

Essex County Council
Minerals & Waste Planning
County Hall
Chelmsford
Essex CM1 1QH



Your ref: S62A/2023/0031
Our ref: N/A
Date: 30 January 2024

Dear Sir/Madam,

Nature of Response: To address minerals and waste safeguarding implications arising through Application S62A/2023/0031.

Proposal: Town and Country Planning Act 1990 (Section 62A Applications)
The erection of up to 55 dwellings, associated landscaping and open space, with access from Knight Park.

Location: Land North of Thaxted Road, Saffron Walden.

Thank you for your email received 2nd January consulting the Mineral and Waste Planning Authority (MWPA) on the above proposals.

The 'application site' forms the basis for the minerals and waste safeguarding assessment set out below.

This response deals with mineral policy matters and waste policy matters in turn. A spatial representation of the application site and the matters discussed can be found in Appendix One. A list of relevant designations and specific facilities which would potentially be affected are listed, with their most recent planning application reference where relevant, in Appendix Two.

Mineral Matters

Safeguarding Mineral Resources

The majority of the application site is located within land which is designated as a Mineral Safeguarding Area (MSA) and therefore the application is subject to Policy S8 of the Essex Minerals Local Plan 2014 (MLP). The MLP can be viewed on the County Council's website via the following link:

<https://www.essex.gov.uk/minerals-waste-planning-policy/minerals-local-plan>

Policy S8 of the MLP requires that a non-mineral proposal located within an MSA which exceeds defined thresholds must be supported by a Minerals Resource Assessment to establish the existence, or otherwise, of a mineral resource capable of having economic importance. This will ascertain whether there is an opportunity for the prior extraction of that mineral to avoid the sterilisation of the resource, as

required by the National Planning Policy Framework (Paragraph 210). The NPPF requires policies that encourage the prior extraction of mineral where it is practical and environmentally feasible.

At 4ha, the area of land associated with the proposed development that lies within an MSA for sand and gravel does not exceed the 5ha threshold upon which local resource safeguarding provisions are applied for this mineral (please see Appendix One). Therefore, a Minerals Resource Assessment (MRA) would **not** be required as part of a planning application on this site.

Mineral Infrastructure Matters

With regard to Mineral Consultation Areas, Policy S8 of the MLP seeks to ensure that existing and allocated mineral sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy S8 of the MLP defines Mineral Consultation Areas as extending up to 250m from the boundary of an infrastructure site or allocation for the same.

The application site does **not** pass through a Mineral Consultation Area (MCA) and therefore, a Mineral Infrastructure Impact Assessment (MIIA) would **not** be required as part of a planning application on this site.

Waste Matters

The Waste Infrastructure Assessment (WIA) November 2023 mentions what needs to be included in the non-mineral development to ensure there is no adverse effect on the effective working of the waste site. However, the mitigation within the WIA relies heavily on the stand-off, minimum 70m, and then refers to proposed planting (paragraph 5.0.1). Trees and hedgerow do not stop noise, and therefore, are not considered an appropriate method of mitigation. The WIA also refers to potential for acoustic glazing, however, this is not committed to in the conclusions.

In addition to this, the Noise Assessment (Cass Allen report) does appear to have made a reasonable assessment of the potential noise impact of the Household Waste Recycling Centre (HWRC), and other commercial activity, but the HWRC is the dominant noise. The Noise Assessment also appears to include more recommendations for mitigation than are included in the WIIA. In particular a 3m high acoustic fence on the boundary, a 1.8m high fences around gardens, and the internal layouts to avoid living spaces facing the HWRC. Internal noise level is okay, if windows are shut, but the overheating assessment indicates windows would need to be open, and then there's likely to be issues with internal noise, so refers to the need for mechanical ventilation.

Therefore, the MWPA **hold no objection** subject to the following conditions to control:

- Minimum 70m stand off from HWRC to façade of a new residential property,
- 3m acoustic fence on HWRC & industrial area boundary with application site boundary,

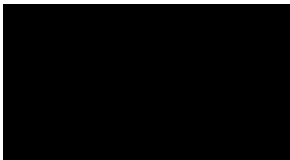
- 1.8m fences on garden within 250m of the HWRC boundary,
- Acoustic glazing with minimum specification as referred to in the Noise Assessment (Cass Allen report) Table 4,
- An overheating assessment and any required mitigation. The calculations for internal noise within the properties is on the basis of windows being closed. It is recognised with the Cass Allen Noise Assessment Report, paragraphs 7.21 to 7.23, that depending on the outcome of an overheating assessment for the properties, that mechanical ventilation may be required if windows are required to be closed to achieve acceptable internal noise levels,
- Internal layouts of houses to ensure living spaces are located not facing the HWRC and commercial area.

Site Waste Management Plan

It is considered that the Site Waste Management Plan (SWMP) provides sufficient detail at this Outline stage. The intentions set out through the section entitled Re-use and Preparation for Re-use are strongly supported, and the intentions behind Section 5 are also supported as an appropriate framework for managing construction waste.

Should Outline permission be granted, then an updated SWMP would be expected as part of the FUL application. This should include quantifications of forecasted waste arising, recycling and re-use targets and a more detailed strategy for the monitoring of actual waste arising and its management during the construction phase, based on the framework set out in the SWMP. Potential management sites for the types of waste identified as arising from the site should also be identified.

Yours sincerely,

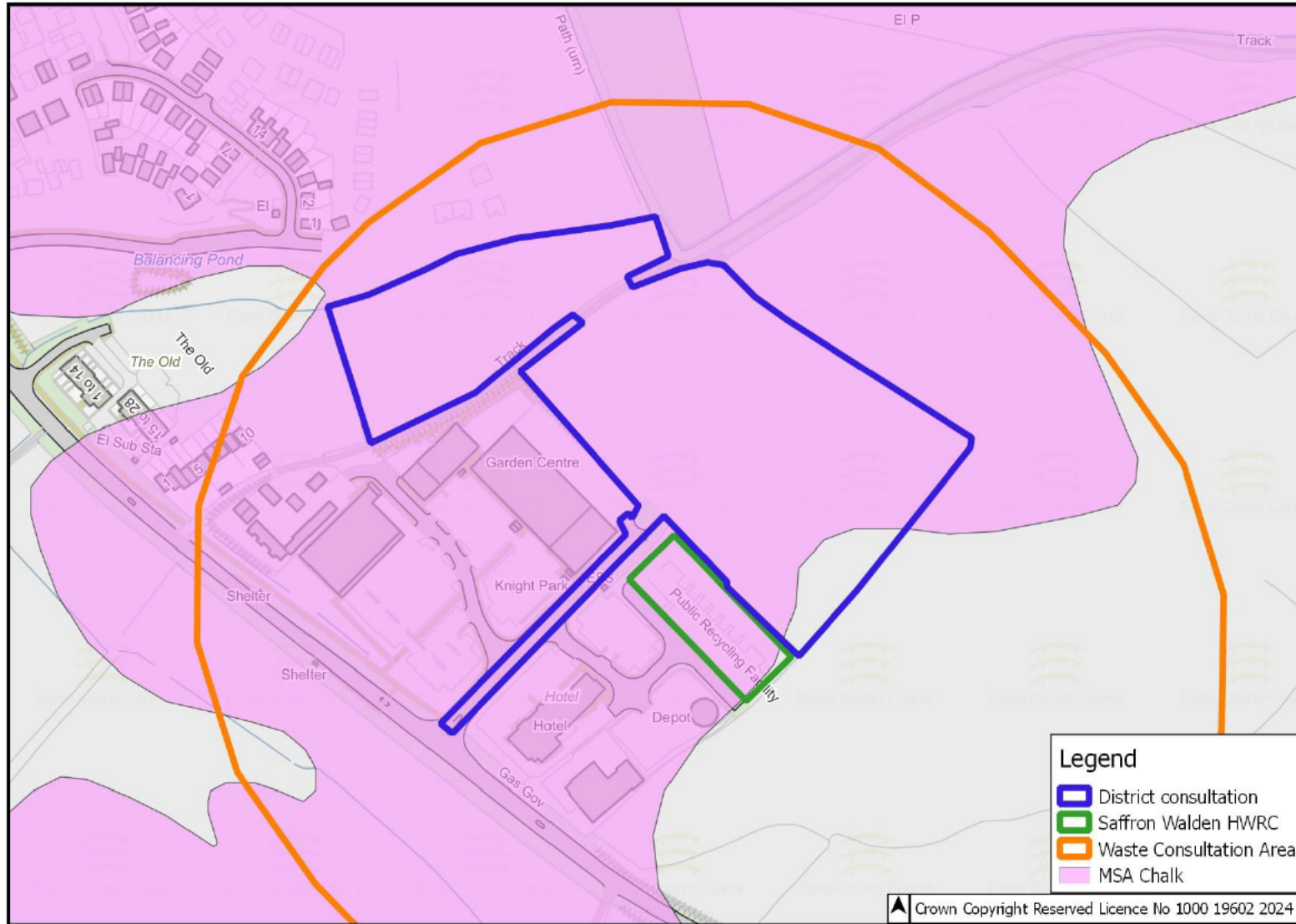


Richard Greaves
Chief Planning Officer
Email: [REDACTED]

Please direct queries to Lauren Keeling
Telephone: [REDACTED]
Email: [REDACTED]

Appendix One

Map 1 – Minerals and Waste Safeguarding Screening – Full Extent of Application Site



Appendix Two – Schedule of Safeguarding Designations and Safeguarded Waste Infrastructure Relevant to The Application Site

Schedule of mineral infrastructure and designations within the application site

Details of planning applications can be viewed on the [ECC website](#), by accepting the disclaimer and then searching on the planning reference

Site type	Site name and address	Planning application number and description	Further Details
Mineral Safeguarding Areas Policy implications set out under ‘Mineral Matters – Safeguarding Mineral Resources’. Subject to MSA designation – Policy 8 of the Essex Minerals Local Plan 2014 Spatial extent shown in Appendix One.	Sand and gravel	N/A	

Schedule of waste infrastructure and designations within the application site

Site type	Site name and address	Planning application number and description	Further Details
WLP Allocations or Safeguarded Waste Development Sites Policy implications set out under ‘Waste Matters – Safeguarding Waste Infrastructure’. Subject to WCA designations – Policy 2 of the Essex and Southend-on-Sea Waste Local Plan 2017. Spatial extent shown in Appendix One.	Saffron Walden HWRC, Veermans Lodge,Thaxted Road,Saffron Walden,CB10 2UR	CC/UTT/07/94 - Civic Amenity & Recycling	Permanent