

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Planning Committee

1st July 2009

AUTHOR/S: Executive Director / Corporate Manager - Planning and Sustainable Communities

**S/0506/09/F – GREAT WILBRAHAM & WEST WRATTING
Extension to Camgrain APC Comprising Additional Grain Storage Facilities and Ancillary Works Including Drainage Proposals, Landscaping and Highway Improvements – Land adjacent to Wilbraham Chalk Pit for Camgrain Stores Limited**

Recommendation: Delegated Approval

Date for Determination: 9th July 2009

Notes:

This Application has been reported to the Planning Committee for determination because the recommendation is contrary to the recommendation of West Wrattling, Great Wilbraham, and Weston Colville Parish Councils.

Members of Committee will visit the site on Wednesday 1st July 2009.

Major Application

Site and Proposal

1. The application site is an approximately 11.3 hectare area of land situated in the countryside on the south-east side of the A11 trunk road, some 600 metres away from the A11 Wilbraham interchange. The site is occupied by a 90,000 tonne grain storage facility for which planning permission was granted in 2006.
2. Along the northern boundary of the site is a footpath and byway beyond which lies a working chalk pit. The land on the site rises to the east and south. Some 400 metres to the west are two residential properties, West Wrattling Valley Farm and Valley Farmhouse. Approximately 3 kilometres to the north, beyond the A11, is the village of Great Wilbraham, whilst Balsham village lies approximately five kilometres to the south-east. Access to the site is from Mill Road, which leads to the A11.
3. The full application, received on 9th April 2009, proposes an expansion of the existing Camgrain site in order to increase the capacity for grain storage from 90,000 tonnes to 300,000 tonnes. The proposal comprises:
 - (a) A 3,000 square metre extension to the east side of the flat store building;
 - (b) Four extra bulk bins;
 - (c) Sixty additional storage silos;
 - (d) Six extra holding bins;
 - (e) Plant house;
 - (f) Four driers.
4. Further landscaping would be added to the eastern and western boundaries, and the extension would be cut into the existing landscape, with the new silos being located behind the existing silos.



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Scale 1/10000 Date 15/6/2009

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5. The accompanying planning statement explains that Camgrain was founded in 1983 to provide grain storage for local and regional farmers, and has become a leading farmer-owned storage cooperative with 175,000 tonnes of storage available to around 300 members. The advantages of centralised storage over individual farm grain stores include: speed of harvest; ability to process all crops regardless of impurities; provides facilities for processing grain to standards required by food and drink processors; ability to open up new markets for growers; unprecedented hygiene standards.
6. Demand for centralised grain storage continues to grow and to outstrip supply, and it is anticipated that the 90,000 tonne storage capacity at the existing premises will be reached by harvest time this year. In November 2007, Sainsburys announced it would use flour from traceable UK farms, and this flour is to be solely sourced from Camgrain. A further two year contract with Camgrain was announced on 15th June 2009. In addition, the company has also been awarded a £4million grant by EEDA for the development of the site. The statement argues that the benefits of central grain storage, together with the EEDA grant and Sainsbury's contract, underlines the success and significance of the company.
7. The application has been accompanied by a number of supporting statements:
8. The planning statement includes a letter of support from Robert Sturdy MEP who considers the application represents a great step forward for the Eastern Region at a time when world stocks, agriculture and food security are under pressure. Also letters of support are included from the English Farming and Food Partnerships Ltd (who state that Camgrain exemplifies the benefits a cooperative approach can deliver to suppliers and customers, that many on-farm grain storage facilities are unable to cope, and that investment in grain storage is urgently required) and the National Farmers Union (who state the proposal is in line with government thinking on farm restructuring and co-operation).
9. The Design and Access Statement explains that the landscape assessment carried out on behalf of the Council in connection with the original application concluded that, if the proposed facility was needed, this is a good site as it sits within a contained compartment, with the landscape mitigation being effective and appropriate to local character. The currently proposed silos would be sited behind the existing on a level site cut into the rising land. As such, it is argued the impact would not be much greater from these viewpoints.
10. The accompanying Transport Assessment proposes to widen Mill Road for some 120m to provide sufficient room for a lorry exiting the site to pass another lorry using the road. Traffic counts of the local road network were undertaken in November 2008. The predicted volume of HGV movements has been based on the existing maximum number of HGV movements (150), increased on a pro rata basis (by 3.33) to reflect the increase in capacity from 90,000 to 300,000 tonnes, resulting in a projected maximum of 500 two-way movements per day. It is argued that the existing junctions have ample capacity to accommodate the traffic likely to be generated by the development.
11. The Landscape Assessment concludes that the low level of available viewpoints and intervening rolls in landform combine to preclude visibility of the site from much of the surrounding area.
12. The Habitat Survey and Ecological Appraisal states that the site has limited potential to be used by nesting birds and brown hare. Proposed mitigation involves deterring ground nesting birds and brown hares from using the site. It is considered the ecological enhancement achieved as part of the development would be secured

through the development of a soft landscaping scheme resulting in an increase in habitat diversity.

13. The Flood Risk Assessment explains that surface water will be formally drained via surface water sewers to infiltration/detention basis. The development will not increase foul water discharge.
14. The Noise Assessment explains that a detailed continuous 24 hour noise survey was undertaken, with the results being used to determine the applicable daytime and night-time noise limits. The noise mitigation scheme includes: - increasing the height of the western boundary bund to 4 metres; the storage silo aeration units and grain dryer aeration fan units directed towards the east away from West Wrattling Valley Farmhouse; all plant building roof fans and dust filters located on eastern façade plant building so they are acoustically screened by the plant building; all grain intake filter exhausts located on eastern façade of grain intake building and directed east; and air outlets for three diesel generators to face east. With these measures, it is argued the noise limits derived at the neighbouring property would be met.
15. External Lighting will be incorporated into the development, and will follow the nature of the existing lighting approved in connection with the previous development. It is anticipated final details will be secured by condition as per the previous permission.
16. A proposed deed of variation to the existing planning obligation, to account for the projected increase in traffic movements to 500 two way movements per day, has been enclosed with the application.

Planning History

17. **S/0623/03/F** – Application for a 30,000 tonne grain store on this site. The Highways Agency raised concerns in respect of the adequacy of the A11 junction to cater for the increase in traffic and stated that modifications would need to be carried out to the junction. The costs of carrying out these modifications meant that the 30,000 tonne facility would not be a financially viable option. The application was withdrawn.
18. **S/2494/04/F** – Members may recall that, following consideration at Planning Committee meetings held in March 2005 and July 2006, planning permission was granted on this site for a 90,000 tonne grain storage facility. The approved development consisted of a grain store, office building (incorporating offices, laboratory and administration floorspace and meeting room), weighbridge and approximately 20 silos. The total approved floorspace (excluding the silos) amounted to 9392m², comprising 8550m² of grain storage and 842m² offices. Following concerns from the Highways Agency and Local Highways Authority about the adequacy of the road network, the permission was conditional upon improvements being carried out to the slip lanes on and off the A11 trunk road and traffic lights being installed on the bridge over the A11. In addition, a planning obligation restricted HGV movements to 150 two-way movements per day and put in place a routeing agreement to ensure lorries delivering grain do not use roads through nearby villages. Consent was granted in January 2007 and work subsequently began on site. It is anticipated that the development approved under this consent will be completed later this year.

Planning Policy

19. **Planning Policy Statements:**

PPS1 – Delivering Sustainable Development
PPS 7 – Sustainable Development in Rural Areas

20. **South Cambridgeshire Local Development Framework Development Control Policies DPD 2007**

DP/1 Sustainable Development
DP/2 Design of New Development
DP/3 Development Criteria
DP/4 Infrastructure and New Developments
DP/7 Development Frameworks
ET/5 Development for the Expansion of Firms
NE/1 Energy Efficiency
NE/4 Landscape Character Areas
NE/6 Biodiversity
NE/8 Groundwater
NE/9 Water and Drainage Infrastructure
NE/11 Flood Risk
NE/14 Lighting Proposals
NE/15 Noise Pollution
NE/16 Emissions
CH/2 Archaeological Sites
TR/1 Planning for More Sustainable Travel
TR/3 Mitigating Travel Impact

21. **Circular 05/2005 – Planning Obligations** – states that planning obligations must be relevant to planning, necessary, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respect.
22. **Circular 11/95: The Use of Conditions in Planning Permissions** – states that conditions should be necessary, relevant to planning, relevant to the development permitted, enforceable, precise and reasonable in all other respects.

Consultations

23. **West Wrattling Parish Council** recommends refusal, stating:

"A count of traffic was done in Nov. '08 and the advised peak period of activity and hence traffic is at harvest time. This would normally be July/August. The long standing count just south near Worsted Lodge shows July and August shows some 11% more traffic in July and August than November.

Conclusion: The Worsted Lodge traffic data available from Highways Agency or County Council should be used in preference to the November count. Alternatively the November data should be factored up by 11% to equate to July/Aug. traffic levels.

It is normal practice of HA to require a developer to assess traffic, not at the year of survey but at an assessed future year. This may be 5 years after the date of any planning application. Quite clearly the development will not exist at the date of application, it would take time to construct and make fully operational. At this future time it is to be expected that traffic-flows on a trunk road, such as A11, will have increased. The HA normally requires certain standard factors (referred to as TEMPRO and NRTF) to be used. The future year selected by HA may be more than 5 years from application but is seldom more than 10 years after the completion of the development. Given the A11 is being dualled to Norwich and given the growth of the population in the Eastern Region (again Policy led) there is a strong case for looking 10 years ahead rather than just 5. If the A11 were to need improvement after (say) 8 years due to this development and policy-led growth it would be very expensive to complete and would not in economic terms justify the development here proposed.

The development already permitted has not yet been fully completed. Hence the Road Safety Review does not look at the safety situation reasonably after all the present consent has been completed and is operational. Further for the first development WS Atkins had concerns when they did a Safety Audit for SCDC – who then wanted an independent audit completed. It is not clear that the WSP Safety Review is a full AUDIT undertaken by a recognised safety audit engineer. There is no indication of J Colron's qualifications in this respect. An independent SAFETY AUDIT by an independent company should be a requirement before consent is given.

The recommended maximum speed for taking the turns off the A11 is (for the moment from North off A11) only 20mph. To achieve this speed any fully loaded grain lorry will have to slow considerably within the main carriageway of the A11, due to the very short deceleration lanes. This form of junction is suited to low-flow interchanges where normally the HGV flow would be low – possibly 5-10% of the total. THIS IS NOT THE CASE HERE. The HGV content of this interchange will inevitably be extremely high requiring many vehicles to slow excessively within the carriageway of the main A11. This is potentially very dangerous as it will not be expected by other drivers on the A11. As the A11 gets busier – it already has over 40,000 vehicles per day (24 hours) this could lead to front/rear collisions or side impacts as a vehicle quickly changes lane to miss a slowing lorry. The junction is the wrong junction for this type of large vehicle traffic, even when the total flow is quite low.

It is felt that an Environmental Statement is needed as pointed out to SCDC when the application was first received.

There is no mention of money for the local community projects.

An increase to 60 silos and associated buildings in an area of 11.3 hectares is huge and is not in keeping with policy NE/4 – landscape areas. This is the countryside, not an industrial park. The landscape photos were either taken in the dark or with a useless camera.

Is the capacity of 300,000 tonnes to be the final figure? Will further applications be made later for more?"

24. In addition, the Chairman of West Wrattling Parish Council has sought the advice of planning Counsel, who has drawn the Parish Council's attention to a recent case. This concluded that part of Schedule 2 of the 1999 Environmental Impact Assessment regulations did not properly implement the EIA Directive 86/337 as it sought to limit the application of the threshold to the further development rather than assess the cumulative effect of development. In addition, regulation 4(8) of the procedure did not comply with Article 10a of the Directive as there was no requirement or obligation provided for concerned members of the public to be informed of their right to address the Secretary of State. In these circumstances, the Parish Council states that, as a matter of law, the Council must insist on an environmental statement before it can properly assess the planning application.
25. **Great Wilbraham Parish Council** recommends refusal, commenting that Members have considerable concerns about the proposal:

"Firstly on the overdevelopment of the site. The tonnage of storage would more than triple and the resultant number of silos would be six times the original application made in 2006. Members feel that the reasons behind this vast expansion have not been fully justified or indeed are necessary at this stage. It could potentially set a precedent for additional industrialisation of this area.

Members feel that there is insufficient screening of the silos, the measures detailed in the application concentrate on only one viewpoint direction.

Members feel that there is insufficient information of the noise pollution. A council member with knowledge of this issue has experience that the impact of noise cannot be assessed on a site which has not yet been constructed.

Members are concerned about the light pollution caused by the proposed lights reflecting off the highly reflective surface of the silos and the increased lighting needed for security on the site.

Finally there are major concerns about the transport issues raised by the application and whether the figures given are realistic. The vast increase in vehicle movement per day gives concern to the validity of any previous study done on this junction, particularly in the summer when traffic on the A11 can be very busy. Members and the public are seriously concerned about the impact of very large heavy lorries, potentially queuing, on the bridge over the A11 which was initially constructed for light farm vehicle and village traffic use only. And despite the minor improvements resulting from the previous application members believe that the slip roads are inadequate for where the traffic joins the A11. Members feel that the risk of serious accidents will be greatly increased.

Members of Great Wilbraham Parish Council feel that if this proposal went ahead it would be to the detriment of safety and would have a severe impact on the environment of the village and locality. They therefore recommend refusal."

26. **Weston Colville Parish Council** recommends refusal, stating:

"We consider the access from the A11 to be completely inadequate for the increased traffic. If substantial improvements were proposed we would like to be able to re-consider our recommendation."

27. **Balsham Parish Council** makes no overall recommendation.

28. **Little Wilbraham and Six Mile Bottom Parish Council** recommends approval:

"No objections provided strict control of large trucks en route to the site is maintained and landscaping is carefully adhered to."

29. **Linton Parish Council** recommends approval.

30. **The Landscape Design Officer** states that landscaping proposals are required for the scheme. These should include:

- (a) Proposals for reinstatement of planting lost during the widening of the access road, together with any supplementary planting;
- (b) Proposals to show how the large areas of extended bunding will link with the existing scrub, young woodland and grassland (planted in 2007 and establishing well) and how the existing planting will be protected during construction;
- (c) Proposals (including sections etc) for the large swale/wetland adjacent to the public by-way to the north of the site;
- (d) Although acknowledged that there are limited views to the site from the south, the scale of the extension, made apparent by the separation of the tall plant houses, will mean that some landscaping will be needed to the southern boundary of the site;

- (d) Details of plant species, sizes, planting rates, grass mixtures etc. Suggest that these are similar to the existing establishing planting;
 - (e) Details of any slope grading or terracing, planting methods, depths of soil, and any additives (water retention granules etc) to show how the planting can be successfully established in a fairly harsh environment.
31. **The Ecology Officer's** comments will be reported verbally at the Committee meeting.
32. **The Environmental Health Officer** requests the submission of further information before being able to give final comments on the application:
- (a) The report seeks to provide measurements and makes predictions for noise levels to West Wrating Valley Farmhouse, which is the nearest dwelling to the development. This is a major extension to the size of the store and the positioning of the equipment, fans, driers and exhausts all point away from this dwelling to ensure the noise levels calculated in the report can be achieved. There are other houses further away that the report feels need not be considered. However, I am concerned that noise levels may be more elevated at other dwellings and therefore need assurance that levels from the whole site will not exceed the applicable noise criteria to 10 other dwellings in the area;
 - (b) Operational noise predictions assume that, as a worst case scenario, only 50% of the fixed aeration units on the storage silos and 40% of the roof fan units on the flatstore buildings will be operational at any one time. Is this assumption directly derived from experience at Camgrain's existing site in Linton?
 - (c) Background noise levels appear to be increasing during the night-time period from 33.9 in 2003, 35.5 in 2005 to 38.2 in 2009. However, these levels do not alter the noise criteria for this period;
 - (d) How will the 4m noise bund be consolidated to ensure it does not slump over time?
33. **The Local Highways Authority's** comments will be reported verbally at the Committee meeting.
34. **The Highways Agency** which is responsible for the A11 Trunk Road, states that, following a review of the Transport Assessment, a number of issues have arisen which require further clarification. Firstly, the additional traffic generation figures for the development proposals included in the report are assumed and based on a planning condition associated with the existing consent stating "...no more than 75 HGV movements or 150 two way HGV movements in any day." This figure has been increased on a pro-rata basis in respect of the proposed increase in grain storage capacity. The capacity increases by 3.33. Furthermore, it is disappointing that traffic surveys were not carried out at the Camgrain site access during the harvest months of July, August and September, as this would have provided a more precise basis for the factoring up exercise. For the purposes of peak period assessment, WSP's account of traffic generation associated with the development is 'approximate' and therefore requires revisiting.

To understand the present conditions at the A11/Mill Road junction, the Highways Agency considered it necessary to verify the design flow theoretical capacity of a compact grade separated junction. For purposes of clarification, the theoretical capacity of a compact grade separated junction is difficult to quantify categorically given the infinite combinations of traffic flows which may occur on the mainline and side roads. However, the DMRB states such junctions appear to be suitable where mainline flows are between 12,500-30,000 AADT and are normally associated with very low flows on the minor road.

The 2008 traffic flow diagrams presented by WSP appear to indicate junction flows would be within these parameters. However, their own road safety review highlights that mainline flows are already approaching the upper limit. No future year assessments have been provided by WSP. This should be provided to determine traffic demands at the A11/Mill Road junction under future year conditions.

There may well be potential for HGV's queuing to join the mainline of the A11. The introduction of traffic signals is likely to have had a positive effect with regard to shuttle operation on the bridge, increasing HGV flows could lead to instances whereby HGV's would stack at the signals and then cross over the bridge in convoy – potentially then proceeding through the junction to attempt to join the A11 simultaneously. This may result in HGV's queuing to join the A11 from a standing start. This issue must be considered.

The Council must not determine the application until the Highways Agency has had the opportunity to evaluate and respond to such additional information. Would not object to the planning committee considering the application and determining its views on all other aspects of the application.

35. **The Environment Agency** advises that the submitted Flood Risk Assessment satisfactorily demonstrates that the proposed extension is acceptable. However, there are a few concerns about the surface water drainage proposals. Conditions requiring the submission of a surface water drainage scheme and a pollution control scheme should therefore be added to any permission.

The site is on high ground with land falling steeply towards the A11. Failure of the infiltration drainage or saturation of soil layers could cause problems for third party properties or the carriageway. The FRA has used theoretical coefficients. Any drainage system must utilise on-site porosity tests and investigate local geology to ensure no failure of the system. The design calculations may not reflect recent rainfall trends. The 1 in 100 year critical rainstorm volumes must be checked for this catchment. Existing impermeable areas are shown to connect to the new infiltration system so it is important that the existing and proposed drainage systems cater for current design guidance and assumptions are not made regarding the adequacy of the existing system. The submitted drawing appears to show a retention basin and not an infiltration basin. It also only caters for a 1 in 30 year return period storm. Failure of an infiltration system can render the owner liable for any resulting damage. All systems must therefore be adopted or demonstrate their maintenance will be formally established in perpetuity with the development.

36. **East of England Development Agency (EEDA)** explains that its role is to improve the region's economic performance and its main focus in responding is to address:
- (a) Whether the proposal will help further sustainable economic development and regeneration in the East of England, and in particular,
 - (b) The ability of the proposals to help deliver the Regional Economic Strategy (RES)

The RES sets out the objectives and long term vision for the region's economy, and includes a series of priorities that are particularly relevant to this development and site. These include: strengthening the region's enterprise and improving enterprise performance through business support; to develop innovation and creativity; to improve resource efficiency; to support economic participation; and to ensure physical development meets the needs of a changing economy. Strategic ambitions for the rural economy include maintaining the East of England as the UK's leader in the agriculture and food sector.

Camgrain is a cooperative providing grain storage to local and regional farmers. The application proposes the extension of an Advanced Processing Centre (APC) which would become the largest and greenest processing centre in the UK for wheat, barley and other crops. In addition to storage, there are drying facilities and laboratory testing facilities to ensure the quality of the crops is consistent. Granting planning permission would enable Camgrain to maintain supplies in response to increasing demand and ensure that local farming remains competitive and responsive to the market. There are significant operational benefits to farmers and their customers in processing their grain through the cooperative, and the operation of the grain store facility is essential to the success of local farming activities and is of regional agricultural importance. The centralised facility enables farmers to keep pace with modern combine outputs, to process all combinable crops regardless of moisture content, enables access to new markets, gives greater hygiene standards, and the centralised activity is more economical and easily monitored.

EEDA has supported Camgrain through its Rural Development Programme with a £4 million grant. The application is considered to be broadly consistent with the Regional Economic Strategy and particularly the strategic ambitions for rural areas which seeks to support rural businesses and promote a strong rural economy. By raising productivity and being innovative, Camgrain will play a vital role in helping the region's food and drink sector be more competitive in the global market place and help to safeguard and provide local jobs.

37. **The Ramblers Association's** comments are awaited and will be reported verbally at the Committee meeting.
38. **The County Council Countryside Access Team** raises no objections, but points out that Public BOAT No.20 is located adjacent to the site. Informatives drawing the applicant's attention to points of law relating to the byway should be added to any consent.
39. **The County Archaeologist** states that records indicate the site lies in an area of high archaeological potential. It is considered likely that important remains survive on the site and would be severely damaged or destroyed by the proposed development. The area of the application lies directly south of known undated cropmarks comprised of ring ditches and enclosures. Adjacent to the eastern bounds of the proposed development, an evaluation undertaken prior to a windfarm proposal revealed Neolithic flint extraction quarries and associated flint working, and early Iron Age remains. The site is also located 1km east of Fleam Dyke, a known Saxon monument, and some contemporary remains may be present in the application area. The site should be subject to a programme of archaeological investigation, to be secured by planning condition.

Representations

Letters of Objection

40. Letters of objection have been received from 11 local residents, most of whom live within Great Wilbraham. The main points raised are:
 - (a) When permission was granted two years ago, Camgrain must have known it intended to expand further;
 - (b) If approved, this application would lead to a precedent for further development of this nature;

- (c) Due to the size of the extension, the development would have a significant impact on the landscape, which would not be adequately screened by the proposed landscaping;
- (d) The proposal will result in a huge increase in lorry movements;
- (e) It is believed the bridge over the A11 has a 17.5 tonne weight restriction. Will the development lead to stacking on the bridge thereby adding more weight?
- (f) Camgrain has stated that traffic will not go through the villages and that contracts will be cancelled if they do. This should apply to construction traffic as well;
- (g) The proposal would result in significant noise and light pollution;
- (h) There is a railway line less than 1 mile away. It would be more sustainable to move the tonnage by rail rather than road;
- (i) Great Wilbraham is unlikely to expand much in the future, reducing the possibility of securing S106 funding to help towards the maintenance of the community building. A contribution should be sought from this development.

41. The owner of Valley Farm Cottage, the nearest dwelling to the site, approximately 500 metres away, argues that the submitted transport assessment is deeply flawed. The single track part of Mill Road between the grain store and the A11 will not be able to cope with the peak flows of two way HGV traffic proposed. The only way traffic will flow is if stopped vehicles allow multiple vehicles to pass in the opposite direction. This will lead to 'platooning' where groups of HGV's join the A11 giving rise to a serious road hazard. The report doesn't include any analysis of the significant bottleneck in traffic flow that Mill Road presents. Platooning is acknowledged as a serious problem that needs dealing with but no measures are put forward to control it. The only way to resolve this would be to make Mill Road two way from the A11 junction to the site. It is further argued that an independent traffic report should be commissioned. It should include traffic models that are based on actual traffic flow data from harvest time. Traffic does not flow in an orderly way, but tends to have periods of no flow followed by gluts. Poisson statistics deal with such random events. Instead of using a realistic statistical analysis based on poisson statistics, the report estimates peak traffic based on making assumptions that HGV's will leave the site at exactly equal intervals. This greatly underestimates the peak flow of traffic.

There are no road markings at the entrance to Camgrain indicating that traffic needs to give way to traffic from London Road. In addition, the road surface condition has deteriorated since Camgrain opened, and that there is inadequate drainage leading to pooling of water.

The owner of Valley Farm Cottage also expresses concern about the noise impacts of the development. Construction has been ongoing 7 days a week, often very early in the morning. The proposals state the working hours are unknown, and HGV's will access the site 24 hours during the harvest months. Empty grain lorries are noisy when exiting the site. The conveyors are also noisy. The noise report was carried out on two of the coldest days of the year. The noise assessment states readings should not be carried out when temperatures are less than 3 degrees C. On the days of the survey, the lowest temp was -6 and the highest 2.4. Noise survey data should be discounted until a new survey has been carried out. The Linton site has led to regular noise complaints from residents. The operation of the site should not be allowed to be 24 hours for delivery of grain and certain equipment such as dryers and conveyors should not be used when there is a north-easterly/easterly wind.

This neighbouring property also states that the night sky has been adversely affected by lighting from Camgrain. High level lighting on the silos casts diffuse light over a large area, and security spotlights point in a westerly direction.

42. A West Wrattling Parish Councillor has submitted further concerns in respect of the Transport Assessment. This argues that the base traffic flow on the A11 should have been assessed in July or August 2008. The County Council Annual Traffic Monitoring Report for Worsted Lodge, just 2.5 miles along the A11 from the site, shows that the 24 hour AADT is always above 30,000 vehicles, with July and August flows being approximately 11% above November flows. Any assessment using November flows should include an 11% uplift to replicate harvest time levels of traffic. There should also be an assessment of forecast demand, normally for a period of 10 years. The County Monitoring Report indicates continuing growth over the 2005-8 period, and any further traffic from committed developments should be added. The outcome is believed to be 10 year forward forecast flow of close to 45,000 AADT. This is way above the level of this form of junction. The A11 junction is a compact junction, and the flows and turning movements for this larger scheme are not appropriate for such a small junction. It is noted that W S Atkins raised concerns about the junction in respect of the previous proposal. The anticipated 500 daily HGV movements would also be well in excess of what would normally occur at a minor road. The design of the junction should therefore reflect forecast movements in 10 years and allow for the unusually high proportion of HGV traffic, much of it loaded with grain and therefore accelerating slower and braking over a longer length of road than normal traffic.

Letters of Support

43. 23 letters of support have been received predominantly from Camgrain members based in Cambridgeshire, Hertfordshire, Suffolk and Essex. The main points raised are:
- (a) Camgrain collects, cleans, stores, and arranges sales of crops for many small farmers who would otherwise have nowhere to store their grain at harvest;
 - (b) Camgrain provides cost effective and efficient storage whilst enhancing the marketability of crops through contacts with end users such as Sainsbury's;
 - (c) Without Camgrain's help, the quality of many farms' grain would have been lost during last year's harvest. Indeed, some businesses would not have been able to survive without Camgrain;
 - (d) Camgrain makes economic sense for business, removes noisy and dusty grainstores from villages, and reduces tractor and lorry movements close to residential areas;
 - (e) Centralised storage is more efficient than on farm storage and uses less energy;
 - (f) There is an increased demand and urgent need for additional local central storage, as farmers need to comply with more demanding regulations;
 - (g) Unless the agricultural sector keeps ahead of demand, the food industry will face major supply problems;
 - (h) The development would help to maintain a sustainable countryside environment and rural economy;
 - (i) The existing site is excellent with its direct access onto the A11 (avoiding the need to go through villages) and its remoteness from any residential area.
44. One of the letters is from the Chairman of Camgrain, highlighting reasons why the application is so important in helping to deliver a healthy and competitive agricultural sector. Arable farmers in Cambridgeshire are exposed to a global market place for combinable crops at a time when commodity prices have been low and consumer demands for safe food have never been more demanding. As a result, farmers have looked to Camgrain to meet these market conditions and, when their on-farm stores are due for replacement, they have increasingly looked to central storage. The success of this route to market is demonstrated by the Sainsbury's contract. In today's competitive market, farm businesses need to adapt and structure themselves

to be as efficient and competitive as possible. Camgrain has helped make their farmers some of the most efficient and successful in the world. This process has been helped and recognised by the support that EEDA have given the company through the award of European funding. For this reason, Camgrain, who are experiencing continued demand from local farmers and the wider marketplace, requires the application to be granted.

Additional Noise and Traffic Information

45. Further to comments made by the Highways Agency and the Council's Environmental Health Officer, additional information has been provided in respect of highways and noise issues respectively.

Noise

46. The applicant's noise consultants, WSP Acoustics, have responded to the concerns raised by the Environmental Health Officer and the owner of West Wrating Valley Farm Cottage.
47. In order to consider the noise impact on an additional ten properties in the area, further fixed plant noise predictions have been undertaken at the specified locations. This concludes that, with final mitigation measures in place such that the plant noise emission levels/limits specified within the original noise assessment report are achieved, the applicable fixed plant noise limits would be met at each of the identified receptor locations.
48. Noise level predictions for HGV movements on the access road have also been repeated at the additional locations. The assessment concludes that these are of a relatively low level at all receptors, and are expected to be significantly lower than those associated with other ambient noise sources. Noise levels predicted at West Wrating Valley Cottage are only marginally greater than those predicted at the nearby farmhouse but, as this property is located closer to the A11, current ambient noise levels will be slightly higher at this location.
49. It is confirmed that assumptions have been directly derived from experience gained from the operation of the Linton site including the 2008 harvest. It is also acknowledged that background noise levels appear to be increasing during the night time period. This could be due to differences in intervening topography between the 2005 and 2009 assessment points or to natural road traffic growth. Although there has been an increase in measured ambient noise levels, there has been no change to the adopted assessment criteria.
50. Finally, it has been confirmed that the 4m noise bund will be compacted using the same method as agreed for the previous noise bund construction. The required height will be achieved and will not be compacted over time.
51. With regards to the concerns raised by the owner of West Wrating Valley Farm Cottage, an additional assessment of predicted HGV noise levels on the site access and haul routes has been undertaken drawing upon the 2003 baseline noise survey results. This predicts that only minor noise level increases at worst are expected during the night-time period, and argues that predicted worst case noise levels would be below the World Health Organisation guidelines for community noise. It is acknowledged that the 2009 measurements were undertaken during cold weather conditions. The Environmental Health Officer has been provided with further information about the reliability of the plant source noise data, which argues that the prevailing cold weather conditions did not significantly influence the measurement

results, and that the meter used for the survey provides accurate results at temperatures of between -10 and +50 degrees Celsius. With regards to the issue of construction noise, the consultants acknowledge that it is inevitable there will be some disturbance but, given that the nearest property is some 500 metres away, it is expected that any noise disturbance can be addressed through the adoption of best practice techniques.

52. The Environmental Health Officer has responded in respect of the additional noise information as well as the concerns raised by the owner of West Wrattling Valley Farm Cottage. It is considered that issues relating to temperatures when background levels were taken and HGV noise from empty vehicles were adequately considered in WSP's response. It is therefore considered that a further noise report is not required. Lighting standards have been discussed with Camgrain – most general lighting is pointing downwards and the only lighting above the horizontal would be for safety reasons and maintenance access and these are to be on short timers. With regards to the Linton site, this has been in operation for about 25 years and very few complaints have been received (approximately 6 since 2002). Approval is now recommended subject to the following conditions:
- (a) The site shall be constructed and operated to conform to the predicted noise levels submitted with the application, as amended by WSP's subsequent information;
 - (b) A method statement for the construction of the noise barrier to be submitted and agreed and the noise barrier constructed before commencement of development;
 - (c) No external lighting other than in accordance with a previously agreed scheme;
 - (d) Restricted hours of operation of power operated machinery during the construction period;
 - (e) It may also be prudent to include a condition requesting details/locations of any further plant installed on the site.

Traffic/Highways Issues

53. Further to the holding objection raised by the Highways Agency, the applicants have provided the Highways Agency with further information and technical notes.
54. Technical Note 1 deals with the Highways Agency's query as to why the prediction of peak hour traffic was not based on observed movements during the summer 2008 harvest period. It explains that a traffic count of the Great Wilbraham junction was undertaken in August 2008 during the peak harvest period. However, the grain store was not operating under normal harvest conditions due to the unusually wet summer. The approved grain drying facilities were not then implemented, this resulted in additional HGV movements as wet grain was delivered then sent offsite to be dried and subsequently returned to site. The August 2008 traffic count was not therefore representative and not appropriate to use as a basis for prediction of HGV movements. Nonetheless, to assure the HA that the TA does not underestimate peak traffic generation, the August data (taken on the second busiest day of the year) has now been used. This demonstrates that the predicted peak hour traffic flow associated with the proposed expansion to 300,000 tonnes is a considerable overestimate.
55. Technical Note 2 assesses the predicted traffic flows to the year 2019 during the harvest season with the 300,000 tonne expansion and concludes that the existing junction will be capable of accommodating the increase in HGV movements arising from the proposals.

56. Technical Note 3 deals with the issue of convoys joining the A11. This concludes that even during the busiest day of the harvest season, there is very little likelihood that more than one HGV will join the A11 at a time.
57. In addition, the applicants have submitted details of the sequence of events through the weighbridge operation, and have clarified that the management of transport on site through the weighbridge exit ensures that no more than 1 HGV can exit each minute.
58. Following receipt of this further information, the Highways Agency has removed its holding objection subject to the following condition:

“All vehicles hauling grain shall egress the site through a single weighbridge, which shall be maintained in working order at all times.

Reason – To prevent haulage vehicles leaving the site in platoons, in order to ensure that the A11 Trunk Road continues to serve its purpose as part of the national system of routes for through traffic in accordance with Section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety on that road.”

Planning Comments – Key Issues

59. The key issues to consider in the determination of this application are:
- (a) The justification/need for the development;
 - (b) The need for an Environmental Impact Assessment;
 - (c) Visual impact;
 - (d) Highway safety and traffic issues;
 - (e) Residential amenity issues including noise and light pollution;
 - (f) Ecological Issues;
 - (g) Flooding/drainage issues;
 - (h) Archaeology;
 - (i) Community obligations.

Principle of development and need

60. The site lies within the countryside where planning policies state that development must be restricted to that which requires a rural location and that is essential to the operation of farming. Additionally, Planning Policy Statement 7 supports development that delivers diverse and sustainable farming enterprises, and that enables farmers and farming to become more competitive, to adapt to new and changing markets and to comply with changing legislation.
61. The principle of siting such a facility in the countryside was thoroughly explored by this Authority in the consideration of the original application, as a result of which it was accepted that the operation of grain storage is essential to the success of farming and requires a rural location. It is clear from the numerous letters of support received from local farmers and farming bodies, from the EEDA grant and Sainsbury's contract secured by Camgrain, and from the response received by EEDA in connection with the current proposal, that the expansion of Camgrain's existing centralised grain storage facility is essential for the continued effectiveness and success of the farming industry.

Environmental Impact Assessment

62. A request for an Environmental Impact Assessment Screening Opinion was submitted to the Council prior to the submission of the application. This Authority concluded that the proposal falls within Schedule 2 of the Regulations. This comprises classes of projects

- where the planning authority is required to consider whether the project is likely to have a significant effect on the environment. Having regard to the criteria and defined lists of environmental factors in Schedule 3 to the Regulations, noting the size of the development and cumulative impact of new development plus the existing development, the proposal was not considered to have more than local importance, to affect a particularly environmentally sensitive or vulnerable location, or to have unusually complex or potentially hazardous environmental effects. On this basis, this Authority concluded that the proposal was not considered to constitute EIA development.
63. West Wrattling Parish Council has insisted that an EIA be required for this application. This issue is presently the subject of discussion with the Council's Legal Officer, West Wrattling Parish Council, and the applicant's solicitors, and Members will be updated on any progress at the Committee meeting.

Landscape and visual impact

64. In its consideration of the original application, an assessment of the visual impact of the development within the landscape was carried out on this Authority's behalf by David Brown Landscape Consultants. This assessment admitted that the impact on the immediate landscape, when viewed from Mill Road bridge and from the footpath/byway that runs along the northern edge of the site, would be severe, but considered that these impacts could be ameliorated by the proposed landscaping and soil bunding. Due to the lie of the land and the fact that the site sits in a valley, the report also concluded that there would be no material harm to the longer distance views of the site.
65. As acknowledged in David Brown's original assessment, the present development is most prominent from the Mill Road bridge over the A11, and from the bridleway that runs directly adjacent to the northern boundary of the site. From the bridge, the flat shed and silos are prominent. The proposals seek to extend the flat shed on its eastern side and to site the additional silos behind the existing silos on a level site that cuts into the gradually rising topography. As such, whilst the proposal represents a significant extension to the existing facility, the vast majority of the additional bulk will be concealed by the already permitted development.
66. The landscaping measures approved in connection with the previous application have already been carried out, and these have helped to minimise the visual intrusion of the development in the landscape, particularly when viewed from the bridleway to the north, from where high bunding largely conceals views of the development. The current proposal seeks to add new bunding and planting on the western and eastern boundaries in order to further minimise the visual impact of the development. The Landscape Design Officer has raised no in-principle objections to the landscaping proposals for these boundaries, subject to the submission of further details. The application, however, makes no provision for landscaping along the southern boundary of the site, arguing that this is unnecessary due to the topography of the site. However, whilst there are limited views to the site from the south, the Landscape Design Officer has stressed that some landscaping will be required for this boundary. I am seeking clarification as to whether this would necessitate any increase in the site area, and will update Members verbally at the Committee meeting.

Highways Issues

67. Significant concerns have been raised by West Wrattling and Great Wilbraham Parish Councils, by the Highways Agency and by local residents in respect of the traffic implications of the proposal.

68. As part of the original application for the 90,000 tonne storage facility, the applicants were required to upgrade the existing A11 junction, by increasing the length of the northbound slip road from 77m to 130m and the southbound slip road from 95m to 130m, and to provide traffic signals at the A11 overbridge. The Highways Agency considered the proposals would bring the junction up to the required standard and raised no objections at the time subject to the tonnage of grain being restricted to 90,000 tonnes and to vehicle movements being restricted to 150 two way movements per day. These improvements have since been carried out.
69. The Highways Agency initially raised a holding objection to the current proposal, and requested the submission of further information prior to the application being determined. This information and the Highways Agency's response are set out in paragraphs 53-58. In summary, following the receipt of this additional information, the Highways Agency now considers the proposal to be acceptable, subject to a condition requiring vehicles to egress the site through a single weighbridge, together with the proposed deed of variation to the existing legal agreement.
70. As a result of considerable concerns about the highway safety implications of the development, the previous application was deferred at Committee to enable independent highways advice to be sought from Atkins. Atkins raised concerns about the proposed modifications to the junction and felt a parallel diverge/merge layout would reduce conflict on the A11, but acknowledged this would be over and above the standards. The Highways Agency also stated that such an arrangement couldn't be insisted upon on highway safety grounds. The outcome of seeking Atkins advice was that the proposals were ultimately deemed to be acceptable, in accordance with the Highways Agency's original assessment of the application. Given that the Highways Agency's concerns in connection with the current proposal have now been fully resolved and its holding objection removed, I do not consider the commissioning of a further independent assessment (as requested within a number of responses to the application) to be necessary in this instance.
71. The comments of the Local Highways Authority in respect of the proposed widening and improvements to Mill Road, as well as in respect of any weight limits affecting the bridge over the A11, are awaited and will be reported verbally at the Committee meeting.

Noise and Light Pollution Issues

72. Following concerns raised by the Council's Environmental Health Officer and by the owner of West Wratting Valley Farm Cottage, further noise assessments have been carried out (see paragraphs 46-51).
73. The Environmental Health Officer's subsequent response is in paragraph 52 of this report. This concludes that issues relating to the impact of the development upon the amenities of nearby residents have now been adequately considered, and recommends approval subject to a number of conditions being added to any planning permission.

Ecological Issues

74. The application has been accompanied by an Ecological Assessment and I am presently awaiting the Ecology Officer's comments, which will be reported verbally at the Committee meeting.

Flooding/drainage Issues

75. The application has been considered by the Environment Agency who has raised no in-principle objections, subject to conditions being added to any permission requiring

the submission of surface water drainage and pollution control schemes prior to the commencement of any development.

Archaeology

76. Following the comments received from the County Archaeologist, any permission should be subject to a condition requiring an archaeological investigation to be carried out prior to the commencement of any development.

Community Obligations

77. West Wrattling Parish Council has queried whether the developers could be required to contribute towards local community facilities. Circulars 05/2005 and 11/95 make it clear that any requirements encompassed within legal agreements or conditions, respectively, must be necessary and relevant to planning. As this development could not be argued to increase demand for local services and facilities, I consider that any requirement for a financial contribution towards village community facilities could not be justified.

Recommendation

78. Subject to no material objections being raised by the Ecology Officer or the Local Highways Authority, delegated powers are sought to approve the application, as amended by Highways Technical Notes 1, 2 and 3 dated 4th June 2009, and additional noise assessment information in WSP's letters dated 3rd, 8th and 10th June 2009, subject to a deed of variation to the existing legal agreement to restrict development generated traffic to 500 two-way movements per day, and to the following additional conditions:
- (1) The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission (Reason - To ensure that consideration of any future application for development in the area will not be prejudiced by permissions for development which have not been acted upon.);
 - (2) No development shall take place until full details of both hard and soft landscape works, including details of protection of existing planting, details/sections of the swale, and details/cross sections of mound construction angles and heights of the spoil bunds, have been submitted to and approved in writing by the Local Planning Authority. These details shall include indications of all existing trees and hedgerows on the land and details of any to be retained, together with measures for their protection in the course of development. The details shall also include specification of all proposed trees, hedges and shrub planting, which shall include details of species, density and size of stock (Reason - To ensure the development is satisfactorily assimilated into the area and enhances biodiversity in accordance with Policies DP/2 and NE/6 of the adopted Local Development Framework 2007);
 - (3) All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the occupation of any part of the development or in accordance with a programme agreed in writing with the Local Planning Authority. If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation (Reason - To ensure the development is satisfactorily assimilated into the area and

enhances biodiversity in accordance with Policies DP/2 and NE/6 of the adopted Local Development Framework 2007);

- (4) Prior to the commencement of any development, a scheme for the provision and implementation of surface water drainage shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be constructed and completed in accordance with the approved plans prior to the occupation of any part of the development or in accordance with the implementation programme agreed in writing with the Local Planning Authority (Reason - To ensure a satisfactory method of surface water drainage and to prevent the increased risk of flooding in accordance with Policies DP/1 and NE/11 of the adopted Local Development Framework 2007);
- (5) Prior to the commencement of any development, a scheme for the provision and implementation of pollution control shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be constructed and completed in accordance with the approved plans prior to the occupation of any part of the development or in accordance with the implementation programme agreed with the Local Planning Authority (Reason - To reduce the risk of pollution to the water environment in accordance with Policy DP/1 of the adopted Local Development Framework 2007);
- (6) During the period of construction, no power operated machinery shall be operated on the site before 0800 hours and after 1800 hours on weekdays and 1300 hours on Saturdays, nor at any time on Sundays and Bank Holidays, unless otherwise previously agreed in writing with the Local Planning Authority (Reason - To minimise noise disturbance for adjoining residents in accordance with Policy NE/15 of the adopted Local Development Framework 2007);
- (7) Details of the location and type of any power driven plant or equipment including equipment for heating, ventilation and for the control or extraction of any odour, dust or fumes from the building(s) but excluding office equipment and vehicles and the location of the outlet from the building(s) of such plant or equipment shall be submitted to and approved in writing by the Local Planning Authority before such plant or equipment is installed; the said plant or equipment shall be installed in accordance with the approved details and with any agreed noise restrictions (Reason - To protect the occupiers of adjoining dwellings from the effect of odour, dust or fumes in accordance with Policy NE/16 of the adopted Local Development Framework 2007);
- (8) The site shall not be constructed or operated other than in accordance with the predicted noise levels submitted with the planning application and prepared by WSP Environmental UK Reference 12103446 and dated 20th March 2009, as amended by letters from WSP dated 3/06/09, 8/06/09 and 10/06/09 (Reason - To minimise noise disturbance for adjoining residents in accordance with Policy NE/15 of the adopted Local Development Framework 2007);
- (9) A method statement for the construction of the noise barrier shall be submitted to and agreed in writing with the Local Planning Authority and the noise barrier constructed before commencement of the development hereby permitted (Reason – To ensure that the noise barrier provides mitigating effects to reduce noise and dust emissions from the site in accordance with Policy NE/16 of the adopted Local Development Framework 2007);

- (10) No external lighting shall be provided or installed within the site other than in accordance with a scheme which has been submitted to and approved in writing by the Local Planning Authority (Reason -To minimise the effects of light pollution on the surrounding area in accordance with Policy NE/14 of the adopted Local Development Framework 2007);
- (11) The development, hereby permitted, shall not commence until the improvements to Mill Road have been carried out and completed in accordance with the approved details specified on drawing number 1122/SK/01 Rev A (Reason – In the interests of highway safety in accordance with Policy DP/3 of the adopted Local Development Framework 2007);
- (12) All vehicles hauling grain shall egress the site through a single weighbridge, which shall be maintained in working order at all times (Reason – To prevent haulage vehicles leaving the site in platoons, in order to ensure that the A11 Trunk Road continues to serve its purpose as part of the national system of routes for through traffic in accordance with Section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety on that road);
- (13) No development shall take place on the application site until the implementation of a programme of archaeological work has been secured in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority (Reason - To secure the provision of archaeological excavation and the subsequent recording of the remains in accordance with Policy CH/2 of the adopted Local Development Framework 2007);
- (14) No more than 300,000 tonnes of grain shall be stored on the site at any one time (Reason – The application has been assessed on the basis of the number of HGV movements associated with the storage of 300,000 tonnes of grain);
- (15) For a period of 10 years from the date of first bringing into use the development, hereby permitted, if the site ceases to be used for the purposes described in the application for a continuous period of 12 months, all buildings, silos and associated works (including hardstandings and boundary structures) shall be demolished and removed from the land, and the land restored in accordance with a scheme and timescale that shall previously have been submitted to and approved in writing by the Local Planning Authority (Reason – To ensure the removal of the structures if no longer required for the purposes, hereby permitted, in order to protect the character and appearance of the countryside in accordance with Policies DP/2 and NE/4 of the adopted Local Development Framework 2007);

Background Papers: the following background papers were used in the preparation of this report:

Planning Policy Statements 1 and 7
South Cambridgeshire Local Development Framework (LDF) 2007;
Circular 05/2005 – Planning Obligations
Circular 11/95 – The Use of Conditions in Planning Permissions
Planning application references: S/0506/09/F, S/2494/04/F, S/0623/03/F

Contact Officer: Lorraine Casey – Senior Planning Assistant
Telephone: (01954) 713251

S/0506/09/F – Camgrain: Committee Update

Additional consultation responses

The Local Highways Authority raises no objections but seeks confirmation from the applicant that they will maintain the unilateral agreement in relationship to routing of HGV's. The principle of widening the last 120m of the access road to 6m, to allow 2 HGV's to pass, is accepted. However, this could lead to unacceptable degradation of the highway as the level of usage will place undue stress on any joints between existing and new surfaces. As such, the applicant should be required to enter into a Section 278 agreement for the complete reconstruction of the full width of the access road for at least 120m from the entrance to the site. A further condition should require the submission of a method statement relating to the construction phase of the proposed development. The LHA has also commented in respect of a specific concern raised by Dr Bateman that give way markings should be installed at the exit of the site to Mill Lane. The LHA has requested that a condition be added to any consent requiring Camgrain to provide suitable give way markings and signs on their land.

The Landscape Design Officer has clarified that any landscaping condition should include details of how excavated material will be dealt with, and has also confirmed that any landscaping to the southern boundary could be contained within the current red line.

The Ecology Officer raises no objections, stating that no significant areas of arable plants are likely to be affected. The pond/soakaway is a poorly designed feature and could be landscaped to improve its habitat potential. In addition, a pole mounted barn owl nest box should be erected on the edge of the pond/soakaway. These issues could be dealt with as conditions of any planning permission.

Further representations by the Parish Council

West Wrattling Parish Council makes the following additional comments:

- The application has not been accompanied by an EIA. By not insisting on the submission of an EIA, the Council may be opening itself up to future legal action;
- The Council has not reconsulted the Parish Councils and local residents in respect of the additional noise and highways information. This shows a poor attitude by the Council, and the application should be deferred for a month until August Committee to allow for adequate consultation;
- The additional submitted highways information is misleading as TD 40/94 does not state that this form of junction is appropriate above 30,000 vehicles per day. The A11 junction to the Camgrain site is a compact grade junction, which is only suitable for mainline flows below 30,000 vehicles per day. The applicant's own analysis points to the forecast flows on the A11 exceeding 45,000 vehicles per day, resulting in a vehicle passing through on the nearside lane approximately every 2.4 seconds. The slip roads are too short for a lorry to get up to speed before joining the highway and lorries will therefore join the A11 at low speed, causing vehicles on the A11 to brake or change lane. There would be similar problems with lorries exiting the A11 having to commence braking on the main road well in advance of the junction;

- The scheme would result in nearly 4 times the normal anticipated level of HGV movements on a low flow minor road;
- For the original 90,000 tonne application, the Council sought independent highways advice from Atkins who raised concerns about the form of the junction and advised a parallel merge/diverge arrangement would be more appropriate. Now, 3.33 times as much traffic through the same junction is being accepted by Officers without getting any further independent highways advice;
- The possible need for further landscaping should also have been properly considered as part of the application;
- Who will monitor and enforce any planning conditions?

Further representations by local residents

The residents of Valley Farm Cottage, Dr and Mrs Bateman, make the following additional comments:

- Camgrain would be the UK's largest grain storage depot, but would be served by a single track road. It needs to be upgraded to a two way road to deal with the significant increase in HGV traffic. No platooning model of this single track road has been carried out even though the Highways Agency requested that the affect of the single track bridge over the A11 be modelled. The Highways Agency has not fully considered the issue of platooning, which would arise due to the single carriageway nature of the road rather than the traffic lights;
- Camgrain have already exceeded their existing agreement of 150 HGV movements per day, 11 times in 2008, so what assurances are there that Camgrain would adhere to the conditions of the new S106?;
- No account has been made of HGV movements associated with the adjoining chalk pit site;
- Given the very large size of the development and the potential impact on the water aquifer, noise and light pollution, traffic, visual amenity etc, the Council should insist upon the submission of an EIA. The adjoining landfill site was required to submit an EIA so why has Camgrain not been required to do so?
- Concerns regarding noise have not been taken into account adequately. The background noise levels experienced at Valley Farm Cottage are dependent on wind direction. Further extensive assessment of this property should be required at different times of year;
- Much of the lighting on the current silos does not point downwards and is greatly reflected from the steel surfaces;
- No confidence that Camgrain will adhere to best practice regarding noise disturbance;
- Contrary to the claim in the landscape assessment, the development is very visible from many miles away;

- There are plenty of hares and skylarks in the area;
- Construction work has resulted in disturbance to the top soil and substantial chalk deposits being left on the lane between the site and Valley Farm Cottage. Proper drainage is essential;
- Were the County Archaeology team consulted in respect of the original application?
- What are Camgrain's operating hours?
- Why have the 3 passing bays required in the previous application not been provided?

Responses

The applicants agent has confirmed that the existing HGV routing plan will remain, and that Camgrain have no objections to the LHA's proposed conditions, including the requirement for give way markings and signs.

The Highways Agency has responded, stating that its concerns on the platooning issue have been satisfactorily addressed subject to the previously recommended condition requiring HGV's to egress the site through a single weighbridge.

Officers views are that the extra noise and highways information is effectively technical detail to address the Highways Agency's holding objection and concerns raised by the Environmental Health Officer, and the decision was therefore made to send these details out for information only.

With regards to the request for an EIA, this Council did carry out a screening opinion, which considered the cumulative impact of the approved and proposed development, and came to the decision that an EIA was not necessary in this instance.

With regards to archaeological issues, the County Archaeological team did not comment in respect of the original application, and the consent was not therefore subject to an archaeological investigation condition;

This Council's Enforcement team investigated the passing bay issue in late 2007/early 2008 and confirmed in an email to the director of Camgrain that they had been provided and that the relevant condition of the previous consent had been satisfied;

The Officer recommendation remains one of approval subject to the conditions set out in the report, and to additional conditions to address comments made by the LHA, Landscape Design Officer and Ecology Officer.

L Casey
30/06/2009

