

Analysis of Traffic Reports Commissioned by Cranswick plc

Traffic Generation Report (April 2017)

Existing and Proposed Travel Routes (September 2017)

1. Overview

The development of Cranswick plc's poultry meat processing facility is nearing completion. However, "the factory building has been constructed larger than originally approved pursuant to planning permission DC/17/05666" (ref: 14.1 Committee Report for DC/19/03841).

Planning breaches at the facility have recently been investigated by Babergh and Mid Suffolk District Council (BMSDC) and the development has been subject to a series of planning enforcements. As a result, there are currently a number of retrospective planning applications (for works carried out without planning permission) or requests for change of condition (alterations to the conditions imposed at the time planning permission was granted) in progress, see Appendix 1 for details.

One such planning application, namely DC/19/03907 - Application under Section 73 of the Town and Country Planning Act - Variation of Condition 2 (Approved plans and documents) for planning permission DC/17/05666, is of particular interest because:

- It includes two traffic reports dated April and September 2017, produced by Trundley Design Services on behalf of Cranswick plc. However, neither report appears to be included in the document submissions for the original planning application in 2017 (DC/17/05666), which suggests that the evidence base used for decision making during the initial application for the poultry meat processing facility was incomplete and thus flawed.
- Analysis of the two traffic reports (detailed below) identifies numerous omissions and inaccuracies in the data relevant to the situation in 2017, which means that even if the reports had been made available at that time, this data would have undermined the validity of the basis for decision making.
- Furthermore, given the fact that production plans at the processing facility have changed since 2017 and the fact that both reports have been submitted as documentation for consideration in the current planning application DC/19/03907, the data in each report needs to be extrapolated and assumptions made in order to be of relevance to decision making in 2019.

For more detailed background and context please see Appendix 2.

2. Key Points Arising From Analysis of Trundley Design Services Traffic Reports 2017

2.1 Traffic Generation Report (April 2017)

The Traffic Generation Report (April 2017) details a comparison of operations and HGV numbers at the existing Weybread poultry meat processing facility versus proposed operations at the Eye poultry meat processing facility.

- Staff vehicle numbers projected to double from 150 cars to 300 cars. However, these numbers have since changed and Planning Permission granted (DC/17/05666) allowed for 450 parking spaces and most recent application DC/19/03841 is for 457 parking spaces. **This represents around a threefold increase in number of cars expected at the new production facility.**
- Live bird deliveries increase:
 - Based on 1m birds/week HGV numbers per day projected to increase by 47% (however, this has since changed and capacity is now 1.2m birds/week).
 - Actual: Weybread = 17 HGV/day.
 - Projected: Eye = 25 HGV/day.
 - Report based on 5 day week. Assuming 52 operational weeks/year, HGV numbers increase from 85 to 125 lorries per week and 4,420 to 6,500 lorries per year.
 - Numbers used by Trundley Design in the report take into account the 'new live bird handling system, providing 38% increase of birds per delivery vehicle'.
 - Based on current capacity 1.2m birds/week, HGV numbers per day projected to increase by 76%
 - Actual: Weybread = 17 HGV/day.
 - Projected: Eye = 30 HGV/day.
 - Report based on 5 day week. Assuming 52 operational weeks/year, HGV numbers increase from 85 to 150 lorries per week and 4,420 to 7,800 lorries per year.
- Product despatch:
 - Based on 1m birds/week HGV numbers per day projected to reduce by 8% (however, this has since changed and capacity is now 1.2m birds/week).
 - Actual: Weybread = 25 HGV/day.
 - Projected: Eye 23 HGV/day.
 - NB Difference stated in the 2017 report is due to "major retail customer for retail product (ie cut/prepared portions) in lieu of full birds" but no explanation is provided in the report to account for change from 20 pallets/vehicle to 26 pallets/vehicle.
 - Based on current capacity 1.2m birds/week HGV numbers per day projected to increase by 12%
 - Actual: Weybread = 25 HGV/day.
 - Projected: Eye 28 HGV/day
 - Report based on 5 day week. Assuming 52 operational weeks/year, HGV numbers increase from 125 to 140 lorries per week and 6,500 to 7,280 lorries per year.
- **However, since the publication of the Traffic Generation Report (April 2017), which assumes numbers based on operating 5 days/week, the hours of operation at Eye poultry meat processing factory have changed and are now proposed 24/7/365 – see DC/19/03841, Committee Report and DC/19/03103, Discharge of Condition.**
- **In which case, numbers based on 24/7/365 are:**
 - Live bird deliveries
 - 1,200,000 birds/week divided by 7 days = 171,429 birds/day
 - Divided by 8117 birds/vehicle = 22 lorries/day
 - = 154 lorries/week
 - =8030 lorries/year
 - **HGV/year increase by 82% compared to Weybread**

- Product despatch
 - 171,429 birds/day @ 1.4kg = 240,000kg/day
 - 240,000kg x 20% = 48,000kg
 - 240,000 x 80% = 192,000kg
 - 48,000kg divided by 250kg per pallet = 192 pallets
 - 192,000kg divided by 600kg per pallet = 320 pallets
 - 512 pallets divided by 26 pallets/lorry = 20 lorries/day
 - =140 lorries/week
 - = 7,300 lorries/year
 - **HGV/year increase by 12% compared to Weybread**
- 42 lorries per day (associated with bird delivery and product despatch only) will access the production facility, 7 days/week, 365 days/year, excluding lorries exporting waste daily from the site.
- The numbers of vehicles are extrapolated from the data in the Traffic Generation Report 2017 but note that the parameters may well have altered since the publication of the report and further information to this effect will need to be obtained from Cranswick.

Omitted from the report are:

- Staff vehicle numbers/shift cycle - for recent data concerning employee shift numbers see DC/19/03841 Committee Report, dated 30th October 2019.
- Packaging material deliveries – numbers not mentioned in the report.

Also omitted from the report are other HGV numbers associated with waste exported from the site:

- Solid waste from delivery of birds (litter, muck, feathers, soil etc) - removed daily from site*
- Waste blood in sealed vessels - unclear how frequently removed from site*
- Evisceration waste (inedible offal) - removed daily from site*
- Chilling waste (drip/solids from birds) - removed daily from site*
- Grading and despatch waste (rejected/damaged birds) - removed daily from site*
- Waste packaging materials etc – number and frequency of vehicles unknown.

* These functions are derived from Planning Statement by Trundley Design Services on behalf of Crown/Cranswick, uploaded 17th February 2017 for 0332/17 Scoping Opinion – Proposed development for production facility at Eye Airfield (withdrawn).

2.2 Existing and Proposed Travel Routes (September 2017)

The Existing and Proposed Travel Routes Report (September 2017) identifies existing poultry feeder sites owned or leased to Crown/Cranswick and details comparative traffic routes for HGV delivery of birds from feeder sites to Weybread versus Eye poultry meat processing facilities.

- List appears to include egg production sites as well as broiler rearing sites eg No.30 Plantation Farm, No.34 Calkewood Lane, No. 39 Oak Farm – route will therefore be to Crown Hatcheries at Kenninghall (Diss) or another Crown hatchery, not Eye processing factory.
- Sites 28 through to 41, inclusive, are routed to incorrect destination and therefore routes and total mileage are inaccurate.

- List does not include new site at Brome (BMSDC ref: 1307/17) planning permission was granted for 8 poultry units – capacity 352,000 broilers on 35-38 day cycle = 2.5m birds per year. List will not include any other sites that may have been acquired since September 2017.
- Report only addresses routes, using Google maps (avoiding Eye town centre and using A/B roads where possible) but this is not an accurate representation, as it fails to take into account the need to adhere to the ‘approved Suffolk Lorry Route Network’ and possible HGV restrictions, where routes incorporate rural minor roads and lanes. For example, the report includes a proposed route from the Worlingworth feeder site to the Eye processing facility via Southolt (a small settlement in open countryside), accessing the A140 via Thorndon (a hinterland village) – a route consisting of narrow and single lanes, with few passing places and Thorndon has a 7.5 tonne weight restriction for HGV traffic.

The report also fails to identify:

- Originating location for despatch of lorries to feeder sites.
- Numbers of lorries per collection from individual feeder sites, destined for Eye Airfield poultry meat processing factory.
- Frequency of collection from each feeder site.
- Destination and volume of waste export from Eye Airfield poultry meat processing site.

It is important to note that since the publication of the Existing and Proposed Travel Route Report (September 2017) steps have been taken by Cranswick to increase capacity at 14 of the feeder sites included on the list. An increase in bird volumes results in an increase in HGV volumes for chick deliveries, egg deliveries, feed and bedding deliveries, waste removal (solid and water), dead bird removal and broiler deliveries to Eye poultry meat processing factory.

- All of the egg production sites (30, 34 & 39) identified in the Existing and Proposed Travel Route Report 2017 have since obtained planning approval to increase the capacity of birds housed on site.
- Broiler sites such as Worlingworth and Heavingingham obtained Environmental Permits earlier this year to increase production capacity; Worlingworth and Heavingingham by 70,000 and 50,000 birds per 35-38 day cycle, producing an extra 490,000 and 350,000 birds per year and at least 2.1m and 2.5m total birds per year, respectively.
- Crown Chicken (Cranswick), during 2019, has been granted additional Environmental Permits for 9 other sites included in the report, suggesting an increase in production volume (see Appendix 4).

The size of at least 14 of the supply chain sites today is far bigger than the size of the same sites in 2017. It is clear that the size of the sites on the list and the corresponding volume of traffic generated from each site was omitted from the Existing and Proposed Travel Route Report and not only that but the list is incomplete and as such is inaccurate and misrepresentative.

3. Conclusions

- The Traffic Generation Report (April 2017) was a misleading document at the time of publication because of numerous omissions; it did not then and does not now, accurately reflect the business operation at the Eye processing factory.
- The Existing and Proposed Travel Route Report (September 2017) is factually incorrect, incomplete and misrepresentative of travel routes associated with feeder sites.
- Neither report provides a sound basis for informed decision making; worse, each could result in misguided decision making.
- Evident, from the Traffic Generation Report (April 2017) however, is that, even allowing for the fact that lorries used for live bird deliveries will be fully (better) utilised and that lorries used for product despatch will carry more pallets, **the total number of lorries at the Eye Airfield site, for these functions alone, will nearly double that of the Weybread site.** This clearly differs from the Planning Statement assertion submitted by Freeths LLP, dated October 2017, in which Section 8.37 states: “The assessment identifies that the HGV traffic at the proposed new development will broadly represent that which takes place at the existing site. Whilst the development will increase the operating capacity of the business, this will utilise spare haulage capacity.”
- Following the purchase of Crown Chicken in 2016, Cranswick announced an ambitious and major plan to develop and extend its farming and feed milling infrastructure, to include the leasing and development of another feed milling operation in Hoxne, the upgrade of poultry rearing sites in and around Mid Suffolk area and the movement and expansion of Crown’s poultry meat processing business from Weybread to the Eye facility. In 2017, Cranswick already had an existing feeder supply chain consisting of over 40 Crown Chicken operated sites, within close proximity to the proposed Eye Airfield facility. However, the extent of the business operation and future growth plans were not fully appraised by BMSDC and as such, it must be assumed, that decision making was based on incomplete and inaccurate information.
- It is clear that a comprehensive analysis of the impact of HGV traffic associated with the wider network of supply chain feeder sites has not been modelled at any stage by agents for Cranswick or BMSDC, in either the economic viability assessment or the planning process.
- It would seem that an independent appraisal of the need for an EIA for the original (DC/17/05666) planning application for the Eye Airfield poultry meat processing factory was not carried out, as the BMSDC planning officer appears to have relied solely on information provided by the applicant (see Appendix 2 for details). By contrast, on 30th May 2019 the Scoping Opinion determined by Breckland Council for a new poultry meat processing facility proposed by Banham Poultry Ltd in Attleborough confirmed that “the development is likely to give rise to significant environmental effect, and therefore an Environmental Statement must be submitted in support of any planning application”(see Appendix 3 for details). It is fair to assume that due diligence was inadequate in determining the outcome of the EIA screening process for the Eye Airfield poultry meat processing facility.

- The analysis detailed above, concerning the Traffic Reports commissioned by Cranswick in 2017, suggests that BMSDC have been misinformed and have further, seemingly, displayed a lack of knowledge and a fundamental misunderstanding of the poultry market and trends, the adverse impact of industrial farming, Cranswick plc's business strategy, the nature of the poultry meat processing factory operation and the supply chain mechanism, which brings into question:
 - Competency
 - Proper and thorough due process
 - Due diligence
 - Governance standards
 - Independence
- Whilst the economic benefit of the Cranswick production facility can be argued, there is no benefit, only detriment, to the communities within which the feeder sites are located and detriment to other communities within the vicinity. BMSDC are in danger of failing in a basic duty of care to all of the communities within the district that may be adversely affected by the expansion of this and other businesses within the poultry sector, unless action is taken now to mitigate the issues relating to intensive poultry site developments.

4. Recommendations

In order to fully understand and satisfactorily mitigate the impact of the Eye factory operation and the supply chain it is necessary to obtain from Cranswick:

- Revised Traffic Generation Report, to include:
 - Current position (Phase I).
 - Future growth projections (Phase II and beyond).
 - To include omissions highlighted in this analysis.
- Revised Travel Route Report, to address issues highlighted in this analysis.
- Travel route report for existing feeder sites:
 - To identify origin & destination traffic movements, numbers, frequency etc relating to operations at existing feeder sites ie chick deliveries, egg deliveries, feed, bedding, waste removal (solid and water), dead bird removal and broiler deliveries to Eye poultry meat processing facility.
 - To include breeding, hatcheries and rearing sites.
- Feeder site expansion plan, to include new site proposals .
- Traffic generation and travel route report for Crown milling operations in Kenninghall and Denham.

It is of critical importance that BMSDC recognises that further intensification of poultry farming is a major issue facing rural communities within the district and:

- Develops a comprehensive poultry site survey, to include all poultry operators in Mid Suffolk district, to identify key locations, nature and scale of business, operational infrastructure, logistical chains and business development plans, within the context of the Joint Local Plan timeframe.
- Commissions a transport survey to model the cumulative impact of traffic to and from these sites, to include current and projected volumes and routes within the context of the Joint Local Plan timeframe and traffic surveys already conducted by WSP consultants on behalf of BMSDC.

- Develops a mitigation plan to avoid overconcentration and intensification of the development of poultry supply chain feeder sites in inappropriate rural locations.
- Implements a rigorous appraisal of planning applications in relation to poultry site developments and considers such applications within the context of existing poultry sites and the cumulative effect in terms of pollution, traffic increase and loss of community amenity.
- Develops policy, for inclusion in the Joint Local Plan, to control the unrestricted growth of development within the poultry sector and set out considerations against which such development should be appraised, having regard to the wide range of impacts that intensive poultry site development generates.
- The current policies outlined in the draft Joint Local Plan are not sound because the evidence base is incomplete and thus flawed; if BMSDC have failed to accurately represent the traffic generation from the Eye Airfield poultry meat processing facility and poultry feeder site networks in the district, then the WSP traffic assessment study of the road network must be deemed to be incomplete and inaccurate and action must be taken to rectify this situation.

For other detailed recommendations please refer to those outlined in the Stradbroke Parish Council response to the Joint Local Plan consultation (www.stradbrokepc.org/planning-committee) and also Stradbroke Parish Council's further submission in a letter dated 15th October 2019, addressed to Robert Hobbs, Corporate Manager, Strategic Planning at BMSDC.

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12.11.19

Appendix 1

Recent 2019 planning applications, awaiting decisions, concerning the Cranswick meat processing facility:

1. DC/19/04495 Discharge of conditions application for DC/17/05666 - Condition 23 (Renewable energy technology) - validated 24th September 2019
2. DC/19/03908 Planning application - erection of electrical substation and gas meter housing - validated 17th August 2019. Subject to an enforcement.
3. DC/19/03907 Application under Section 73 of the Town and Country Planning Act - Variation of Condition 2 (Approved plans and documents) on planning permission DC/17/05666 - validated 17th August 2019. Subject to an enforcement. Committee Report - grant.
4. DC/19/03841 Planning application - retention of construction of extensions and elevations and elevational alterations to production facility - validated 19th August 2019. Subject to an enforcement. Committee Report - grant.
5. DC/19/03837 Planning application - erection of a CHP compound and oxygen and CO2 tank compound to serve production facility - validated 19th August 2019.
6. DC/19/03812 Planning application - retention of construction of security gatehouse, realignment of road and new car park to serve production facility - validated 10th August 2019. Subject to an enforcement.
7. DC/19/03771 Planning application - retention of construction of an LV compound to include LV switch room, LV transformer and hot water vessel and transformer compound to serve production facility - validated 16th August 2019. Subject to an enforcement.
8. DC/19/03747 Planning application - retention of construction of a fresh water tank, permeate tank, fuel tanks, water pumps and a water softener plant - validated 16th August 2019. Subject to an enforcement.

Appendix 2

Background and context

- **Ref: 0332/17 Scoping Opinion – proposed development for production facility at Eye Airfield. Correspondence between 23/1/17 and 28/3/17.**
 - On 20th January 2017 Trundley Design Services, as agent for Crown/Cranswick sent an email to MSDC stating: “Further to a review of the screening direction documents due to the project being larger than the 1000m2 created floor space an Environmental Impact Assessment will be required. We would therefore request your formal scoping opinion to confirm the extents of the EIA required for the project.”
 - Planning Statement by Trundley Design Services uploaded to BMSDC planning portal 17/2/17 was in the form of a report outlining the nature of the operation at the proposed Eye Airfield site. Section 5, entitled ‘Transportation Issues’ states: “It is considered that a traffic impact report will be required to demonstrate that this application will not lead to an overload of the highway network”.
 - No traffic report was submitted as evidence in 0332/17.
 - Scoping opinion withdrawn on 23/3/17 as a result of:
- **Ref: 1082/17 Request for Screening Opinion in accordance with the Town & Country Planning (Environmental impact Assessment) Regulations 2011 (as amended) to construct a production facility for the processing of poultry. Correspondence between 16/3/17 and 28/3/17.**
 - On 16th March 2017, Freeths LLP (solicitors for Crown Chicken Ltd) sent a letter to MSDC referring to a recent telephone conversation. Letter includes:
 - “I am aware that a Scoping Opinion request has been submitted (reference:0332/17) by Trundley Design Services but, as discussed, our client and Trundley Design Services, have asked that we first establish whether a EIA is necessary in this instance. To assist your determination of this request we set out below the following information. 1.Description of site and surroundings 2.Description of proposed development3.Review of Regulations and requirement for an EIA “
 - “The EIA Regulations require proposals to be screened to establish whether they constitute EIA development dependent on whether they meet the criteria outlined in Schedule 2 of the Regulations. In this particular case the development falls within Category 7f and is above the indicative threshold of 1000m2.”
 - “The projected output tonnage is expected to exceed the threshold required for a permit from the Environment Agency under the Environmental Permitting Regulations but the NPPG makes clear that requirements for consent under other legislation is not itself a justification for an EIA.”
 - “The extent of the impact would be very modest and localised to the site and immediate surrounding area and any transport/traffic impacts are not considered to be of significance to warrant an EIA.”

- “It is submitted that the proposal development falls within category 7f and therefore the size of the application site falls above the indicative threshold for screening the proposed development. Having regard that the proposed development would not be within a ‘sensitive area’, that it is of modest size and limited complexity and that the environmental effects would not be ‘significant’ we conclude that an Environmental Impact Assessment is not required in this case. “
 - On 23/3/17 MSDC issued a Screening Opinion Decision, including the statement: “The proposal is to be sited within a purpose built industrial estate and from the information given it is not considered that the proposal on its own will have a significant impact on traffic generation”.
 - Also on 23/3/17 MSDC planning officer wrote to Trundley Design Services: “I have just done the screening opinion that Mark Bassett from Freeths sent to me and I have just come to the conclusion that the Crown Chicken proposal at Eye Airfield does not require an Environmental Statement.”
 - As a result Trundley Design Services withdrew the Scoping Opinion on 23/3/17.
 - No traffic report was submitted as evidence in 1082/17.
- **Ref: DC/17/05666 Planning Application - Erection of a new processing facility, waste water treatment plant and gatehouse with associated car park and service yards, two vehicle access points, drainage swale and landscaping. | Land To The South Of Eye Airfield And East Of The A140. Correspondence between 11/11/17 and 19/4/18. Planning permission granted.**
 - Planning Statement submitted by Freeths LLP, dated October 2017: Section 5.18 states: “In respect of HGV movements a full Transport Assessment has been undertaken in support of this application. Furthermore, the applicant has confirmed that they are happy to provide routing details for HGV movements if required”. Section 8.37 states: “The assessment identifies that the HGV traffic at the proposed new development will broadly represent that which takes place at the existing site. Whilst the development will increase the operating capacity of the business, this will utilise spare haulage capacity.”
 - Travel Plan report produced by Connect Consultants Nov 2017 – focus on staff travel to site only ie walking, cycling, public transport, car share.
 - Transport Assessment Report produced by Connect Consultants Nov 2017. This assessment provides a comparison of all vehicle movements at the existing Weybread poultry meat processing facility versus those expected at the Eye poultry meat processing facility, based on an increase in car parking spaces to 370 (not 457 currently) and using 150% worst case uplift.
 - A survey of in/out flows of traffic at the Weybread sitewas undertaken on 29/6/17 and Section 4.1.1 Table 5 shows 62 HGV lorries in 24 hour period – note that this is different to the 42 HGV lorries indicated in the Traffic Generation Report (April 2017).
 - This report only details the traffic generation characteristics at the site, the impact on the highway and junctions in the immediate vicinity.
 - The Traffic Generation Report (April 2017) and the Existing and Proposed Travel Routes Report (September 2017) do not appear to have been submitted for consideration in DC/17/05666.

Appendix 3

Breckland Council Scoping Decision (Ref: 3SO/2019/0001/SCO) concerning Banham Poultry Ltd proposed new development for poultry meat processing facility in Attleborough

Decision Notice: 30th May 2019

See Breckland Council website/planning applications for full details.

In brief:

Planning permission had been granted in 2013 for a poultry meat processing facility on the site. Approved floor area was 14,644 square metres and staff car park of 173 spaces. The application had been subject to Environmental Impact Assessment (EIA).

New planning application seeks to vary the approved drawings as a S73 amendment application. New floor area to increase to 20,200 square metres.

The applicant's EIA Scoping Report states:

1.3.3. Under the previous 2011 EIA Regulations an EIA Scoping Report was submitted to Breckland Council in March 2013, for a poultry processing building and associated infrastructure.

1.3.5. As the major elements of the proposed development remain similar to those subject to the previous EIA, this agreed scope forms the basis of our proposed scope for the current application but with modification to account for current knowledge, techniques and guidance. In addition, the 2017 EIA Regulations include a number of additional requirements not addressed as part of the previous scoping exercise. These include consideration of any significant effects relating to human health, greenhouse gas emissions and effects arising from the risks of major accidents and disasters. Each of these topics are addressed in this Scoping Report.

Breckland Council's Scoping Opinion states:

The Scoping Opinion states that: "The proposal exceeds the Schedule 2 threshold for urban development projects, as set out in section 7(f) and changes and extensions, as set out in section 13 (b) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It is confirmed that the development is likely to give rise to significant environmental effect, and therefore an Environmental Statement must be submitted in support of any planning application".

The Scoping Opinion concludes: "It is essential with an application of this quantum that the scope of the development is fully explained within the associated documents. The planning and delivery of the development and its infrastructure should be factored into the ES assessment with the direct, indirect and secondary effects, including any temporary and cumulative effects, being fully explored.

Note:

There are many similarities in operation between the Banham Poultry and Cranswick poultry meat processing sites. However, car parking spaces proposed at the Banham Poultry processing site are far fewer than those proposed at Eye Airfield and the floor area proposed is less (20,200 square metres) than that at Eye Airfield (32,000 square metres). Breckland

Council concluded that an EIA was necessary for the original EIA screening for the Banham Poultry processing site in 2013, as well as the recent enquiry in 2019, whereas BMSDC concluded that an EIA was not required for the larger Eye Airfield poultry meat processing site in 2017 and have subsequently endorsed that decision in 2019 – see Screening Opinion Decision for DC/19/03907.

According to documentation submitted with the Banham Poultry scoping enquiry, the EIA 2017 regulations came into effect in May 2017 and included additional requirements such as ‘consideration of significant effects relating to human health, greenhouse gas emissions and effects arising from the risks of major accidents and disasters’. Discussions between Babergh & Mid Suffolk District Council and Cranswick’s agents were ongoing in March 2017 and all parties should have been aware of the imminent introduction of more stringent EIA regulations.

The Office for National Statistics latest report ‘Road Transport and Air Emissions’ released 16th September 2019, states: “although the UK’s total greenhouse gas (GHG) emissions have fallen by 32% from 1990 to 2017, GHG emissions from road transport have increased by 6% over the same period. Around a fifth (21%) of UK greenhouse gas emissions¹ came from road transport in 2017”.

Breckland Council’s Scoping Opinion sets out the key study areas to address in the EIA and notably, the Environmental Protection Team at Breckland Council requested the inclusion of polluting emissions from vehicles.

Appendix 4

Environmental Permits granted 2019

For sites listed in Existing and Proposed Travel Route Report published by Trundley Design Services (September 2017)

Site No	Site Name	Site Address	Environmental Permit Date
4	Becks Green Farm	Becks Green Lane NR34 8NB	26/7/19
6	Brampton	Hill Farm NR34 8DT	26/7/19
7	Chare Farm	New Forest Farm IP31 2DX	26/7/19
8	Dale Farm	Dale Road, Stanton IP31 2DY	26/7/19
9	Darsham	The Street IP17 3QW	26/7/19
11	Fennings Farm	Pixie Green IP21 5NH	26/7/19
13	Heveningham	Irongate Farm IP19 0EG	31/7/19
18	Mendlesham	Duncans Farm IP14 5RL	26/7/19
26	Westall Farm	Westall IP19 8NR	26/7/19
27	Worlingworth	Home Farm IP13 7HR	17/7/19
37	Potash Farm	Wyverstone IP14 4SN	13/3/19