



PLANNING APPLICATION AND SUPPORTING STATEMENT

**Planning application seeking for the installation and use
of a washing plant for the recycling of inert materials
together with associated access onto the highway**

**Cavenham Quarry, Cavenham Road, Tuddenham,
Bury St Edmunds, Suffolk, IP28 6SE**



Application prepared on behalf of:
Allen Newport Limited

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Drawing Reference KD.CAV.4.D.001	Location Plan	Scale 1:10,000@A3
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APPENDICES

- Appendix 1 – Surface Water Storage Volume Estimation
- Appendix 2 - Noise Assessment produced by WBM
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- Appendix 4 – Preliminary Ecological Appraisal produced by Wilkinson Associates
- Appendix 5 – Landscape and Visual Impact Assessment produced by Kedd Limited

1. INTRODUCTION

Summary of the Proposed Development

- 1.1 This planning application has been submitted to Suffolk County Council (SCC) seeking planning permission for the installation and use of a washing plant for the recycling of inert materials together with associated access onto the highway (the Proposed Development) on land at Cavenham Quarry, Cavenham Road, Tuddenham, Bury St Edmunds, Suffolk, IP28 6SE.
- 1.2 Ultimately, should planning permission be granted, it will maximise the amount of the incoming waste stream which can be recycled and ultimately reused, and in doing so, push waste further up the waste hierarchy in accordance with recognised Government objectives, reducing the need for disposal via landfill.
- 1.3 This application has been produced by PDE Consulting Limited on behalf of Allen Newport Limited (the Applicant).

The Applicant Company

- 1.4 Allen Newport Ltd, based at Cavenham, Suffolk, is a local and long established supplier of sand and gravel. The quality of their service, as well as their products, has allowed them to maintain an excellent reputation over the years.
- 1.5 In 2023 Allen Newport Ltd, was acquired by the SRC Group, an independent, family owned business providing top quality aggregate solutions. The SRC Group supply a diverse range of materials and services for construction, building and large scale civil projects across the UK. In addition, they operate state of the art recycling equipment, specialising in waste recycling and disposal services.
- 1.6 Allen Newport Ltd is a member of the Mineral Products Association, the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime mortar and silica sand industries, representing the interests of over 90% of the UK's quarrying industry.

Site Location and Access

- 1.7 The application site (the Site), as shown outlined red on Drawing Reference KD.CAV.4.D.001 extends to approximately 1.92 hectares (ha) and is comprised of the Development Area and the access road. The Development Area comprises the footprint upon which the built development and uses will be conducted and it amounts to approximately 0.84 ha.
- 1.8 The Site comprises part of a wider quarry which is known as Cavenham Quarry / Marston's Pit (the Quarry). The current situation is shown on Drawing Reference KD.CAV.4.D.002. The Site lies within the administrative boundary of SCC, sitting approximately 0.75 kilometres (km) to the north of Cavenham, 1.15 km east of Tuddenham, 0.77 km southwest of Icklingham and ten kilometres to the north west of Bury St Edmunds.

2. THE CURRENT STATUS OF THE SITE AND THE QUARRY

Planning History

- 2.1 The wider Quarry has a long history associated with mineral extraction and associated operations dating back to the 1960's. Presently, the Quarry has a number of different operations which either can take place or which are taking place in accordance with extant planning permission(s) including extraction, processing, storage and sale of sand and gravel deposits, importation, storage and processing of inert materials, sale and onward distribution of recycled aggregates, and landfilling of residual inert materials.
- 2.2 Planning permission reference N/67/569 allowed for the extraction and processing of sand and gravel at the Quarry. The permission states that the plant area containing all plant, machinery and foundations shall be removed at such time or times as the Local Planning Authority may determine that they are no longer required, either for the purposes for which they were installed, or for the rehabilitation of the worked out site.
- 2.3 Planning permission reference F/2011/0243/CCA, was granted by SCC on 26 July 2011. This consent consolidated the three previous consents into a single certificate for the existing Quarry.
- 2.4 Planning permission reference F/2011/0243/CCA varied condition 2 of planning permission reference numbers F/08/0584/CCA, F/08/0585/CCA, F/08/0591/CCA (variations of earlier permissions to provide for continued extraction and deferment of restoration) to extend the working and restoration completion dates within the Quarry.
- 2.5 On 08 December 2014, SCC granted planning permission reference F/14/1981 which sought to vary planning permission reference F/2011/0243/CCA. The permission allowed for the continuation of mineral extraction and subsequent restoration within the Quarry. This consent also allowed for an alternative method of transporting mineral around the Quarry, to allow for the use of dump trucks which provide a more efficient method, as an alternative to conveyors which were previously permitted.
- 2.6 On 08 December 2014 planning permission reference F/14/1967 was also consented to allow for the variation of condition 3 attached to planning permission reference F/09/0495 to allow for an extension of time for the operation of the facility for the storage, treatment, and recycling of inert materials until 30 December 2020.
- 2.7 On 21 September 2016 SCC granted planning permission reference SCC/0123/16F to enable the continued extraction of sand and gravel and subsequent restoration subject to the variation of conditions 2, 7, 14, 31, 32, 33, 35 and 36 of planning permission reference F14/1981 to allow changes to the existing working practices and alternative restoration end dates for the Quarry.
- 2.8 Planning permission reference SCC/0124/16F was also granted by SCC on 21 September 2016 and permitted a western extension to the Quarry for the extraction, processing, sale and distribution of sand and gravel, revised silting operations and subsequent restoration.
- 2.9 On 24 December 2020 SCC granted planning permission reference SCC/0063/20F to allow for a minor extension to Cavenham Quarry for the extraction, processing, sale and distribution of sand and gravel and subsequent restoration using inert materials together with the use of the existing access.

- 2.10 On 24 December 2020 SCC also granted planning permission reference SCC/0064/20F to allow for a minor western extension to Cavenham Quarry for the extraction, processing, sale and distribution of sand and gravel and subsequent restoration using inert materials together with the establishment of a replacement recycling facility. Along with an alternative restoration scheme for the existing quarry using inert materials.
- 2.11 Although planning permission reference SCC/0064/20F contains a number of conditions concerning the extraction of sand and gravel and subsequent restoration of the plant area within the Quarry, the processing plant area is consented by virtue of planning permission N67/569 which was granted on 07 November 1967.
- 2.12 On 20 December 2023 SCC granted planning permission reference SCC/0102/21F to allow for a western extension to Cavenham Quarry for the extraction, processing, sale and distribution of sand and gravel and subsequent restoration using inert materials.

3. THE PROPOSAL

Introduction

- 3.1 This planning application seeks permission for the installation and use of a washing plant for the recycling of inert materials together with associated access onto the highway on land at Cavenham Quarry, Cavenham Road, Tuddenham, Bury St Edmunds, Suffolk, IP28 6SE.
- 3.2 The Proposed Development seeks for the establishment of a washing facility to be located within the existing recycling area, as seen on Drawing References KD.CAV.4.D.003 and KD.CAV.4.D.004. Under the terms of previous planning permissions at the Quarry, the right to import and process inert materials and distribute recyclable materials is already established.
- 3.3 The establishment of a washing facility will complement the Applicant's existing operations within the wider Quarry by ensuring that a substantial proportion of any incoming inert material can be recycled. This will push material up the waste hierarchy by reducing the reliance on landfill as well as providing recycled aggregate products to the local construction market, a sustainable alternative to the use of primary aggregate products.
- 3.4 While this will be a new activity, there is no intention to alter the existing trading levels at the Quarry. On an annual basis approximately 200,000 tonnes (t) of inert materials are imported to the Site, and approximately 20% of the inert material is sold back into the market as a variety of products and the remaining materials are disposed of within the Quarry in the course of its restoration. This would amount to approximately 40,000 t of recycled aggregates being sold from the Site per annum, in average 20t loads.

The Recycling Process

- 3.5 Inert materials shall enter the Site via HGV using the existing access road and stop on the weighbridge where they will be weighed. Having been weighed, all HGVs bringing material to Site shall enter the recycling area and either deposit their load of material into a designated stockpile or proceed to a location within the Quarry where they may permanently deposit their materials. Due to the nature of the loads being brought to Site, only a small proportion shall proceed through the processing area without treatment and these materials shall be used for the restoration of the wider Quarry.
- 3.6 HGVs that do not have a return load of either primary aggregates or recycled aggregates and sands shall move through the plant site and then onto the weighbridge. Following this, they shall leave the Site using the existing access road. HGVs which have a return load shall pass through the plant site where they will be loaded with the requisite load which will be either primary aggregates or recycled aggregates or sands. Having been loaded by a loading shovel, they shall move out of this area, over the weighbridge and exit the Site using the existing access road.
- 3.7 The process whereby inert material is washed and then sorted into saleable products by the processing plant is relatively straightforward and commonplace within the aggregates and material industries. In simple terms, the washing and sorting process is as follows.
- 3.8 Materials entering the processing plant shall be loaded into a feed hopper via an excavator where they shall then be transferred by conveyor to a vibrating screen which shall do the initial separation according to size. Oversize material shall be removed from the process and later crushed.

- 3.9 Having initially been partly separated, the materials are then subject to further classification by a screening and simple washing process whereby water is added to assist the separation and cleaning process. Some sands and silts are washed away into the sand classification system and larger particles are then transported, again by conveyor belt, to the final screening and separation area.
- 3.10 Coarse particles then pass over the final screen which sorts them by size and then transfers them in their graded form into different stockpiles. Typically, the sizes of aggregates sold will be 40mm, 20mm and 10mm, although the specific product produced will vary depending upon the requirements at the time.
- 3.11 The sands and silts pass into the classification system where they are separated into their component sizes which typically results in the production of a concreting grade sand and one which is generally used in mortar production or other similar applications. The silts which have been removed are then transferred to a silt press. The 'cake' which is the product of the silt press will be used for the progressive restoration of the Quarry.
- 3.12 Water used to wash the waste will be sourced from the existing quarry's lagoon system. The process of soil washing is a sustainable use of water, as the water will be pumped from the lagoon into a header tank which will feed into the soils washing plant, once it has run through the plant it will be re-circulated back through to be used again, ensuring that the minimum of water is lost through the washing process.
- 3.13 Once separated, the recycled aggregates are removed by loading shovel to other stockpiles from which they are ultimately sold and transported from Site by HGV. These HGVs are loaded by a tracked or wheeled loading shovel, weighed on the Site weighbridge and then dispatched from the Site.

Duration of Operation

- 3.14 It is proposed that the soils washing plant, cease operation when it is no longer required for its purpose solely in connection with the wider Quarry developments.

Need and Principle of Development

- 3.15 The need for the Proposed Development is clear, it will enable the Applicant to recycle a greater proportion of the incoming material stream and in doing so, maximise the available recycled aggregate products for use in the local construction market while at the same time reducing the reliance on landfill. While landfill is considered as a waste management option of 'last resort', it is recognised that landfill is necessary in order to ensure the satisfactory and timely restoration of the Quarry as required under the extant consent.
- 3.16 The principle of waste recycling at mineral extraction and landfill sites is well established in planning policy, provided it does not seek to prejudice approved restoration timescales. Washing is becoming an increasingly common method of recycling materials and maximises the available return from the waste stream, while at the same time, reducing the fraction of the waste stream requiring final disposal to a minimum.

Throughput

- 3.17 It is not proposed to alter the throughput of inert materials at the Site as set out above. The Proposed Development is simply an evolution of the Applicant's existing recycling operations. The existing inert material stream shall simply be processed through the proposed washing plant and existing crusher and screener.
- 3.18 As mentioned above, recyclable material will be exported from the Site on a back-haul basis, utilising lorries importing inert materials to the Site and which do not have a load of primary aggregate for export from the Site. Consequently, the Proposed Development is not anticipated to increase the number of HGVs accessing and egressing the Site.

Hours of Operation

- 3.19 The recycling operations already benefit from planning permission at the Site, which sets out the permitted hours of operation. These are as follows:

"No operations authorised or required by this permission including servicing and plant maintenance shall be carried out except between the following times:

- a) *Monday to Friday 0700-1800;*
- b) *Saturday 0700-1300;*
- c) *No working on Sundays and bank holidays.*

The above time restrictions shall not apply to water pumping and environmental monitoring."

- 3.20 It is proposed that these hours of operation are the same in respect of the Proposed Development.

4. ENVIRONMENTAL CONSIDERATIONS

- 4.1 Environmental considerations applicable to the Proposed Development have been considered in more detail, below, in the context of the extant permission and the existing operations at the Quarry.

Transport

- 4.2 The Proposed Development does not seek to alter the levels of trading at the Site. The existing Quarry already has a routing agreement in place for the permitted operations. The Proposed Development does not propose to change the permitted access arrangement, and no difficulties have been experienced in the use of the access or the approved vehicle routing since the Quarry was permitted a considerable number of years ago. It can therefore be considered that there will be no additional adverse impact upon the local road network as a consequence of granting planning permission.

Flood Risk

- 4.3 The Development Area amounts to approximately 0.84 ha. Water used to wash the inert materials will be sourced from the existing quarry's lagoon system. The process of soil washing is a sustainable use of water, as the water will be pumped from the lagoon into a header tank which will feed into the soils washing plant, once it has run through the plant it will be re-circulated back through to be used again, ensuring that the minimum of water is lost through the washing process.
- 4.4 EA mapping indicates that the Site lies in Flood Zone 1 *i.e.* at the lowest risk of fluvial flooding. Considering this, the various elements of the Proposed Development are classified as appropriate in this setting and the Proposed Development can be concluded to be acceptable on the grounds of fluvial flood risk.
- 4.5 EA mapping illustrates the extent of flood risk from reservoirs. The Development Area is not at risk of flooding from reservoir failure.
- 4.6 There is no connection to mains drainage (water supply, foul sewer or storm drains) at the Development Area. It is considered that there is negligible risk of flooding from artificial sources.
- 4.7 The Site constitutes a sub-catchment that is largely isolated from rainfall runoff from adjacent lands due to topographic control on overland flow coupled with the existing surface water drainage network. It can, therefore, be considered that there will be negligible potential for significant flooding of the Site from rainfall runoff from surrounding lands.
- 4.8 Rainfall runoff generation is largely limited to rainfall that is directly incident upon the Development Area itself. Any runoff from the Development Area will go into the Quarry's lagoon system; the latter has a surface area of 96,000 m².
- 4.9 Rainfall runoff rates have been calculated for the design storm event (100-yr return period with 40% climate change allowance). This is in line with the Cam and Ely Ouse Management Catchment peak rainfall allowances: 1% annual exceedance rainfall event, with the Upper end allowance set at 40% for the 2070s epoch (for development with a lifetime between 2061 and 2125). These calculations are contained within Appendix 1.

- 4.10 The requisite storage volume in the design event is 899 m³. The Quarry's lagoon system has a surface area of 96,000 m². Therefore, the storm runoff from the Proposed Development will only raise the water level in the lagoon system by <10mm.
- 4.11 Therefore, it is considered that the Proposed Development will not exacerbate the risk of flooding on adjacent third-party lands.
- 4.12 On the basis of the above it is considered the Proposed Development is acceptable on the grounds of flood risk.

Dust

- 4.13 The processing of inert material through the washing plant is a wet process and is therefore not anticipated to give rise to any unacceptable impacts with regard to dust. Extant planning permission allows for the processing and recycling of inert materials by way of crushing and dry screening and given that no increase in the throughput of inert materials at the Site is proposed it can only be concluded that there will be no change from the current situation.
- 4.14 With the existing dust mitigation measures and good working practices remaining in place, the impact of dust from the Proposed Development will be negligible.

Noise

- 4.15 A Noise Assessment was undertaken by Walker Beak Mason (WBM) on behalf of the Applicant. The Noise Assessment is included in Appendix 2.
- 4.16 The report sets out the findings of baseline noise surveys conducted in June, July and August 2023 at positions representative of the closest dwellings to the plant site including the two nearest locations for which site noise limits are already in place.
- 4.17 The report reviews the existing Site noise limits in relation to the background noise levels observed in June, July and August 2023 concluding that although the existing site noise limits could be retained, Planning Practice Guidance (Minerals) (PPGM) site noise limits have been suggested based on current background noise levels and including limits for the remaining baseline survey locations for which no limits are in place.
- 4.18 Site noise calculations have been undertaken for five residential locations, taken to be representative of the nearest dwellings to the Site. Site noise calculations have also been undertaken for ecological receptors in the vicinity of the Site. The calculated Site noise levels are presented for inspection and comparison with the existing and PPGM site noise limits.
- 4.19 The calculated Site noise levels for operation of the soils wash plant and associated mobile plant / HGV movements comply with the both the existing and the PPGM site noise limits at all the assessment locations.
- 4.20 The assessment demonstrates that the magnitude of noise impact of the proposals will be slight and therefore below the lowest observed adverse effect level and well below the significant observed adverse effect level as set out in the Explanatory Note to the Noise Policy Statement for England.

- 4.21 Cumulative noise impact has also been considered and it is concluded that Site noise levels with the addition of the soils wash plant operations would not adversely impact the Site's ability to comply with the existing and PPGM site noise limits and that there is no significant cumulative noise impact with other commercial / industrial operations in the area.
- 4.22 The report concludes that since the Proposed Development conforms to the advice set out in the Planning Practice Guidance (Minerals) with regard to site noise limits and have been shown to have a noise impact below the lowest observed adverse effect level, it is considered that the Proposed Development can be operated while keeping noise emissions to within environmentally acceptable limits.

Cultural Heritage

- 4.23 A Cultural Heritage Assessment has been undertaken by Andrew Josephs Associates on behalf of the Applicant. The Assessment is included in Appendix 3.
- 4.24 The Proposed Development is wholly within the existing recycling area that has already been disturbed and from an archaeological perspective retains no potential. This report therefore concentrates on the setting of designated heritage assets.
- 4.25 The potential effects upon heritage have been assessed within the framework of national planning policy and guidance. Specifically, the assessment has been undertaken in line with paragraph 194 of NPPF (2023):

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance...."

- 4.26 A variety of sources were consulted including the Suffolk Historic Environment Record, DEFRA Magic and the Historic England Archive. A site visit was carried out in April 2023.

Indirect Effects

- 4.27 Based solely upon distance – that is it sits within the 1 km study area - Black Ditches Scheduled Monument is the only asset that could be affected. There would be no impact upon the setting of listed buildings, conservation areas, World Heritage Sites, Historic Parks and Gardens or Battlefields due to a combination of distance, topography and intervening woodland. None lie within 1 km of the Site.
- 4.28 There would be views of the Site at a distance of 650 m, filtered by trees along the monument, at the southern end of the Black Ditches scheduled area. There would be no views from the central or northern parts of the monument. The monument sits adjacent to active mineral workings that have been ongoing since at least the 1980s.
- 4.29 The view of the Proposed Development would form a very small part of the panorama and would be absorbed into an existing backdrop of development that includes industrial processes (outside the Applicant's land ownership) which is of similar scale to the proposed soils wash plant. After restoration and closure of the Quarry, the soils washing plant would be dismantled.

Assessment of Effects

- 4.30 The key factor in an assessment is to determine the effects upon significance and how that can affect our ability to appreciate the asset, the test set in Historic England guidance.
- 4.31 The effects are assessed as being of negligible magnitude during construction and operation, and neutral after dismantling.
- 4.32 Cumulative effects are also assessed as being of negligible magnitude during construction and operation, and neutral after dismantling, as a result of the addition of an industrial feature next to an existing industrial facility and plant site.

Conclusion

- 4.33 Having regard to the baseline conditions and the nature of the Proposed Development, the assessment concludes that there will be an adverse effect of negligible magnitude upon the setting of Black Ditches, but no affect upon our ability to appreciate the significance of the heritage asset. In National Planning Policy Framework (NPPF) terms, this effect falls at the lowest end of the 'less than substantial harm' scale.
- 4.34 There would be no effects upon the monument after dismantling and restoration.
- 4.35 The Proposed Development therefore accords with both local and national cultural heritage policy.

Ecology

- 4.36 A Preliminary Ecological Appraisal (PEA) has been undertaken by Wilkinson Associates in connection with the Proposed Development. The PEA is included in Appendix 4.
- 4.37 The key findings of the PEA are as follows:
- The Site does not lie within any designated sites.
 - No direct or indirect impacts on designated sites in the wider area have been identified, including disturbance effects on stone-curlew.
 - The Proposed Development will not affect any habitats or flora of ecological importance.
 - No invasive non-native plant species have been identified on the Site.
 - No legally protected/Priority or other species of ecological importance will be affected by the Proposed Development.
 - No further surveys for protected species or other wildlife groups are considered necessary.
 - No mitigation measures are considered necessary other than the ongoing biodiversity protection measures identified within the 2021 Construction Environmental Management Plan for Biodiversity.
 - On final restoration of the Quarry, the Site will mostly be restored to Breckland heath/acid grassland, with the aim of providing part of a much larger area of habitat suitable for stone-curlew.
- 4.38 The Assessment concludes that the Proposed Development will not have any significant adverse impacts on valued ecological resources.

Landscape and Visual Impact

- 4.39 A Landscape and Visual Impact Assessment was undertaken by KEDD Limited on behalf of the Applicant. The Assessment is included in Appendix 5. The findings of the Assessment can be summarised as follows:
- 4.40 In landscape terms, the Site is small to medium in size and scale. It is not located within a nationally designated landscape. The Landscape Character of the Site is identified as being within the defined Rolling Estate Sandlands. It is also located within proximity to the Valley Fenland, both of which have been assessed as being of medium sensitivity to change from the specific Proposed Development. It has been assessed that the development proposals will not result in any significant adverse impacts during either, the operational (construction) or restoration stages on individual landscape elements and features and their component character. The proposed restoration operations will have a neutral effect compared to the permitted scheme.
- 4.41 Visually, the Site is discrete. It is contained within and / or adjacent to woodland blocks, and within the existing Cavenham Quarry recycling area and / or separated from the majority of potential visual receptors by distance which combined with minor topographical and landform variances and vegetation structure, provides screening of the Site (land levels falling to the north further restricting the potential views of the Site from Icklingham). It is assessed that there will be no significant adverse levels of visual effect to local receptors as a result of the Proposed Development. It is assessed that users of rights of way within the Cavenham Heath National Nature Reserve which is located approximately 600 m north of the Site will receive a moderate adverse effect during the operational (construction) stage of the proposals. The Site does already occupy a part of the existing Cavenham Quarry Recycling Area / study area and receptor views will be transitory as they pass through the reserve on longer routes.
- 4.42 It is assessed that there will be no cumulative adverse significant effects on either landscape character or visual receptors.
- 4.43 The assessment concludes that based on landscape and visual grounds the Site is a good location for the Proposed Development, and will not result in any significant adverse impacts on either landscape or visual receptors during the operational (construction) period. At final restoration and post restoration the scheme will have a neutral effect on landscape character, visual amenity and biodiversity.

Conclusions

- 4.44 Having taken account of the main environmental considerations influencing the proposals it is considered that on the whole, the Proposed Development will have a negligible additional adverse impact by virtue of any of the aspects considered above.

5. DESIGN AND ACCESS STATEMENT

Introduction

- 5.1 A Design and Access statement should consider aspects such as the amount of development, the layout, its scale, any landscaping proposals, appearance and access to the development. The statement contained below has regard to the fact that the Application Area is contained within privately owned land and, save for a small number of collect customers, members of the general public are not permitted on Site due to the nature of the premises.

Amount of Development

- 5.2 The amount of development is the minimum required for a recycling facility of this nature to function. It is limited to the basic elements which are required to recycle waste materials as described above.
- 5.3 Parking is provided for within the wider Quarry using existing facilities.

Layout

- 5.4 The layout of the Proposed Development has been designed in such a way so as to be as operationally efficient as it reasonably can be and care has been had to design the Site in such a way as to minimise, as far as can be reasonably predicted, the occurrence of accidents.
- 5.5 All of the main constituent materials required for the Proposed Development are located within close proximity to where they are required and they have been laid out in such a way as to reduce emissions associated with the transport of the materials around the Site.
- 5.6 As to vehicular movements which are a potential source of accidents, staff parking is located elsewhere in the Quarry and a one way system for HGVs can be adopted at the Site as far as reasonably practicable.

Scale

- 5.7 The scale of the Proposed Development is as large as it is required to perform its function efficiently and safely and is consistent with the surrounding land uses. It is at such a scale so as not to conflict with surrounding land uses.
- 5.8 This application seeks to allow the installation and use of a washing plant for the recycling of inert materials, the scale of the development proposed within the Site is insignificant within the context of the wider Quarry. The Quarry benefits from existing screening measures and the Proposed Plant will be sited within the existing recycling area and therefore will not appear out of context.

Landscaping

- 5.9 The Proposed Development is to be located within the existing recycling area, landscaping is already provided within the Quarry which shall ensure the Site does not conflict with surrounding land uses.

Appearance

- 5.10 The Proposed Development is comparatively small and will not have a significant impact upon the appearance of the Quarry.
- 5.11 The appearance of the Proposed Development is fully illustrated on Drawing References KD.CAV.4.D.003 and KD.CAV.4.D.004.

Access

- 5.12 The Proposed Development shall not alter the existing access arrangements which are employed at the Quarry.

6. PLANNING POLICY CONSIDERATIONS

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 The Adopted Development plan comprises:
- Suffolk Minerals and Waste Local Plan Adopted July 2020;
 - Forest Heath Core Strategy Development Plan Document Adopted 2010; and
 - Forest Heath and St Edmundsbury Local Plan Adopted February 2015.
- 6.3 Other policies which constitute material planning considerations, including National Government Policy comprise:
- National Planning Policy Framework revised 2023;
 - National Planning Policy for Waste October 2014; and
 - Waste Management Plan for England January 2021.

Suffolk Minerals and Waste Local Plan Adopted July 2020

- 6.4 The Suffolk Minerals & Waste Local Plan (SMWLP) contains planning policies for determining planning applications for minerals and waste development, as well as safeguarding the same from other forms of competing development. Policies include those that specify sites for future minerals and waste development.

Policy GP1: Presumption in favour of sustainable development

- 6.5 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 the Plan will be approved without delay, unless material considerations indicate otherwise.

Policy GP2: Climate change mitigation and adaptation

- 6.6 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.

Policy GP3: Spatial Strategy

- 6.7 Preference will be given to proposals for minerals and waste development in accordance with the Key Diagram where individual sites are well related to the Suffolk Lorry Route Network (or rail network or navigation) major centres of population (namely Ipswich, Lowestoft and Bury St Edmunds) and do not have potentially significant adverse impacts upon features of environmental importance (natural or man-made) or endanger human health.

Policy GP4: General environmental criteria

- 6.8 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 protected 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.
- 6.9 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.

Policy WP1: Management of waste (Mt)

- 6.10 The County Council will grant planning permission for appropriate waste management facilities, provided they are in accordance with the Waste Hierarchy and the policies of the Development Plan and there are no other material considerations which indicate otherwise.

Policy WP8: Proposals for recycling or transfer of inert and construction, demolition and excavation waste

- 6.11 Planning permission will be limited to the life of mineral operation at mineral sites. Proposals for waste operations at landfill sites will be limited to a temporary basis whilst landfilling and restoration of the site is taking place.
- 6.12 The landfilling of inert waste that could practicably be recycled will not be acceptable. Conditions will be placed on planning permissions to ensure that only pre-sorted wastes are landfilled.

Policy WP 17: Design of Waste Management Facilities

- 6.13 Waste management facilities will be considered favourably where they incorporate:
- a) Designs of an appropriate scale, density, massing, height and materials;
 - b) Safe and convenient access for all potential users.

Forest Heath Core Strategy Development Plan Document Adopted 2010

Policy CS 2 - Natural Environment

- 6.14 Policy CS 2 of the Forest Heath Core Strategy (FHCS) states that areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the District will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures.

Policy CS 3 - Landscape Character and the Historic Environment

- 6.15 The quality, character, diversity and local distinctiveness of the district's landscape and historic environment shall be protected, conserved and, where possible, enhanced. Proposals for development will take into account the local distinctiveness and sensitivity to change of distinctive landscape character types, and historic assets and their settings. Landscape types are described in the Forest Heath Landscape Character Assessment (LCA).
- 6.16 The Landscape Character Assessment will inform detailed assessment of individual proposals. All schemes should protect and seek to enhance overall landscape character, taking account of the key characteristics and distinctiveness of the landscape and the landscape setting of settlements.

Policy CS 4 - Reduce Emissions, Mitigate and Adapt to future Climate Change

- 6.17 The Council will promote and encourage all development proposals to deliver high levels of building sustainability in order to avoid expansion of the districts ecological footprint and to mitigate against and adapt to climate change.
- 6.18 The Council will support the development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals.

Forest Heath and St Edmundsbury Local Plan Adopted February 2015

Policy DM6: Flooding and Sustainable Drainage

- 6.19 Policy DM6 of the Forest Heath and St Edmundsbury Local Plan (FHSTLP) states proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage will be managed so as not to cause or exacerbate flooding elsewhere.

Policy DM10: Impact of Development on Sites of Biodiversity and Geodiversity Importance

- 6.20 When considering development proposals which may have an adverse impact on nature conservation sites or interests, the local planning authority will have regard to the expert nature conservation advice provided by Natural England, the Suffolk Wildlife Trust and other specialist sources and the following criteria:
- a. The ecological or geological value and objectives for which the site was classified or designated;
 - b. The integrity of the site in terms of its wildlife value, its diversity and relationship with other ecological resources;
 - c. The cumulative impact of the proposal and other developments on the wildlife or geological value of the site;
 - d. The presence of protected species, habitat areas and wildlife corridors, or geological features, and proposed measures to safeguard and enhance them;
 - e. The opportunity to create new habitat areas and to improve the conservation status of locally vulnerable species;
 - f. Guidance set down within Biodiversity Action Plans (BAP), habitat management plans and other relevant sources.
- 6.21 Proposals for development which would adversely affect the integrity of areas of international nature conservation or geological importance, as indicated on the Policies Map, will be determined in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended).
- 6.22 Proposed development likely to result in adverse effects to a SSSI will not be permitted unless the benefits of the development, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs.
- 6.23 Proposals which would result in significant harm to biodiversity, having appropriate regard to the 'mitigation hierarchy', will not be permitted.

Policy DM13: Landscape Features

- 6.24 Development will be permitted where it will not have an unacceptable adverse impact on the character of the landscape, landscape features, wildlife, or amenity value.

Policy DM14: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards

- 6.25 Proposals for all new developments should minimise all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality.

Policy DM20: Archaeology

- 6.26 Development will not be acceptable if it would have a material adverse effect on Scheduled Ancient Monuments or other sites of archaeological importance, or their settings.

National Planning Policy Framework Revised 2023

- 6.27 On 19 December 2023 the NPPF was revised in response to the Levelling-up and Regeneration Bill: reforms to national planning policy consultation and sets out the government's planning policies for England and how these are expected to be applied.

Achieving Sustainable Development

- 6.28 The overarching principle which runs through the NPPF is the presumption in favour of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 6.29 There are three objectives to sustainable development as set out within the NPPF which are: an economic objective, a social objective and an environmental objective. The three objectives should be delivered through the preparation and implementation of plans and the application of the policies contained within the NPPF and they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 6.30 The presumption in favour of sustainable development does not change the statutory status of the development plan in terms of decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed. Plans and decisions should apply a presumption in favour of sustainable development.

Determining Applications

- 6.31 Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

Building a strong, competitive economy

- 6.32 Paragraph 85 states 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, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

Promoting sustainable transport

- 6.33 Paragraph 115 of the NPPF states development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Meeting the challenge of climate change, flooding and coastal change

- 6.34 Paragraph 157 states the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Planning and flood risk

- 6.35 Paragraph 173 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

Conserving and enhancing the natural environment

- 6.36 Paragraph 180 states planning decisions should contribute to and enhance the natural and local environment by:
- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - c) Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d) Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - e) Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - f) Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Habitats and biodiversity

- 6.37 Paragraph 186 states that when determining planning applications, local planning authorities should apply the following principles:
- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - b) Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely

- impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;
 - d) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
 - e) Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Proposals affects heritage assets

- 6.38 Paragraph 200 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Facilitating the sustainable use of minerals

- 6.39 Paragraph 216 states planning policies should so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously.
- 6.40 Policies should also safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material.

National Planning Policy for Waste October 2014

- 6.41 The National Planning Policy for Waste adopted October 2014, was produced to be read in conjunction with the National Planning Policy Framework, the Waste Management Plan for England and National Policy Statements for Waste Water and Hazardous Waste, or any successor documents.
- 6.42 The policy document aims to streamline previous waste planning policy, making it more accessible to local authorities, waste developers and local communities alike. This document sets out a number of policies that all local planning authorities should have regard for, when considering proposals for waste management developments.

Determining planning applications

6.43 When determining waste planning applications, waste planning authorities should:

- Only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need;
- Recognise that proposals for waste management facilities such as incinerators that cut across up-to-date Local Plans reflecting the vision and aspiration of local communities can give rise to justifiable frustration, and expect applicants to demonstrate that waste disposal facilities not in line with the Local Plan, will not undermine the objectives of the Local Plan through prejudicing movement up the waste hierarchy;
- Consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B and the locational implications of any advice on health from the relevant health bodies. Waste planning authorities should avoid carrying out their own detailed assessment of epidemiological and other health studies;
- Concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced;
- Ensure that land raising or landfill sites are restored to beneficial after uses at the earliest opportunity and to high environmental standards through the application of appropriate conditions where necessary.

6.44 When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- The likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;
- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service;
- The handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.

Waste Management Plan for England January 2021

6.45 On 27 January 2021 the Waste Management Plan for England 2021 was published, comprising all current waste management policy in one national document. The plan does not introduce new policies or change how waste is managed in England. Its aim is to bring current waste management policies together under one national plan.

- 6.46 The plan focuses on waste arisings and their management, and contains an analysis of the current waste management situation in England and an evaluation of how the Waste Management Plan will support the implementation of objections and provisions of the Waste (England and Wales) Regulations 2011.
- 6.47 The waste hierarchy, enshrined in law through the Waste (England and Wales) Regulations 2011 ranks the options for waste management driving progress toward better use of resources. The waste hierarchy is as follows (from most to least favourable option):
- **Prevention:** preventing and reducing waste generation;
 - **Reuse and preparation for reuse:** giving the products a second life before they become waste;
 - **Recycle:** any recovery operation by which waste materials are reprocessed into products, materials, or substances whether for the original or other purposes. This includes composting but does not include incineration;
 - **Recovery:** some waste incineration based on a political non-scientific formula that upgrades the less inefficient incinerators; and
 - **Disposal:** processes to dispose of waste, i.e. landfill, some incineration, etc.

Suitability of the Proposal

Principle of the Proposed Development

- 6.48 This application seeks permission to allow for the installation and use of a washing plant for the recycling of inert materials.
- 6.49 The proposal represents sustainable development as it seeks to push material up the waste hierarchy as well as forming a supporting role in the established operations at the Site and the Applicant's own sustainability objectives.
- 6.50 Furthermore the Proposed Development will support the local construction industry through the provision of recycled aggregates which complies with the NPPF objective to support the building of a strong, competitive economy.
- 6.51 The SMWLP, FHSTLP, FHCS and National Guidance recognise the importance of supporting business growth and specifically within the waste sector. By permitting the Proposed Development the recycling process within the Site will be further maximised and also be in accordance with recognised Government objectives by pushing waste up the hierarchy. **The Proposed Development is therefore considered to be in line with the SMWLP, FHSTLP, FHCS, and National Guidance.**

Transport

- 6.52 Policy GP3 of the SMWLP states preference will be given to proposals for minerals and waste development where sites are well related to the Suffolk Lorry Route Network and do not have potentially significant adverse impacts upon features of environmental importance or endanger human health. Policy GP4 of the SMWLP further states minerals and waste developments will be acceptable provided they do not cause significant adverse impacts upon the wider highways network.

- 6.53 The Proposed Development does not seek to alter the levels of trading at the Site or the permitted access arrangements. The Site's access and adjoining routes are identified as Local Access Routes within the Suffolk Lorry Route Network. The Proposed Development does not propose to change the permitted access arrangement, and no difficulties have been experienced in the use of the access or the approved vehicle routing since the Quarry was permitted a considerable number of years ago. **It can therefore be considered that in relation to transport, the Proposed Development complies with Policies GP3 and GP4 of the SMWLP; and National Guidance.**

Air Quality

- 6.54 Policy GP4 of the SMWLP states minerals and waste development will be considered acceptable provided the proposals adequately assess any potentially significant adverse impacts relating to air quality including dust and odour.
- 6.55 Policy DM14 of the FHSTLP states development should ensure there is no deterioration to air quality.
- 6.56 The processing of inert material through the washing plant is a wet process and is therefore not anticipated to give rise to any unacceptable impacts with regard to dust. With the current dust mitigation measures and good working practices remaining in place to ensure that the effect of dust levels on the Proposed Development will be negligible. **It can therefore be determined that the Proposed Development complies with Policies GP4 of the SMWLP; Policy DM14 of the FHSTLP and National Guidance.**

Noise

- 6.57 Policy GP4 of the SMWLP requires minerals and waste development to adequately assess any potentially significant adverse impact resulting from noise.
- 6.58 Policy DM14 of the FHSTLP states development should minimise emissions and other forms of pollution including noise pollution.
- 6.59 This application is supported by a Noise Assessment, which concludes that the Proposed Development conforms to the advice set out in the Planning Practice Guidance (Minerals) with regard to site noise limits and have been shown to have a noise impact below the lowest observed adverse effect level, it is considered that the Proposed Development can be operated while keeping noise emissions to within environmentally acceptable limits. **The Proposed Development therefore accords with planning policy in respect of Noise and specifically meets the requirements of; Policy GP4 of the SMWLP, Policy DM14 of the FHSTLP and National Guidance.**

Landscape and Visual Impact Assessment

- 6.60 Policy GP4 of the SMWLP requires minerals and waste development to adequately assess any potentially significant adverse impacts upon landscape character, visual impact, setting and protected designated landscape.
- 6.61 Policy CS3 of the FHCS states the quality, character, diversity and local distinctiveness of the District's landscape and historic environment shall be protected, conserved and, where possible, enhanced.

- 6.62 Policy DM13 of the FHSTLP states development will be permitted where it will not have an unacceptable adverse impact on the character of the landscape, landscape features or amenity value.
- 6.63 This application is supported by a Landscape and Visual Impact Assessment, which concludes that based on landscape and visual grounds the Site is a good location for the Proposed Development, and will not result in any significant adverse impacts on either landscape or visual receptors during the operational (construction) period. At final restoration and post restoration the scheme will have a neutral effect on landscape character, visual amenity and biodiversity. **The Proposed Development therefore accords with planning policy in respect of Landscape and Visual Impact Assessment and specifically meets the requirements of Policy GP4 of the SMWLP; Policy CS3 of the FHCS; Policy DM13 of the FHSTLP and National Guidance.**

Cultural Heritage

- 6.64 Policy GP4 of the SMWLP requires minerals and waste development to adequately assess any potentially significant adverse impacts upon the historic environment, archaeology, heritage assets and their setting.
- 6.65 Policy CS3 of the FHCS states the quality, character, diversity and local distinctiveness of the District's historic environment shall be protected, conserved and, where possible, enhanced.
- 6.66 Policy DM20 of the FHSTLP states development must not have a material adverse effect on Scheduled Ancient Monuments or other sites of archaeological importance, or their settings.
- 6.67 This application is supported by a Cultural Heritage Assessment which concludes that there will be an adverse effect of negligible magnitude upon the setting of Black Ditches, but no affect upon our ability to appreciate the significance of the heritage asset. In NPPF terms, this effect falls at the lowest end of the 'less than substantial harm' scale. **The Proposed Development therefore accords with planning policy in respect of cultural heritage and, specifically, meets the requirement of; Policy GP4 of the SMWLP; Policy CS3 of the FHCS, Policy DM20 of the FHSTLP and National Guidance.**

Flood Risk

- 6.68 Policy GP2 of the SMWLP requires minerals and waste development to minimise their potential contribution to climate change. Policy GP4 of the SMWLP states that development must adequately assess any potentially significant adverse impacts upon pluvial, fluvial, tidal and groundwater flood risk.
- 6.69 Policy CS4 of the FHCS states support will be given for development proposals that avoid areas of current and future flood risk.
- 6.70 Policy DM6 of the FHSTLP states proposals for new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage will be managed so as not to cause or exacerbate flooding elsewhere. Policy DM14 further requires that new developments ensure there is no deterioration to water quality.
- 6.71 The Development Area amounts to approximately 0.84 ha. EA mapping indicates that the Site lies in Flood Zone 1 *i.e.* at the lowest risk of fluvial flooding. Considering this, the various elements of the Proposed Development are classified as appropriate in this setting and the Proposed Development can be concluded to be acceptable on the grounds of fluvial flood risk.

- 6.72 Rainfall runoff rates have been calculated for the design storm event (100-yr return period with 40% climate change allowance). The requisite storage volume in the design event is 899 m³. The Quarry's lagoon system has a surface area of 96,000 m². Therefore, the storm runoff from the Proposed Development will only raise the water level in the lagoon system by <10mm. Therefore, it is considered that the Proposed Development will not exacerbate the risk of flooding on adjacent third-party lands. On the basis of the above it is considered the Proposed Development is acceptable on the grounds of flood risk. **It can, therefore, be considered that the Proposed Development complies with Policies GP2 and GP4 of the SMWLP; Policy CS4 of the FHCS; Policy DM6 of the FHSTLP and National Guidance.**

Ecology

- 6.73 Policy GP4 of the SMWLP requires minerals and waste development to adequately assess any potentially significant adverse impacts upon biodiversity.
- 6.74 Policy CS2 of the FHCS states that areas of biodiversity interest and local distinctiveness within the District will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures.
- 6.75 Policy DM10 of the FHSTLP states that when considering development proposals which may have an adverse impact on nature conservation sites or interests, the local planning authority will have regard to the expert nature conservation advice provided by Natural England, the Suffolk Wildlife Trust and other specialist sources.
- 6.76 This application is supported by a Preliminary Ecological Appraisal which concludes that the Proposed Development will not have any significant adverse impacts on valued ecological resources. **It can be considered that the Proposed Development complies with Policy GP4 of the SMWLP; Policy CS2 of the FHCS; Policies DM10, DM11 and DM12 of the FHSTLP and National Guidance.**

Conclusions with Regard to Planning Policy

- 6.77 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Council to determine any application in accordance with the statutory development plan unless material considerations indicate otherwise.
- 6.78 The material considerations of the Proposed Development which relate to the principle of development, ecology, flood risk, cultural heritage, transport, air quality, noise and landscape visual impact have been assessed against the relevant policies. It is concluded that the Proposed Development, taken overall, accords with the relevant development plan policies and in accordance with the NPPF there should be a presumption in favour of granting planning permission for this sustainable development.

7. CONCLUSIONS

- 7.1 This planning application has been submitted to SCC seeking planning permission for the installation and use of a washing plant for the recycling of inert materials together with associated access onto the highway on land at Cavenham Quarry, Cavenham Road, Tuddenham, Bury St Edmunds, Suffolk IP28 6SE.
- 7.2 Ultimately, should planning permission be granted, it will maximise the amount of the incoming waste stream which can be recycled and ultimately reused, and in doing so, push waste further up the waste hierarchy in accordance with recognised Government objectives, reducing the need for landfill.
- 7.3 Having considered the Proposed Development in light of all relevant environmental considerations and against current planning policy it is considered that there are no reasons to withhold the grant of planning permission.

DRAWINGS

Drawing Reference KD.CAV.4.D.001	Location Plan	Scale 1:10,000@A3
Drawing Reference KD.CAV.4.D.002	Existing Site Plan	Scale 1:1,000@A3
Drawing Reference KD.CAV.4.D.003	Proposed Site Plan	Scale 1:1,000@A3
Drawing Reference KD.CAV.4.D.004	Plant Elevations and Footprint	Scale varies@A3