Materials Recovery Facility and Ancillary Development

Supporting Statement

Falconer Road, Haverhill

Prepared Widdington Recycling Limited

December 2024

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1. Introduction

Widdington Recycling Ltd

1.1 Widdington Recycling Ltd is based at their Widdington Pit site, which is located approximately 7 km to the south of saffron Walden, close to the M11. The company operates a sand pit, waste transfer station and composting operation and inert landfill. The waste transfer station operations process construction, demolition waste and skip waste plus other wastes identified in the site's environmental permit to produce a range of recycled materials, principally soils and secondary aggregates. The company sells this material along with primary aggregates from the site.

1.2 Inert waste arising from the waste transfer station is directed to the inert landfill for use in the progressive restoration of the sandpit.

1.3 The company runs its own fleet of skip wagons that serves the south Cambridgeshire/north Essex/west Suffolk market area. Skips are provided to both the general public and the construction industry. The company also run a fleet of fixed bodied HGVs from which it both collects construction and demolition waste and delivers aggregate from its Widdington site.

1.4 The company has recently acquired an existing waste site located at the end of Faulkner Road in Haverhill, Suffolk. The Haverhill site is located approximately 17 miles by road from Widdington and the intention is to develop a complimentary operation to the existing operations.

1.5 The Haverhill site has a history of waste management and an existing environmental permit for a Waste Transfer Station. The proposals are to construct a waste transfer Station building within which predominantly construction and demolition waste, together with a range of other wastes allowed under the site's environmental permit can be sorted and processed to recover valuable resources such as metals, glass, wood and hard-core to create secondary/recycled aggregates.

2. Site Description

2.1 The site location is identified on **Drawing WIDD/MRF/01**. It is located approximately 1 km to the south east of the centre of Haverhill in the county of Suffolk.

2.2 The site is accessed off the end of Falconer Road, which runs through the centre of an industrial area located off the A143.

2.3 There is a single access point into the site through lockable steel gates. The site extends to approximately 1.27 ha (3.13 acres), which comprises an open level site which falls gradually from a high of 72 m AOD in the east to 69 m AOD in the west.

2.4 Along the western margin of the site is a 2.5m high screening bund. Along the western and south-western boundary is a mature tree belt and along the northern boundary there is a mature hedgerow which has been supplemented by recent planting of leylandii trees.

2.5 Beyond the screening bund to the east lies a number of industrial units. To the north the hedgerow are a number of smaller industrial units and to the north west is vehicle storage beyond which lies further industrial units.

2.6 To the south-west is a mature belt of trees, which follows a former railway line that originally ran through the centre of Haverhill. Beyond the tree belt to the south lies further industrial units.

2.7 The nearest sensitive receptors are residential properties that are located on Ashlea Road, approximately 55 m from the western extremity of the site.

2.8 Due to the intervening vegetation. There are no direct views of the site from any sensitive receptors or the industrial units in close vicinity to the site.

3. Planning History

3.1 The earliest consent on record dates back to September 1975 permission was granted for a fabrication plant for steel tubing and ancillary offices (reference E/75/2116/P),

3.2 In October 1980 permission was granted for small industrial units under planning consent reference E/80/2784/P.

3.3 December 1989 permission was granted for the erection of an office block (Class B1 use) and construction of vehicular access (reference E/89/2430/P).

3.4 In August 1993, planning permission for the renewal of the office block and construction of the particular access granted in 1975 was approved (reference E/93/1889/P).

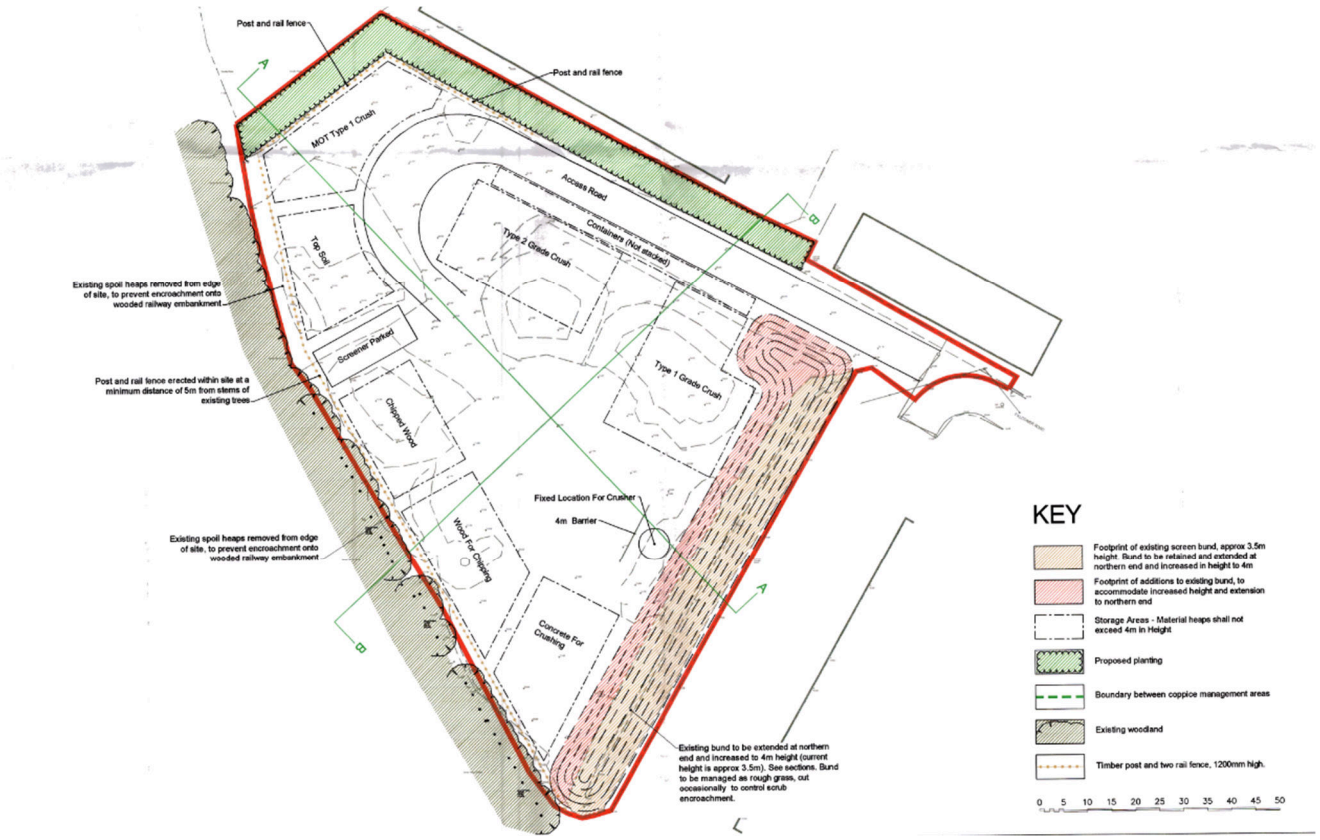
3.5 15 April 2004 planning was granted for the erection of two starter units with associated access and parking (reference SE/04/1457/P) granted by St Edmundsbury Borough Council.

3.6 In outline planning permission for 17 industrial units for mixed B1, B2 and B8 use together with associated access and parking was approved (reference SE/06/1754).

3.7 This consent was superseded in January 2013 by planning permission reference SE/12/1606/FUL for the erection of three light industrial units with associated parking.

3.8 It appears that none of these permissions was ever implemented, and in March 2014, Suffolk County Council granted a retrospective permission for "*the retention of an existing access track with hardstanding for the storage of inert materials arising from demolition activities, including broken concrete, brick, timber, clays and soils; use of site for concrete and brick, crushing, and wood chipping*".

3.9 The approved layout of the site is shown on the extract drawing below:



3.10 Since 2014, the site has been used for waste management purposes.

4. Description of the Proposals

4.1 The proposal is to erect a Materials Recovery Facility on site to enable recycling of a range of wastes as approved by the site's existing environmental permit, within an enclosed environment. The building will be 30m wide by 90m in length and 12.96 m at the ridge with an eaves height of 10.00 m. Construction will be a steel portal frame cladded with Steadmans plastic coated single skin steel profiled cladding.

4.2 The Waste Transfer Shed will be open-fronted, with 5m concrete pushwalls in place along the rear and eastern walls of the building. The floor and roof plan for the building is shown on **Drawing WIDD/HAV/MRF/04**. The side, rear and front elevations are also shown on **Drawing WIDD/HAV/MRF/04**.

4.3 The colour of the cladding will be subject to approval by the Waste Planning Authority, however, it is proposed to use RAL 080 70 05 goosewing grey for the external colour of the building. This has been chosen as it is widely used within the surrounding industrial units.

4.4 Rainwater from the roof of the building will be collected via guttering and stored in a water tank for use as process water (dampening down of haul roads, dust control, cleaning of plant and machinery etc.). The tank will be capable of storing up to 260,000 litres of water and will be located to the east of the building as shown on the site layout **Drawing WIDD/HAV/MRF/03**.

4.5 It is proposed to install lighting around the building to illuminate the operational area in the vicinity of the proposed building. A lighting assessment for the proposals has been completed and is attached in **Appendix 6**.

4.6 The building will be located along the eastern margin of the site. Access into the site will remain as per the existing site arrangements.

4.7 The access road is currently unsurfaced. The road will be fully surfaced and will lead onto a concreted area in front of the MRF building. All waste recycling operations will be confined to the concreted area. A surface water management system will be incorporated into the site. This will include the provision of a Class 2 oil and silt interceptor which will trap any suspended solids or oils which may be present within the surface water run-off from the operations. The surface water run-off will be discharged to foul sewer located close to the site.

4.8 The grey water collected from the roof of the Waste Transfer Station building and stored in an adjacent above ground water tank. The collected water will be used in site dust suppression systems and as general process water.

5. Operations within the Building

5.1 The waste will generally comprise skip waste collected from the local area. Demolition and construction waste will also be processed at the site together with other waste allowed by the site's environmental permit. The skip waste and construction and demolition waste will be delivered to site using the operator's own fleet of collection vehicles.

5.2 The range of wastes currently permitted at the site include:

- Mining waste
- Agricultural waste
- Wood waste
- Inorganic and organic chemical waste
- Thermal industry waste (e.g. slag)
- Metal waste
- Construction and demolition waste
- Waste from other waste management facilities
- Municipal waste

5.3 The majority of the waste accepted at the site will be construction, demolition and commercial (skip) waste. Whilst the site is permitted to accept municipal waste, it will not be accepted at the site, due to concerns of odour emissions.

5.4 Unprocessed waste will be placed into store ready for initial sorting. Larger items such as metal, wood, uPVC plastic window frames, bulky items such as mattresses, will be removed either by hand or mobile handling machines. Following the initial pick, the waste material will be screened via a rotating screen (trommel) to remove fines (sub 50mm material). The oversize from the trommel will be subject to hand picking on a conveyor picking station to remove recyclable material such as plastic, wood and metal.

5.5 Following sorting, the various waste types will either be removed off-site for further recycling or reprocessing, to the landfill for use as an inert landfill waste if suitable, or to the composting area if the recovered waste is organic and meets the permit specifications, or removed to another suitably licenced facility (either non-inert landfill or waste transfer station). Any waste which is deposited within the building which does not meet the waste acceptance criteria or is not permitted to be brought onto site under the terms of the environmental permit, will be placed into a quarantine area for removal from site to a suitably licenced facility.

5.6 The operations within the building will take place within the currently approved hours of operations for the site, namely;

0600 hrs to 1800 hrs Monday to Friday,
0600 hrs to 1400 hrs Saturday,
with no operations on Sundays or Bank/Public Holidays.

6. Concrete Hardstanding

6.1 In addition to the waste transfer building, it is proposed to construct a concrete hardstanding over the operational area of the site. The hardstanding will provide an impervious floor to the recycling operations and incorporate a drainage system for the site for the first time. The extent of the concrete pad is shown edged on the Proposed Site Layout **Drawing WIDD/HAV/MRF/03**. The pad is designed to drain towards the central spine of the site and away from the proposed MRF building.

6.2 Prior to the applicant taking control at the site, all waste operations took place directly onto made ground comprising backfilled soils and hardcore. It is understood that historically there have been significant drainage issues associated with the site, resulting in flooding to neighbouring businesses located along the northern boundary of the site.

6.3 To prevent the operational and environmental issues identified, a concrete hardstanding is considered the most appropriate solution. The hardstanding will ensure that operational areas can be maintained in a dry and clean state throughout the year. The concrete hardstanding will be to a 'waste specification' i.e. capable of withstanding waste operations without causing damage to the surface of the pad. The pad will be constructed from 300mm reinforced concrete.

6.4 It appears that surface water run-off has been allowed to discharge from the waste operations onto adjacent land in an uncontrolled manner. The surface water run-off would be considered to be effluent and potentially contaminated with suspended solids, liquor from the waste materials stored within the area, and oils from plant and machinery operating on site. In addition, the volume of unregulated flow into the adjacent land has created flooding issues which the landowner and businesses still have understandable concerns over.

6.5 To ensure that the recycling operations are properly managed and controlled, the concrete hard standing will have a suitable drainage system incorporated into it which will be sufficient to accommodate potential surface water run-off. The design of the drainage system is shown on **Drawing HAV/WIDD/WTS/09**. The outfall from the drainage collection system will be into a suitably sized Class 1 Oil Interceptor/Separator tank. Details for a typical tank are attached in **Appendix 1**. The size of the tank required to accommodate the run-off from the area of hardstanding has been calculated to be the SPEL P250/1CSC (or tank of similar capacity).

6.6 The discharge from the separator tank will be regulated to ensure that the maximum flow does not exceed 2lt/s (as required by Anglian Water). The surface water will need to be discharged into foul sewer due to the potential for contamination arising from the waste recycling activities on site. The intention is to connect into the existing foul sewer infrastructure to the north of the site.

6.7 The drainage system has been designed by consulting engineers RAB Consulting. Their site assessment and design for the site is set out in **Appendix 2.**

6.8 The drainage system incorporates an above-ground water tank which will hold a maximum of 260,000 lts of water, which will be used to store grade water collected from the MRF roof. This water will be used as process water and in the dust suppression systems incorporated into particular machinery such as the crusher. In addition, this water will be used to clean down the concrete hardstanding and to dampen down any external stockpiles which may have the potential to give rise to fugitive dust during prolonged dry and windy conditions.

6.9 The 9 m diameter tank will be located in the south western corner of the site, adjacent to the Waste Transfer Building. The location of the tank is shown on **Drawing WID/HAV/MRF/03V2**. The tank will have a total height of 2.3m and be constructed from galvanised steel and lined with EPDM rubber. It will also incorporate an anti-algae polypropylene mesh cover to allow rainwater to percolate through but prevent debris from entering the tank and sunlight passing through to inhibit the growth of algae. The tank will have an overflow connected to the local surface sewer system with a maximum flow rate of 2lt/s to meet the requirements of Anglian Water.

6.10 The concrete hard standing will need to ensure potentially contaminated surface water is captured and contained within the site before its discharge to foul sewer. To contain any surface water the hardstanding will have a raised kerb edging around the perimeter. All surface water within the operational area of the site will be contained and directed into the silt and oil interceptors and attenuating tanks. There will be no unregulated discharge from the operations onto neighbouring properties.

7. Ancillary Development

7.1 The proposals include a brick built welfare unit to be located in the south west corner of the site, as indicated on the Site Layout Plan, **Drawing WID/HAV/MRF03**. The welfare building will be accessed by pedestrians only (there will be no vehicular access/parking associated with the welfare building), due to site safety precautions. The pedestrian access will be a surfaced path behind the MRF building.

7.2 The welfare building will comprise a two-storey brick building, which will provide changing rooms, toilets, mess room and kitchen on the ground floor and a common room, two offices, kitchen, stores, toilets and shower room on the first floor. Elevations of the welfare building are shown on **Drawing WID/HAV/MRF/06**.

7.3 To the north of the welfare building will be located a water tank to accept grey water from the roof of the MRF building.

7.4 There will be a weighbridge and office located alongside the access road. The location of the weighbridge and office is identified on **Drawing WIDD/HAV/MRF/03.** The elevations and roof plan for the weighbridge office is shown on **Drawing WIDD/HAV/MRF/05**.

7.5 It is proposed to install solar photovoltaic (PV) panels on the roof of the MRF (as shown on **Drawing WIDD/HAV/MRF/04**). The panels will be sufficient to generate 40 kw per hour or an expected 348044kWh per year. This will make a significant contribution towards the electrical demand of the site. Any surplus energy would be exported to the grid.

7.6 There will be a requirement for a small substation to connect the power generated by the solar panels to the electricity grid network. It is proposed that this is located by the site entrance in the location identified on **Drawing WID/HAV/MRF/03V2**. The exact dimensions of the substation will be determined by the Distribution Network Operator.

8. Staffing and Car Parking

8.1 It is expected that the site will employ 10 full-time members of staff and 5 part-time positions. The full-time positions will comprise:

1) Site Manager
2) Weighbridge Clerk
3) 2 x mobile plant operatives
4) Admin clerk
5) 5 x general operatives

8.2 The part-time positions will include:

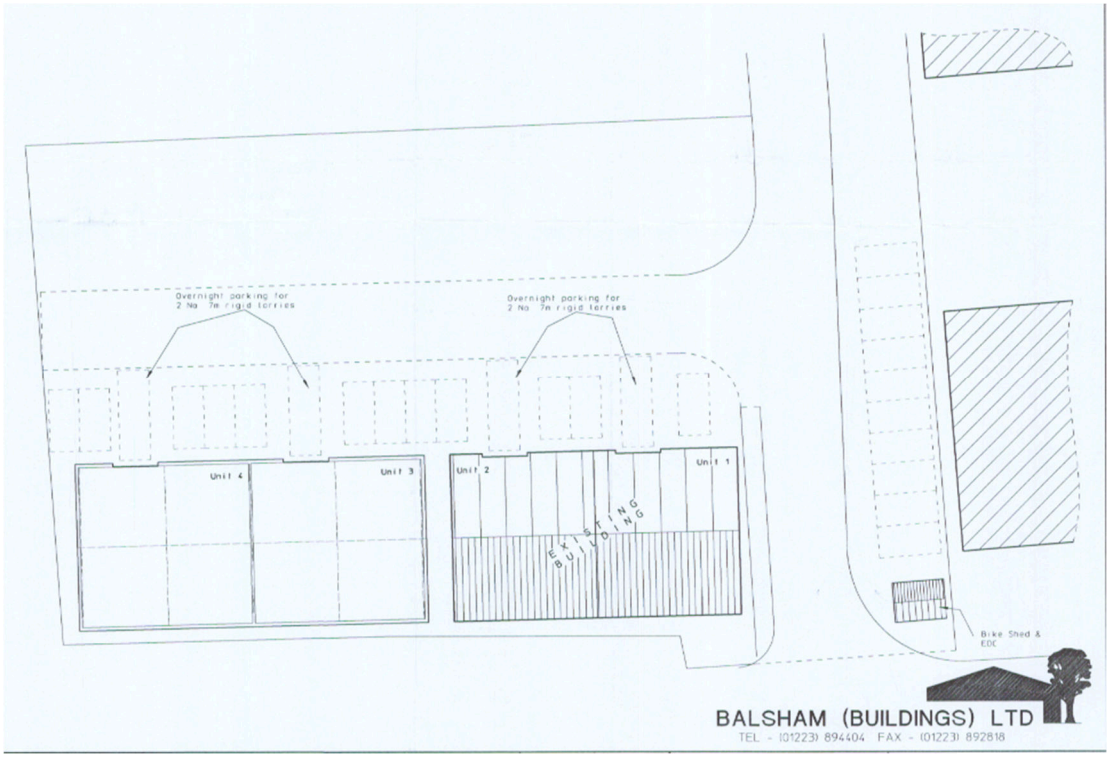
1) 2 x Fitters
2) Electrician
3) 2 x cleaners

8.3 There are no proposals to create car parking spaces within the development site. Widdington Recycling owns additional land outside the planning application boundary, which is shown on the site layout plan **Drawing WID/HAV/MRF/03V2**. The additional area, known as Lury Court, comprises an office accommodation, two light industrial units and a forecourt providing existing car parking capacity.

8.4 Lury Court has the benefit of several planning permissions. It comprises two light industrial units and an office administration building. The two units were approved in May 2004 (ref SE/04/2157/P) and the office block was granted in April 2008 (ref SE/08/0589), both by West Suffolk Council. As the units and the offices are proposed to be used in support of the operations of the waste management facility, the units and offices will not generate any additional parking requirements outside those identified in para 8.1 above.

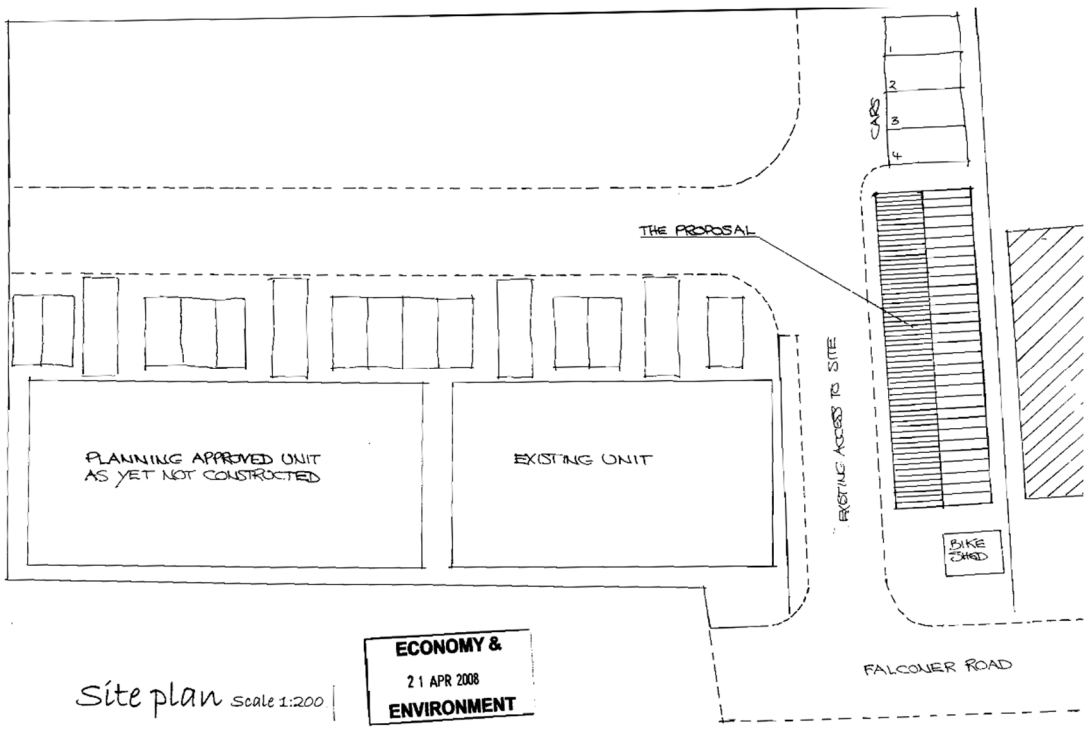
8.5 The planning permission for the industrial units includes an approved site layout plan (ref TR/101 dated 20/12/2002). This provided for 6 car parking spaces allocated to each unit plus two HGV parking spaces for each unit (a total of 12 car parking spaces and 4 HGV spaces), together with an additional 10 car parking spaces along the eastern margin of the site. A copy of the approved plan is provided in Appendix 10, however an extract of the drawing confirming the location of the parking bays is provided below:

Extract of approved drawing TR/101



8.6 Lury Court will provide adequate car-parking provision for the staff and any visitors to the waste development site. As identified on the proposed site layout, there are sufficient spaces for 2 x disabled parking and 16 car parking spaces.

8.7 The planning permission for the office building was approved in June 2008 (ref SE/08/0589) by West Suffolk Council. The approved layout plan indicates that the office location is where the 10 parking bays are shown on approved drawing TR/101. 4 replacement parking bays were proposed to the north of the offices (as illustrated on the approved site plan below:



8.8 The proposal is to use Lury Court as the workshops and administrative office for the waste operations. The 16 approved parking bays have relocated along the northern edge of the site to include 2 disabled parking bays close to the offices. This is considered to be sufficient to accommodate the 10 staff and any visitors/tradespersons visiting the site.

8.9 The 5 x general site operatives will be arriving via minibus each day. There is therefore considered to be sufficient existing car parking spaces to accommodate staff driving to work as well as visitors to both Lury Court and the waste management facility.

8.10 A covered cycleway will be provided for a minimum of 5 cycles adjacent to the proposed welfare building.

8.11 The company will encourage car-sharing, cycling and use of public transport for all site staff.

9. Phase 1 Preliminary Site Investigation

Background

9.1 A Phase 1 Preliminary Risk Assessment (PRA) has been undertaken in respect of the development site by Wiser Environment, on behalf of Widdington Recycling Ltd. A copy of the PRA is provided in **Appendix 9**.

9.2 The PRA confirms that the first recorded historic use of the site dates back to 1877 where unspecified works were noted. From 1880 to 1986 a clay pit is noted on the site and over this period adjacent land has been developed for industrial use.

Geology

9.3 The surface of the site comprises an impermeable concrete layer over artificial/disturbed ground. Underlying the artificial made ground, the superficial geology comprises river terrace deposits and alluvium described as the Lowestoft formation. The bedrock geology comprises chalk of the Lewes nodular and Seaford took formations.

Ground Workings

9.4 There are three instances of historical ground excavation within 250 m of the site noted on historic Ordnance Survey maps dating back to 1896.

Mining

9.5 The area within which the site is located generally affected by historic tin mining, clay, mining, gypsum, extraction and coal mining.

Hydrogeology

9.6 The site is underlain by a Secondary A superficial aquifer, which is characterised by permeable layers capable of supplying local water supply.

9.7 The Principal bedrock aquifer underlying the site has a high level of water storage and may supply water in a strategic scale. The site lies within a Source Protection Zone 3 and the nearest groundwater abstraction licence point lies 437 m to the west. The PRA confirms that the site lies within an area of medium groundwater vulnerability of both the superficial and bedrock.

Hydrology

9.8 There are two inland rivers 163 m south-west of the site and one 203 m north of the site. The PRA confirms that the site is at very low risk of flooding from rivers, with one flood event recorded 127 m north of the site in 1968.

9.9 In respect of surface water flooding, the PRA confirms the highest risk of surface water flooding on site is a maximum model the depth between 0.1m and 0.3m localised to a small specific area at the eastern boundary.

9.10 The Phase 1 report concludes that there is a low risk of contamination across the site on the basis of:

- No known contaminative previous use of the site.
- Site covered by an impermeable concrete surface, and sealed drainage system.
- The waste reception and storage areas are covered by roofing or wastes are stored in weatherproof containers.
- All vehicles accessing site inspected and maintained regularly.
- Fencing around site collects all loose litter and is cleared appropriately.
- Operational areas of site are non-smoking zones.
- 24 hr CCTV system in place across site.
- Site operated in accordance with a Fire Prevention Plan and Management System
- SOPs and training provided to all relevant staff.Regular housekeeping of site surface.

10. Environmental Considerations

10.1 The enclosing of the operations will lead to improvements in controlling potential emissions arising from the recycling operations. There are potential impacts on the environment that may be created by the proposed operations. These have been individually appraised and are noise, dust and traffic movements.

10.2 There are no environmentally sensitive areas within the site e.g. Site of Special Scientific Interest (SSSI) or within 5km of the site. The DEFRA environmental database MAGIC extract below confirms the nearest SSSI is located over 5km to the north west of site at Over and Lawn Woods.

10.3 The nearest sensitive receptors have been identified as the residential properties along Ashlea Road to the west of the site, which are located approximately 150m from the proposed Waste Transfer Station building. There are also residential properties located off Chalkstone Way approximately 175m to the north of the site.

10.4 The properties along Ashlea Road are screened from the site by a belt of mature woodland, however there is potential for impact from the development through noise and to a lesser degree given the extent of the tree belt, dust.

10.5 The properties off Chalkstone Way are separated from the site by industrial units and the A143. It is unlikely that these properties will be affect by noise but there is potential for fugitive dust impact if the development is not managed effectively.

11. Arboriculture

11.1 There is a belt of mature trees that runs along the western and northern boundaries of the site. A significant proportion of the trees are within the ownership boundary of Widdington Recycling. During the initial site clearance and levelling operations, part of the earth bank in the south-western corner of the site was removed. Unfortunately, the removal of the bank went close to several mature trees located on the top of the bank. It was evident that the trees would require some mitigation in order to save them. The advice of an orb or cultural list was sought at the time who stated that the trees were "*over–mature and well within the process of dieback. The trees wouldn't have lasted another 2/3 years before collapsing*".

11.2 Consequently, the recommendation was to immediately fell them, which took place in August 2023. To ensure the protection of the remaining trees Western margin of the site and Arboricultural Impact Assessment has been undertaken. A copy of the assessment is provided in **Appendix 7**.

11.3 The conclusions of the assessment are:

- it is necessary to help one part of one low quality landscape feature to achieve the proposed layout (this refers to the section of leylandii hedge along the north-eastern boundary that will be replaced with a broadleaf shrub hedgerow)
- a group of 14 Lombardy Poplar trees have been identified for removal. Irrespective of the development for health and safety reasons
- the alignment of a constructed section of boundary wall is encroached within the Root Protection Areas of an area of trees to be retained. It is recommended that regular monitoring on an annual basis for a period of five years is required,
- the report recommends that specialist advice is obtained from a structural engineer with regards to the implications for the stability of the concrete wall from root growth from trees to be retained close to the wall.

11.4 It is confirmed that Widdington Recycling will implement the recommendations contained within the assessment.

11.5 The loss of mature trees along the western boundary of the site, exacerbated by the predevelopment earthworks, will be marginally offset through the planting of over 500 shrubs and trees along the eastern boundary (this supplemental planting proposed along the northern boundary).

11.6 There is however little scope for any additional mitigating planting within the site. Widdington Recycling will however, work with the Local Planning Authority to consider alternative mitigating strategies, which may involve off-site planting.

12. Noise

12.1 A noise assessment has been undertaken in respect of the proposals by Vibrock, which is provided as **Appendix 4**. The assessment was based on a noise survey undertaken over a 7 day period from 11-18 September, 2023, undertaken by HA Acoustics with reference to the guidance presented within BS 7445 and BS 4142.

12.2 As set out in the summary (Section 6) of the assessment report the assessment confirms "*the development is unlikely to result in any 'adverse' or 'significant adverse' impacts'*.

12.3 Further the report states:

As a result, the proposed development is considered to be consistent with the aims of the NPSE and NPPF which seek to mitigate and minimise potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and the quality of life.

The overall noise impact of the development is therefore considered to be in line with current national and local planning policy which seeks to prevent and avoid any significant or unacceptable adverse impacts and, where necessary, mitigate and reduce to a minimum other adverse impacts.

12.4 Noise monitoring will be undertaken once the site is fully operational to ensure noise levels are in accordance with the predicted noise limits from the noise assessment. In the event that noise levels exceed predicted levels and are above recommended noise limits then additional mitigation will be employed at the site. Any additional mitigation will be subject to further review.

12.5 Noise monitoring will continue throughout the life of the operations, unless the Local Planning Authority are content that no further monitoring will be required.

13. Dust

13.1 The site has a history of waste management going back several years (albeit on an intermittent basis). It is understood that there have not been any complaints relating to dust generation at the site historically. Notwithstanding this, the proposals to house the waste operations within a building and the provision of a sealed concrete operational area will significantly improve the management of dust at the site.

13.2 There is potential for some dust to be generated through the waste processing operations. The nearest sensitive receptors to the site are at the residential properties at Ashlea Close (approximately 150m from the Waste Transfer Station) and the properties off Chalkstone Way approximately 175m to the north.

13.3 At the distances identified fugitive dust arising from the waste processing operations has the potential to cause nuisance. However, the ability to undertake operations within an enclosed building will significantly reduce the potential to give rise to fugitive dust. The concrete hardstanding will ensure the site can be kept in a well-maintained state, free from mud and other deleterious materials that have the potential to give rise to fugitive dust. The operations on site will incorporate dampening down of the access road and operational areas when required and the spraying of stockpiles which have the potential to give rise to fugitive dust.

13.4 Dust consultants Vibrock were instructed to provide a Dust Management Plan for the operations at the site. The plan is provided in **Appendix 3**. In addition, at the request of the LPA, they have also undertaken an Air Quality Assessment of the proposals. A copy of the assessment is also provided in **Appendix 3**.

13.5 The Air Quality Assessment concludes:

10.1 The proposed development has the potential to generate dust and other airborne pollutants, however it is considered that any dust occurrence events will be limited, of short duration, and will be minimised by implementation of the dust control recommendations.

10.2 With regard to PM10 and PM2.5 dust levels from the site, analysis has been made of the air quality data. The conclusion of the analysis was that AQO will not be exceeded. In addition, the potential air quality impacts from traffic associated with the development is negligible and the need of further assessment screened out.

10.3 The proposed development meets the air quality and dust requirements of national and local policy and guidance which seek to prevent new and existing developments from contributing to unacceptable levels of air pollution by avoiding, minimising and mitigating the potential impacts of waste development on the environment.

10.4 Overall the potential impacts on air quality due to the proposed development, with the implementation of suitable dust mitigation measures, is not considered to be significant.

Dust Management

Site Management

13.6 The site manager will be responsible for the day-to-day control of the site and ensuring full compliance with the planning permissions and any associated management plans concerned with the operations of the site.

13.7 Staff at all levels will receive the necessary training and instructions to ensure they are aware of their responsibilities and duties in association with detecting and controlling potential sources of dust emissions.

13.8 If any members of staff fell to comply with the provisions of the dust management plan, then they will be retrained as necessary and may also be subject to disciplinary action.

Potential for Emissions

13.9 The British Standards Institution defines dust as particles below 75 µm. Fine dust, which is defined as particles up to 10 µm have agreed standards imposed through the National Air Quality Strategy. These particles are generally formed through vehicle emissions.

13.10 Coarser dust which is generally regarded as 'nuisance dust' are considered to be above 30 µm and make up the largest proportion of dust emitted from waste operations (mainly from crushing and screening of demolition waste e.g. concrete and bricks). Dust particles of this size largely deposited within 100 m of the dust source . Adverse impacts due to nuisance dust are considered to be most likely experienced within this distance, however, topography and weather conditions will influence this distance. Due to the screening afforded by the mature tree belt along the western and northern boundary of the site potential for nuisance dust is considered low to those residential receptors lying to the west and north.

13.11 Notwithstanding this, there is a responsibility on the site operator to ensure that potential sources of dust emissions are identified and good practice/mitigation measures employed to reduce the potential as far as reasonably practicable.

13.12 The potential sources of dust emissions at Haverhill have been identified as:

- Crushing of demolition waste
- Screening of waste,
- Exposed site stockpiles,
- Vehicle movements within the site.

13.13 The Dust Management Plan sets out how fugitive dust generation will be managed within the site. Notwithstanding this, dust monitoring at the boundary of the site will be undertaken to establish whether dust control measures implemented at the site are sufficient to control fugitive dust.

13.14 In general, the site will be kept free from mud and a road sweeper will be employed on an as and when necessary basis. The access road and operational areas will be dampened down using a water bowser during dry and/or windy conditions.

13.15 Stockpiles will be kept to a maximum 4m in height and contained on three sides using concrete 'Lego' blocks to the full height of the stockpiles. This will limit the exposure of the sides of stockpiles to any wind blow across the site to inhibit the creation of fugitive dust.

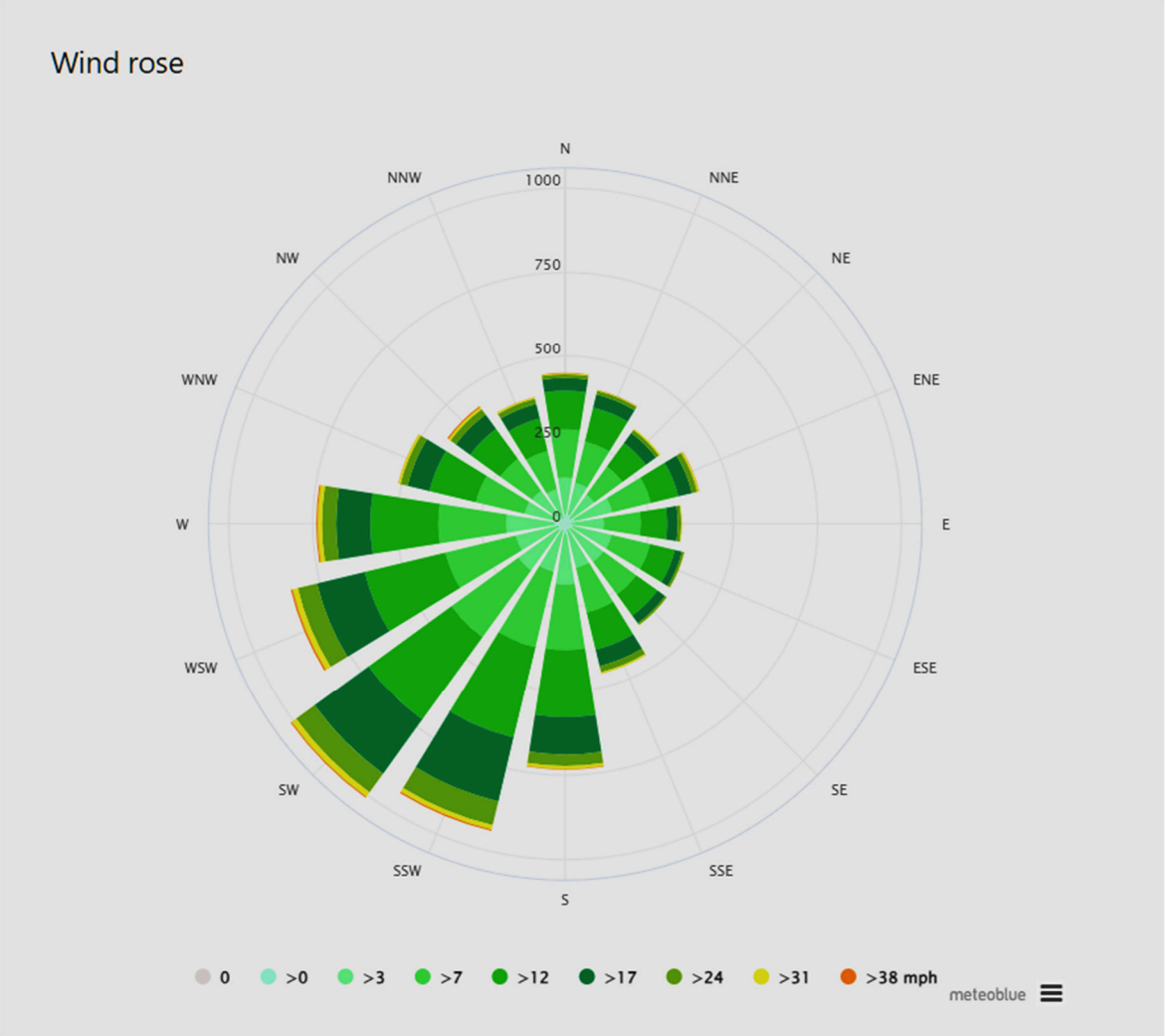
13.16 Potentially dust generating operations such as crushing and screening will only employ plant with built-in water dampening systems to inhibit the production of fugitive dust. In addition, these operations will only take place within areas of the site that are screened from the effects of wind blow to reduce the potential for fugitive dust generation. The screening will be created from the Waste Transfer Station building and 'Lego' blocks placed at appropriate locations around these activities.

Weather

13.17 Weather conditions, particularly wind and rainfall can significantly affect the propensity for dust generation from a site. The table below sets out trigger levels for dust generation.

	Wind Speed		**Precipitation**	
m/s	**Beaufort Scale**	**Dry**	**Showers**	**Heavy Rain**
>6	4+ Dust and loose paper raised stop small branches begin to move	Red	Amber	Green
2-6	2 – 3 Wind felt on exposed skin. Leaves rustle. Wind vanes begin to move	Amber	Green	Green
<2	0 -1 Smoke drifts indicates wind direction. Leaves and wind vanes are stationary	Green	Green	Green

13.18 Weather records for Haverhill indicates that the prevailing wind direction is from the west south-west , i.e. away from the nearest sensitive residential receptors located to the west at Ashlea Close, but towards those properties at Chalkstone Way.



13.19 Directional frisbee gauges will be installed in locations to be approved by the Waste Planning Authority and local Environmental Heath Officer. The dust gauges will remain in place throughout the duration of the development and the dust monitoring pads analysed by dust consultants, the results of which shall be submitted to the planning authority.

13.20 The dust gauges will allow assessment of the nature of any dust, the direction from which the dust came, and the amount of dust deposited from all directions.

13.21 It is proposed to monitor on a quarterly basis, which can be reviewed in time should the monitoring confirm that dust is being adequately controlled.

Litter

13.22 Wind-blown litter can be a significant problem for waste sorting operations and is one of the main drivers for undertaking these operations within a building. The new shed will ensure that during windy days, recycling activities can still take place.

14. Odour

14.1 At the request of the LPA, an Odour Impact Assessment was undertaken in December 2024, which assesses the potential impacts on the local environment due to odour emissions from the proposed development. The assessment was undertaken by DustScanAQ. A copy of the assessment is provided in Appendix 11.

14.2 During the summer of 2024, the site accepted municipal waste, for bulking up and transporting to suitable recovery and disposal facilities elsewhere in the region, in accordance with the site's environmental permit. Municipal waste comprises a number of waste types including food waste which has the propensity to decompose, particularly when stored over the summer months when the waste has the opportunity to heat up. This decomposition has the potential to give rise to unpleasant odours.

14.3 The municipal waste on site started to decompose before it was able to be removed, which gave rise to a number of odour complaints from various businesses adjoining the site. As a consequence of these complaints, a decision was taken to cease accepting all municipal waste at the facility. The only waste types accepted at the facility will be construction and demolition waste and skip waste. None of these waste streams are likely to give rise to any odour due to the low levels of organic matter within them.

14.4 The odour assessment was undertaken on the basis of no municipal waste being accepted at the site.

14.5 The assessment concluded that:

> *A 'sniff test' survey was carried out in November 2024 to determine the potential for odour issues at nearby receptor locations. On-site monitoring confirmed that the main odours were due to the handling of the above waste streams, as well as the ongoing groundworks and laying of concrete pads in the west of the site.*
>
> *At off-site receptor locations, odours associated with on-site processes were not present in sufficient quantities to cause significant issues.*
>
> *Given that little odour linked to the recycling facility were detected at nearby receptors (housing to the northwest and bakery to the south) it is unlikely that any odour arising from the facility would cause any detriment to nuisance to residents and surrounding businesses during normal operations.*
>
> *A risk assessment based on the 'source-pathway-receptor' model outlined by the IAQM was also carried out, taking into account the results of the odour survey, local meteorological conditions and the proximity of sensitive receptors. The results of this assessment suggested that there would be a Negligible odour effect at off-site receptors during normal site operations.*
>
> *Furthermore, as the site no longer handles waste with a highly offensive odour, it is considered unlikely that odour issues will occur as a result of typical on-site operations.*

15. Flood Risk

15.1 The proposed location lies in an elevated location and within Flood Zone 1. The site is not therefore considered to be a risk from flooding. The drawing below confirms the location of the site and the Flood Zones in the immediate area to the site.

15.2 A Flood Risk Assessment has been undertaken by RAB Consultants and is incorporated into their report provided in **Appendix 5**.

16. Traffic

16.1 There are currently no traffic movement restrictions in place on the extant planning permission or limits on tonnage which can be imported to site. There is an environmental permit in place which is regulated by the Environment Agency. The permit allows up to 75,000 munic of waste to be imported and treated at the site per annum. The anticipated annual tonnage is expected to be less than this maximum at around 40,000 tonnes per annum.

16.2 The waste will be imported to site in HGVs and skip wagons. The average weight per load is estimated to be in the order of 9 tonnes per load (this is based on an average skip weight of 3.5 tonnes and 18 tonnes for HGVs) assuming a 25% skip wagon to 75% HGV split in deliveries to site.

16.3 All the waste imported and treated at site will need to be removed from site either as a recycled product (e.g. secondary aggregate and soils), bulked recyclate (e.g. metal, plastic) or as a waste product (fines, non-recoverable waste such as plasterboard and wood). From historic data at Widdington, approximately 50% of the material removed will be via backhauling e.g. from HGVs which have delivered to site taking material or waste away. The remaining 50% will be collected by HGV.

16.4 Based on these assumptions, the traffic movements are anticipated to be in the order of 40 per day (20 in and 20 out) per day. Given this low level of traffic movements, it is not considered that this will give rise to any unacceptable impact on the local highway network.

16.5 All traffic will be directed to access the industrial estate from the east, utilising the A1017 bypass to avoid traffic movements through the town of Haverhill. Widdington Recycling runs its own fleet of HGVs and skip wagons therefore it can instruct all its drivers of any lorry routing and enforce where necessary.

17. Lighting

17.1 Strenger Ltd was appointed by Widdington Recycling Ltd to undertake a lighting assessment for an exterior lighting installation associated with a proposed Materials Recovery. A copy of their assessment is provided in **Appendix 6**.

17.2 The assessment concludes that the proposed development will be compliant with the residential receptor criteria as set out in ILP Guidance Note 01/21: The Reduction of Obtrusive Light. Specifically, the Assessed Scheme of Lighting associated with the Proposed Development is compliant with the ILP post-curfew obtrusive light criteria for Environmental Zone E3. The adopted criteria are as follows

- 'Light intrusion' limit of 2 lux (E - vertical illuminance)
- 'Glare' limit of 2.5d to 1,000 cd (I - source intensity)
- 'Sky-glow' limit of 5 % (upward light ratio)

17.3 Compliance has been achieved with the adoption of an environmentally sympathetic scheme of lighting having the following integral mitigation measures:

- the use of luminaires with minimal to zero direct contribution to upward light;
- minimising luminaire uplift angles;
- careful aiming and positioning of luminaires;
- careful selection of luminaires;
- the use of optimal light distributions for their specific location and orientation;
- optimisation of mounting heights;
- the adoption of the lowest intensity LED modules practicable; and
- minimising the task illuminance level.

18. Planning Policy

18.1 Section 38(6) Planning and Compulsory Purchase Act 2004 states that determination must be made in accordance with the Development Plan unless material considerations indicate otherwise, which with the Development Plan as (a) the Regional Spatial Strategy for the region in which the area is situated, and (b) the Development Plan documents (taken as a whole) which have been adopted or approved in relation to that area. Adopted Structure and Local Plans retain development plan status and automatically became 'saved' policies for a period of three years from the commencement of the Act. For plans in preparation the three-year period will commence from the adoption or approval of the draft plan.

18.2 The National Planning Policy Framework (NPPF) came into force in March 2012 and last updated in December 2023. This introduced the principle of a presumption in favour of sustainable development as "a golden thread running through the planning system". Where a proposal is considered to be sustainable and in accordance with the Development Plan, the NPPF directs planning authorities to grant planning permission unless material considerations indicate otherwise.

The Development Plan

18.3 In the case of the proposals the Development Plan consists of the following documents:

- Suffolk County Council Minerals and Waste Local Plan – adopted July 2020
- The former St Edmundsbury area Local Plan (now part of West Suffolk Council) comprising
    - Core Strategy – adopted December 2010
    - Vision 2031 – adopted September 2014
    - Joint Development Management Policies – adopted February 2015

Suffolk County Council Minerals and Waste Local Plan – adopted July 2020

18.4 Policy GP1 states in relation to presumption in favour of grant of sustainable developments:

The County Council will take a positive approach to minerals and waste development that reflects the presumption in favour of sustainable development.

It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure minerals and waste development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the site allocations and policies in this Plan will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or the relevant policies are demonstrably out-of-date at the time of making the decision, the County Council will grant permission unless material considerations indicate otherwise – taking into account whether:

a) Any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework and National Planning Policy for Waste taken as a whole; or

b) Specific policies in the National Planning Policy Framework or National Planning Policy for Waste indicate that development should be restricted.

18.5 It is considered that the proposed development is in accordance with this policy. The site already has planning permission granted for a waste use and the provision of a building will ensure that the operations can continue but in a better controlled and regulated environment.

18.6 Policy GP2 is concerned with Climate change and mitigation. The policy states:

New minerals and waste management facilities should through their construction and operation minimise their potential contribution to climate change through reducing carbon and methane emissions, incorporate energy and water efficient design strategies and be adaptable to future climatic conditions.

Proposals for new minerals and waste facilities should where appropriate:

a) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption, including maximising cooling and avoiding solar gain in the summer;

b) be planned so as to minimise carbon dioxide and methane emissions, and support opportunities for decentralised and renewable or low-carbon energy supply;

c) give priority to the use of sustainable drainage systems, paying attention to the potential contribution to be gained to water harvesting from impermeable surfaces and encourage layouts that accommodate waste water recycling;

d) take account of potential changes in climate including pluvial and fluvial flooding, rising sea levels and coastal erosion, and;

e) incorporate proposals for sustainable travel including travel plans where appropriate.

18.7 The development is not 'new' to the site as planning permission for waste management operations is already in place. The provision of a new Waste Transfer Station and hardstanding would be a new development for the site. The ability to effectively manage waste at Haverhill will reduce vehicle movements of the developer, by ensuring waste arising from the Haverhill area can be treated locally rather than at the company's existing site at Widdington.

18.8 Policy GP4 on general environmental criteria, states:

Minerals and waste development will be acceptable so long as the proposals, adequately assess (and address where applicable any potentially significant adverse impacts including cumulative impacts) on the following:

a) pluvial, fluvial, tidal and groundwater flood risk;

b) vehicle movements, access and the wider highways network;

c) landscape character, visual impact, setting, and designated landscapes including Areas of Outstanding Natural Beauty and the Broads;

d) biodiversity including Natura 2000 sites, ancient woodlands and trees;

e) geodiversity;

f) historic environment, archaeology, heritage assets and their setting;

g) public rights of way;

h) neighbouring land-use;

i) soil resources including the best and most versatile agricultural land;

j) noise and vibration;

k) air quality including dust and odour;

l) light pollution;

m) the local water environment;

n) land instability;

o) airfield safeguarding;

p) the differential settlement of quarry backfilling;

q) mud and aggregates on the road;

r) litter, vermin and birds;

s) The use of alternative forms of transport including the use of rail freight shipping should be considered; or

t) military and civil aviation.

Proposals should meet or exceed the appropriate national or local legislation, planning policy or guidance for each criterion, including reference to any hierarchy of importance. Proposals should aim to achieve a biodiversity net gain. Proposals should demonstrate that when considering the potential for significant adverse impacts upon features of acknowledged environmental importance, that the hierarchy of firstly avoidance, then mitigation and finally compensation has been followed.

18.9 It is considered that all the environmental criteria have been taken into account in respect of the proposed development, which would not give rise to any unacceptable impact on any of these aspects.

18.10 On sites suitable for consideration for waste development, Policy WP3 states:

General waste management facilities (other than landfill sites and water recycling centres) may be acceptable within the following areas:

a) land in existing waste management use;

b) land in existing general industrial use (B2 use class) or in existing storage or distribution use (B8 use class) (excluding open air composting);

c) land allocated for B2 and B8 purposes in a local plan or development plan document (excluding open air composting);

d) within or adjacent to agricultural and forestry buildings;

e) agricultural and forestry land (open air composting only) excluding ancient woodland or planted ancient woodland sites;

f) brownfield land (excluding open air composting);

g) former airfields (open air composting only);

h) water recycling centres (including composting and anaerobic digestion) and;

i) current and former mineral workings (open air composting and construction, demolition and excavation waste recycling only).

Proposals must also comply with the environmental criteria set out in Policy GP4.

18.11 The site has an extant planning permission for waste management, therefore it is considered that there is a general acceptability in principle for waste operations at the site. The appropriateness of the development is therefore considered to be limited to whether the proposed development will have an acceptable or unacceptable impact on the local environment.

18.12 The development and operation of the new Waste Transfer Station is designed to minimise impacts and to offer an improvement to operations over the previous waste management operations.

18.13 Policy WP8 deals specifically with the recycling of inert, construction and demolition waste. The policy states:

Proposals for recycling or transfer of inert and construction, demolition and excavation waste may be acceptable on land within the uses identified within Policy WP3.

At mineral sites, planning permission will be limited to the life of the mineral operation.

Proposals for such facilities at landfill sites may be considered acceptable on a temporary basis whilst landfilling and restoration is taking place on site.

On land suitable for General Industrial (B2) or Storage & Distribution (B8) uses, activities shall take place within purpose-designed facilities.

Proposals must also comply with the environmental criteria set out in Policy GP4.

18.14 As previously mentioned, the site already benefits from a planning permission relating to waste management of construction and demolition waste, therefore from a land use perspective it is considered that the proposed development is in accordance with this policy.

St Edmundsbury Core Strategy – December 2010

18.15 Waste development is dealt with by the County Council and in planning policy terms by the adopted Minerals and Waste Local Plan. The District Council adopted policies in respect of waste development is more properly concerned with sustainable development and ensuring that any development is of high quality.

18.16 Policy CS2 states in relation to sustainable development and pertinent to the proposed development:

A) making the most resource efficient use of land and infrastructure;

G) maximising the efficient use of water including recycling of used water and rain water harvesting;

Surface Water Run-off – incorporating flood prevention and risk management measures, such as sustainable urban drainage; • Waste – adhering to the waste hierarchy during construction and following development to prevent waste generation and ensure reuse, recovery and recycling…

J) incorporating the principles of sustainable design and construction in accordance with recognised appropriate national standards and codes of practice to cover the following themes:-

- *Energy and CO2 Emissions – seeking, where feasible and viable, carbon neutral development, low carbon sources and decentralised energy generation;*

Transport – minimising the need for travel and ensuring a balance between transport infrastructure and pedestrians;

18.17 The proposed development accords with all the requirements of Policy CS2 as far as the policy applies.

Haverhill Vision 2031

18.18 In the Haverhill Vision 2031 Policy document, adopted in September 2014 the Haverhill Industrial Estate, within which the site is located, is identified as being a suitable location for B1, B2 and B8 uses. The Suffolk County Minerals and Waste Local Plan considers in Policy WP3 "*that land in existing general industrial use (B2 use class) or in existing storage or distribution use (B8 use class)"* is potentially suitable for waste development.

19. Landscape and Visual Impact

19.1 The site is located within Haverhill Industrial Estate and is well-screened from residential properties in the vicinity of the site.

19.2 The building will be of a profile-clad steel portal framed design, similar to all the industrial units within the industrial estate. The cladding will be 'goosewing grey' to reflect the colour of the adjacent industrial units.

19.3 Whilst the height of the building will be higher than the adjacent industrial units, it will not pose a visual intrusion from any sensitive receptors. The land on which the adjacent units stand is approximately 2m higher than the ground level of the development site. The adjacent units are estimated to be 8m in height. In comparison, the proposed building will be approximately an additional 2.5m higher.

19.4 A 3D model of the existing site was generated in March 2023, which is reproduced below:

19.5 The model confirms the well-screened nature of the site from the west and the proximity of industrial units to the site. Notwithstanding this, it is proposed to erect a 2m high panel wall along the northern and western boundary. This will provide visual and acoustic screening as well as inhibit wind blow across the site and therefore mitigate against potential fugitive dust.

19.6 To soften the impact of the screen, it is proposed to undertake hedgerow planting against the outer face of the screening panels. The planting will consist of locally sourced British native hedgerow shrubs. It is proposed to plant a mix of blackthorn (*Prunus spinosa*), hawthorn (*Crataegus mongyna*), and holly (*Ilex aquifolium*) to provide all-year-round foliage. The plants will be planted at 0.5m centres, doubled staggered rows with an

approximate mix of 40%/40%/20% respectively. The plants will be 450mm-500mm whips and all planting will be undertaken accordance with *the Forest Practice Note Number 8 Using Local Stock for Planting Native Trees and Shrubs, Forestry Commission (1999)*.

19.7 The location of the proposed panel walling and landscape planting is shown on **Drawing WID/HAV/WTS/03**.

19.8 The **3D Massing Drawing WID/HAV/MRF/08** indicates the scale of the proposed buildings in relation to the existing buildings in the vicinity of the site.

20. Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment

20.1 JBA Consulting were commissioned to undertake a Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain (BNG) assessment in relation to the proposed development for the construction of a new Materials Recycling Facility and associated infrastructure.

20.2 A habitat survey was conducted on 8th May 2024 to identify, map and condition assess the habitats on site. The site was assessed for its potential to support protected species, and a search for invasive species was also undertaken. The site consisted of unsealed, unvegetated urban land with broadleaved woodland, hedgerow and urban trees at the fringes.

20.3 A copy of the report and assessment is provided in **Appendix 8**.

Statutory Designated Sites

20.4 The ecological appraisal confirmed that there is a Local Nature Reserve (LNR) Haverhill Railway Walks that runs along the south west boundary of the site. There are no further statutory sites present within 2 km of the site. The report considers that due to works only taking place within the site boundary. No adverse impacts are expected on the LNR.

Non-Statutory Designated Sites

20.5 13 non-statutory designated sites were identified within a 2 km radius of the site. The site lies within an area designated as a B-Line (which is a network of insect 'pathways' which link existing wildlife areas together to create a network across the UK). The proposed development is not expected to have any long-term impacts on the designation area given the development will not remove any commuting corridors for wildlife, including pollinators.

20.6 Other designated sites include 3 Essex Local Wildlife Sites, 3 County Wildlife Sites, a Common Land area, an area of Ancient Woodland, Wood Pasture, Parkland Priority Habitat and 2 Traditional Orchards.

Site Survey

Priority and Protected Species

Amphibians, including Great Crested Newt

20.7 There are no ponds present within the site which does not provide suitable habitat for terrestrial amphibians and the adjacent A 413 will act as a barrier for their movement. There are no records amphibians present across the site. It is concluded that it is highly likely that Great Crested Newt and other amphibians will be absent from the site.

Birds

20.8 Only the hedgerow and woodland at the fringes of the site provides suitable habitat to support nesting birds. The desk study did not identify protected or priority species.

Badger

20.9 The site does not provide suitable habitat for setts or foraging, owing to the lack of vegetation and disturbed nature of the site. Despite records of badges within the data search they are presumed absent from the site. Given the unsuitability of the habitat but the present within the adjacent woodland.

Bats

20.10 Records of Common Pipistrelle return from the data search. However, only the hedgerow and woodland at the fringes of the site would provide suitable habitat. The removal of a small portion circa 50 m of hedgerow along the northern boundary the site (primarily consisting of immature *leylandii* trees) is not considered to have contributed to habitat fragmentation due to the lack of natural habitats to the east of the site.

20.11 The woodland. To the south-east of the site has a high proportion of mature trees and therefore may contain treated features suitable for resting bats.

Invertebrates

20.12 No, priority species were identified from the desk study to be recorded on the site. Only the hedgerow and woodland at the fringes provide suitable habitat.

Reptiles

20.13 No records of reptiles were returned in the data search and the site is considered to lack suitable basking and foraging areas.

Invasive non-native species

20.14 No invasive species were recorded during the site survey, despite record the several species within close proximity been identified in the data search.

Biodiversity Net Gain Calculation

20.15 The Biodiversity Net Gain Assessment established that the current baseline habitat units comprised 1.84 of trees (1.19 of other broadleaved woodland and nought .65 of urban tree), and 0.5 habitat units associated with native hedgerow with trees.

20.16 The majority of the site area will change from unsealed to sealed surface with some buildings. This does not constitute a loss on biodiversity units as both are considered urban habitats and therefore have a zero value.

20.17 Broadleaved woodland along the north western corner of the site will be retained and supplemented with additional hedgerow planting. The areas of habitat that will be lost to the development has been calculated as 0.23 habitat units (comprising 0.0814 hectares of Urban trees).

20.18 The Statutory Biodiversity Metric calculation confirms that within the current landscape proposals, there will be a 12.41% net loss for habitat units and an 8.89% net gain for hedge units. There will be a loss of four urban trees.

20.19 The assessment concludes that the creation of habitat at the site is unfeasible within the design development. In respect of habitat compensation, the assessment states:

Given the constraints of the site design and nature, it is currently not feasible to achieve net gain for habitat units within the boundaries of the site.

20.20 A calculation of the estimated cost to purchase statutory biodiversity credits is contained within the assessment which indicates a total estimated cost of £34,880. Widdington Recycling owns land at Widdington which may be suitable for compensation planting. This area is located outside of the administrative boundary of the LPA and therefore an additional calculation will be required to establish what level of compensatory habitat would be required for an off-site location.

20.21 The developer will therefore either purchase the appropriate level of biodiversity credits or offer suitable off-site planting in order to meets the minimum 10% gain required under the Biodiversity Net Gain Regulations.

21. Summary

21.1 As defined by the NPPF, the presumption in favour of sustainable development means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The benefits should be assessed against the policies in this framework taken as a whole; or as specific policies in this Framework indicate development should be restricted.

21.2 Paragraph 85 of the NPPF states that "**Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity**".

21.3 The waste treatment facility is a wholly appropriate use at the site, which has a history of waste management use.

21.4 In terms of economic considerations, the proposal will ensure the more efficient and environmentally acceptable use of an existing site that was already in waste management use.

21.5 The MRF building embraces sustainable development. It has been designed to harvest rainwater and generate electricity through solar PV panels, both for use by the site.

21.6 The building is to be located in an area where waste management activities have been undertaken in the open air for a number of years. The location chosen for the building will screen the building from the majority of views into the site.

21.7 The concrete pad will assist in ensuring the recycling operations and stockpiling of materials can be controlled and will minimize the production of mud and fugitive dust. The pad also ensures that a suitable drainage system will be in place for the first time at the site.

21.8 The proposed development is in accordance with the Development Plan and accordingly should be approved.