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6 May 2021

Dear Sir

**Objection to Planning Application SCC/0024/21MS/VOC at Masons Landfill, Bramford Road, Great Blakenham IP6 0JX (the “Application”)**  
**Objector: Valley Ridge Holdings Ltd (“VRH”)**

We act for Valley Ridge Holdings Ltd, which objects to the Application on the grounds set out in this letter.

VRH is an adjacent landowner at Masons Landfill, with the benefit of extant planning permission (1969/10) from Mid Suffolk District Council, with Suffolk County Council support, for a major mixed-use leisure scheme (“SnOasis”). The redline boundary for the SnOasis scheme partly overlaps with land within the redline boundary of the Application, and shares the junction and access road from Bramford Road with the landfill.

VRH is in pre-application discussions with Mid Suffolk District Council to bring forward a planning application for a varied scheme on the SnOasis site. The new proposals are very similar in principle to SnOasis, but with a greater emphasis on sustainability and ‘staycationing’ as a result of an anticipated increase in domestic travel post-Covid19.

For the purposes of this objection, the consented SnOasis scheme is referenced, although the grounds of objection and matters raised are equally as applicable to the proposed varied scheme.

## 1 Executive Summary

- 1.1 The Application fails to comply with policies GP2, GP4, WP1 and WP2 of the Suffolk Minerals and Waste Local Plan adopted July 2020.
- 1.2 The Environmental Statement dated March 2021, prepared by Sirius Planning, is fatally flawed in its assessments, which do not include SnOasis as a receptor. In any event the environmental impacts both on SnOasis, and cumulatively with it, would likely be significant and incapable of adequate mitigation.

- 1.3 The Application is fundamentally incompatible with the SnOasis scheme in planning terms, such that SnOasis would not be brought forward were permission to be granted.
- 1.4 The development the subject of the Application is irredeemably non-compliant with relevant planning policies, and the harms caused by it would clearly outweigh any benefit. It is inherently unsustainable, and inconsistent with wider circular economy and carbon reduction priorities from national down to local government, and should be refused.

## **2 Waste Planning Policy**

- 2.1 This objection is accompanied at **Appendix 1** by an Expert Report on Waste Policy and Need by Simon Aumônier, Principal Partner at ERM, regarding detailed grounds of objection on waste planning policy matters.
- 2.2 In summary, the extension to Masons Landfill is not needed and is in conflict with the Development Plan for the following reasons:
  - 2.2.1 The Resources and Waste Strategy for England (the Strategy) sets out clearly the aim of limiting waste growth and diverting from landfill as much residual waste as possible. Landfill is the management route of last resort. Although some void will be required for wastes that cannot be managed through other treatments, this should be minimised and permitting additional and unnecessary landfill capacity should be avoided.
  - 2.2.2 The Suffolk Waste Strategy (SWS) provides the quantitative need analysis for the Suffolk Minerals and Waste Plan (the Plan). Under the SWS's conservative scenario, consented and permitted void at the Folly Farm landfill in Suffolk is sufficient to meet the predicted need for landfill, through to the end of its permission in 2029.
  - 2.2.3 The SWS predates the 2018 Strategy, which introduces ambitious aims and interventions for waste management. If the minimum annual requirement of the SWS, which is forecast for 2020/21, is extrapolated to reflect the Strategy's aims, voidspace at Folly Farm landfill is sufficient to meet Suffolk's residual waste management needs beyond the end of the Plan period.
  - 2.2.4 Extension of the Masons Landfill permission will result in an excess of landfill capacity in Suffolk. Inevitably, by duplication, this will increase environmental impacts associated with landfill operations. Masons Landfill already imports more waste from outside of the County than Local Authority Collected Waste from Suffolk disposed at the site. Surplus provision of capacity will encourage this practice to continue. Potentially, imports might accelerate if there are further shortfalls in delivery of waste.
  - 2.2.5 Residual waste from outside the County is also managed at the nearby Great Blakenham energy from waste (EfW) plant. This is not consistent with an interpretation of the balance of waste arisings and management capacity that suggests a need for additional landfill void.

- 2.2.6 The application points to residual waste arisings in the South East region in seeking to justify need. In widening the catchment for the site, eventually residual wastes will be found that might fill its void, provided gates fees are sufficiently low to counterbalance the increased costs of transport. The Plan sets out Suffolk's ambition to be self-sufficient. Recognising that waste will cross administrative boundaries, it is not consistent with the principles of sustainable development for waste to travel increasing distances simply in order to allow the construction of additional cells in existing landfill void. Neither is it appropriate for Suffolk becomes a magnet for wastes produced in other authorities because they are not making provision for their own disposal needs.

### **3 Environmental Impact Assessment**

- 3.1 The Environmental Statement dated March 2021 accompanying the Application (the "ES") is fatally deficient in a number of respects. It was formally scoped by Suffolk County Council in August 2020, but VRH was not consulted on that scoping exercise.
- 3.2 As a result, VRH's site is not identified as a receptor in the ES, despite the SnOasis scheme now having full detailed consent.
- 3.3 Therefore the assessment fails to take into account the correct information with respect to impacts on SnOasis, set out below:
- 3.3.1 The scoping out of traffic and transport in the ES ignores the consented SnOasis scheme and impacts on the shared access road and on the local road network are simply not assessed;
- 3.3.2 The scoping out of air quality ignores the potential impacts on the SnOasis scheme, eg, potential odour effects on the site access road;
- 3.3.3 The scoping out of socio-economic effects ignores the potential impacts on the SnOasis scheme. The number of jobs apparently protected by the Application is negligible in comparison to the potential jobs to be created by the SnOasis scheme, as is the spending in the local economy by landfill employees when compared to the spending anticipated by SnOasis employees and visitors;
- 3.3.4 The ES does not consider or assess the significance of or duration over which the accepted 'notable landscape detractors' will impact on the SnOasis scheme;
- 3.3.5 The hydrology and surface water assessment identifies and accepts that there is an increased risk of the discharge of poor-quality water to groundwater, but does not assess the potential impact of this on the ability of the SnOasis scheme to provide sustainable heat for its own use through a system of ground source heat pumps. There are no reported cumulative effects with the SnOasis scheme;
- 3.3.6 The cumulative assessment in the ES ignores the SnOasis scheme. It purports to rely on the original ES for the SnOasis scheme "capturing impacts from the continuation of infilling and restoration works at Masons Landfill" in the baseline

assessment for SnOasis. The SnOasis ES is now five years old and was prepared on the basis of the existing landfill permission expiring in 2022.

- 3.3.7 As a consented scheme on an adjacent site, the ES should have taken the SnOasis scheme into account in all assessments, and it should have been included in the future baseline for a comprehensive assessment of all cumulative and in-combination effects.

- 3.4 Continuation of landfill at the Masons Landfill will lead to an unnecessary duplication of general environmental impacts such as noise, odour, mud and aggregates on the shared access road and litter, vermin and birds.
- 3.5 The nuisance impacts to surrounding receptors including SnOasis would be significant and unacceptable, and incapable of sufficient mitigation.

#### **4 Incompatibility in planning terms with the SnOasis Scheme**

- 4.1 The SnOasis scheme will re-develop about 120 Ha of ex-quarry land with a world-class holiday park offering eco-friendly accommodation, various outdoor activities, indoor ski slope, hotel and a variety of bars, restaurants and cafés.
- 4.2 The scheme represents an investment of over £500 million in the area. It is expected to attract over 975,000 visitors per year, to generate over 2,000 jobs and up to £46 million of economic activity annually in SnOasis and the wider region.
- 4.3 SnOasis is considered by the Chief Planning Officer of Mid Suffolk District Council to be a project of 'District-wide interest' due to its scale, nature and context, and it will be a destination for visitors from all over the country.
- 4.4 SnOasis has been in development for 20 years, with significant resource and investment having been committed by VRH and the local authorities to ensure it can be brought forward and its significant benefits realised.
- 4.5 Since it was originally consented by the Secretary of State in 2008, the SnOasis scheme has evolved from a 'day resort' to a full staycation destination, with an emphasis on outdoor wellness and leisure.
- 4.6 Final reserved matters were granted on 20 April 2020 and funding has now been secured to proceed with this scheme (or an amended scheme which is currently at pre-application stage), primarily on the basis that the current permission for the Masons Landfill would expire in October 2022.
- 4.7 The planning application for the amended scheme was subject of a comprehensive public consultation exercise in April 2021. Feedback from this suggests widespread local support for the proposed application which reinforces VRH's expectations for the social and economic benefits to be delivered by it.
- 4.8 The SnOasis scheme is fully compliant with policies set out in the National Planning Policy Framework 2019. It would deliver a socially, environmentally and economically sustainable

development which would support a strong and prosperous local economy and encourage sustainable tourism.

- 4.9 The scheme has the full support of Mid Suffolk District Council and remains consistent with the objectives of the adopted Local Plan to deliver economic growth within the Borough and use new development to generate opportunities for employment.
- 4.10 SnOasis is also consistent with the aspirations of emerging planning policy – the Babergh and Mid Suffolk Joint Local Plan – to improve productivity, diversify the District's economic base and enhance tourism facilities, which it recognises are an important feature of the local economy.
- 4.11 However it is clear that the success of the SnOasis scheme would be unacceptably compromised by the proximity and continuation of landfill activities. The redline boundary for the SnOasis scheme overlaps with land within the redline boundary of the Application, such that the SnOasis site and access road are directly adjacent to cells that are proposed to be operational as part of the extension.
- 4.12 **Appendix 2** is a copy of the approved access road plan from the Section 106 Agreement for SnOasis dated 28 April 2020. The SnOasis scheme shares part of this access road and the junction from Bramford Road with the landfill.
- 4.13 **Appendix 3** is a copy of the Phasing Plan that accompanies the Application. The cells shown bright green - Cell 4A East, 4B East, 4B West and 4C South - lie directly adjacent to the land identified on the SnOasis scheme for the access road.
- 4.14 The environmental nuisance factors of odours, mud accumulation on the shared access road, and dust would be highly perceptible from the access road and the SnOasis site itself, which would be prejudicial to the visual presentation and the physical enjoyment of the SnOasis scheme.
- 4.15 Vermin is also a significant factor at this site in this context, and the landfill attracts large flocks of seagulls which scavenge in the waste. This has the potential for human health risks given the large numbers of visitors expected and the proximity of the proposed new landfill cells to the SnOasis site.
- 4.16 As mentioned above, it is a certainty that the SnOasis scheme (with or without variations) has all necessary consents and funding and is ready to proceed. It is also a certainty that it will *not* be brought forward, were this Application to be granted permission. It is highly unlikely that funding for SnOasis would remain in place if the Application were granted, causing the loss of this long-standing and economically important scheme.
- 4.17 In these circumstances, the County is entitled to weigh up the merits of the two schemes and take this incompatibility into account as a highly material planning consideration.

- 4.18 A consideration is ‘material’ in planning terms if it is relevant to whether an application should be granted or refused, and that is of such weight as it might ‘tip the balance’ one way or another<sup>1</sup>.
- 4.19 The issue of weighing up the merits of alternative schemes and uses was considered in the leading case of *R (on the application of Mount Cook Land Ltd) v Westminster City Council* [2003] EWCA Civ 1346. In this case a leaseholder applied for planning permission for alterations to its demise; the application was opposed by the freeholder on the basis that it was working up a different application for the same premises, which would be more beneficial and desirable.
- 4.20 The Court of Appeal in refusing the judicial review of the grant of the leaseholder’s permission held that the weight and materiality of a competing use is a matter for planning judgment, which depends on the likelihood of the second use coming about.
- 4.21 The Court of Appeal confirmed the principles (paragraphs 22, 25) from earlier case law that:
- 4.21.1 “Each case will turn on its own merits, but the importance of the project or proposal, its desirability in the public interest, are undoubtedly matters to be weighed;
- 4.21.2 Therefore in considering whether to grant planning permission for a proposal (use B) which will pre-empt the possibility of desirable future use (use A), the relative desirability of the two uses have to be weighed;
- 4.21.3 In striking a balance, the likelihood of use A actually coming about is doubtless a highly material consideration;
- 4.21.4 It logically follows that in cases where the importance or desirability in the public interest of preserving a particular alternative option is so great that the decision-maker could reasonably conclude that to grant the application in the circumstances would or could constitute a planning harm.”
- 4.22 VRH submits that this is such a case, and the certainty of SnOasis coming forward is more than merely a realistic possibility – it is now in the final stages of readiness for implementation, with development partners and project funding having been secured by VRH.
- 4.23 The extent to which VRH has progressed the scheme since acquiring the site is entirely premised on the landfill use ceasing in 2022, and it does not have the commitment of its partners to proceed with the scheme should this Application be granted.
- 4.24 SnOasis is therefore a highly material planning consideration, whose importance and desirability in the public interest are matters which weigh heavily in this case.
- 4.25 In terms of their relative policy compliance, the landfill is not policy compliant, and there is no need for it to continue. The benefits of the landfill operating for a further 13 years must

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<sup>1</sup> *R (Kides) v South Cambridgeshire DC* [2002] EWCA Civ 1370

be weighed against the loss of the benefits of the SnOasis scheme over a much longer period of time.

- 4.26 There is a clear lack of need and policy compliance for the landfill extension. On its own merits it should fail. In addition to its own policy non-compliance, the loss of SnOasis occasioned by the approval of this Application would also unacceptably conflict with local planning policies promoting economic growth, employment and tourism.
- 4.27 Conversely, the significant benefits of the SnOasis scheme (or any variation thereof) far outweigh any tangible benefit of the landfill scheme, and would do so for many years beyond the expiry of the extension sought by the Application.
- 4.28 In the circumstances of this case, it would be both rational and sensible for the County Council to judge the planning harm that would be caused by the loss of the SnOasis scheme as a material consideration of such weight as to 'tip the balance' in favour of refusal.

Yours faithfully

A handwritten signature in cursive script that reads "Keystone Law".

**Keystone Law**

## **Appendix 1 – Waste Report**



## Proposed Extension to Mason's Landfill Permission

Expert Report on Waste Policy and Need

April 2021

Project No.: 0595713

<b>Document details</b>	
Document title	Proposed Extension to Mason's Landfill Permission
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## Signature Page

April 2021

# Proposed Extension to Mason's Landfill Permission

## Expert Report on Waste Policy and Need



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## CONTENTS

<b>1.</b>	<b>INTRODUCTION .....</b>	<b>2</b>
1.1	Credentials.....	3
1.2	Instruction .....	3
1.3	Summary .....	Error! Bookmark not defined.
<b>2.</b>	<b>POLICY AND REGULATORY CONTEXT FOR LANDFILL.....</b>	<b>3</b>
2.1	Resources and Waste Strategy for England .....	3
2.2	The Committee on Climate Change.....	5
2.3	Emerging National Policies .....	5
2.4	The Suffolk Minerals and Waste Plan .....	6
<b>3.</b>	<b>DEMAND FOR LANDFILL .....</b>	<b>6</b>
3.1	Suffolk Waste Study .....	6
3.2	Landfill Provision.....	7
3.3	The Effects of Surplus Capacity.....	8
3.4	Other Waste Treatment .....	9
<b>4.</b>	<b>CONSISTENCY WITH THE DEVELOPMENT PLAN .....</b>	<b>11</b>
4.1	Policy GP2.....	11
4.2	Policy GP4.....	11
4.3	Waste Policies and Policy WP1 .....	11
4.4	Policy WP12 .....	12
<b>5.</b>	<b>POLICY AND NEED IN THE ENVIRONMENTAL STATEMENT .....</b>	<b>12</b>
5.1	Introduction .....	12
5.2	Forward (sic).....	12
5.3	Planning Policy Context.....	12
5.4	Need and Alternatives .....	13

### List of Tables

Table 1 Non-hazardous Waste and Residual Waste Arising Projection .....	7
Table 2 Local Authority Collected Waste Disposed at Masons Landfill.....	9
Table 3 Local Authority Collected Waste Treated at Great Blakenham EfW Plant .....	10

### List of Figures

Figure 1 Residual Waste Arising and Remaining Landfill Capacity at Folly Farm Landfill .....	8
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## 1. EXECUTIVE SUMMARY

The Resources and Waste Strategy for England (the Strategy) sets out clearly the aim of limiting waste growth and diverting from landfill as much residual waste as possible. Landfill is the management route of last resort. Although some void will be required for wastes that cannot be managed through other treatments, this should be minimised and permitting additional and unnecessary landfill capacity should be avoided.

The Suffolk Waste Strategy (SWS) provides the quantitative need analysis for the Suffolk Minerals and Waste Plan (the Plan). Under the SWS's conservative scenario, consented and permitted void at the Folly Farm landfill in Suffolk is sufficient to meet the predicted need for landfill, through to the end of its permission in 2029.

The SWS predates the 2018 Strategy, which introduces ambitious aims and interventions for waste management. If the minimum annual requirement of the SWS, which is forecast for 2020/21, is extrapolated to reflect the Strategy's aims, voidspace at Folly Farm landfill is sufficient to meet Suffolk's residual waste management needs beyond the end of the Plan period.

Extension of the Masons Landfill permission will result in an excess of landfill capacity in Suffolk. Inevitably, by duplication, this will increase environmental impacts associated with landfill operations. Masons Landfill already imports more waste from outside of the County than Local Authority Collected Waste from Suffolk disposed at the site. Surplus provision of capacity will encourage this practice to continue. Potentially, imports might accelerate if there are further shortfalls in delivery of waste.

Residual waste from outside the County is also managed at the nearby Great Blakenham energy from waste (EfW) plant. This is not consistent with an interpretation of the balance of waste arisings and management capacity that suggests a need for additional landfill void.

The application points to residual waste arisings in the South East region in seeking to justify need. In widening the catchment for the site, eventually residual wastes will be found that might fill its void, provided gates fees are sufficiently low to counterbalance the increased costs of transport. The Plan sets out Suffolk's ambition to be self-sufficient. Recognising that waste will cross administrative boundaries, it is not consistent with the principles of sustainable development for waste to travel increasing distances simply in order to allow the construction of additional cells in existing landfill void. Neither is it appropriate for Suffolk becomes a magnet for wastes produced in other authorities because they are not making provision for their own disposal needs.

## **2. INTRODUCTION**

### **2.1 Credentials**

My name is Simon Aumônier. I am a Principal Partner at ERM, a global sustainability consulting business. I am the Director of ERM's product services and regulatory affairs team in EMEA. I have three decades of experience in the waste management sector as an advisor to local, regional and central government, international organisations and the private sector, including waste producers, investors and the waste management industry. I conducted the first national assessment of methane from landfills in the UK and advised the International Panel on Climate Change on this topic in the 1990s.

My waste policy experience includes managing the consultation on the national waste strategy document 'Limiting Landfill' which paved the way for Waste Strategy 2000, an author of Defra's Guide to Municipal Waste Management Strategies, the leader of innovative research on the carbon and energy balance of UK waste streams that was widely referenced in the Waste Strategy for England 2007 and director of the development of numerous waste strategies for local authorities in England.

With respect to waste planning and need, I was the lead author of the Companion Guide to PPS10, advising DCLG on the PPS itself, and have directed need assessments for the East of England Regional Assembly (including Suffolk, clearly), and the South East and North East Regional Technical Advisory Bodies, as well as individual local authorities and in relation to specific waste management projects. I have presented expert witness evidence at more than 20 public inquiries and examinations in public into waste management facilities and plans. My clients have included many waste management companies, including Cory Environmental, Sita/SUEZ, Urbaser, Veolia, Viridor and Wheelabrator.

### **2.2 Instruction**

I am instructed by Valley Ridge Holdings Limited to compile this expert report to address waste policy and the demand residual waste management capacity for Suffolk, in response to the proposed extension to Mason's Landfill permission submitted by Viridor Waste Management.

## **3. POLICY AND REGULATORY CONTEXT FOR LANDFILL**

This section of the report outlines the policy and regulatory position with respect to the landfill disposal of waste in England and the quantitative need assessment that underpins the Suffolk Minerals and Waste Plan.

### **3.1 Resources and Waste Strategy for England**

The Resources and Waste Strategy for England (the 'Strategy') was published by the Department for Environment, Food & Rural Affairs (Defra) in December 2018. The Strategy describes the long-term policy outlook in managing material resources, with the goal of minimising waste generation and promoting resource efficiency.<sup>1</sup> The Strategy is in line with the 25 Year Environment Plan, a blueprint published by Defra in January 2018 to outline actions for the improvement to the environment within a generation.

The waste hierarchy, a ranking of broad waste management options, acts as the backbone of the Strategy, as it did previous national strategy and planning documents for waste, as well as the Waste Framework Directive. It is mandated in the Waste (England and Wales) Regulations 2011 that all handlers of waste, including producers, are required by statute to adopt the waste hierarchy for the

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<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

management of waste.<sup>2</sup> The waste hierarchy prioritises waste management practices that are required to be adopted by businesses or organisations in a specific order,<sup>3</sup> as follows:

1. Waste Prevention;
2. Preparing for reuse;
3. Recycling;
4. Other recovery, including anaerobic digestion and energy from waste; and
5. Disposal.

According to the waste hierarchy, waste prevention should be prioritised whereas disposal, i.e. landfill, should be the least favoured waste management option. It is recognised that landfill is a necessary component of waste management arrangements. However, the key principle is that efforts should be made to maximise the amount of waste being managed by waste management options higher up in the waste hierarchy. Landfill should be used as little as possible, and as a last resort. Proper application of the waste hierarchy will act to reduce the need for the Mason's Landfill void under a time extension.

Landfill is a major source of greenhouse gas (GHG) emissions contributing to global climate change, in the form of methane, a powerful GHG that is formed as biodegradable wastes are broken down by micro-organisms under anaerobic conditions and that is released in landfill gas. A key objective of the Landfill Directive was to reduce landfill of biodegradable waste in order to limit emissions of landfill. Although rates of landfill have been substantially reduced over the last two decades, further diversion of biodegradable wastes from landfill remains a priority.

The Strategy includes goals to reduce GHG emissions from landfill and to improve recycling rates. Two of the key initiatives to be implemented are:

- Eliminate food waste to landfill by 2030; and
- Reduce municipal waste to landfill to 10% or less of total waste by 2035.

Both of these initiatives, once they have been implemented in national and local strategies and plans will further reduce residual waste requiring landfill. These initiatives post-date the SWS that presented the quantitative need case in the County.

It is likely that separate food waste collections will be provided more widely in England so as to divert food waste from landfill to anaerobic digestion and composting. A new food surplus and waste hierarchy was published in April 2021 to outline the prioritised list of management options for food.<sup>4</sup> Based on same principles of the waste hierarchy, this hierarchy provides details on the management options that are specific to food and drink surplus and waste: “

1. Prevent surplus and waste in your business;
2. Redistribute surplus food;
3. Make animal feed from former food;
4. Recycle your food waste - anaerobic digestion;
5. Recycle your food waste – composting;
6. Recycle your food waste – landspreading;
7. Incinerate to generate energy;

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<sup>2</sup> [The Waste \(England and Wales\) Regulations 2011 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2011/1184/contents/make)

<sup>3</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69403/pb13530-waste-hierarchy-guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf)

<sup>4</sup> <https://www.gov.uk/government/publications/food-and-drink-waste-hierarchy-deal-with-surplus-and-waste/food-and-drink-waste-hierarchy-deal-with-surplus-and-waste>

8. Incinerate without generating energy; and
9. Send to landfill or sewer.”

Similar to the waste hierarchy, the food and waste surplus hierarchy describes landfill as the waste management option of last resort for food surplus and waste. It further reaffirms that the Government aims to reduce the need for landfill, which in turn will reduce the demand for landfill void in Suffolk and undermine the need case for an extension at Masons Landfill.

The Government is leading by example in cutting down the waste sent to landfill to 10% or less of total waste. These initiatives will make use waste management options higher in the waste hierarchy to reduce the amount of waste being sent to landfill. As a result, the demand for landfill will be lower in the foreseeable future, *inter alia* reducing the need for void at Mason's Landfill.

### 3.2 The Committee on Climate Change

The Sixth Carbon Budget, published by the Committee on Climate Change in December 2020, lays out the UK's path to net zero greenhouse gas emission by 2050.<sup>5</sup> This latest Carbon Budget recommends that all biodegradable waste should be banned from landfill by 2025. Waste is estimated to contribute around 6% of the UK's GHG emissions in 2019. Reducing the potential for the decomposition of organic matter in landfills will in turn decrease the waste management industry's GHG emissions.

The Sixth Carbon Budget projects that all waste could be banned in landfill by 2040 if carbon capture and storage systems are fitted in all EfW facilities. This will significantly reduce the demand for landfill and further cut down GHG emissions from the waste industry. The extension of operation of Mason's Landfill will be a hindrance to meeting the Carbon Budget's goal for reducing GHG emissions.

### 3.3 Emerging National Policies

As well as measures directly to reduce or ban waste entering landfills, other emerging policies for waste management will be put in place to increase waste prevention, reuse and recycling in order to relieve the demand on landfill.<sup>6</sup> Emerging policies include:

- Achieve 50% recycling rate for household waste by 2020;
- Aim to implement the extended producer responsibility scheme on packaging waste in 2023;
- Aim to implement the deposit return scheme for single-use drinks containers in 2023;
- Aim to legislate mandatory separate food waste collection in 2023;
- Aim for all plastic packaging to be recyclable, reusable or compostable by 2025;
- Achieve 75% recycling rate for packaging by 2030;
- Achieve 65% recycling rate for municipal solid waste by 2035
- Aim to eliminate avoidable plastic waste by 2042;
- Aim to eliminate all avoidable waste by 2050
- Free separate garden waste collection; and
- Consider proposal for extended producer responsibility for textile waste.

These goals and policies focus on the reduction, reuse, recycling and recovery of materials and will lead to the introduction of a series of measures to deliver their aims. As a result, less material will

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<sup>5</sup> <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf>

<sup>6</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

become residual waste requiring landfill. The demand for landfill void will be reduced as a result, although there will remain a need for some wastes that cannot be managed by other means.

### **3.4 The Suffolk Minerals and Waste Plan**

The Suffolk Minerals and Waste Plan (the Plan) was adopted by Suffolk County Council on 9 July 2020. It sets out planning policy for minerals and waste for the county of Suffolk, including its vision up to 2036. The theme of the vision is for Suffolk to comply with statutory requirements while providing sustainable waste management solutions that are environmentally sound. One of the objectives to achieve the vision is by creating waste management policies that encourage moving waste treatment up the waste hierarchy, i.e. moving away from landfill as much as possible.

Similar to those policies described in the Strategy, the Plan recognises the necessity of landfill within the waste hierarchy and Suffolk County Council has reserved sufficient landfill void for the County up to 2036. The Plan permits only the landfilling of residual source-separated or pre-sorted waste. In principle, the need for landfilling in Suffolk should be minimised due to robust separate collection and recycling programmes and the landfill ban to be introduced under the Strategy.

## **4. DEMAND FOR LANDFILL**

This section of the report analyses the quantitative demand for landfill in Suffolk.

### **4.1 Suffolk Waste Study**

The SWS projects waste arisings and the capacity of waste management facilities in Suffolk up to 2036. It was published by Suffolk County Council in 2018. The SWS was adopted in the Plan as its quantitative estimation of waste treatment capacity.

The SWS projects waste arisings under various recycling rates and concludes that there is sufficient waste treatment and disposal capacity available through to 2036. It accounts for rates of recycling, treatment and incineration and forecasts arisings of residual waste. Non-hazardous waste arisings are forecast to increase from 660,000 tonnes per annum (tpa) in 2020 to 768,000 tpa in 2035, under a low recycling and composting rate (51%) scenario. Discounting non-hazardous waste arisings that are sent to incineration and other treatment, i.e. 643,000 tpa, the residual non-hazardous waste arisings projected to require landfill are estimated to be 17,000 tpa in 2020, rising to 127,000 tpa in 2036 (see *Table 1*).

**Table 1 Projected Non-Hazardous Waste and Residual Waste Arisings**

Year	Non-Hazardous Waste (tonnes)	Residual Non-Hazardous Waste for Landfill (tonnes)
2020/21	660,000	17,000
2021/22	671,000	28,000
2022/23	682,000	39,000
2023/24	693,000	50,000
2024/25	703,000	60,000
2025/26	713,000	70,000
2026/27	724,000	81,000
2027/28	734,000	91,000
2028/29	743,000	100,000
2029/30	753,000	110,000
2030/31	763,000	120,000
2031/32	765,000	122,000
2032/33	767,000	124,000
2033/34	768,000	125,000
2034/35	768,000	125,000
2035/36	770,000	127,000

Source: Suffolk Waste Study 2018.

*Table 1* presents the conservative projection of residual non-hazardous waste arising in Suffolk through to 2036 from the SWS. These projections predate Defra's promotion of vigorous separate collection and recycling policies in the Strategy which was published later in the same year. The Strategy suggests that a 65% recycling rate should be achieved for municipal solid waste and no more than 10% of municipal waste should be landfilled by 2035.

As a result of these developments, we might reasonably expect projections made in 2021 to be less than those presented in *Table 1*.

## 4.2 Landfill Provision

There are two non-hazardous waste landfills operating in Suffolk at present: Folly Farm Landfill; and Mason's Landfill. The SWS reports remaining landfill capacity at Mason's Landfill and Folly Farm Landfill to be 3,800,000 tonnes and 600,000 tonnes respectively in 2015. It was reported by the Environment Agency in December 2020 that Mason's Landfill has remaining capacity of 2,490,000 m<sup>3</sup>.<sup>(7)</sup> Whilst Mason's Landfill's current planning permission expires in 2022, the Folly Farm Landfill is permitted through to 2029 under its current planning permission. The SWS projects that the remaining landfill capacity in Mason's Landfill and Folly Farm Landfill will be sufficient for Suffolk through to 2036.

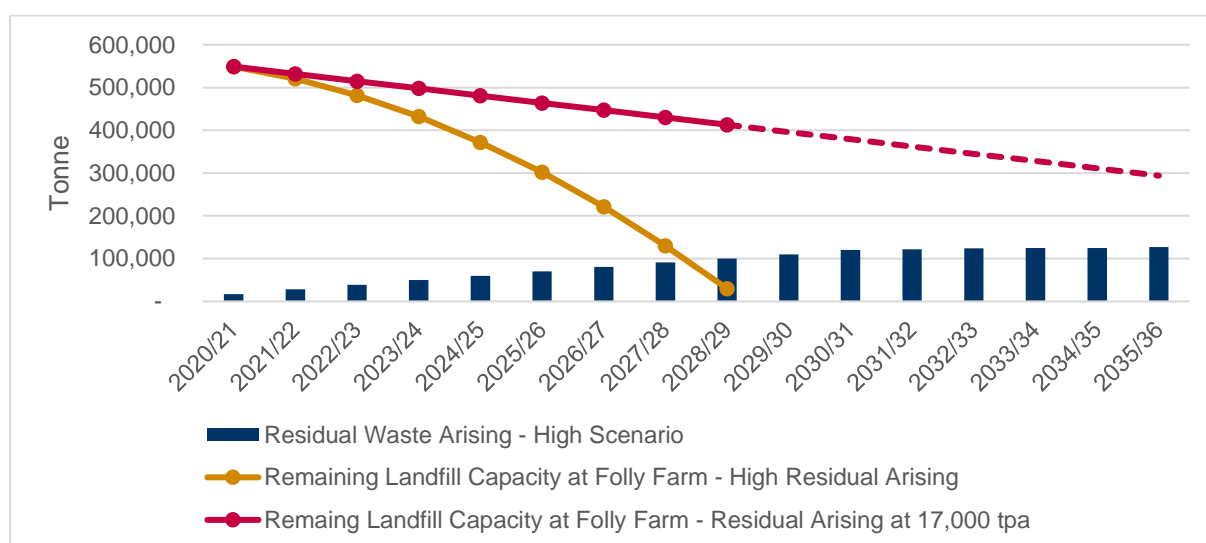
Comparing the SWS conservative projects of residual waste to landfill in *Table 1* with void remaining at Folly Farm, we can see that it provides sufficient capacity to meet Suffolk's need through to the end of its permission in 2029. This scenario is presented below in *Figure 1* by the high residual waste arisings scenario. Since Folly Farm provides sufficient capacity to accept projected waste arisings,

<sup>7</sup> [Remaining Landfill Capacity - data.gov.uk](https://data.gov.uk)

there is no quantitative need for void at Masons Landfill through to the end of the Folly Farm permission.

This scenario is a conservative one, for example based on a 51% recycling rate and continuing waste growth. The measures set out in the Strategy and recommended by the Committee on Climate Change suggest a stabilisation of growth and higher rates of diversion from landfill. I have demonstrated the potential effect of such measures and outcomes on need through a further scenario presented in Figure 1. If residual waste arisings requiring landfill in Suffolk were to remain stable at the conservative 17,000 tpa the SWS forecast for 2020/21, then the void available at Folly Farm is sufficient beyond the end of the Plan period. There is no quantitative need for Masons Landfill through the whole of the Plan period.

**Figure 1 Residual Waste Arising and Remaining Landfill Capacity at Folly Farm Landfill**



Source: Suffolk Waste Study 2018.

### 4.3 The Effects of Surplus Capacity

As *Figure 1* suggests, based on the SWS predictions there is sufficient landfill capacity in Suffolk through to the end of the Folly Farm permission in 2029 without extending the permission at Mason's Landfill. If we assume that, as a result of the Strategy's new aims and interventions there is no growth in residual waste beyond the SWS prediction for 2020/21, there is sufficient capacity at Folly Farm beyond the end of the Plan period. Permitted capacity at Masons Landfill beyond its current completion date of 2022 thus represents an over-supply or a surplus.

Continuing the operation of two landfills in a market where supply significantly exceeds demand will have perverse outcomes, as is already the case. Some environmental effects will be multiplied, since it will be less efficient in effect to operate two sites rather than one. Deliveries and site operations will result in odour, noise, litter vermin, birds and mud on road impacts at more than one location. Cells will be completed and capped and gas management infrastructure installed less quickly than might otherwise be the case, which will lead to increased emissions of landfill gas including methane and an unnecessary contribution to climate change.

Over-supply will also lead to residual wastes being imported from outside of the County, with resulting increased transport impacts. Suffolk is not obliged to be self-sufficient, although it is an objective of the Plan, and we should recognise that waste management does not obey administrative boundaries. However, it is not necessary for the County to make provision largely for out-of-County residual waste.

Indeed, it is clear that Masons Landfill does already accept a considerable amount of waste from outside of Suffolk. Table 2 presents information from England's Waste Collection Data for 2018/19 and 2019/20 that shows the site accepts less Local Authority Collected Waste from Suffolk than it does from other local authorities. Note that these statistics do not include commercial wastes.

**Table 2 Local Authority Collected Waste Disposed at Masons Landfill**

	2018/19	2019/20
Source	(tonnes)	
East Suffolk Council	-	376
Ipswich Borough Council	100	223
Suffolk County Council	8,538	8,224
West Suffolk Council	-	42
Suffolk Coastal District Council	808	-
Waveney District Council	94	-
<b>Suffolk (total)</b>	<b>9,540</b>	<b>8,866</b>
Bedford	6,111	2,102
Central Bedfordshire	336	110
Essex County Council	-	4,126
Hertfordshire County Council	5,123	4,902
Milton Keynes Council	200	7,420
Norfolk County Council	-	2,736
<b>Outside of Suffolk (total)</b>	<b>11,770</b>	<b>21,395</b>

Source: Q100 Waste Collection Data England 2018-19 & 2019-20, [WasteDataFlow - Local Authority waste management - data.gov.uk](#)

Table 2 shows that Masons Landfill was receiving in 2018/19 and 2019/20 a significant proportion of the residual waste forecast in the SWS to require disposal in 2020/21 (17,000 tonnes). As I have established above, Folly Farm landfill has sufficient capacity to manage these needs through to 2029. If this situation were to perpetuate, all other things being equal Folly Farm would not be completed by the end of its permission.

The majority of the Local Authority Collected Waste landfilled at the site has a source outside of the County. With the exception of wastes from Essex, the sources are not local authorities adjacent to Suffolk, requiring waste to be transported some considerable distance for disposal.

The planning application reports c. 195,000 tpa landfilled at the site on average. A significant majority of waste accepted is not Local Authority Collected Waste. It is not clear from where these wastes arise. Nonetheless, if the proportions are the same as for Local Authority Collected Waste, then the significant majority of wastes received at Masons Landfill, and by extension those envisaged to be received in the future were its permission to be extended, are from outside of Suffolk.

#### 4.4 Other Waste Treatment

The Great Blakenham Energy from Waste (EfW) Plant opened in 2014 and has a capacity of 269,000 tpa. Its capacity is considered in the SWS. Table 3 presents information from England's

Waste Collection Data for 2018/19 and 2019/20 on receipts of waste at Great Blakenham. This shows that a significant proportion of Local Authority Collected Waste received at the plant is from local authorities outside of Suffolk, including a substantial arising from Norfolk.

**Table 3 Local Authority Collected Waste Treated at Great Blakenham EfW Plant**

	2018/19	2019/20
Sources	(tonnes)	
East Suffolk Council	-	594
Ipswich Borough Council	938	375
Mid Suffolk District Council	1,409	612
Suffolk County Council	190,646	191,910
West Suffolk Council	-	504
Forest Heath District Council	440	-
St Edmundsbury Borough Council	823	-
Suffolk Coastal District Council	1,707	-
Waveney District Council	947	-
<b>Suffolk (total)</b>	<b>196,910</b>	<b>193,995</b>
Essex County Council	1,047	2,998
Hertfordshire County Council	5,544	5,318
Norfolk County Council	45,768	42,403
Southend-on-Sea Borough Council	-	16,258
<b>Outside of Suffolk (total)</b>	<b>52,359</b>	<b>66,977</b>

Source: Q100 Waste Collection Data England 2018-19 & 2019-20, [WasteDataFlow - Local Authority waste management - data.gov.uk](https://data.gov.uk/dataset/waste-data-flow-local-authority-waste-management)

As I mention above, waste flows across administrative boundaries, and these imports of residual waste for recovery at Great Blakenham may be balanced by exports, especially of commercial wastes. Nonetheless, it further undermines the case made by the applicant that an extension is required at Mason's landfill because of a need to manage residual wastes in Suffolk. In the EfW plant there is a proximate facility that receives c. 50,000-67,000 tpa of wastes from outside of the County.

Were this capacity available for managing residual waste arising in Suffolk, the period over which remaining void at Folly Farm would meet the needs of the County according to the SWS forecasts would be considerably extended.

In 2020, the EfW plant was expanded to handle 295,000 tpa.<sup>8</sup> This increases the amount of residual waste treatment capacity available within the County, providing a further 26,000 tpa that was not taken into account in the SWS calculations. This additional capacity reinforces the points that I make in the preceding two paragraphs.

Table 2 and Table 3 indicate that between them, Mason's Landfill and the Great Blakenham EfW plant receive between 64,000 and 88,000 tpa from sources outside of the County. By reference to the

<sup>8</sup> <https://www.letsrecycle.com/news/latest-news/suez-expands-great-blakenham-capacity/>

SWS figures presented in Table 1, we can see that this volume of waste far exceeds the current need for residual waste management forecast for Suffolk in the SWS. The capacity of the EfW plant devoted to out-of-County residual wastes alone is sufficient to meet the need in the SWS through to 2023/24 or 2024/25 – before the void at Folly Farm is taken into account.

The Plan aims for net self-sufficiency. Unless there are corresponding exports of residual waste out of the County to balance these demonstrated imports, an extended permission at Mason's landfill will compromise this aim.

## **5. CONSISTENCY WITH THE DEVELOPMENT PLAN**

### **5.1 Policy GP2**

Permitting continued operations at Masons Landfill will have the effect of continuing oversupply of void in the County. At the margin, this is likely to depress gate fees and encourage the landfill of waste that might otherwise be managed at a higher level in the waste hierarchy, for example by undermining the business case for waste separation. Landfilling other than as a last resort is contrary to national policy and conflicts with Policy GP2 of the Plan which requires the mitigation of climate change as a result of increased emissions of landfill gas containing methane. The application is inconsistent with the Development Plan.

### **5.2 Policy GP4**

Whilst Folly Farm landfill continues to operate with sufficient capacity to meet the needs of the Plan as set out in the SWS, an extension to permitted disposal at Masons Landfill will result in an unnecessary duplication of landfill operations. Whilst some impacts of landfill are related to the rate of fill, other impacts are incurred simply by having the site open. As a result of unnecessary duplication of operations, impacts on vehicle movements, neighbouring land use, noise and vibration, air quality including dust and odour, mud and aggregates on the road and litter, vermin and birds will be greater than they might otherwise and need to be, regardless of site mitigations. The application is inconsistent with the Development Plan.

### **5.3 Waste Policies and Policy WP1**

As I demonstrate above, there is no quantitative need for additional permitted landfill void on the basis of the conservative prediction in the SWS through to the end of the Folly Farm permission in 2029. On the basis of an alternative scenario in which the SWS prediction for 2020/21 is extrapolated and growth in waste arisings is avoided as a result of national Strategy initiatives, Folly Farm provides enough capacity for the entire Plan period. Out-of-County wastes received at the Great Blakenham EfW plant take up capacity that might otherwise serve Suffolk's needs.

An important goal in the Plan is to aim for net self-sufficiency, whereby the County Council aims to manage an amount of waste equal to that arising in Suffolk, whilst acknowledging that waste is transported between different areas of the country. The Plan also has to take into account of the potential to receive London Waste. Based on the SWS and the Waste Policy section of the Plan, Policy WP1 sets out the anticipated annual levels of wastes arising for which permission will be granted planning permission. There is no need for Masons Landfill and therefore the application is inconsistent with the Development Plan.

Policy WP1 also requires that applications granted planning permission are in accordance with the waste hierarchy. As I observe above, an over-supply of capacity in Suffolk at the margin must encourage waste producers to depart from the hierarchy. The application is thus inconsistent with the Development Plan.

## 5.4 Policy WP12

Policy WP12 states that proposals for the disposal of non-hazardous or hazardous waste by landfilling or landraising may be acceptable where no alternative form of waste management can be made available to meet the need. There is no additional need to be met on the basis of the conservative prediction in the SWS of residual waste requiring disposal to landfill through to the end of the Folly Farm landfill permission in 2029. As a result, an alternative is already in place to meet need. The application is therefore inconsistent with the Development Plan.

Waste policy developments since the SWS was completed in 2018 will further reduce waste arisings and divert more residual waste from landfill. If these developments result in stasis in terms of residual wastes requiring disposal, then the Folly Farm landfill is sufficient to meet need over the entire Plan period. Under these circumstances, and subject to planning permission to continue operations at Folly Farm beyond 2029, the application would be inconsistent with the Development Plan with respect to Policy WP12 through the entire Plan period.

## 6. POLICY AND NEED IN THE ENVIRONMENTAL STATEMENT

### 6.1 Introduction

Policy and need are addressed at various points in the Environmental Statement (ES) and this text is largely repeated in the Planning Statement. In my comments below, I do not consider every instance, and absence of comment should not be taken to mean that I agree with the ES (or the Planning Statement). Nonetheless, I identify some key points where the ES is deficient with respect to these two issues that I deal with in my report. I do not comment on other deficiencies in the ES or elsewhere in the planning application, in particular associated with its coverage and/or exclusion of environmental impacts.

### 6.2 Forward [sic]

Paragraph 1.1.1 of the ES asserts that *“The UK Government still recognises the important role that landfill has as part of an integrated, sustainable approach to waste management.”* The Strategy contains no such reference. The closest wording to this can be found on page 79, where the Strategy states that *“We recognise that there is an ongoing role for landfill in managing waste, particularly for inert waste that cannot be prevented or recycled, but want to see its use minimised as much as possible.”*

Use of the words *“important”* *“integrated”* and *“sustainable”* are all missing, although one can understand why they are so appealing to the applicant.

The Strategy envisages an approach to the management of resources that is entirely at odds with continued landfilling. Whilst the extent of change and range of measures proposed to bring it about can only be conveyed through reading the Strategy as a whole, although I have summarised key elements above, its intent is best captured succinctly in the preface on page 7 as *“Our Strategy sets out how we will preserve our stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy.”* Each component of this overview will lead to a reduction in the role of, and need for, landfill.

This assertion in the ES is a misleading summary of the Government’s position on landfill.

### 6.3 Planning Policy Context

In paragraph 4.2.2, the ES refers to the summary that I mention above, stating that *“the Strategy recognises that landfill as a management option for residual waste will continue until improved recovery techniques become available.”* It is clear that this is both a partial and a passive reflection of

the Strategy's active position, failing entirely to capture its ambition "...to see its [landfill's] use minimised as much as possible."

To that extent, in its summary of the policy context, the ES is unreliable.

## 6.4 Need and Alternatives

Section 5.3 of the ES considers "Assessment of Need". Paragraph 5.3.1, which begins this section, deals entirely with waste data for the South East region. In case of any doubt, Suffolk is not in the South East of England. It is in the East of England region. Suffolk is not adjacent to any county in the South East of England. This paragraph is irrelevant and misleading.

Paragraph 5.3.2 claims that the "Extending the life of Masons to 2035 will ensure a disposal capacity for the local and wider area for the medium term". It will not "ensure" disposal capacity, it will considerably add to it, well beyond the need set out in the SWS and providing an over-supply.

Paragraph 5.3.3 makes a claim as to "...the reliance the Minerals and Waste Local Plan places on Masons Landfill as meeting the need for landfill capacity in Suffolk." As I demonstrate above, this is not the case. The SWS, conducted prior to the publication of the Strategy, sets out a need for landfill that can be met by Folly Farm through to 2029. Implementation of the Strategy is likely to reduce the need for landfill of residual waste still further.

Paragraph 5.4.4 claims that "Closing the landfill with immediate effect would result in the loss of a resource for the disposal of residual waste material, which may result in waste being transported further from its place of origin for disposal." In practice, given that wastes are imported from out-of-County for disposal, as I discuss above, the contrary might equally well be the case; with residual wastes landfilled at other more proximate sites. There is no evidence presented at all that supports this assertion. This claim is repeated at paragraph 5.4.8, and my response is the same.

Paragraph 5.4.10 asserts that "The continued operation of the facility will provide a much needed disposal resource." Need has not been demonstrated, let alone much need.

Paragraph 5.5.2 states "Landfill is the only option that can manage all types of residual waste; mass burn incineration and advance thermal treatment still generate a residual waste that requires management, typically landfill. As such, a like for like consideration of alternative disposal options cannot be adequately undertaken." This is disingenuous.

The principal solid product of waste combustion is incinerator bottom ash (IBA), which is typically matured and used as a substitute for virgin aggregate. As an example, details of ash management at the Great Blakenham facility can be found here: <https://www.suez.co.uk/en-gb/our-offering/success-stories/our-references/suffolks-acclaimed-energy-plant-saves-emissions-and-costs> and here: <file:///C:/Users/Simon.Aumonier/Downloads/SuffolkReport2018-web.pdf>. Viridor recycles the IBA from its fleet of EfW plant.

A small proportion of residual wastes received at a waste combustion facility will be classified as rejects. These may require disposal to landfill, but they may be suitable for recycling, for example in the case of metallic components of waste too large to go safely through the grate.

Whilst it is true that some wastes requiring disposal can only be landfilled, the significant majority of non-hazardous residual wastes, such as those received currently at Masons Landfill can be managed through combustion. As such, it is perfectly possible to undertake a like-for-like comparison of alternative management options for the most of the wastes it seeks permission to receive in the future if one had any interest in doing so.

## 7. SUMMARY

Waste policy in the Resources and Waste Strategy for England (the Strategy) sets out clearly the aim of limiting waste growth and diverting from landfill as much residual waste as possible in order to

recover valuable resources and reduce emissions of greenhouse gases contributing to climate change. Landfill is the management route of last resort. Permitting additional and unnecessary landfill capacity should be avoided, although some void will be required for wastes that cannot be managed through other treatments. This should be minimised.

Consented and permitted void at the Folly Farm landfill in Suffolk is sufficient to meet the predicted need for landfill set out in the Suffolk Waste Strategy (SWS) that provides the quantitative need analysis for the Suffolk Minerals and Waste Plan (the Plan) under a conservative scenario, through to the end of its permission in 2029.

The SWS was completed prior to the publication of the Strategy in 2018, which introduces more ambitious aims and interventions for waste management. Extrapolation of the minimum annual requirement of the SWS, which is forecast for 2020/21, to reflect the Strategy's intended outcomes, suggests that voidspace at Folly Farm landfill is sufficient to meet Suffolk's residual waste management needs beyond the end of the Plan period. An extension to Masons Landfill is not needed and is in conflict with the Development Plan.

At the maximum residual waste arisings requiring landfill forecast in the SWS (127,000 tonnes per year [tpa]), the void at Masons Landfill as of March 2020 (2,948,000 m<sup>3</sup>) would be sufficient to address need for approximately 23 years, assuming a bulk density of 1t m<sup>3</sup>. Were residual waste arisings requiring landfill to remain at 17,000 tpa, the conservative requirement predicted for 2020/21, this void would meet Suffolk's need for approximately 170 years.

Permitting extension of the Masons Landfill permission will result in an excess of landfill capacity in Suffolk. Inevitably, by duplication, this will increase environmental impacts associated with landfill operations, which is in conflict with the Development Plan. Masons Landfill already imports more waste from outside of the County than the Local Authority Collected Waste from Suffolk disposed at the site. Further surplus provision of capacity will encourage this practice to continue, and potentially to accelerate if there are further shortfalls in delivery of waste to the site.

Residual waste from outside the County is also managed at the nearby Great Blakenham energy from waste (EfW) plant. This is not consistent with an interpretation of the balance of waste arisings and management capacity that suggests a need for additional landfill void.

The application points to residual waste arisings in the South East region in its purported justification of need, suggesting a widening of the catchment for the site in order to fill its void. Clearly, if one looks increasingly into the distance, eventually residual waste arisings might be found that could report to Masons Landfill. However, transport costs will mean that Viridor could only attract waste to the site if it were to reduce its gate fee to a point at which combined costs were competitive with landfill sites closer to the waste source or if there were to be no more proximate void. On the one hand, this means receipt in Suffolk simply because other facilities are undercut. On the other, it means Suffolk becomes a magnet for wastes produced in other authorities because they are not making provision for their own disposal needs.

Clearly, the County of Suffolk should provide for its own need for the landfill disposal of residual waste, consistent with the ambition of the Plan for self-sufficiency. Recognising that waste will travel across borders, it is not possible to consider transport of residual waste for landfill from distant counties and/or disposal at reduced gate fees simply in order to allow the construction of additional cells in existing landfill void as consistent with the principles of sustainable development.

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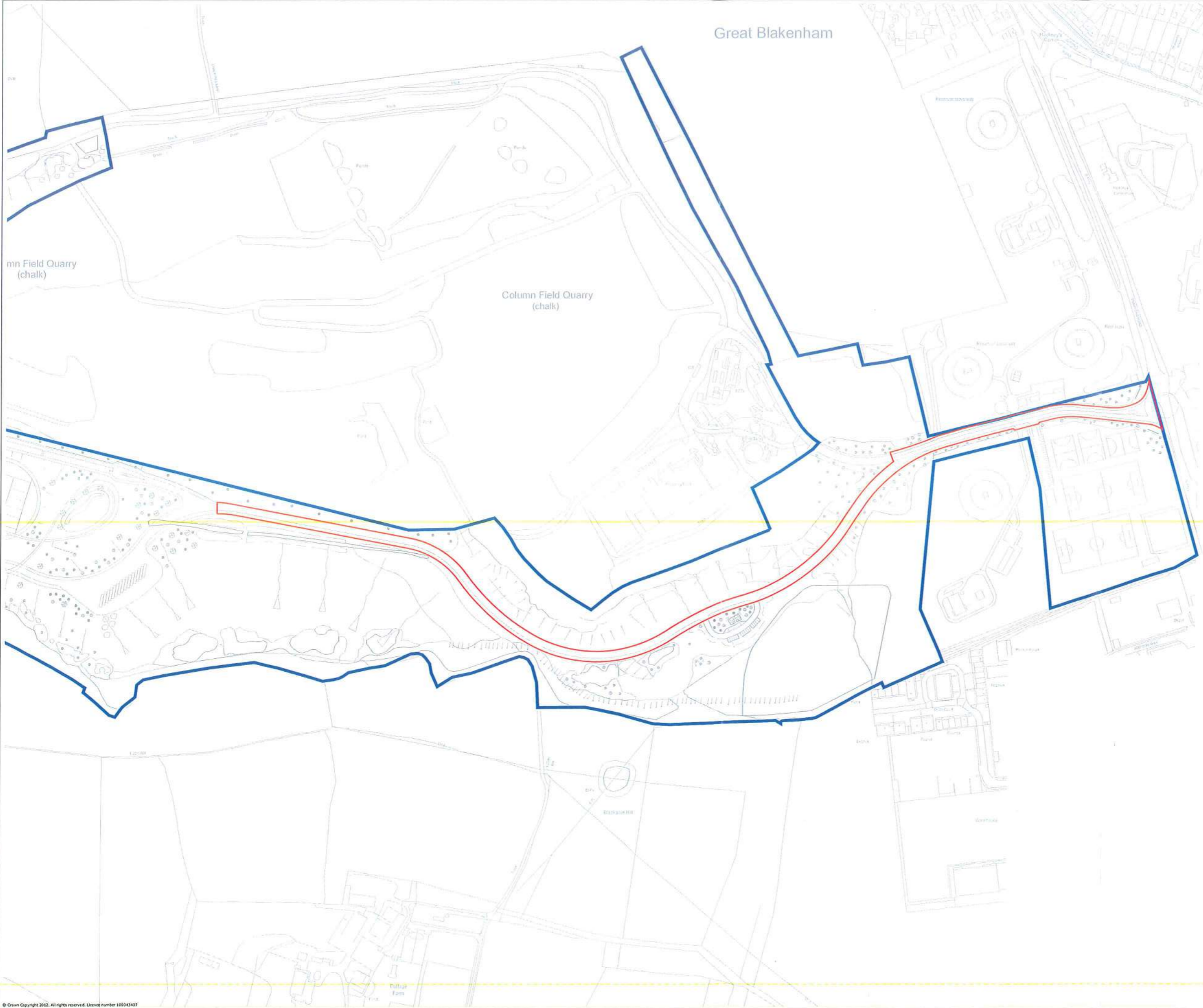
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**Appendix 2 – SnOasis Site Boundary & Access Road Plan from  
Section 106 Agreement dated 28 April 2020**



Great Blakenham



- Legend:
- Site Boundary
  - Access Road Extents



44 North Street  
Culford  
Suffolk  
IP11 2JG  
T: 01443 531 300  
www.motion.co.uk

Craig Marks  
1.5 Mofette  
London  
SE5 9PG  
T: 020 8165 5218

Project:  
Snoasis, Great Blakenham

Title:  
Plan 1  
Access Road

Scale: 1:2000 (B A1)

Drawing:  
160702-16

Revision:  
-





[illegible]

A	Up-dated to comments	29.05.17
Rev	Description	Date
Purpose of Issue		
<b>PLANNING</b>		
Bradley Murphy Design Ltd & The Courtyard Histon Technology Park De Lank Histon Wornborough CV38 3XB  T: 01938 674005 E: info@bradlaimurphydesign.co.uk www.bradlaimurphydesign.co.uk		
Client		
<b>SNOASIS</b>		
Project		
<b>SNOASIS</b>		
Drawing Title		
Planting Plan (Sheet 1 of 15)		
Drawn	Checked	Approved
JAS:NA	NA	NA
JAS:NA	Scale	Sheet Size
BAD:10.025	1:500	A0
Drawing Number	Date	
BAD:10.025.001.001	25/04/2017	
	Revision	
	A	

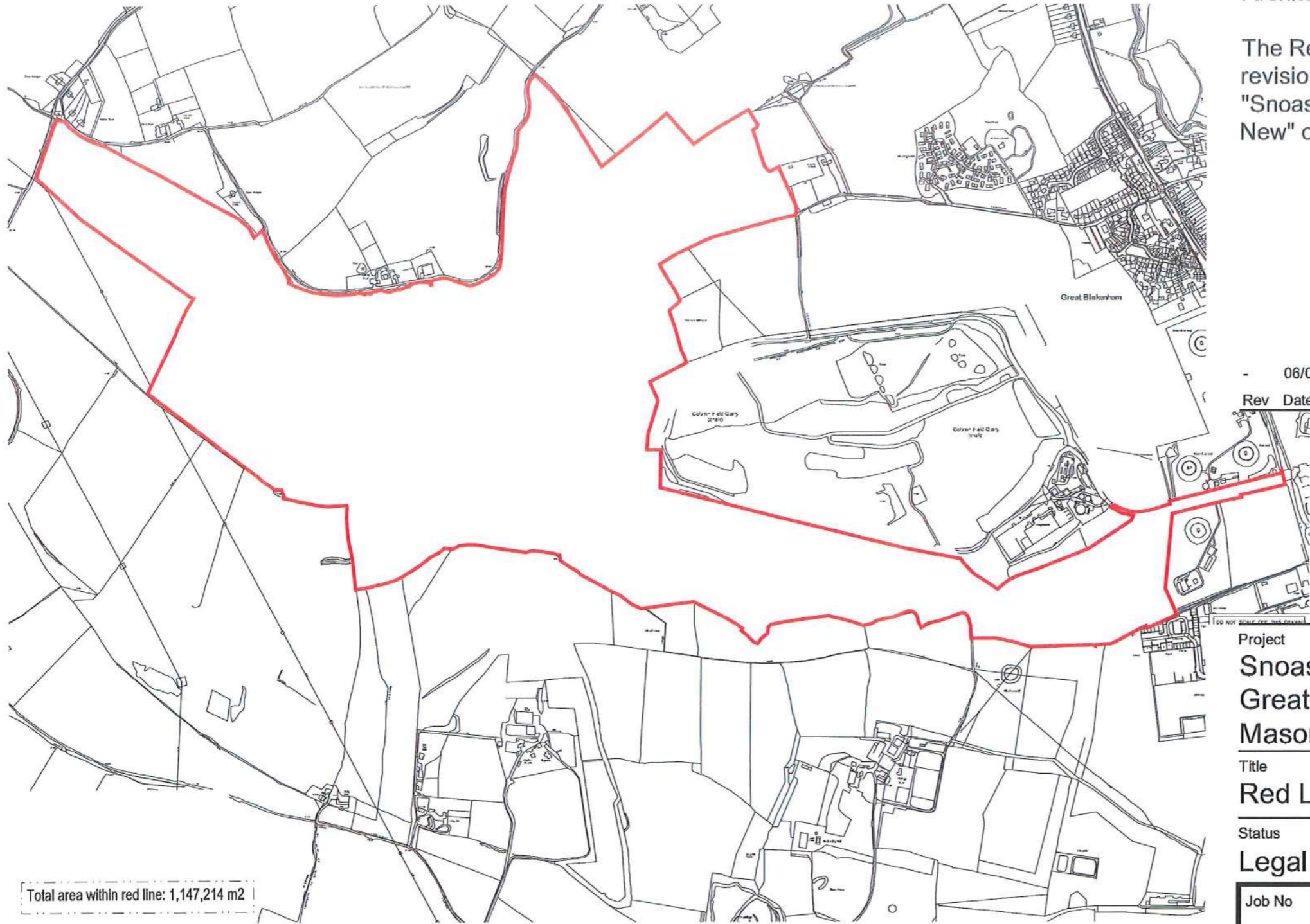


**BMD**  
LANDSCAPE  
DESIGN  
PLANNING

Do not scale from drawing.

Note:  
This drawing is a revision to the original "Red Line Plan" CAD drawing file produced by Leslie Jones Architecture "3634-AL (02) 0039 P01".

The Red Line shown in this drawing reflects the revisions to the Title Plan based on the Sketch "Snoasis Sec 106 Title Plan Review Original and New" over the above LJA's drawing.



-	06/04/2020	CH	FIRST ISSUE
Rev	Date	Check	Description

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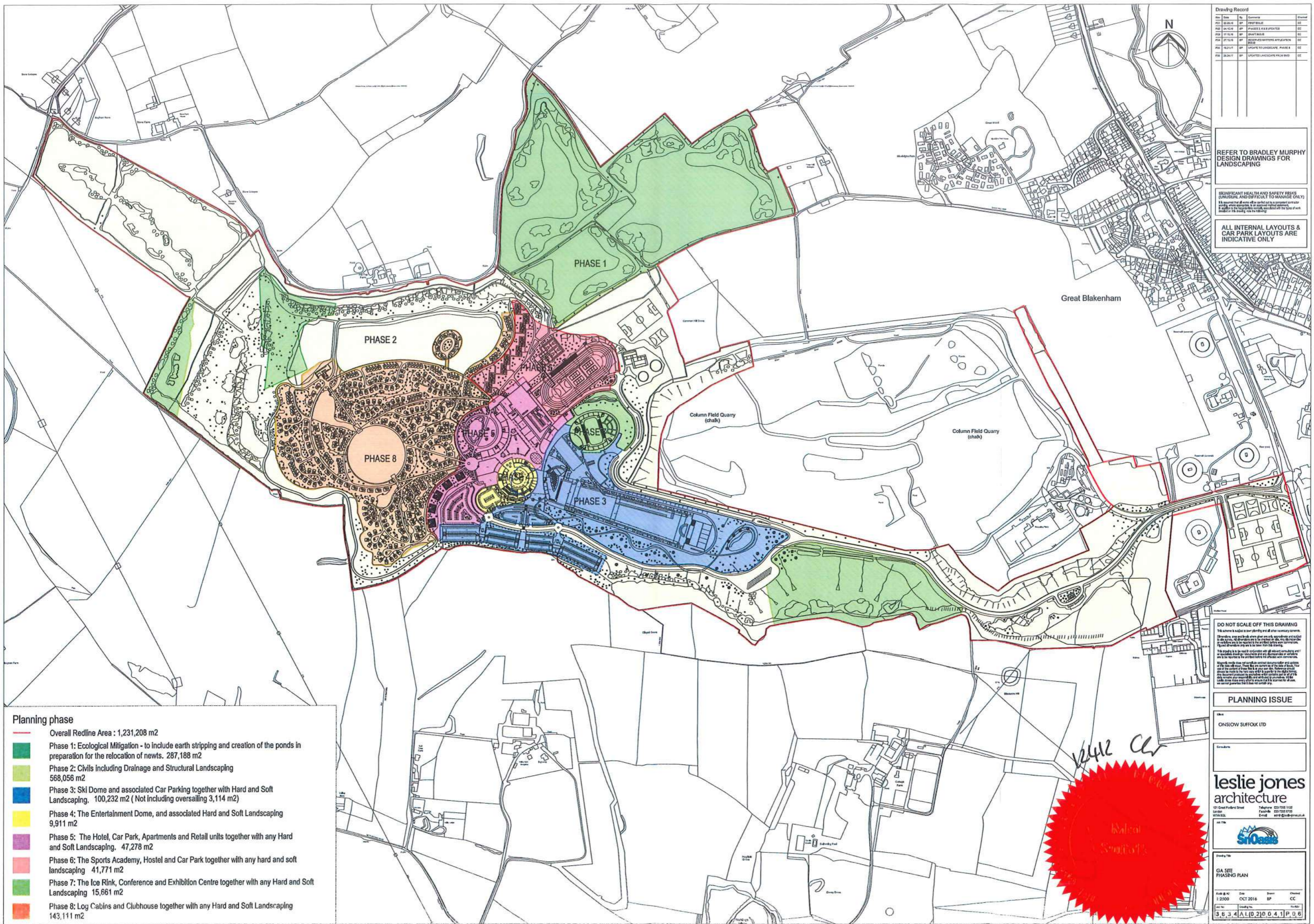
Title  
Red Line Plan

Status  
Legal

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Job No	Zone	Sheet No	Rev
4497		LG-90-001	-

ISO 14001 : 2004 ISO 9001 : 2000 RIBA Chartered Practice  
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**Planning phase**

- Overall Redline Area : 1,231,208 m2
- Phase 1: Ecological Mitigation - to include earth stripping and creation of the ponds in preparation for the relocation of newts. 287,188 m2
- Phase 2: Civils including Drainage and Structural Landscaping 568,056 m2
- Phase 3: Ski Dome and associated Car Parking together with Hard and Soft Landscaping. 100,232 m2 ( Not including oversailing 3,114 m2)
- Phase 4: The Entertainment Dome, and associated Hard and Soft Landscaping 9,911 m2
- Phase 5: The Hotel, Car Park, Apartments and Retail units together with any Hard and Soft Landscaping. 47,278 m2
- Phase 6: The Sports Academy, Hostel and Car Park together with any hard and soft landscaping 41,771 m2
- Phase 7: The Ice Rink, Conference and Exhibition Centre together with any Hard and Soft Landscaping 15,661 m2
- Phase 8: Log Cabins and Clubhouse together with any Hard and Soft Landscaping 143,111 m2

**Drawing Record**

No	Date	By	Comments	Checked
PD1	02.04.16	BP	FIRST ISSUE	CC
PD2	04.10.16	BP	PHASE 3 & 4 REVISED	CC
PD3	07.11.16	BP	PHASE 5 & 6 REVISED	CC
PD4	27.11.16	BP	REVISED WATERS APPLICATION	CC
PD5	16.12.17	BP	UPDATE TO LANDSCAPE PHASE 6	CC
PD6	02.03.17	BP	UPDATE TO LANDSCAPE PHASE 8	CC

REFER TO BRADLEY MURPHY DESIGN DRAWINGS FOR LANDSCAPING

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**PLANNING ISSUE**

Client: ONSLOW SUFFOLK LTD

Consultants:

**leslie jones architecture**

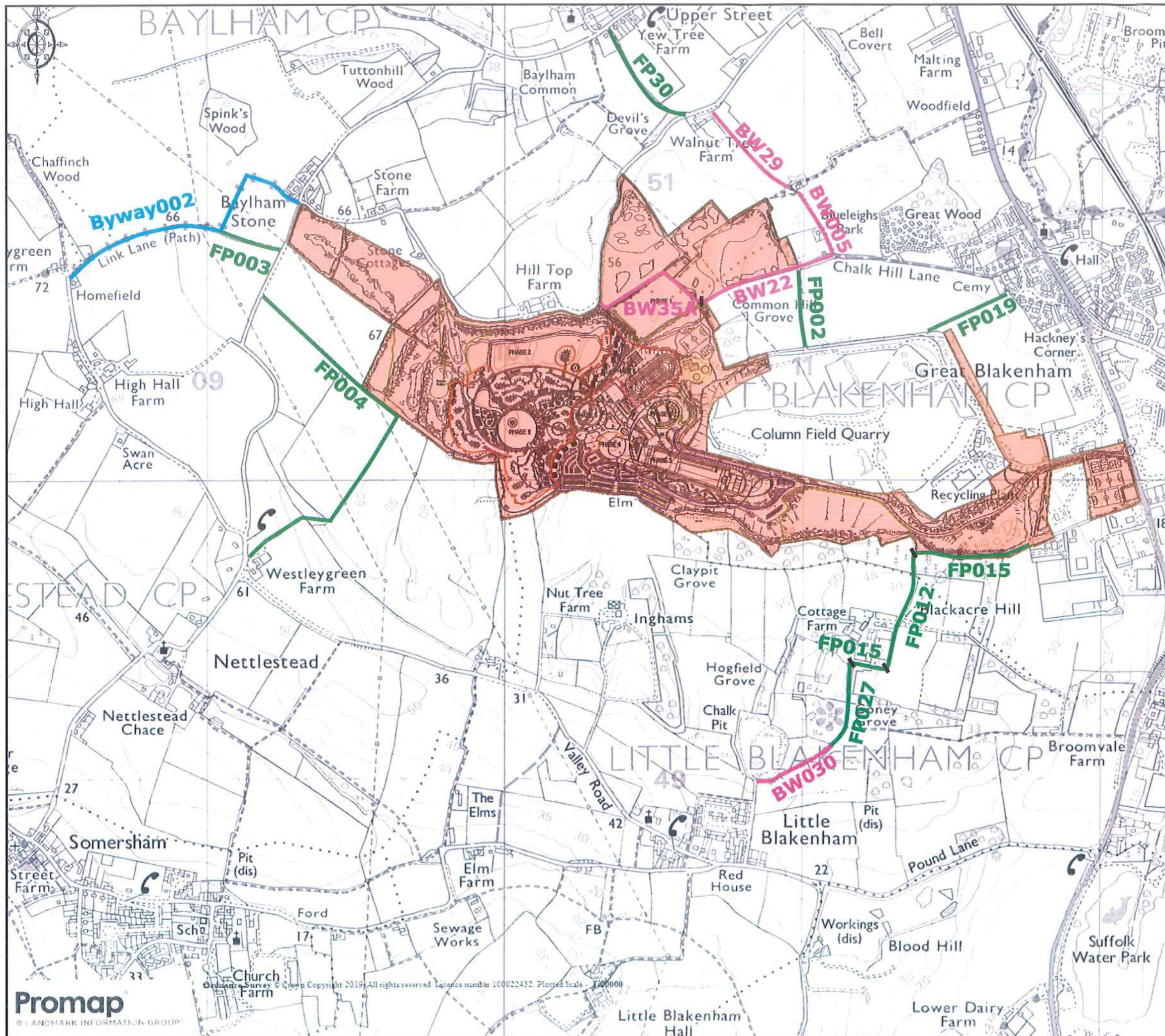
121 Great Portland Street London W1W 6LQ Tel: 020 7288 0100 Email: info@lesliejones.co.uk

**GA SITE PHASING PLAN**

Scale: 1:2500 Date: OCT 2016 Drawn: BP Checked: CC

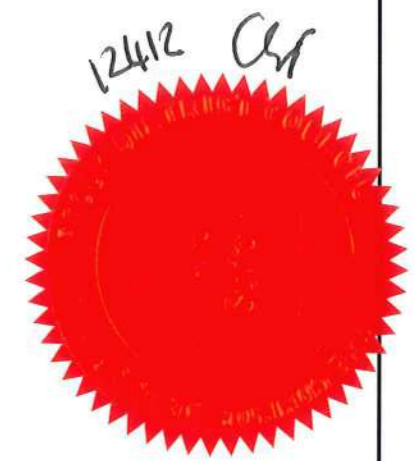
Rev: 3, 6, 3, 4, 1, 0, 2, 0, 0, 4, 1, P, 0, 6





# Legend

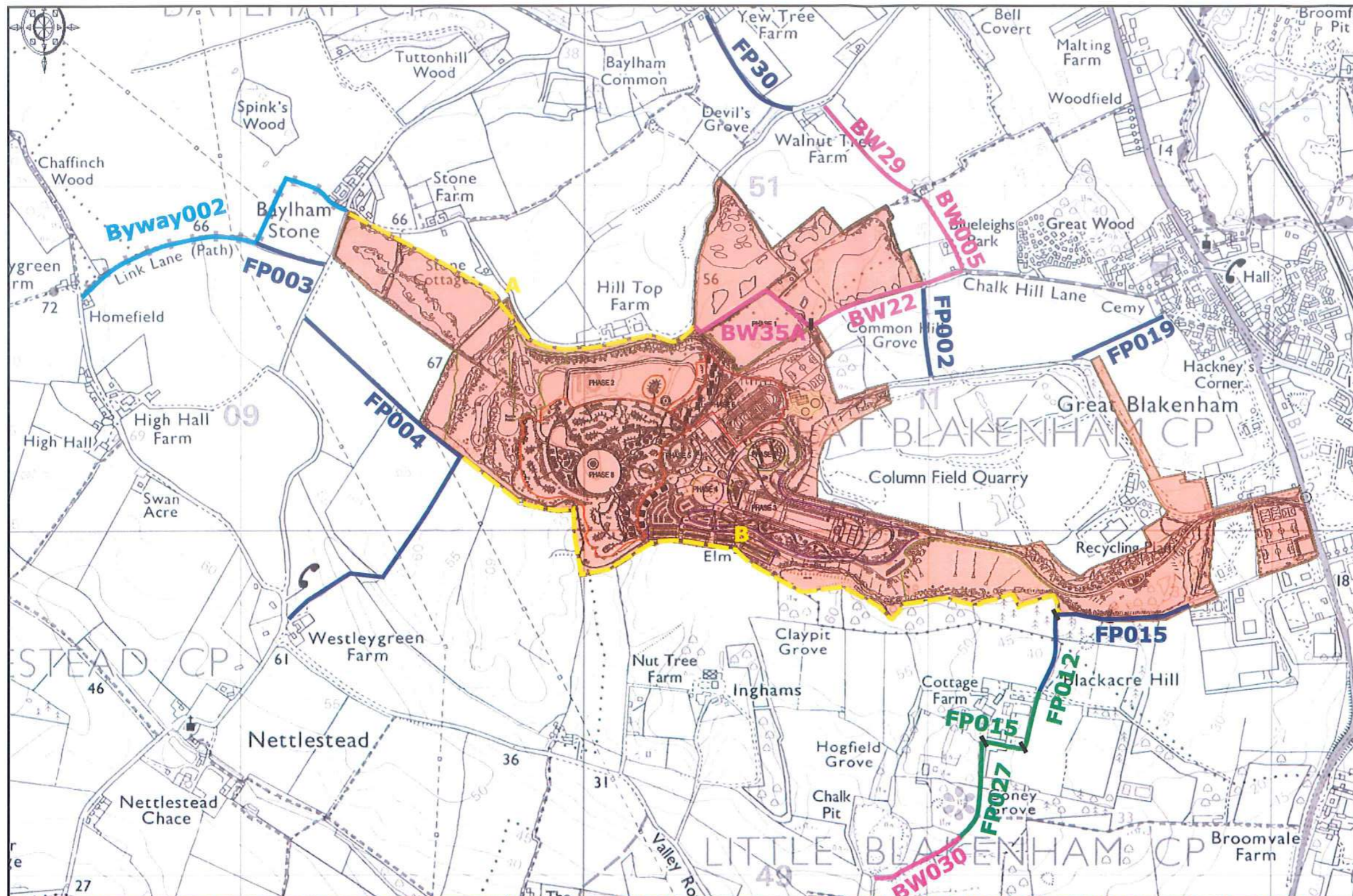
- Footpath
- Bridleway
- Byway Open to All Traffic



**motion**

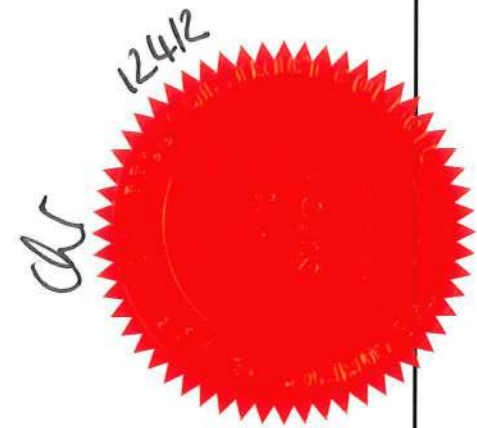
84 North Street, Guildford, GU1 4NU  
T: 01483 531 300  
www.motion.co.uk

Project: SnOasis, Great Blakenham	
Title: Existing Rights of Way Network	
Figure: Figure 1.1	Revision: -



#### Legend

- Footpath
- Footpath to Bridleway
- Bridleway
- Byway Open to All Traffic
- Indicative New Bridleway  
(Indicative routes subject to detailed survey/design)



**motion**

84 North Street, Guildford, GU1 4NU  
T: 01483 531 300

www.motion.co.uk

Project:

SnOasis, Great Blakenham

Title:

Indicative PROW Improvements

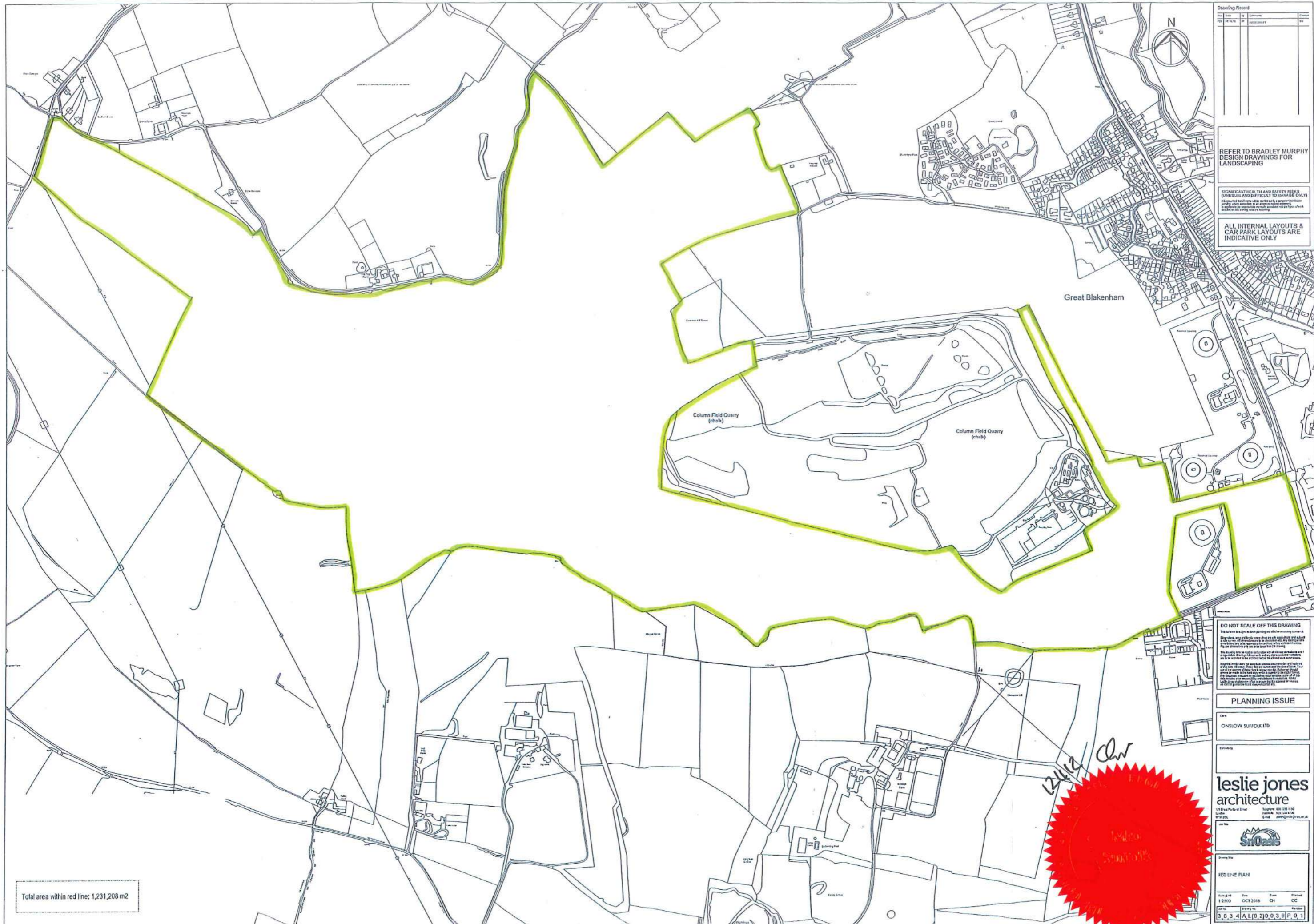
Figure:

Figure 1.2

Revision:

-

PROW	Parish	Treatment Required	Classification		Length (m)	Width (m)	Area (m <sup>2</sup> )	Surfacing		Compensation	
			Current	Proposed				Cost/m <sup>2</sup>	Total	Cost/m <sup>2</sup>	Total
BW005	Great Blakenham	Surface with hoggin and widen	Bridleway	Bridleway	235	3	705	£15	£10,575	-	-
BW029	Baylham	Surface with hoggin and widen	Bridleway	Bridleway	380	3	1140	£15	£17,100	-	-
BW35A & BW2	Great Blakenham	Surface with hoggin and widen	Bridleway	Bridleway	886	3	2658	£15	£39,870	-	-
Byway 002	Nettlestead	Surface with hoggin and widen	Byway	Byway	880	3	2640	£15	£39,600	-	-
FP002	Great Blakenham	Upgrade to Bridleway (hoggin surface)	Footpath	Bridleway	300	3	900	£25	£22,500	£2.50	£2,250.00
FP003	Nettlestead	Upgrade to Bridleway (hoggin surface)	Footpath	Bridleway	218	3	654	£25	£16,350	£2.50	£1,635.00
FP004	Nettlestead	Upgrade to Bridleway (hoggin surface)	Footpath	Bridleway	1365	3	4095	£25	£102,375	£2.50	£10,237.50
FP012	Great Blakenham	Upgrade to Bridleway (hoggin surface)	Footpath	Bridleway	230	3	690	£25	£17,250	£2.50	£1,725.00
FP015	Great Blakenham	Upgrade to Bridleway (hoggin surface)	Footpath	Bridleway	400	3	1200	£25	£30,000	£2.50	£3,000.00
FP019	Great Blakenham	Upgrade to Bridleway (hoggin surface)	Footpath	Bridleway	400	3	1200	£25	£30,000	£2.50	£3,000.00
FP030	Baylham	Upgrade to Bridleway (hoggin surface)	Footpath	Bridleway	400	3	1200	£25	£30,000	£2.50	£3,000.00
New PROW A	Baylham	New bridleway between Byway 002 and BW35A	-	Bridleway	-	-	-	-	-	-	-
New PROW B	Nettlestead	New bridleway between FP004 and FP12/15	-	Bridleway	-	-	-	-	-	-	-
Notes:								Total		Total	£24,847.50
All distances measured on google earth								Surfacing & Compensation Total		£380,467.50	
Right of Way classifications and routes taken from Suffolk Definitive Map								Design & Staff Time (@12%)		£45,656.10	
								Contingency (@10%)		£38,046.75	
								New PROW (A & B) Contribution		£200,000.00	
								GRAND TOTAL		£664,170.35	



Total area within red line: 1,231,208 m2

Drawing Record			
No.	Date	By	Comments
001	24.10.18	JP	Issue 001

REFER TO BRADLEY MURPHY  
DESIGN DRAWINGS FOR  
LANDSCAPING

SIGNIFICANT HEALTH AND SAFETY RISKS  
(UNUSUAL AND DIFFICULT TO MANAGE ONLY)  
It is assumed that the site is free from any significant health and safety risks. The designer is not responsible for any health and safety risks that may arise from the use of the site.

ALL INTERNAL LAYOUTS &  
CAR PARK LAYOUTS ARE  
INDICATIVE ONLY

DO NOT SCALE OFF THIS DRAWING  
This drawing is issued for your reference and is not to be used for any other purpose. It is not to be scaled off or used for any other purpose. It is not to be used for any other purpose. It is not to be used for any other purpose.

PLANNING ISSUE

ONSLOW SUFFOLK LTD

12/12/2018

leslie jones  
architecture

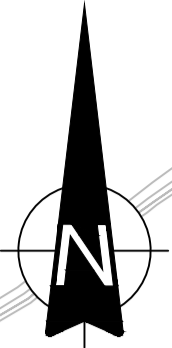
121 Great Portland Street  
London W1G 0QS  
Tel: 020 7613 1100  
Fax: 020 7613 1101  
Email: info@lesliejones.co.uk



RED LINE PLAN

Scale	Date	Drawn	Checked
1:2500	OCT 2018	GH	CC

## **Appendix 3 – Masons Landfill Extension Phasing Plan dated 7 January 2021**



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NOTES

- 1. ALL DIMENSIONS IN MILLIMETRES AND ALL LEVELS IN METRES ABOVE ORDNANCE DATUM.
- 2. DO NOT SCALE FROM THIS DRAWING.
- 3. ANY ANOMALIES IDENTIFIED WITH THE DETAILS SHOWN ON THIS DRAWING ARE TO BE BROUGHT TO THE ATTENTION OF SIRIUS ENVIRONMENTAL PRIOR TO CONSTRUCTION WORKS COMMENCING.

LEGEND

- 18.5— SITE SURVEY, JAN 2021
- PLANING BOUNDARY
- - - - - APPROXIMATE CELL BOUNDARIES
- AREA OF LANDFILL NON OPERATIONAL AND CAPPED
- AREA OF LANDFILL RESTORED
- AREA OF LANDFILL NON OPERATIONAL AND TEMP CAPPED
- AREA OF LANDFILL OPERATIONAL / UNCAPPED
- AREA OF LANDFILL NOT YET OPERATIONAL
- NON LANDFILL AREA

1	Site Survey Updated, Application Boundary Amended	12.02.21	MCC
REV	DESCRIPTION	DATE	BY

CLIENT



4245 Park Approach, Thorpe Park, Leeds. LS15 8GB. 0113 264 9960

JOB TITLE

MASONS LANDFILL SITE

DRAWING TITLE

Phasing Plan

DRAWN	DATE	APPROVED	DATE
M.C	07/01/2021	F.W	07/01/2021
SCALE	SHEET	DRAWING NUMBER	REVISION
1:2000	A1L	VI4031/16/04	1