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Dear Andy

Planning reference: SCC/0017/25SE

Location: Haverhill Waste Management Site, Falconer Road, Haverhill, Suffolk, CB9 8QE

Introduction

Widdington Recycling Ltd is seeking retrospective application for the construction of a Materials Recovery Facility (MRF) to house recycling operations together with associated hardstanding, solar PV panels to generate up to 40kWh for site use, welfare and office building, weighbridge and weighbridge office and site screening.

The site is located on land at the end of Falconer Road in Haverhill, with industrial units to the north, east and south, and residential receptors to the west. The industrial units those to the north which are approximately 10m to the access road / nearest site boundary. The closest residential receptors are on Ashlea Road, approximately 70m from the nearest site boundary.

Review

The Air Quality Assessment is well structured, and reasonable conclusions have been made. However, as stated in Appendix 4, an assessment needs to be completed reviewing the baseline conditions and consider the construction phase dust impacts. Therefore, I will need to review this assessment once completed.

The Dust Management Plan (DMP) aligns with the IAQM guidance for minerals and dust sites. However, a Dust Risk Assessment using the *Guidance on the Assessment of Dust from Demolition and Construction (2024)* will need to be completed before the construction begins.

As the site no longer handles waste with a high odour potential, I see no reason to reject the application based on odour impacts.

Air Quality Assessment

The applicant has submitted an air quality assessment report with their application. This assessment is generally well structured and follows the relevant IAQM guidance. In the 'Non-Technical Summary', it reasonably states:

"Given the intended dust control measures, it is considered that the site can be operated with minimal impact on nearby sensitive receptors."

However, I have the following comments:

- The assessment only considers operational impacts and does not include the construction phase impacts of the proposed site. In Appendix 4 it states, "*IAQM recommends that the site is visited at the beginning of the assessment to understand the site itself and its locality including local factors that can affect dust emissions and dispersion... The assessment should also take into account the principal existing dust sources (other than the application site) such as dust from existing mineral operations, agricultural activities and construction activities*". Therefore, I will need to review this assessment once completed.
- The assessment does not state that "*locations where people are occupationally exposed over a full working day... examples include offices, warehouses and industrial units*" are also classed as medium sensitivity receptors. I do not expect the assessment outcome to change, however, it would have been helpful for the applicant to state each receptor sensitivity within the assessment.

Dust Management Plan

The DMP follows a structure that's in line with IAQM guidance for dust management at waste sites. It identifies dust sources, considers sensitive receptors, and sets out mitigation measures. It also covers monitoring, complaints, and incident management. Section 10 also states that the DMP "*will be reviewed and updated, as appropriate, in consultation with the regulator.*"

However, I have the following comments:

- The responsible person for the site needs to be named in Section 10, to make sure that reviews are carried out.
- Section 4.4 states, "*emissions will be monitored via daily visual inspections.*" A record needs to be kept of these daily inspections if continuous dust monitoring will only occur in the event of complaints. The IAQM Minerals Dust Guidance (2016) states, "*Proactive monitoring can demonstrate that dust mitigation measures are effective and that dust impacts are being adequately controlled. Visual assessments and instrumental monitoring can provide early warning of dust problems, enabling timely corrective action.*" Therefore, I recommend that if the daily inspections show that there is potential for dust release, automatic monitors should be installed downwind of sensitive receptors.

¹ IAQM (2016). Guidance on the Assessment of Mineral Dust Impacts for Planning.

- Construction phase impacts are not considered within the DMP. A Dust Risk Assessment using the *Guidance on the Assessment of Dust from Demolition and Construction (2024)* will need to be completed before the construction begins.

Odour Impact Assessment

The Odour Impact Assessment follows the IAQM 2018 guidance structure well. It uses the Source-Pathway-Receptor model, considers frequency, intensity, duration, offensiveness, and location, and includes sniff tests, which are recommended for a complete assessment.

The sniff test locations are reasonable and consider local sensitive receptors. However, the on-site receptors should be considered medium sensitivity receptors as supported in the guidance (“*examples may include places of work, commercial/retail premises and playing/recreation fields*”). This will not change the overall assessment outcome, however.

It is also recommended in the guidance that sniff tests are completed on three non-consecutive days. Whereas the assessment states that all locations were only surveyed on 13th November 2024. As these sniff tests were to “*measure and characterise the character and intensity of odour generated by current operations, thereby allowing the source odour potential to be determined*,” the approach is fair.

As the site no longer handles waste with a high odour potential, I see no reason to reject the application based on odour impacts.

Yours sincerely,

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For and on behalf of

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