearest sensitive receptors, based on worst case scenario data are below the levels at which adverse odour impact would be expected to occur.
81. Odour control measures are proposed in the design of the proposal and it is stressed by the agent that the process to remove the methane, which is the smelly element of manure, is sealed and should not smell. If excessive odour occurs there is likely to be a problem which will need to be rectified and it would be in the operators interest to rectify any issues without delay.
82. There have been no objections to the proposal by the Council's Environmental and Public Health and Housing teams as a result of a review of the submitted

information. It should be noted that the site will require an Environmental Permit from the Environment Agency which provides a further level of control.

Flood risk and pollution

83. The site lies within Flood Zone 1 . The application is accompanied by a Flood Risk Assessment and Surface Water Drainage Strategy. This has been assessed by the Environment Agency and Suffolk County Council Flood and Water manager and no objections have been raised to the proposed development subject to conditions requiring the submission of further details as set out at paragraphs 36 and 37.

Historic Environment

84. The Landscape and Visual Impact Assessment (LVIA) and the Cultural Heritage Impact Assessment (CHIA) which have been submitted as part of the application recognise the significance of the historic and cultural landscape that the application site lies within. Of particular note is the potential to impact upon the setting of the scheduled monument known as 'Bowl Barrow on Chalk Hill' which lies approx. 270m to the northeast of the application site.
85. Historic England in their consultation response have identified the proposed AD plant would in their view result in harm to the significance of the designated heritage asset given the proximity, location, size and nature of the proposal. It is stated in their response that there is no objection to the principle of the AD plant, but it is recommended that amendments should be sort to reduce the potential impact of the development. It is suggested that increased screening should be provided in the form of landscaping along the north eastern boundary of the site .
86. An additional landscape plan was requested and received. Further comments are awaited from Historic England and the Council's Landscape and Conservation officers and these will be reported verbally at the meeting.
87. The NPPF requires that any harm resulting from the proposal can be justified and is outweighed by the public benefits arising from the development. In this case the less than substantial harm that arises from the development is likely to be capable of mitigation by enhanced landscaping proposals. The site lies close to an existing farm complex, a solar farm and the A11 which have all eroded the historic setting of the barrow over time and whilst this is not justification in itself the benefits arising from the proposal in terms of the sustainability of the proposal and its overall conformity with national and local planning policy objectives must be afforded significant weight.
88. Suffolk County Council Archaeology team requested on site works prior to any consent being granted given the archaeological potential of the site. This work has been carried out and the response of the archaeologists is one of no objection subject to a condition to record the reporting of the archaeological investigations at this site.

Highways and Traffic

89. At the time of the original submission limited information was submitted regarding the routing of traffic delivering feedstock to the site. The matter of impact from traffic movements has become the main source of concern from the Parish Councils and residents who have commented on the proposal.
90. The agent responded to initial questions raised by Suffolk County Council Highways in relation to the likelihood that a large number of shorter, local vehicle trips will be required to supply the AD plant. The further information provided by the agent resulted in the suggestion of conditions to require the submission of a Traffic Management Plan 3 months prior to the use of the plant; improvements to the surface of the Bay Farm access and the submission of a Deliveries Management Plan relating to the construction period (refer to paragraph 35).
91. The response from the Highway Authority takes into account the fact that the site is a working farm which already operates all year round and produces a significant number of vehicular movements on a daily basis which are not controlled via the planning process.
92. The application information indicates that a change in cropping may occur to ensure the supply of feedstock and vehicular movements will alter as a result of keeping feedstock, such as sugar beet, on the farm and no longer needing to import fertiliser given the use of the liquid digestate.
93. The applicants via their agent have provided additional information by letter dated 18th February in the form of measures that could be used as conditions or form part of the Traffic Management Plan. They are as follows (summarised);
 - The feedstock for the plant only to be sourced from the area identified on the submitted plan which shows the geographical extent of the feedstock source areas. This would allow control over the scale and nature of the operation.
 - No HGV deliveries associated with the AD plant to use the existing farm track between Bay Farm and Golf Links Road.
 - The Traffic Management Plan could include
 - A vehicle routing plan to be issued to all feedstock delivery drivers providing details of proscribed and prohibited routes - reference to Worlington and Freckenham as prohibited routes
 - The erection of directional signs at the junction between Bay Farm and the C610 requiring all vehicles exiting the AD plant to turn left and use the A11 for their onward travel
 - Timing restrictions on feedstock deliveries outside of the harvest period to between 8am and 4pm.
 - Requirement for proportion of digestate to be transported by the existing irrigation pipe network at Bay Farm and the remaining digestate only applied to fields within the geographical area shown on the feedstock sources plan referred to above.
94. Further comments will be sought on the acceptability of these suggestions and conditions and presented verbally at the meeting.

95. The NPPF directs that applications should only be refused on transport grounds if the impacts of the development are severe. Officers are satisfied that the proposed development can be accommodated in highways terms given the additional information submitted by the applicant and agent. In reaching this decision, it is material that that Suffolk County Council Highway Engineer has raised no objection to the proposals.

CONCLUSION

96. The development proposal has been considered against the objectives of the NPPF, local policy and other material considerations and is considered to accord with the provisions of the NPPF and Development Plan policy. The recommendation is one of approval.

RECOMMENDATION:

97. That planning permission is **GRANTED**, subject to:

- (1) The following conditions:

1. Time
2. Compliance with approved plans.
3. Highways – surfacing of access
4. Highways – Traffic Management Plan
5. Highways – Construction Delivery Plan
6. Highways – Geographical extent of feedstock sources plan
7. Highways – no AD HGV deliveries to use farm track between Bay Farm and Golf Links Road
8. Feedstock type
9. Hours of construction
10. Control of waste material arising from site preparation and construction
11. Details of security or flood lights
12. Sound proofing
13. Recommendations of Ecology report to be carried out
14. Archaeology - report of investigations
15. Landscaping Implementation
16. Environment Agency – contamination – remediation strategy
17. Environment Agency – surface water disposal scheme
18. Environment Agency – pollution control
19. Environment Agency – piling, bore holes and foundations
20. Precise details of materials.

Documents:

All background documents including application forms, drawings and other supporting documentation relating to this application can be viewed online:

<https://planning.westsuffolk.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>