

From: Leiversconsultancy@btinternet.com <Leiversconsultancy@btinternet.com>

Sent: 17 April 2025 12:23

To: Andy Rutter <Andy.Rutter@suffolk.gov.uk>

Subject: Widdington Recycling - Haverhill

Dear Andy,

I refer to the various statutory responses received in respect of the planning application for the Materials Recovery Facility at Haverhill.

I set out below the responses to the individual points raised.

Air Quality

In response to the points raised by SRL in their correspondence dated 18 March 2025, please see attached following:

- 1) Construction Dust Assessment dated 3 April 2025 (ref R25.12183/1/1/AG)
- 2) Air Quality Assessment Rev 2 dated 3 April 2025 (ref R25.12183/2/AG)
- 3) Dust Management Plan Rev 2 dated 3 April 2025 (ref R25.12183/2/DMP/AG)

It is anticipated that the revised plans and the additional Construction Dust Assessment satisfactorily addressed the points raised by SRL.

Highways

It is noted that the response of Highways Development Control recommends conditions that should be attached to any planning permission.

It is confirmed that all of the conditions are acceptable to the applicant.

Landscape

Please see below for responses to the points raised on the Arboricultural Impact Assessment and Tree Protection Plan, made by our consultant Hayden's Arboricultural Consultants:

The Tree Protection Plan does not appear sufficient to adequately protect the existing vegetation along the north-eastern and north-western boundaries. The proposed wall structure along the north-western boundary appears too close to the A002, and no protective fencing is proposed. There is also no protective fencing proposed along the north-eastern boundary.

It is our opinion that site practicalities, including the extreme level changes, preclude the effective installation and use of standard tree protection fencing (as set out in BS5837:2012) along the northeastern and northwestern boundaries. This is an implication of the site's topography- the steep drop-off prevented access to the base of the trees along these boundaries during the tree survey. It is unclear to me how the trees could be accessed at all during the construction process.

Revising plans to provide more space from A002 may be of marginal benefit, but as the wall is outside of the canopy and the impacts to the rooting environment have already occurred, I do not see the advantage to this.

Given the indication of the constructed and proposed boundary walls, it is not clear from where the planting areas will be accessed for aftercare, long-term maintenance, and management.

This is a good point. I recommend that gated steps or some other appropriate access is included in the designs (not within root protection areas).

A post-completion arboricultural safety assessment will need to be completed by a suitably qualified Arboriculturist to ensure that all retained trees in the vicinity of the works are structurally sound and do not pose a risk to life and/or property of any users of the site.

Such an assessment is recommended at items 4.4.3 and 4.5.2 of the AIA and at item 7 of the flow chart on the AIA + TPP drawing.

Technical: The relevant local authority is Suffolk County Council rather than West Suffolk Council.

This can be reflected in any revisions to the report.

The Method Statement and Tree Protection Plan need to be revised. The vegetation that borders the proposal site to the south-west, north-west and north-east must be adequately protected during construction...

As mentioned above, I see little capacity for fencing to achieve this aim. I would suggest that supervision of the construction process by an arboriculturalist would be the only way to do so.

... and managed during operation of the site to avoid any further damage and losses.

As mentioned above, I believe the AIA does set out the need for ongoing assessment to ensure this.

In addition to the responses of Hayden's Arboricultural Consultants, I would also add against the comment that the management of the planting should extend beyond the 5 years set out in the Landscaping Plan to cover the period for the whole of operation of the development. This period cannot be legally covered by condition and would require a s106 legal agreement.

Noise

In response to the matters raised on noise by SRL in their correspondence dated 14 March 2025, noise consultants Vibrock, responsible for the submitted noise assessment have provided the following comments:

There is no assessment or consideration of noise from building services plant associated with the welfare office or weighbridge office.

These are low level noise sources that make no significant contribution to the overall noise levels emitted from the site.

The majority of the noise data collected has been discounted because of nearby construction noise. While it is correct not to include this as part of the typical noise climate, it reduces the relevant data to a one hour period for day (5pm – 6pm) and night time (6am – 7am) for each day of the survey. These periods are likely to represent the lowest background noise levels during the proposed periods of operation, but if there are any quieter periods at other times of day/night, then the comparison of the rating and background levels may result in an exceedance.

As noted, this is in-line with best practice. This analysis of the noise data to determine a representative background sound level also leans towards a worst-case assessment approach which further reduces uncertainty within the assessment outcome.

An overall operational noise limit has not been provided at the nearest receptors.

This isn't a mandatory requirement and ultimately is a matter for the Local Authority based on the outcome of the noise impact assessment, its views on the appropriateness of imposing limits and also with regard to local planning policies and the way that other similar sites are regulated across the County.

I propose the following conditions, or conditions worded similarly are applied to the site if planning permission is granted.

"Noise emitted from the site (including operational noise levels, and noise from building services) hereby permitted shall not exceed the existing background level at any noise sensitive premises when measured and corrected in accordance with BS4142:2014+A1:2019 "Methods for rating and assessing industrial and commercial sound."

Should such a condition be considered necessary then it may be appropriate to word as follows:

"Noise emitted from the site (including operational noise levels, and noise from building services) hereby permitted shall not exceed the existing background level by more than 5 dB at any noise sensitive premises when measured and corrected in accordance with BS 4142:2014+A1:2019 "Methods for rating and assessing industrial and commercial sound."

This condition would align with national and local planning policy which seeks to avoid unacceptable impacts, and also to minimise adverse impacts which relate to +5 dB above the background level with reference to BS 4142.

I trust the above and revised assessments are satisfactory, however, please do not hesitate to contact me should you require any further details. I would also be obliged if you could confirm whether there are any other responses that require attention.

Kind regards,

Mark

Mark Leivers
Director
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