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BY EMAIL ONLY

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Classification:	Project related		
Enclosures	Appendices		

Dear Jon,

**Appeal Reference: APP/L2630/W/23/3324060 Deal Farm, Bressingham - Transport Planning
Skeleton Proof**

In preparing the transport evidence for the above Appeal, I have revisited the operational data which underpins the transport position for the proposed AD plant to ensure it is reliable. The original Transport Statement (Plandescil, June 2022) stated that, "this study compares movements against detailed movements averaged over the last 5 years" i.e., between 2015 to 2020. We now have up to date information for between 2017 – 2022.

As a result of my review of this information, some of the operational data has changed. Therefore, and in the interests of transparency, this letter sets out the data that I have obtained to date as well as the basis for the Appellant's case which has not changed, i.e., that the network can accommodate the new trips associated with the AD plant in operational and road safety terms.

RG Aves Farming Operations

Through discussions with RG Aves and their agronomist, I have been provided with greater clarity on the operations of the farm since 2017/2018. Appended to this letter are copies of:

- Cropping plans for the landholding (**Appendix A**).
- RG Aves Manure Management Plans (**Appendix B**).
- Purchase data for standing straw (**Appendix C**).

Sales data has also been provided which details the annual tonnages sold by crop as presented in **Table 1**.

Table 1: RG Aves Annual Sales by Crop (t)

	2017 Sales (t)	2018 Sales (t)	2019 Sales (t)	2020 Sales (t)	2021 Sales (t)	2022 Sales (t)
Wheat	1,288	950	1,090	985	5,958	1,408
Maize	4,600	4,211	4,143	1,169	3,149	737
Sugar beet	4,866	3,299	4,553	3,673	4,808	3,045
Rye	2,550	2,879	1,419	2,146	0	0
Grass	3,100	3,176	1,609	1,258	0	3,926
Total*	16,404	14,515	12,814	9,231	13,915	9,116

On the basis of data obtained, the summary in **Table 2** will be explained in detail and evidenced in the full Proof of Evidence. At present, I am awaiting final up to date information regarding manures, so there is a mathematical deficit between feedstock requirements and the formal evidence. However, the final Proof of Evidence will demonstrate that this can be secured via the RG Aves landholdings and/or from the locality.

Table 2: AD Plant Trip Types

Item	Description of AD Plant Operational Trips	Nature of Trip
Maize	100% grown on RG Aves landholdings.	Farming
Grass	100% grown on RG Aves landholdings.	Farming
Straw	Grown on RG Aves land as a by-product of wheat or bought as standing straw	Farming
Chicken manure	Chicken unit is part of RG Aves operations. In future the muck will be transported to the AD plant rather than to the pad and fields for spreading. The existing muck spreading trips will be replaced by digestate spreading trips.	Farming
Pig manure	Pig unit is part of RG Aves operations and will be expanded in terms of head of stock within the current built footprint. Any residual deficit in pig manure tonnage would be secured from farms in the locality. Manures are currently transported from barn to pad prior to spreading. With the AD plant in place, manure will be transported direct from barn to AD plant rather than to pads for spreading. The existing muck spreading trips will be replaced by digestate spreading trips.	Farming
Cattle/duck manure	No cattle or duck manures are generated on the RG Aves landholding although they are obtained for spreading from nearby farms in exchange for straw. This import will continue with the AD Plant in place.	Farming
Solid digestate	Solid will be spread during periods that muck spreading currently takes place and using the same vehicles.	Farming
Liquid digestate	It is the intention, subject to final confirmation, that liquid digestate will be umbilical fed. On this basis, there will be no additional movements. Otherwise, and in any event, any additional movements can be accommodated within the highway network. All liquid digestate can be used on the RG Aves landholdings.	Farming
CO2 removal	Carbon Dioxide will be periodically transported to manufacturers or carbon capture offsite.	Commercial
Propane delivery	Propane will be periodically delivered to the site for use in the production and export of gas.	Commercial

Item	Description of AD Plant Operational Trips	Nature of Trip
Staff and Visitors	Trips associated with staff, maintenance, health and safety and insurance inspections, training, biological and feedstock sampling, and annual electrical inspections all by car or light goods vehicle (LGV).	Car and Van
Deliveries	Periodic trips associated with skip collections and delivery of large parts and consumables will be made by heavy commercial vehicle (HCV)	Commercial

AD Plant Operations

Storengy UK Limited (the holding company of the Appellant, Deal Farm Biogas Limited, and wholly owned by Engie S.A) is now leading the project as it is now its intention to operate the AD facility instead of Biowatt who have been leading on the process up to submission of the appeal. Biowatt are therefore no longer providing the working assumptions for the project. Consequently, I have been able to obtain more comprehensive and up to date data associated with the AD plant operations. Storengy, the AD process engineers Thoni, and the new AD technical advisors WRM Ltd have collectively provided the details provided in **Appendix D**.

The AD plant is proposed to be fed by energy crop and farming wastes and residues. The maize, grass, straw, chicken and pig manures are already generated on the RG Aves farm land and have been produced in quantities in the region of the feedstock requirements for at least the past 6 years. As such, these vehicle trips are existing agricultural trips.

The AD plant will require propane to be delivered and CO₂ to be exported. These are therefore new trips and will be made by HCV.

The AD plant by-product digestate will be transported from the appeal site to spread on farm land, using the same agricultural tractor and trailers, as are currently used to spread manures. These therefore constitute agricultural movements.

The staff and visitors to the AD plant all constitute new trips associated with the Appeal site.

It is estimated that some 3,413 new trips per annum will be associated with the proposed AD plant. Assuming 260 working days, this equates to an increase of 2 HCV movements per day, and 13 car and LGV trips per day.

Notwithstanding the arguments and associated trip numbers above, in the hypothetical situation that 100% of all vehicle trips associated with the AD plant were considered to be new, this would present a daily average of 36 new trips per day. This number of new trips would not be sufficient to materially change the operational capacity of the surrounding road network nor the inherent road safety risk.

Operational Impact

Data associated with the network in the vicinity of the site has been obtained as provided at:

- Automatic Traffic Count survey data in the vicinity of the site (**Appendix E**);
- Crashmap data in the vicinity of the site (**Appendix F**).

The data confirms that the network in the vicinity of the site is very lightly trafficked with two sections having less than 100 vehicles per day) and provides a largely slow speed environment. There have been no personal injury crashes recorded in the local area around the site.

In terms of operational capacity, the addition of some 15 new vehicle movements per day will not have a “severe” impact on the operation of the network.

In terms of road safety, there is no trend of crashes along potential routes to the Appeal site. The safe operation of the Quiet Lanes in the vicinity of the site will not be affected by the traffic associated with the AD plant.

Mitigation

The Transport Proof of Evidence will demonstrate that the proposal complies with policy DM3.11 of the Local Plan and accords with Paragraph 114 and 115 of the NPPF (December 2023).

Notwithstanding this, the Appellant recognises the concerns locally with respect to transport road safety associated with the proposal. A haul route to the site is therefore proposed to ensure that HCVs are restricted to prescribed routes. The haul route proposal includes a series of small off-site highways interventions to improve the going along the haul route for all users. These proposals will offer a modest improvement to the road safety risk along the route.

Proposed Conditions

Again, recognising the local concerns relating to transport, conditions will be proposed to provide surety on the operations of the AD plant with respect to days of operation, cap on HCVs received to the site, tonnage of annual throughput and the provision of a servicing and delivery plan. These will reflect the form of the currently proposed conditions and may be agreed in due course.

The draft S106 agreement will establish a dual legal mechanism by which those feedstocks to be secured via the RG Aves landholding will be secured.

I trust that this is helpful to have sight of at this stage and I would very much welcome a discussion with you so we may look to agree common ground to confine the issues for debate during the inquiry as best as possible.

Yours sincerely,



Sarah Taylor
Director Safe and Active Travel
Mobility & Infrastructure