



Appeal Decision

Site visit made on 20 January 2026

by F Harrison BA(Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 24 February 2026

Appeal Ref: APP/P2935/W/25/3375680

High Park Farm, High Park Farm Drive, Felton, Northumberland NE65 9EY

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mr Ralph Thompson of Silvermoor Haylage against the decision of Northumberland County Council.
 - The application Ref is 24/02540/FUL.
 - The development proposed is the change of use of agricultural building to a facility to dry paper pulp to produce animal bedding to include feeder, drum, burner, stack installation and control room.
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Decision

1. The appeal is dismissed.

Application for Costs

2. An application for costs was made by Mr Ralph Thompson of Silvermoor Haylage against Northumberland County Council. This application is the subject of a separate decision.

Main Issue

3. The main issue is the effect of the proposal on highway safety, with particular regard to safe and suitable access for all users.

Reasons

4. The appeal site would be accessed from the B6345 via a narrow, unlit and unclassified road that has no footpaths. It forms part of the Public Rights of Way (PROW) network and provides access to a working farm and to Northumberland Anglers Federation designated parking for access to the River Croquet. A two-day traffic and pedestrian survey undertaken during the middle of summer as agreed with the Council indicates that the unclassified road is lightly trafficked with low pedestrian movements.
5. The appellant contends that it would be rare for two Heavy Goods Vehicles (HGVs) associated with the proposal to pass on the access road, and that a delivery management plan could be appropriately secured to avoid the need for HGVs to cross each other on the unclassified road. This would also seek to control farm vehicles associated with the working farm which is also under the appellant's ownership. Notwithstanding this, the appellant appears agreeable to an indicative highway improvement scheme as illustrated on drawings 2546-SK1, 2546-SK2 and 2546-SK3 that would provide passing places and also separate pedestrians from vehicles as requested by the Council's Countryside/Rights of Way officer in order to protect the users of the PROW from the increased vehicles on the road..

6. I observed the unclassified road is undulating, has differing sight lines and is relatively narrow in places such that there would be insufficient room for two HGVs to pass, including tractors associated with the working farm, or a car to safely pass an HGV without manoeuvring onto the grass verges which are not generally very wide. Should two vehicles meet, one would need to reverse a considerable distance to find a section of the road where they could pass each other safely. This could also be at a time when pedestrians are on the PROW. Consequently, there is the possibility of vehicles meeting the HGVs associated with the proposal which has highway safety implications due to the conflict between users.
7. Reference is made to guidance contained within Manual for Streets (MfS) seeking to demonstrate that there would be sufficient room for two HGVs to pass. However, the MfS is primarily aimed at residential streets which have differing place and movement functions to the unclassified rural road at the appeal site. Any comparison with the MfS guidance does not therefore indicate that the appeal site could be safely accessed. The National Planning Policy Framework (the Framework) is clear that development should give priority to pedestrian and cycle movements both within the scheme and within neighbouring areas and create places that are safe which minimise the scope for conflicts between users. Given the range of users of the unclassified road, to ensure their safety a scheme of passing places and user separation is necessary.
8. Geometry goes beyond the width of a road and given the unclassified rural nature of the access to the site it is reasonable that comprehensive baseline information about the vertical alignment, terrain and other matters is properly understood to assess the suitability of the proposed highway improvements to ensure its delivery. As such, this is not a matter that can be deferred to a condition as there are limited assurances that the proposed highway works shown on the preliminary design would be feasible, which would render the condition imprecise. Without the proposed highway improvements being secured the proposal would not meet the requirements of the Framework for safe and suitable site access to be achieved for all users and would not minimise conflict between different modes of transport as required by Policy TRA2 of the Northumberland Local Plan (2022) (NLP).
9. The proposal would operate with the same vehicles that bring materials to the appeal site also transferring materials away from the site in the same visit. This so called 'backloading' is an efficient way of operating that reduces the trip generation of the development. The Appellant's forecasted trip generation based on 'first principles' is 11 two-way HGV movements per day taking account of the contracted throughput tonnage. A worst-case scenario of the facility operating at maximum capacity would generate 22 two-way HGV movements, although this scenario is said to be unlikely. No assessment has been made of the number of trips generated by staff or associated with the maintenance and servicing of the enterprise, beyond the delivery of fuel.
10. There may well not be any directly comparable sites on the industry standard Trip Rate Information Computer System (TRICS), however given the breadth of TRICS data available there is no substantiated evidence to demonstrate that a profile could not have been used as a proxy for the appeal scheme. Moreover, the scheme is not particularly unusual or so unique such that there would not reasonably be comparable site analysis from a similar facility that could corroborate the appellant's forecasts. Consequently, it has not been clearly articulated that the appeal scheme is an atypical development or that there is not a

clear valid comparable situation that would justify the assessment of trips being constructed from first principles. As such, the use of 'first principles' does not draw support from the superseded government publication 'Guidance on Transport Assessments', even if the content remains trusted by transport practitioners.

11. A key consideration is whether the proposal would make the safety of the local road network any worse over and above the existing situation. Understanding the number of vehicle trips generated by the proposal is therefore fundamental to assessing what effect it would have on highway safety. Notwithstanding that the forecasts are said to be based on the appellant's in-depth knowledge of how the proposed facility will operate, they are not substantiated which in my view limits the reliability of the stated trip generation to and from the appeal site.
12. Alongside the uncertainties surrounding the extent of the activity arising from the proposal I am also mindful of the local circumstances and the context of the surrounding road network. There are five potential routes to the appeal site with a range of users including vehicles, cyclists and pedestrians. The routes include travelling through the villages of Felton, East Thirston and West Thirston, past dwellings, a school and a nursery, on roads of varying widths, some of which are unlit and do not have continuous footpaths. It is not disputed that this creates the potential for conflict between all road users.
13. Automatic traffic count surveys recorded HGVs¹, travelling through Felton, West Thirston and East Thirston and using the bridge at Guyzance. The Appellant's extensive examination of highway safety on the surrounding road network demonstrates that there have been limited accidents involving goods vehicles, pedestrians and cyclists and that there are no weight restrictions, including at the bridge at Guyzance which is also said to be geometrically feasible for HGVs to use. On this basis, the appellant contends that the trips generated by the proposal would amount to a very modest uplift in traffic flows and would not result in a material change in the safety of the highway network.
14. The Planning Practice Guidance states that a judgement must be made as to whether a development proposal would generate significant amounts of movement on a case-by-case basis. Significance may be a lower threshold when taking into account local circumstances and so it does not therefore automatically follow that the appeal scheme would not have a significant effect on the safety of the local road network because of its scale and the predicted number of traffic movements when taking into account the rural and village characteristics of the local road network. I have carefully considered comments from a large volume of local residents regarding highway safety concerns and their perceptions of danger, alongside the significant objections of the Council's Highways Development Management team, which is a matter of notable consequence as they are responsible for the safety of users of the local network.
15. The surrounding roads are lightly trafficked and have not been subject to recorded accidents that have involved personal injury, however this does not mean the local road network would be inherently safe with the type and number of vehicle movements generated by the proposal. While undertaken when HGV movements associated with local farms would have been at their highest and at school/nursery drop off time, the appellant's site visits to sections of the local road network are

¹ Categorized as all vehicles over 3.5 tonnes gross weight with two or three axles, including tractors (without trailers) all vehicles with four or more axles, including goods vehicles towing a caravan or trailer.

limited to one day and so are only a snapshot in time. Even if the proposal would not result in a severe residual cumulative impact on the road network this relates to its operational performance and levels of congestion, not road safety.

16. Many local residents have drawn my attention to regular on-street parking that takes place on Main Street in Felton, particularly during the tourist season, which narrows the road and means cars have to wait for other cars to pass, as do buses which are timetabled to meet on Main Street. Additionally, Main Street is said to be a common route for children to take to travel to Felton Primary School. There have also been incidents of parked cars being damaged by cars travelling too close and the speed limit has recently been lowered to 20 miles per hour as a traffic calming measure. Similarly, as children are dropped off/picked up at the nursery in West Thirston at multiple times in the day parked cars narrow the B6345, which is proximate to a sharp corner and can mean traversing the corner on the wrong side of the road. In these circumstances, there are specific concerns for the safety of the nursery staff and children who regularly walk into the village on footpaths that I observed to be relatively narrow in places.
17. The appellant suggests that a condition is imposed to secure the implementation of a freight management plan that restricts HGVs to Route D, the shortest and quickest route and avoids travelling through nearby villages. However, such a condition would fail to meet the relevant tests set out in the Framework and would not be enforceable because the appellant has confirmed that the HGVs travelling to and from the site would be operated by a third-party haulage company and so are not within the appellant's control. While there may be other examples where management plans have been implemented it is unclear whether these were secured through a condition or a planning obligation and I do not have sufficient details to make a comparison to the appeal scheme.
18. Consequently, HGVs associated with the proposal could take any chosen route on the local road network, travelling past sensitive receptors and where there are incomplete footpaths. This would increase the potential for conflict between users, including children, and decrease highway safety for all users. In the absence of robust data on the number of trips generated, it is not possible to clearly ascertain whether the routes to the site could safely accommodate the increased traffic, particularly given the nature of the additional trips being HGVs. While it is indicated that a haulage company has previously operated in the appeal site location without any significant consequence for highway safety, I do not have any firm details of this operation and so it is unclear if it is directly comparable to the appeal scheme.
19. The Council also has concerns regarding the provision of disabled parking. However, given the generous amount of space available at the appeal site there is no clear reason why such disabled spaces could not readily be accommodated at the site. A policy compliant parking scheme could be secured through a condition.
20. Whether or not the proposal would be inherently unsafe is a matter of judgement. Drawing the above together and taking account of the evidence presented, the use of first principles to establish the likely trip generation of the scheme, without any verification, decreases the reliability of the figures and the effect on the safety of the local roads is uncertain. I cannot be confident that the forecast 11 two-way HGV movements is a realistic or accurate baseline or whether the increase in trips would be within daily or seasonal variations. As such, I am unable to accurately assess the effect of the proposal on the specific context of the local road network

and the potential highway safety risks it may cause. Furthermore, without a detailed highways improvement scheme to demonstrate that the passing places and user segregation is deliverable there are limited assurances that safe access to the appeal site would be achieved.

21. Overall, the proposal would have an unacceptable effect on highway safety, would not give priority to pedestrian and cycle movements or create places that minimise the scope for conflicts between users. It would not meet the provisions of the Framework in relation to promoting sustainable transport as a consequence.
22. For the reasons given, I conclude that the proposal would be harmful to highway safety, with particular regard to safe and suitable access for all users. It would be in conflict with NLP Policy TRA2 insofar as it requires development to provide effective and safe access and egress, minimise conflict between different modes of transport, facilitate the safe use of the transport network and minimise any adverse impact on communities.

Other Considerations

23. The proposal would provide local farms with the opportunity to easily access affordable, clean and sterile bedding and it is not disputed that the proposal would support rural economic growth. However, given the scale and nature of the proposal this matter attracts limited weight. The proposal would deliver above the statutory 10% biodiversity net gain which attracts limited weight owing to the modest scale of the uplift over the 10%. While there would be no significant consequences for the residential amenity of the occupiers of the nearest properties or on the rural setting arising from the schemes design and appearance, this and any other policy compliance, weighs neither for nor against the proposal. There is support from some local residents for the proposal, however this is not a reason, in itself to allow unacceptable development. The Council's handling of the application has not affected my consideration of the planning merits of the case.
24. The above considerations are insufficient to outweigh the harm and conflict with the development plan identified under the main issue.
25. Several concerns have been raised by a significant number of interested parties, including in relation to air quality and water pollution. However, as I am dismissing for other reasons it is not necessary for me to consider these, and any other matters, further.

Conclusion

26. My above findings bring the proposal into conflict with the development plan, read as a whole. There are no material considerations that indicate a decision should be made other than in accordance with it. Therefore, I conclude that the appeal should be dismissed.

F Harrison

INSPECTOR