STEPHENSON HALLIDAY

Planning, Landscape & Environment
an RSK company

Planning Department
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Our Ref: 1149

29/01/2026

Dear Sir / Madam,

PLANNING APPLICATION FOR THE INSTALLATION OF A FIRE SUPPRESSION SYSTEM AT HAVERHILL TRANSFER STATION, HOMEFIELD ROAD, HAVERHILL, CB9 8QP

Stephenson Halliday is instructed by FCC Environment ('the Applicant') to apply for full planning permission for the installation of a fire suppression system ('the Proposed Development') at Haverhill Transfer Station, Holmefield Road, Haverhill ('the Site').

The Proposed Development would provide an ancillary facility to the previously approved development ref. SCC/0040/21SE, which was granted full planning permission by Suffolk County Council ('the Council') on 20th October 2021 for the *"Change of use and alterations to provide combined Recycling Centre and Waste Transfer Station".* ('the Approved Development' or 'the Planning Permission').

This application submission comprises of the following information:

- Site Location Plan- EC-25005-306-S01
- Proposed Site Plan- EC-25005-305-S04
- Proposed Layout- EC-25005-301-S03
- Proposed Elevations- EC-25005-302-S01 & EC-25005-303-S01
- Planting Plan- 0643-SHRSK-XX-XX-DR-L-1001_rev06
- Arboricultural Assessment- 12168-AA

Context of the Proposal

In October 2021, planning permission was granted by Suffolk County Council to provide a combined Recycling Centre and Waste Transfer Station (WTS) on the Site. The full description of the Approved Development was as follows:

"Change of use and alterations to provide combined Recycling Centre and Waste Transfer Station."

The proposals included alterations to the existing WTS and layout to accommodate a new Recycling Centre and ancillary buildings; thus, relocating the Haverhill Recycling Centre, previously located at Chalkstone Way, to the Site.

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The Proposed Development does not seek a variation to the approved use of the Site or significant alterations to the approved design, but instead amends the layout slightly in order to allow for the incorporation of a fire suppression system.

In discussions with the Applicant, the Local Planning Authority have advised that the submission of a Full Planning Application was the most appropriate method to achieve this, rather the through the submission of an application seeking S73 Consent.

The Proposed Development

The Proposed Development is for the installation of a fire suppression system on the Site.

The Proposed Development includes the following individual elements:

- Installation of water tank;
- Installation of pump house and fire suppression system equipment;
- Installation of generator;
- Extension of existing cabin plinth;
- Relocation of welfare/office cabin;
- Extension of raised walkway & handrail; and
- Relocation of stairs.

The main elements of the system (the water tank & pump house) are proposed to be located along the northern boundary of the Site, with the cain plinth being extended and welfare cabin moved slightly further south to allow for these new structures.

There are a number of the trees along the northernmost boundary of the Site, which are adjacent to the Proposed Development. A section of these trees will have to be removed to facilitate the construction of the Proposed Development, as indicated on the submitted **Detailed Planting Plan**. However, trees will be re-planted once works have been completed to match the existing trees.

The fire suppression system is required for safety purposes on the Site, allowing for any fires to be detected and extinguished in a timely manner, even when the Site is not manned.

Planning Policy Considerations

The Site lies within the administrative area of West Suffolk District Council. However, as the Proposed Development is a waste application, it is submitted to and considered under the minerals and waste Development Plan from Suffolk County Council.

The Development Plan includes:

- Suffolk Minerals & Waste Local Plan (2020)
- West Suffolk Local Plan (2024-2041)

Other material considerations include the National Planning Policy Framework (NPPF) (2024).

There are no Neighbourhood Plans which are applicable to the Site.

Suffolk Minerals & Waste Local Plan (2020)

The relevant policies are as follows:

- Policy GP1: Presumption in favour of sustainable development
- Policy GP3: Spatial strategy
- Policy GP4: General environmental criteria
- Policy WP3: Existing or designated land-uses potentially suitable for waste development
- Policy WP4: Household waste recycling centres
- Policy WP9: Waste transfer stations, materials recycling facilities, end of life vehicle facilities and waste electrical and electronic equipment recovery facilities
- Policy WP17: Design of waste management facilities
- Policy WP18: Safeguarding of waste management sites

West Suffolk Local Plan (2024-2041)

The relevant policies are as follows:

- Policy SP1: The climate and environment emergency and sustainable development
- Policy SP3: Health and wellbeing
- Policy SP4: Design
- Policy LP12: Trees
- Policy SP8: Biodiversity net gain and enhancements

NPPF (2024)

The following paragraphs are the most relevant to the Proposed Development:

- 2. Achieving sustainable development: Paragraph 11
- 6. Building a strong, competitive economy: Paragraph 85

Planning Assessment

Principle of Development

The Proposed Development seeks to support the established use of the Site and will allow for the continued, safe use of an established waste management facility, which provides employment opportunities for the County.

The principle of Proposed Development has been supported within the Planning Permission, with the Officers report confirming:

"The application is to modify an existing WTS, this utilises the efficient use of land and infrastructure. The infrastructure to support the proposal is already present at the location to help provide a service necessary to support the local population."

The Proposed Development will allow for a fire suppression system to be installed on Site; which will support the existing use and improve the fire safety of the Site. Therefore, the Proposed Development is in accordance with Policies WP3, WP4, WP9 & WP18 of the Suffolk Minerals & Waste Local Plan (SMWLP), as well as Policy SP3 of the West Suffolk Local Plan (WSLP), and Paragraph 85 of the NPPF.

The Proposed Development also supports Policy GP1 of SMWLP, Policy SP1 of the WSLP, and Paragraph 11 of the NPPF, which all call for a presumption in favour of sustainable development.

Thus, it is considered that the proposal is acceptable in principle.

Design & Visual Impacts

Out of the proposed structures to be erected, the tallest is the water tank, with a height of 3.15m. This is however substantially smaller than the approved Recycling Centre/Waste Transfer Station building on Site, which has a height of 11.7m.

The office cabin, which is proposed to be relocated slightly further south than previously approved to accommodate the proposed water tank, has a height of 2.5m. However, this will not result in additional impacts compared to its approved position.

The proposed water tank will be housed in a light grey (RAL 7035) GRP enclosure, and the proposed pumphouse will be flame red (RAL 3000). All the other materials will match what is existing/has previously been approved. The materials for the proposed buildings will assimilate with the surrounding industrial context. Whilst the red cladding is not an existing material on the site, it will be well screened by other buildings and will not detrimentally impact the character of the surrounding area.

Whilst some trees are proposed to be removed during construction, these will be re-planted upon completion, and will provide sufficient screening to the water tank once fully grown.

Consequently, there will not be a detrimental visual or amenity impact as a result of the Proposed Development, due to the elements proposed not being substantially different from the Approved Development. Therefore, the design and visual impacts of proposal are acceptable in accordance with Policy WP17 of the SMWLP and Policy SP4 of the WSLP.

Trees

There are a number of the trees along the northernmost boundary of the Site, which are adjacent to the Proposed Development. A less than 25m² area of these trees will have to be removed to facilitate the construction of the Proposed Development, as indicated on the submitted **Detailed Planting Plan**. However, trees will be re-planted once works have been completed to match the existing trees.

An arboricultural assessment was undertaken which found that the trees which are proposed to be removed to facilitate the Proposed Development are mostly Category C trees (low quality), with one Category B tree (moderate quality). Whilst Category B trees are normally recommended to be retained where possible, the need for the Proposed Development for the safety of the Site outweighs the removal of the tree. It was assessed that new trees replanted in the same position will quickly and adequately compensate for the removal of these trees.

The impact on the trees is therefore considered to be acceptable, and in accordance with Policy GP4 of the SMWLP and Policy LP12 of the WSLP.

Ecology

With regards to ecology, the Proposed Development will be constructed on hardstanding, which has a biodiversity value of zero. It is considered some minor ecological impacts will occur as a result of the loss of the trees, but as the amount of habitat to be removed measures less than 25m², Biodiversity Net Gain (BNG) is exempt from the permission and is not required. The ecological impacts of the Proposed Development is therefore considered to be acceptable, and in accordance with Policy SP8 of the Local Plan.

Summary

The Proposed Development is for the installation of a fire suppression system on the Site, ancillary to the approved application ref. SCC/0040/21SE.

As discussed within this correspondence, the Proposed Development is acceptable in principle and there will be no additional impacts occurring as a result of the proposals. The revisions to the Approved Development are therefore considered to be minor in nature and in accordance with the relevant Development Plan policies. It is therefore respectfully requested the Application is supported.

Should you have any questions, or require further information, please do not hesitate to get in touch.

Yours faithfully,

[redacted]

Emily Anderson

Senior Planner

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