

# Delivering New Waste Management and Operational Facilities for West Suffolk

Identification and Assessment of Potential Options and Sites (post public consultation amended version)

For Forest Heath District Council, St Edmundsbury Borough Council and Suffolk County Council

Units 5 & 6, The Old Wool Warehouse  
St Andrews Street South  
Bury St Edmunds  
IP33 3PH

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## **INSTRUCTIONS**

- i. Carter Jonas incorporating John Popham Planning is instructed by Forest Heath District Council, St Edmundsbury Borough Council and Suffolk County Council to formalise, recap and report on the work carried out by the West Suffolk councils (Forest Heath District Council and St Edmundsbury Borough Council) and Suffolk County Council over the last 5 years in identifying the optimal solution and optimal site for meeting their existing and future waste management and operational service and facility needs.

# 1 INTRODUCTION

- 1.1 This report concerns the planning for and delivery of replacement and future waste management and operational facilities in the St Edmundsbury Borough and Forest Heath District areas of Suffolk (now collectively known as West Suffolk), specifically waste transfer stations, household waste recycling centres and fleet depots. A number of factors have precipitated a review by St Edmundsbury Borough Council and Forest Heath District Council (working together as West Suffolk, as waste collection authority) and Suffolk County Council (as waste disposal authority) of the way in which these facilities are currently delivered or are currently proposed to be delivered in the future. Factors such as the need to increase operational efficiency and to reduce costs, Government initiatives to co-locate public services and the opportunity to redevelop West Suffolk's existing depot facility site on Olding Road have been of particular influence.
- 1.2 Suffolk Waste Partnership<sup>1</sup> has been working to establish a new network of waste transfer facilities across Suffolk since 2010 in order to provide efficient and effective transfer of waste from all parts of the County to the Energy from Waste facility at Great Blakenham. The review and assessment work carried out by the County Council as part of this process concluded that there are three key locations in Suffolk where waste transfer facilities are required; one of those locations is Bury St Edmunds. In view of this conclusion the County Council conducted a site search in the Bury St Edmunds area in 2012. The only suitable and available site found was the existing household waste recycling centre site (together with some adjoining land) at Rougham Hill. Proposals for a combined waste transfer station and household waste recycling centre on the Rougham Hill site were therefore worked up and planning permission was subsequently secured.
- 1.3 At a similar time a number of factors combined to encourage St Edmundsbury Borough Council and Forest Heath District Council to review their delivery of waste management and operational services, including the opportunity to co-locate the proposed waste transfer station for the Bury St Edmunds area with not just the household waste recycling centre, as the County Council had already secured permission for, but also a new fleet depot. It is of direct relevance that co-locating multiple public services or functions in this way increases operational efficiency and is supported by current Government thinking and initiatives.
- 1.4 Suffolk County Council and the West Suffolk councils started working together in 2014 to explore the possibility of co-locating all three facilities. The work carried out indicated that co-location of the facilities would be advantageous and the councils started to look for sites which might be capable of accommodating the combined facilities accordingly. There were no suitable sites allocated for waste management development within the waste plan or development plan so the search was widened to include unallocated sites which might be suitable. Three possible sites were identified; land at Tut Hill, land at Hollow Road Farm

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<sup>1</sup> The Suffolk Waste Partnership (SWP) is a strategic partnership of the county, district and borough councils, which works together to continuously improve waste management services throughout Suffolk.

(both on the outskirts of Bury St Edmunds) and land at Symonds Farm, Saxham. Assessment of these sites indicated that one of the sites, land at Hollow Road Farm on the north-eastern outskirts of Bury St Edmunds, performed better against the site requirements than the other two. The councils sought to explore further the site's potential and conducted a pre-planning public consultation exercise across March and April 2015.

- 1.5 The consultation, which mooted a potential development scheme for Hollow Road Farm, generated a significant number of concerns and objections. One of the key concerns expressed was that Hollow Road Farm was the wrong location for the co-located facilities. Other responses suggested that the facilities would be better provided from their existing or separate sites. This feedback made clear the need to formalise the assessment of the options and sites for delivering future waste management and operational services and facilities which the councils have conducted and to seek the public's views on it.
- 1.6 This report constitutes the formalised assessment of the options and sites. It examines and assesses all of the options and sites considered since work on the project commenced. Its aim is to identify the current optimal solution for delivering the facilities required and the best site or sites for delivering them on. By virtue of the fact that it will be made publicly available through further pre-application consultation this report also provides a background against which other potential sites can be suggested, explored and assessed.

## **2 PURPOSE OF REPORT**

### **Why is the report needed?**

- 2.1 Since the summer of 2014 the councils have considered numerous options and sites for the delivery of the waste management and operational facilities that, between them, they need to deliver or replace. This has been an evolving and organic process which has occurred over a period of time as options and sites have presented themselves and then ruled themselves out, been ruled out or been investigated further. As a consequence the process has been more of an informal than a formal one and has not previously been consistently documented.
- 2.2 Without a documented account of the process which has been followed in assessing the options and sites for delivering the waste management and operational services required for the West Suffolk area it is difficult for those who have not been directly involved to review and understand it. This is recognised by the councils who have commissioned this report to recap the assessment exercises they have been through and to document them. Interested parties should, as a result, be able to review, understand and scrutinise the process that the councils have been through.

### **What does the report do?**

- 2.3 The report provides a comprehensive account of both the West Suffolk councils' and Suffolk County Council's reviews and assessments of their waste management and operational facilities respectively. More specifically it:
- Provides a background to the reviews of waste management and operational facilities undertaken by the councils which explains the existing position and circumstances and why the reviews were necessary (see "Background" and "Chronology" headings, section 3);
  - Explains what the reviews established – the need for a new approach to the provision of waste management and operational facilities in particular (section 3);
  - Reviews the relevant planning policy to see what this provides in relation to meeting the need for new or replacement waste management and operational facilities (section 4);
  - Documents the councils' assessment of the possible options for the delivery of the necessary facilities (section 5);
  - Identifies the current optimal solution for the delivery of the facilities required as arrived at by the above assessment (see "Optimal Solution" heading, section 5);
  - Documents the councils' assessment of the possible sites on which to deliver the optimal facilities solution (section 6); and
  - Identifies the current optimal site for accommodating the optimal facilities delivery solution as arrived at by the above assessment (see "Optimal Site" heading, section 6).

### **3 THE NEED FOR NEW OR REPLACEMENT WASTE MANAGEMENT AND OPERATIONAL FACILITIES**

- 3.1 This section looks at the circumstances and factors that have led Suffolk County Council and the West Suffolk councils to review their existing waste management and operational facilities provision; the factors that amount to a need for new or replacement facilities.

#### **Background**

- 3.2 Suffolk County Council and the West Suffolk councils face a number of waste management and operational challenges over the next 25 years (the duration of the Great Blakenham Energy from Waste contract) across the St Edmundsbury and Forest Heath Districts (West Suffolk). There is a clear understanding that continuing with their current services and facilities provision is not an option for the councils and that a new approach is therefore required. Household and business growth will increase demand for waste services and create new commercial opportunities whilst the implementation of the Energy from Waste facility at Great Blakenham has changed the requirements for waste transfer and haulage across Suffolk. Additionally, the present location of waste transfer stations on the western fringe of West Suffolk entails unnecessary waste miles and costs.
- 3.3 In addition, a handful of emerging issues have confirmed the need to consider a new approach. The Suffolk Waste Partnership (see paragraph 3.78 – 3.81 below) has been working to establish a new network of waste transfer stations, close to major centres of population since the beginning of 2010 to ensure efficient movement of waste from across Suffolk to the Energy from Waste facility (now built and operational). In 2012, work to establish the most appropriate location for a waste transfer station to serve West Suffolk identified that Bury St Edmunds (the largest town in the area) needed such a facility. At present the nearest waste transfer station is in Red Lodge. Suffolk County Council has since secured planning permission for the redevelopment of the household waste recycling centre site at Rougham Hill in Bury St Edmunds to incorporate a waste transfer station. However, while this would allow the creation of a new, purpose built, appropriately located facility it doesn't offer the potential to co-locate the waste transfer station and household waste recycling centre with a waste collection and municipal services depot, which could offer significant benefits. A new approach could allow this to happen.
- 3.4 West Suffolk's waste collection and municipal services are currently operated from depots on Olding Road in Bury St Edmunds, Holborn Avenue in Mildenhall and Homefield Road in Haverhill. The facilities at the Olding Road depot are aging and are in need of renovation. Their size, age and construction mean that the cost of renovation is likely to be significant. While the site remains in use and functions satisfactorily, its specification, configuration and location are less than ideal. Accordingly, there is scope for a more efficient and effective means of delivering this function. Relocation, which is one option for the future provision of the depot function, would afford the opportunity to combine the Olding Road depot with the

Holborn Avenue depot which is likely to afford cost, managerial and operational efficiencies (see paragraph 3.22 below).

- 3.5 There is a further factor which favours relocation of the Olding Road depot. A masterplan for an area of land at the eastern end of the Western Way general employment area in Bury St Edmunds, which includes the site, was adopted in 2006. The masterplan proposes the redevelopment of the area to create a “public service village” (PSV). A first phase of the development was completed in 2009. It comprised the construction of what is now West Suffolk House, the shared offices of St Edmundsbury Borough Council (and now West Suffolk), Suffolk County Council and several other public sector organisations. The rest of the masterplanned redevelopment is yet to take place; a significant part of it would rely on the Olding Road depot site being vacated. In late 2013 the site adjoining the Olding Road depot (the DHL/NHS logistics site), which did not form part of the original PSV masterplan area, came on the market unexpectedly and was sold to a developer. The developer has since expressed an interest in the site potentially forming part of an amended masterplan for are of wider area of land in the vicinity of Western Way and Olding Road. This may increase the likelihood of the Western Way development proposals being delivered or reduce the timescale in which they are delivered. If and when they do go ahead, whether as the result of a partnering arrangement or not, the Olding Road depot would need to be relocated.<sup>2</sup>
- 3.6 The above elements combine to create a further important factor which favours a new approach to delivery of waste management and operational services and facilities in West Suffolk. The fact that a waste transfer station has not yet been provided in or near Bury St Edmunds and the scope, and to a degree, pressure to relocate West Suffolk’s existing depot facilities from Olding Road offer the opportunity to co-locate these related facilities and thereby the possibility of integrating and improving services, creating better public access, supporting regeneration, enabling greater commercialism, reducing long term costs and providing managerial and operational efficiencies. If the chance to co-locate these services is not taken now the next opportunity is not likely to be until the 2040s at the earliest (allowing building lifespans of 25 years and bearing in mind that the recently commenced Energy from Waste contract runs for 25 years). Co-locating the facilities would accord with current Government thinking and initiatives; particularly the Cabinet Office (Government Property Unit) and Local Government Association’s “One Public Estate” initiative (see paragraphs 3.74 – 3.77 below).

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<sup>2</sup> The masterplan for the public service village (adopted in 2006) explains that: “*The vision for this site is to accommodate a complex of office buildings to provide a range of public services in a pleasant and high quality environment. It will be a new quarter for the town and the development of this site will provide a benchmark for the standard of future development in this locality, and a catalyst for the development of other sites in the vicinity of Western Way/Beetons Way*”. Accordingly the proposed public service village is not considered to be an appropriate location for the operational hub proposals.

## Chronology of events

- 3.7 **Spring 2010:** Co-location of waste management and operational facilities in the West Suffolk area was first considered by Suffolk County Council and St Edmundsbury Borough Council (prior to the formation of the West Suffolk partnership with Forest Heath) in spring 2010. Co-location was ruled out as combining depots at this stage would not have been deliverable. While the Suffolk Waste Partnership had by this point realised there was a need to create a network of suitably located transfer stations to serve the proposed Energy from Waste facility it had yet to conclude where they should be located. The pressure for St Edmundsbury Borough Council to relocate its depot facilities from the Olding Road site was also less as, despite an adopted masterplan having been in place for the redevelopment of the site and surrounding area for several years, the adjoining building and premises were off-market and there had not been any significant moves made towards the next stage of the PSV proposals. Further, the Government Property Unit was only just forming and the “One Public Estate” programme and Transformation Challenge Award (see paragraphs 3.70 – 3.73 below) were yet to be launched.
- 3.8 **2011 – 2013:** Following this early look at co-location and the subsequent determination not to explore it further at this point the Suffolk Waste Partnership progressed its review of waste transfer facilities in the County and produced a final report in summer 2011<sup>3</sup>. It was this report that concluded that a waste transfer station needed be located in or near to Bury St Edmunds. A thorough search for sites within the Bury area was undertaken by County Council officers in 2012. At the end of the process only one suitable, available and deliverable site remained, the existing household waste recycling centre site at Rougham Hill (including some adjoining land which was also in St Edmundsbury Borough Council’s ownership). An application for the redevelopment of the site to deliver a waste transfer station and a repositioned household waste recycling centre was worked up and submitted. It gained planning permission in October 2013.
- 3.9 In late 2011 Forest Heath District Council and St Edmundsbury Borough Council decided to adopt a shared services structure whereby combined officer teams would deliver services on behalf of both councils. A joint chief executive was appointed in April 2012 and a new joint senior management team was in place by November 2012. This significant change had the effect of streamlining decision making processes involving both councils and allowed options for further joint working and asset sharing to be properly considered.
- 3.10 **Summer 2014:** The Rougham Hill planning permission was subsequently challenged via a judicial review which had been sought by local residents. It was not until July 2014 that the challenge was declared unsuccessful. During this time, however, St Edmundsbury Borough Council members, who had always had concerns about the Rougham Hill proposals (these had been expressed through the Development Control Committee’s consideration of the proposals), urged West Suffolk officers to consider other options for delivering the waste

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<sup>3</sup> SCC report: Waste Transfer Infrastructure Network Project Discovery Phase – Final Report – 19 July 2011

transfer facility required. Co-location of facilities was re-considered at this point. The “One Public Estate” programme had by then been introduced, as had the Transformation Challenge Award; “West Suffolk” had been formed (and the rationalisation of the constituent councils’ services and facilities was high on the agenda); and the sale of the DHL/NHS logistics site next to St Edmundsbury Borough Council’s Olding Road depot had led to a serious expression of interest in bringing forward the next phase of the PSV proposals.

- 3.11 The County Council, having been conscious of the potential benefits of co-location for some time but having already committed to its Rougham Hill proposals, was not in a position to consider further co-location (it’s proposals already included the co-location of the waste transfer station and household waste recycling centre facilities). Accordingly, the West Suffolk councils began considering the relocation of their Olding Road and Holborn Road depot facilities and co-location with other potential public sector partners whilst not ruling out the possibility of co-location with Suffolk County Council’s waste management facilities should the County’s position change.
- 3.12 The West Suffolk councils started to consider the options for delivering the new and replacement waste management and operational services and facilities required and possible sites on which they could be located. Following the conclusion of the Rougham Hill planning permission challenge and an internal review, Suffolk County Council, being aware of the potential benefits of co-location in this area, began to work with the West Suffolk councils in a preliminary evaluation exercise to see if there was a joint solution to the provision of waste management and operational services and facilities which could prove mutually advantageous. The West Suffolk councils had remained open to the possibility that Suffolk County Council may be interested in working with them and put a report to St Edmundsbury’s “Full Council” in June 2014<sup>4</sup>. The report raised the possibility of co-locating a replacement depot facility with a new waste transfer station and replacement household waste recycling centre on a site near Bury St Edmunds. It also indicated that once the right site for the proposed development was found an option to purchase the site would need to be secured in order for detailed feasibility assessment work to commence (to minimise the risk of abortive costs).
- 3.13 **Autumn 2014:** A joint West Suffolk and Suffolk County Council project team was formed and the councils commenced work on the assessment of options for delivering the waste management and operational facilities they needed to put in place for the future. By February 2015 the three councils had arrived at what they considered an optimal solution, a “West Suffolk operational hub”, which comprised the co-location of a new depot for West Suffolk with the County’s proposed waste transfer station and a new household waste recycling centre, as well as the potential to accommodate other public sector partners subject to interest. The West Suffolk councils’ work on options and, more specifically, sites for delivering the necessary waste management and operational services and facilities since 2013 had concluded that there were no suitable and available allocated or previously

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<sup>4</sup> Report to SEBC Council: Project to Investigate Relocating the Depot to a Potential New Shared Facility near to Bury St Edmunds – 30 June 2014

developed sites in the search area on which a collection of waste management and operational facilities could be located. As a result the councils were forced to consider unallocated greenfield sites. Three possible greenfield sites were identified and assessed and one of the sites, land at Hollow Road Farm<sup>5</sup>, emerged as the most suitable, available and deliverable. Therefore, by the end of February 2015, the councils had assessed Hollow Road Farm to be the best site to accommodate the optimal approach to delivering the facilities required.

- 3.14 The councils continued their feasibility assessment work on the proposed Hollow Road Farm “operational hub” solution, prepared an initial business case and gained approval of it from all three councils’ cabinets<sup>6</sup>. They secured an option to purchase the site in December 2014. Work on a planning application was commenced and, with draft proposals taking shape in February, a public consultation was organised for March/April. The public consultation generated a significant amount of local interest and, ultimately, concerns objections being expressed. As has already been mentioned at paragraph 1.5 above, one of the key concerns expressed by the respondents was that, in their view, Hollow Road Farm was the wrong location for the co-located facilities. Further, a number of responses suggested that it would be better if some of the facilities continued to be provided on their existing sites, or that the facilities would be better provided on a different site, or separate sites. Some of these responses cited specific alternative sites.
- 3.15 The councils either assessed or reassessed the alternative sites raised through the public consultation process (one had already been considered) and a further alternative site raised subsequently. All of these additional sites were found to be unsuitable with the result that land at Hollow Road Farm was still considered the optimal site.

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<sup>5</sup> Hollow Road Farm lies on the eastern outskirts of Bury St Edmunds, west of Barton Hill and the A134 within the parish of Fornham St Martin (see plans at Appendices C & D).

<sup>6</sup> Report to FHDC Cabinet: CAB/FH/15/001 – West Suffolk Operational Hub – 17 February 2015

<https://democracy.westsuffolk.gov.uk/documents/g227/Public%20reports%20pack%20Tuesday%2017-Feb-2015%2018.00%20Forest%20Heath%20Cabinet.pdf?T=10>

Minutes of FHDC Cabinet: *Minutes of a meeting of the Cabinet held on Tuesday 17 February 2015*

<https://democracy.westsuffolk.gov.uk/documents/g227/Printed%20minutes%20Tuesday%2017-Feb-2015%2018.00%20Forest%20Heath%20Cabinet.pdf?T=1>

Report to SEBC Cabinet: CAB/SE/15/015 – West Suffolk Operational Hub – 10 February 2015

<https://democracy.westsuffolk.gov.uk/documents/s6065/CAB.SE.15.015%20West%20Suffolk%20Operational%20Hub.pdf>

Minutes of SEBC Cabinet: *Minutes of a meeting of the Cabinet held on Tuesday 10 February 2015*

<https://democracy.westsuffolk.gov.uk/documents/g223/Printed%20minutes%20Tuesday%2010-Feb-2015%2017.00%20St%20Edmundsbury%20Cabinet.pdf?T=1>

Report to SCC Cabinet: *Consideration of Business Case for a West Suffolk Operational Hub – 24 February 2015*

[http://committeeminutes.suffolkcc.gov.uk/searchResult.aspx?qry=c\\_committee~~The%20Cabinet](http://committeeminutes.suffolkcc.gov.uk/searchResult.aspx?qry=c_committee~~The%20Cabinet)

Minutes of SCC Cabinet: *Confirmed Minutes of the meeting held on 24 February 2015*

[http://committeeminutes.suffolkcc.gov.uk/searchResult.aspx?qry=c\\_committee~~The%20Cabinet](http://committeeminutes.suffolkcc.gov.uk/searchResult.aspx?qry=c_committee~~The%20Cabinet)

- 3.16 In addition to triggering this further site assessment and reassessment work the feedback made clear the need to formalise the councils’ assessments of the options and sites for delivering the waste management and operational facilities required and to ensure they were properly presented (in order to demonstrate that the proposed “operational hub” at Hollow Road Farm was, and is, the optimal solution to delivering the facilities required).
- 3.17 Since the public consultation, work on the planning application has been put on hold pending the formalisation of the waste management and operational facilities delivery options and sites assessment processes. This report is the key output of the formalisation work; it details the work undertaken and its findings and conclusions.

**The existing provision**

3.18 A key element of the need to review the existing waste management and operational facilities is the unsuitability or sub-optimal nature of some of the facilities. These facilities are considered below.

**Depots**

3.19 There are currently three Council Waste and Street Scene depots in West Suffolk. These are located at Olding Road in Bury St Edmunds, at Holborn Avenue in Mildenhall and at Homefield Road in Haverhill. The range of services provided from these facilities is shown in figure 1 below.

Olding Road, Bury St Edmunds	Holborn Avenue, Mildenhall	Homefield Road, Haverhill
Domestic waste collection Trade waste collection Street cleansing Grounds maintenance Skip service Material processing / transfer Bulky waste and bin service Vehicle and plant repair Fleet management Management and administration	Domestic waste collection Trade waste collection Street cleansing Bulky waste and bin service	Domestic waste collection Trade waste collection Street cleansing Grounds maintenance Gulley emptying Bulky waste and bin service

**Figure 1: services provided from existing West Suffolk depots** (source: West Suffolk)

3.20 St Edmundsbury Borough Council undertook a review of its depots (Olding Road, Bury St Edmunds and Reeds Lane, Haverhill) in 2006. This coincided with the completion and adoption of the masterplan for the redevelopment of the area of land at the eastern end of the Western Way general employment area which included the Olding Road depot site (see paragraph 3.5 above). Following this review it was decided that the Bury St Edmunds depot

would remain at Olding Road notwithstanding the development proposals for the area. The redevelopment was proposed to be phased and the Olding Road site did not fall within the first phase area. In 2009 the Haverhill depot was relocated to Homefield Road to allow the previous town centre site to be redeveloped for retail use. A separate review by Forest Heath District Council led to the depot at Holborn Avenue in Mildenhall being completely rebuilt on its existing site at a similar time.

- 3.21 The current practice of operating waste collection and municipal services from three sites means management costs and operating costs are relatively high and opportunities for operational flexibility and efficiency are limited. Accordingly, resources can be stretched during periods of high work demand and staff absence.
- 3.22 There is an opportunity to reduce the number locations from which waste collection and municipal services are provided and then reconfigure and remodel the delivery of the services in order to reduce costs and make efficiency savings. At present combining the Olding Road and Holborn Avenue depots provides the best opportunity for doing this. The closer proximity of Mildenhall to Bury St Edmunds and good road links to the Forest Heath towns along with the now limited number of services run from the Holborn Avenue depot (since the advent of shared services in West Suffolk) make centralising it an obvious option. In the case of Homefield Road (Haverhill), its greater distance from Bury St Edmunds, its location on the south west fringe of West Suffolk and future planned growth in Haverhill mean that it is likely to remain strategically important. For this reason it has not formed part of the West Suffolk councils' review of their waste collection and municipal services offer apart from during the early stages when its retention was considered to be necessary. The Olding Road and Holborn Avenue depots are considered in more detail below.

#### *Olding Road, Bury St Edmunds*

- 3.23 The Bury St Edmunds depot at Olding Road comprises about a third of the floorspace of a large industrial building, the other end of which is in separate ownership and is occupied by a DHL/NHS logistics operation. The freehold of this adjoining site changed hands in 2013 and now rests with a developer. The DHL/NHS logistics lease expires in approximately two years' time providing the opportunity for redevelopment of the site which would logically include the depot site as well. Whilst the depot building and yard have provided adequate accommodation for the depot functions they were not designed for this purpose. They are also in need of significant maintenance in order to extend their life and make them more resource efficient. Senior members of St Edmundsbury Borough Council are therefore broadly supportive of relocating the depot in or around Bury St Edmunds. The redevelopment of the site as part of the development proposals for the wider area could provide a capital receipt to help facilitate the relocation.
- 3.24 The depot building was originally constructed over 50 years ago as a manufacturing plant for heavy machinery. It was acquired and converted to use as a Council depot approximately 30 years ago. The asbestos cement roof and metal wall cladding are nearing the end of their service life and will require replacing with modern materials to protect the

building if it is to remain operational in the medium or long term. Many internal services that were installed in the 1980s are also nearing the end of their service life and will need to be replaced in the medium term. The building is very energy inefficient and utility costs are therefore high compared to modern facilities. The external hard surfaces are 50 years old and are difficult to maintain to the environmental protection standards required for a waste handling facility. They will need to be replaced in their entirety in the medium term. The total capital cost of the essential works described above (at today's rates) is estimated at £2.25 million and the cost of maintaining the site would remain high due to the age and condition of the unimproved elements.

- 3.25 The council services being delivered from the site have changed significantly over time e.g. removal of the highways and housing repairs functions and expansion of waste handling services. The site has been altered and adapted to suit these changes and meet minimum operational requirements but the function and efficiency of services is constrained by site conditions.
- 3.26 The site has a number of difficulties associated with its size, location and age. There is limited room to expand within the site to cope with the increase in waste generation from future housing growth. The building suffers from a number of problems including poor energy efficiency, facilities which are no longer fit for purpose and a maintenance backlog. It is a poor location for heavy goods vehicle (HGV) access and waste collection and municipal service provision is not in keeping with the development proposals for the area. Even if the depot were in the right location there are significant maintenance implications (with an estimated cost of £2.25 million) which would need to be met in the next 10 years just to sustain operations as they are. Increasingly stringent legislative and operating requirements are likely to require further investment unless a new or different approach to providing these services is adopted.

#### *Holborn Avenue, Mildenhall*

- 3.27 As explained above the depot at Holborn Avenue in Mildenhall was completely rebuilt on its existing site in 2009. It is therefore a relatively new facility but has very limited room to expand to cope with future the waste generation from housing growth and to accommodate additional services.
- 3.28 At the time the depot facility was rebuilt, the assumption was that it would provide an adequate base for delivery of waste collection and municipal services for Forest Heath District Council alone. As such the building was designed to accommodate managers, supervisors and customer services and administration teams in a facility that included all of the necessary staff welfare facilities. With the advent of shared services under a single, unified management structure the waste collection and municipal services teams have merged and administrative functions are now predominantly located in Bury St Edmunds. This has meant that the office based facilities at Holborn Road are underutilised. However, facilities for parking operational vehicles including HGVs are at capacity and there is limited scope to expand this to cater for future growth.

## **Waste transfer stations**

- 3.29 Suffolk County Council's waste transfer requirements are currently met by private firms (under contract) at three locations in or close to the West Suffolk area, these are: The Carrops, Red Lodge; Burrell Way, Thetford; and Homefield Road, Haverhill. All three facilities are located on the western fringe of West Suffolk. However, a significant proportion of the waste the facilities handle comes from the West Suffolk area, e.g. Bury St Edmunds, and the majority is ultimately destined for facilities in central or eastern Suffolk (Energy from Waste facility and materials recycling facility). This means that significant (and ultimately unnecessary) waste miles and costs are incurred in transporting the waste.
- 3.30 It was this issue that the County Council sought to address through its review of waste transfer facilities which concluded in 2011. The review found that, as a minimum, transfer stations should be located in the 'key locations' of Lowestoft, Bury St Edmunds and east of Ipswich. The analysis also showed there to be a potential benefit from locating transfer stations in what were termed 'desirable locations' if a business case for such facilities could be made. These were Sudbury, Haverhill and Mildenhall.
- 3.31 None of the existing waste transfer facilities in West Suffolk meet the requirement for provision in the key location of Bury St Edmunds.
- 3.32 All three existing waste transfer stations currently used by the councils in West Suffolk are in private ownership. Private ownership of waste transfer stations means that changing waste transfer service providers (e.g. at the end of a contract) requires a change of facility locations. Changing facility locations has the potential to cause an upheaval in waste collection services because of the re-routing and other logistical complications it presents. This is seen as a barrier to changing waste transfer service providers and therefore to flexibility and competition. With publicly owned facilities these problems do not occur – a change of service provider can take place with the location from which the services are provided being kept the same. As a result the upheaval associated with a change of location is avoided. These considerations were an important factor in the Suffolk Waste Partnership making the decision to invest in publicly owned waste transfer stations following its review of waste transfer station provision in the County, which it concluded in 2011 (see paragraph 3.8 above). At the time of the review there were four waste transfer stations serving West Suffolk and all were in private ownership.

### *The Carrops, Red Lodge*

- 3.33 The Carrops is located just south of the village of Red Lodge off the B1085.
- 3.34 The waste transfer station at The Carrops is a privately owned and operated facility which accepts both residual and recycle waste from the St Edmundsbury Borough and Forest Heath District areas as well as residual waste from Suffolk's household waste recycling centres. It is an older, covered facility (although it isn't fully enclosed) which last year

handled 30,289 tonnes of residual waste and 9,419 tonnes of recyclate from the West Suffolk area.

- 3.35 In addition to the waste transfer station the site accommodates a windrow composting operation. Assuming the composting operation is to continue the site has limited space or no space for co-location of other facilities, accommodating partners or expansion.
- 3.36 The facility receives waste during the hours of 7:30 – 16:00 on weekdays and 7:30 – 13:00 on Saturdays. Longer weekday and weekend opening times would afford greater flexibility for waste collections.
- 3.37 The Carrops is not in a “key location” or “desirable location” as identified by the Suffolk Waste Partnership work which started in 2010 (see paragraph 3.30 above). Although it is the closest to Bury St Edmunds of the three existing waste transfer stations serving West Suffolk it is still 14 miles away and therefore gives rise to additional waste miles.
- 3.38 The transfer station is poorly located in terms of access to Bury St Edmunds via of the trunk road network. Although it is located close to the strategic lorry route network (A11 and A14), traffic travelling south from Red Lodge on the A11 is unable to join the A14 eastbound carriageway where the two roads meet. Traffic wishing to travel eastbound on the A14 must therefore travel 3 miles in a westerly direction before being able to cross over the A14 and join the eastbound carriageway at junction 37.
- 3.39 Traffic accessing the site must pass immediately adjacent to a significant number of sensitive receptors (dwellings) and there is potential for conflict with residential traffic and road users. Further, the road providing access to the site is currently poorly maintained and is therefore not ideal for the HGV traffic associated with the facility.
- 3.40 The site is designated as an “existing waste site” and a “waste site allocation” in the Cambridgeshire County Council Minerals and Waste Site Specific Proposals Development Plan Document.
- 3.41 The facility is owned and operated by the same company as the other two waste transfer stations serving West Suffolk (see below), FCC Recycling UK Ltd.

#### *Burrell Way, Thetford*

- 3.42 Burrell Way is located on the southern side of Thetford, south west of the town centre and close to the A11.
- 3.43 The Burrell Way waste transfer station is a privately owned and operated facility which accepts residual waste from the St Edmundsbury Borough and Forest Heath District areas. Last year it handled 4,584 tonnes of waste from the West Suffolk area. It is a large, good quality transfer station located on an industrial estate. However, its industrial estate location means that there is no scope for co-location of other facilities, accommodating partners or expansion. Occupancy levels on the estate are good and there are no adjoining or nearby sites available.

- 3.44 The facility receives waste during the hours of 7:30 – 16:00 on weekdays and 7:30 – 13:00 on Saturdays. Longer weekday and weekend opening times would afford greater flexibility for waste collections.
- 3.45 While the facility currently serves the West Suffolk area it is not in a “key location” or “desirable location” as identified in the Suffolk Waste Partnership work which started in 2010. It is well located in relation to trunk road network however.

#### *Homefield Road, Haverhill*

- 3.46 Homefield Road is located on the southern edge of Haverhill adjacent to the A1017.
- 3.47 The waste transfer station at Homefield Road is a privately owned and operated facility which accepts both residual and recyclate waste from the St Edmundsbury Borough and Forest Heath District areas as well as residual waste from Suffolk’s household waste recycling centres. It is a large, good quality facility which last year handled 10,874 tonnes of residual waste and 3,030 tonnes of recyclate from the West Suffolk area. The existing facilities are underutilised and should therefore be able to accommodate waste generation increases without physical expansion.
- 3.48 Homefield Road is an existing industrial estate location which is suitable for the waste transfer station use but means that opportunities for co-location of other facilities, for accommodating partners and for physical expansion are limited. As with Burrell Way, occupancy levels on the estate are good and there are no adjoining or nearby sites available.
- 3.49 It receives waste 7:30 – 16:00 on weekdays and 7:30-13:00 on Saturdays. Longer weekday and weekend opening times would afford greater flexibility for waste collections.
- 3.50 Homefield Road is not located in a “key location” but is in a “desirable location” as identified in the Suffolk Waste Partnership work which started in 2010. The site is well located in relation to trunk road network.

#### **Household waste recycling centres**

- 3.51 Suffolk County Council has three household waste recycling centres in the West Suffolk area. One is located at Rougham Hill in Bury St Edmunds, another in Mildenhall and a third in Haverhill. The facilities are strategically located as part of a wider network to provide the best coverage of the County. The County Council therefore plans to keep the HWRCs in their respective areas. As a result it is only the Bury St Edmunds facility that is relevant to the councils’ review of waste management and operational service and facility provision in West Suffolk (the possible new approaches to which focus on the Bury St Edmunds area).
- 3.52 The Rougham Hill facility lies on the outskirts of Bury St Edmunds south east of the town centre. It is therefore well located in terms of the main population centre of West Suffolk – Bury St Edmunds.

- 3.53 The household waste recycling centre site is owned by St Edmundsbury BC but is leased to Suffolk County Council. It is operated under contract until May 2019 by private company, FCC Recycling (UK) Ltd (the same company that owns and operates the three existing waste transfer facilities serving West Suffolk (see above).
- 3.54 The facility accepts over 32 different materials for disposal, reuse and recycling from residents and commercial customers. It is open to customers between 9:00 – 17:00 on weekdays and Saturdays (9:00 – 16:00 during the winter) and 10:00 – 16:00 on Sundays and bank holidays. The facility is open all year apart from Christmas Day, Boxing Day and New Year's Day.
- 3.55 It is estimated that over 250,000 visitors use the facility each year. Between April 2013 and March 2014 it handled 8,377 tonnes of residual, recyclable and compostable waste and is considered to have the capacity to cope with the level of waste associated with the housing growth planned for West Suffolk.
- 3.56 Rougham Hill is a single level site which means that in order to deposit waste users must climb steps to access the disposal containers. Split level sites which afford direct access to disposal containers are now generally considered preferable to single level sites thus there is scope improve the service provided to customers in terms of HWRC facilities serving Bury St Edmunds. Further, while users can deposit reusable items at the site these are taken off-site to be processed. Some household waste recycling centres in other areas have on-site shops for reusable items so that they can be both donated and purchased on site. Providing this service for West Suffolk's HWRC site users, including in the Bury St Edmunds area, could improve or expand their customer experience and increase the capture of materials for reuse.
- 3.57 The current staff facilities at Rougham Hill are satisfactory but basic and have scope for improvement.

## **Political and policy factors**

- 3.58 There are a number of political and policy factors which have contributed to the need for the Councils to review of the way waste management and operational facilities are provided in West Suffolk. These are considered below.

### **Waste Management Plan for England (December 2013)**

- 3.59 The Waste Management Plan for England (herein Waste Management Plan) is a high level policy document. It provides an analysis of the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised Waste Framework Directive (a European Commission document which lays down strategic waste management principles for the European Union).

- 3.60 Parts of the Waste Management Plan are of relevance to the types of services and facilities with which this report is concerned and have implications for their delivery and those responsible for delivering them. The relevant parts are reproduced below.

Under the heading “Waste Services”, page 22

*Managing waste further up the waste hierarchy has required a change in our waste management practices. As waste is increasingly treated as a resource it has led to complexities in our waste management services. These complexities are enhanced by the variation in waste services across England which are delivered by the different tiers of local government, i.e. unitary, county and district levels and by the private sector. Waste services, more specifically waste collection schemes and major disposal and recovery installations for municipal waste, are a matter for local authorities to develop fit for purpose local solutions within the context of the Environmental Protection Act 1990 and subsequent Regulations. Waste services for business waste are largely provided by the private sector as are many of the services for municipal waste commissioned by local authorities.*

Under the heading “Assessment of need for new collection schemes and infrastructure/closure of waste infrastructure” and sub heading “Infrastructure”, page 29

*The Government’s ambitions for waste highlight the importance of putting in place the right waste management infrastructure at the right time and in the right location. We aim to have the appropriate waste reprocessing and treatment infrastructure constructed and operated effectively at all levels of the waste hierarchy to enable the most efficient treatment of our waste and resources. In line with the Government’s approach to localism, we continue to support local authorities to facilitate the provision of necessary waste infrastructure, recognising that local communities should benefit from hosting waste infrastructure and be involved from an early stage in planning for such infrastructure.*

Under the heading “Assessment of need for new collection schemes and infrastructure/closure of waste infrastructure” and sub heading “Proximity principle”, page 29

*The revised Waste Framework Directive establishes the principle of ‘proximity’. This is within the context of the requirement on Member States to establish an integrated and adequate network of waste disposal installations for recovery of mixed municipal waste collected from private households. The requirement includes where such collection also covers waste from other producers. The network must enable waste to be disposed of, or be recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.*

Under the heading “Assessment of need for new collection schemes and infrastructure/closure of waste infrastructure” and sub heading “Collection infrastructure”, page 32

*Local authorities in England are under a legal obligation under the Environmental Protection Act 1990 to provide waste collections to households. From 2003, they have also been under a duty to collect at least two types of recyclable waste separately where they have a duty to collect household waste. From 1 January 2015, local authorities will need to collect waste paper, metal, plastic or glass by way of separate collection where this is necessary to ensure that waste undergoes recovery operations in accordance with Articles 4 and 13 of the Waste Framework Directive and to facilitate or improve recovery; and where such separate collection is technically, environmentally and economically practicable. As noted in the section on measures to promote high quality recycling, the Government has also been working with local authorities to increase the frequency and quality of waste collections, make it easier to recycle and to encourage reward schemes to increase recycling. ... The Department for Communities and Local Government will continue to encourage weekly collections of residual waste in the coming years. Within England, local authorities assess the need for any changes to collection arrangements that best fit their local circumstances and meet the legal obligations to collect waste set out above.*

- 3.61 It can be seen from the above that the Waste Management Plan acknowledges the complexity of delivering waste services in a two tier system, as exists in West Suffolk, and the role of local authorities in developing fit for purpose solutions which afford the most efficient treatment of waste and resources. It also explains the relevance and implications of the proximity principle which, in view of its stipulation that waste must be handled in one of the nearest appropriate installations, is of relevance to the councils' position.

#### **National Planning Policy for Waste (October 2014)**

- 3.62 The National Planning Policy for Waste (herein NPPW) sets out the Government's detailed waste planning policies. It complements the Waste Management Plan for England (see above) and the National Planning Policy Framework (see below). It is primarily concerned with the forward planning of waste and waste management facilities. The relevant parts are set out below.

##### Under the heading "Identify need for waste management facilities", page 4 – section 3

*Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. In preparing Local Plans, waste planning authorities should:*

...

- *work collaboratively in groups with other waste planning authorities, and in two tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management;*
- *consider the extent to which the capacity of existing operational facilities would satisfy any identified need.*

Under the heading “Identifying suitable sites and areas”, page 5 – section 4

*Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations. In preparing their plans, waste planning authorities should:*

- ...
- *plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;*
- ...
- *consider a broad range of locations including industrial sites, looking for opportunities to co-locate waste management facilities together and with complementary activities*

3.63 The NPPW therefore contains a number of important objectives which, even if aimed at plan making, are relevant to the councils’ position. They identify the need for collaborative working, provision of suitable networks of facilities and for assessing the capacity of existing services when planning for new waste development.

3.64 It also requires adherence to the proximity principle and, crucially, encourages waste planning authorities to consider a broad range of locations for new waste management facilities and explore opportunities to co-locate waste management facilities together and with complementary activities.

**National Planning Policy Framework (March 2012)**

3.65 The National Planning Policy Framework (herein NPPF) is of limited relevance to the councils’ position for the simple reason that it is not supposed to deal, directly at least, with waste and waste management development. That is the NPPW’s job (see above). It does however provide that:

Under the heading “Plan-making” and the subheadings “Using a proportionate evidence base” and “Infrastructure”, page 40 – paragraph 162

*Local planning authorities should work with other authorities and providers to:*

- *assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and*
- ...

3.66 While this is aimed at plan making, as with the most relevant parts of the NPPW, it does further emphasise the need to work together with other authorities. It urges assessment of both quality and capacity of waste infrastructure and its ability to meet forecast demands.

The reference to quality of infrastructure is important as does not feature in the other policy documents.

### **Planning for Waste Management Facilities: A Research Study (August 2004)**

- 3.67 This 2004 Government paper contains a wealth of information relevant to the planning of waste management facilities. While it is now over 10 years old it remains a useful reference document in view of its well-researched and informative content. The following extracts are of relevance to the councils' position.

Under the heading "Key Issues Facing Waste Planners and Developers", page 9

*The progression towards sustainable waste management practices requires a holistic approach. This applies to the choice of options in making decisions on waste collection and transport systems all the way to the mode of final disposal of residual wastes.*

*The design, planning and construction phases of new waste facilities can take a considerable period of time. If statutory targets are to be met, sufficient lead in times are required before facilities become operational. This needs to be accommodated within new waste contracts.*

Under the heading "Waste Facility Options" and sub heading "Waste Management Facilities", page 36

*There is a growing trend for integrated waste facilities which combine a number of processes on one site. There may be distinct planning and land-use advantages of such an approach, particularly with regard to transport and the proximity principle.*

- 3.68 These observations provide some important insights for those seeking to deliver new waste management facilities. The view on the need for a holistic approach to choosing options and making decisions on waste collection and transport systems is particularly pertinent to this case, as is the commentary on the timescales for implementing new waste facilities.
- 3.69 The findings in respect of integrated waste facilities and the fact that there may be "distinct planning and land-use advantages" to the co-located approach are also highly relevant.

### **Transformation Challenge Award**

- 3.70 The Transformation Challenge Award is a Government initiative set up to reward local authorities who plan to improve services for end users by re-engineering their business practices (through sharing all or some of their corporate services, workforces, information technology systems and assets) and redesigning service delivery. It is centred on a challenge fund which makes £120 million grant (£15 million in 2014 to 2015 and £105 million in 2015 to 2016) and a £200 million loan facility available to local authorities.

- 3.71 The scheme is flexible thus can involve two or more districts working together or districts working with their county council. It can involve some or all of a council's services. Each scheme is likely to be different, reflecting the different needs and situations of the authorities involved.
- 3.72 In November 2014 the success of a Transformation Challenge Award bid by Suffolk County Council for the 2015/16 year (for which it partnered with a number of local authorities including the West Suffolk councils) was announced. The bid recognised the need for integrated whole systems leadership and made a number of commitments, some of which are of direct relevance to the councils' current position, i.e. having assessed shortcomings in the current provision, trying to decide how best to deliver waste management and operational services and facilities in the future. The relevant commitments are:
- Joint agile working – investing in infrastructure and skills to maximise the benefits of multi-agency working.
  - The co-location of service providers with single points of access for service users - reducing transaction, accommodation, management and support costs.
  - Multi-skilled staff working across the public sector, the voluntary and charitable sector and local communities to maximise local assets enabling people to be as self-sustaining as possible.
- 3.73 In view of the fact that these are *commitments* on the part of the all three councils they need to be factored into the decision making process for any future waste management and operational service delivery decisions.

### **One Public Estate**

- 3.74 The One Public Estate (OPE) programme uses land and property released by government to boost economic growth and regeneration. The Cabinet Office and the Local Government Association (LGA) run the programme to encourage sharing services, reducing running costs and generating capital receipts (money received from selling surplus property). The programme also aims to facilitate and enable local authorities to work successfully with central government and local agencies on public property and land issues through sharing and collaboration.
- 3.75 The programme has four priorities
1. Create economic growth – releasing land and property to enable it to be used to stimulate economic growth, regeneration, new housing and jobs.
  2. Deliver more integrated and customer-focused services – encouraging publicly funded services to co-locate, to demonstrate service efficiencies and to work towards a more customer focused service delivery.
  3. Generate capital receipts through the release of land and property.
  4. Reduce running costs of central and local government assets.
- 3.76 In August 2014 it was announced that Suffolk, St Edmundsbury and Forest Heath (under the grouping Norfolk and Suffolk in partnership with Forest Heath and St. Edmundsbury

(West Suffolk)) were 3 of 20 Councils selected to take part in the second phase of the One Public Estate Programme.

- 3.77 It is evident from the above that the programme has a clear emphasis on co-location of services, releasing land and operational efficiency. As with the Transformation Challenge Award, therefore, the councils' commitment to the OPE programme means the four programme priorities will be an important factor in the decision making process for any future waste management and operational service delivery decisions.

### **Suffolk Waste Partnership Joint Municipal Waste Management Strategy for Suffolk 2003 – 2020 – Addendum 2013**

- 3.78 The Suffolk Waste Partnership (SWP) is a strategic partnership comprising the County Council and district and borough councils within Suffolk, which works together to continuously improve waste management services throughout the County. The SWP has a Joint Municipal Waste Management Strategy 2003-2020 (The Strategy) whose policies set out the strategic framework for the management of municipal waste. The Strategy, originally comprising 17 policies, was reviewed in 2013 and now contains 15 policies.
- 3.79 Suffolk County Council, St Edmundsbury Borough Council and Forest Heath District Council are all members of the SWP.
- 3.80 Of the SWP's 15 policies the following five are considered relevant to the Council's position.

#### Policy 1

*We will enhance joint working between authorities to improve waste management services in Suffolk. Joint working will include:*

- ...
- D) co-operating to deliver funding for initiatives; and*
  - E) jointly awarding contracts where advantageous to improve performance and minimise costs by providing economies of scale.*

#### Policy 8

*We will provide a network of Household Waste and Recycling Centres which complements the other recycling options available to residents, and supports the SWP's other policies (i.e. supports reuse; maximises diversion of materials from landfill; seeks to support SME recycling etc).*

#### Policy 9

*We will recover energy from all Suffolk's residual waste which can be treated through the Energy from Waste facility which SCC has contracted.*

#### Policy 11

*We recognise the increasing need for all SWP member authorities to work together to ensure best value services are provided for our residents. This will be achieved by:*

- A) Ensuring we consider the whole system waste costs that bind together collection and disposal services.*
- B) Creating a legally binding waste framework agreement between the County Council, in its capacity as the Waste Disposal Authority and the District and Borough Councils, in their capacity as the Waste Collection Authorities. Any agreement will be regularly reviewed to ensure it remains to the positive benefit of all members of the Suffolk Waste Partnership.*

#### Policy 14

*We will seek to maximise the proportion of municipal trade waste that is recycled or composted by:*

- A) Advising and supporting business on how best to improve the amount of their waste that is either recycled or composted.*
- B) Improving the levels of joint working on trade waste services between SWP authorities.*
- C) Aiming to achieve at least 30% recycling and composting by 2015.*

- 3.81 It can be seen from the above that through their involvement with the SWP the councils have committed to joint working (of particular note is the reference to jointly awarding contracts where this is beneficial from a performance or cost standpoint), providing a network of household waste recycling centres, sending all of their residual waste to the Energy from Waste facility and considering whole system waste costs for collection and disposal

#### **Summary**

- 3.82 This sub section sets out some important considerations for decision makers dealing with the future delivery of waste management and operational facilities in West Suffolk. Of most importance are the commitments that the councils have made to joint working, co-location of facilities, increasing the efficiency and effectiveness of their service provision, releasing land and property, and considering whole system waste costs. In addition to these commitments this sub section of the report reveals parts of key policy documents which acknowledge some of the difficult or important issues that the councils have to address in deciding on their future waste management and operational services delivery approach. These are: the two tier system; the balancing act that is the proximity principle; the need to consider the capacity of existing facilities; the need to consider a broad range of locations for new facilities including the co-location of such facilities; the need for a holistic approach when making decisions about waste collection and waste management service delivery; the considerable timeframes associated with delivering new facilities; and the potential advantages of integrated waste facilities.

## **Demand factors**

- 3.83 The Waste Management Plan for England indicates that at the national level household and commercial waste generation is decreasing. Household waste has been falling since 2007/8, on average by just over 2% per year. On a similar note, survey data suggests that between 2002/3 and 2009 annual commercial waste generation declined by 6.5 million tonnes, or 21%, an average reduction of 3.2% per year.
- 3.84 Also of relevance is the fact that an ever increasing proportion of the waste produced in England is being recycled, reused or composted. In 2012/13, the proportion of household waste recycled in England was 43.2%, an increase from 41.5% in 2010/11.
- 3.85 Notwithstanding these national trends waste generation in West Suffolk is currently increasing at around 2% per annum, reflecting improvements in the economy and increases in population. Current housing growth in West Suffolk is set to continue or be exceeded over the next 15 to 20 years<sup>7</sup>. It is estimated that the number of homes in West Suffolk's population will grow by 24% by 2031<sup>8</sup>. An increase in commercial activity, and therefore commercial waste generation, is also expected. Accordingly, waste growth in West Suffolk is expected to continue for the foreseeable future. This will significantly increase the demand for the services which the existing depots, waste transfer stations and household waste recycling facilities provide.
- 3.86 It is worth noting that the Energy from Waste contract let by Suffolk County Council runs for 25 years from 2014. This contract requires that any waste, which cannot reasonably be recycled or composted be delivered to the facility at Great Blakenham for energy recovery. This means that the disposal arrangements for residual waste are fixed for the foreseeable future; waste management practices in West Suffolk will need to be planned and delivered accordingly while taking into account the projected increase in waste generation.

## **Implications for the councils**

- 3.87 The growth in waste generation in West Suffolk and the increase in the proportion of waste which is recycled will have consequences for the councils in their roles as waste management services providers. The most obvious implication of the projected waste growth is that the councils will have to ensure that they have sufficient capacity within their existing facilities or put in place plans for expanding them or delivering new larger facilities as and when necessary to meet the growing need. It is estimated that there will be a requirement to provide facilities capable of handling up to 104,000 tonnes per annum of

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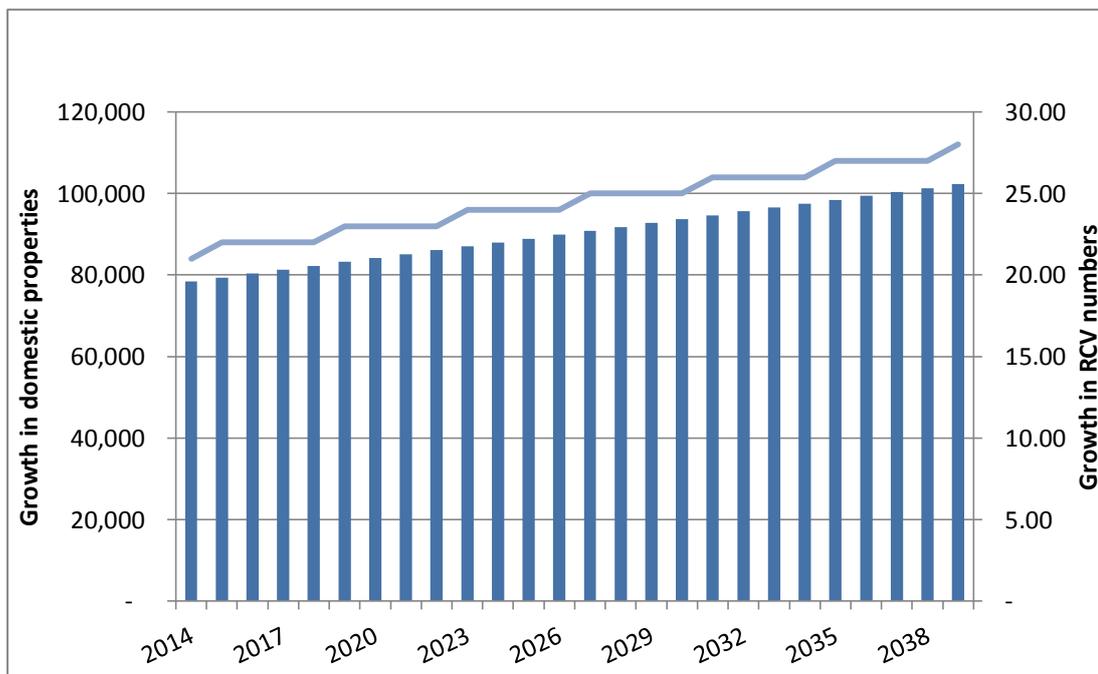
<sup>7</sup> St Edmundsbury Core Strategy December 2010 (para. 2.17 – page 18 & para. 4.10 page 32)  
Forest Heath Local Development Framework Core Strategy Development Plan Document 2001 – 2006  
(with housing projected to 2031) Adopted May 2010 (para. 3.6.6 – page 54)

<sup>8</sup> Suffolk County Council estimates based on relevant local plan documents suggest a housing stock of 74,669 homes in 2011 which is expected to increase to 91,549 homes by 2031.

waste from municipal and commercial sources in West Suffolk by 2039<sup>9</sup>. The existing waste transfer and household waste recycling centre facilities currently handle 90,000 tonnes per annum.

3.88 Another important implication is that the increase in waste generation coupled with the increase in the proportion of waste which is recycled will mean that the need for services and facilities associated with recycling will increase disproportionately, i.e. more than for residual waste. This is likely to mean an increase in demand, in particular, for recycling collection services, sorting facilities, recycling of additional and new types of waste and household waste recycling centre services as more and more waste is recycled and becomes recyclable.

3.89 An illustration of the growth in service provision likely to be required to deal with the growing waste generation is the projected increase in the number of refuse collection vehicles (RCVs) needed. This is shown in figure 2 below. It can be seen that an additional refuse collection vehicle will be required every five years. The knock-on effects (or what this means for the services which receive waste collected by the RCVs) are obvious. It is important to note that the growth in waste will not be stepped like the increase in the number of RCVs required. The steps reflect the capacity each additional vehicle affords and how each additional vehicle is employed more and more closely to its full capacity over time until its use reaches full capacity (at which point an additional RCV is required).



**Figure 2: West Suffolk Housing Growth 2014 – 2038 and its impact on the number of Refuse Collection Vehicles Required** (source: West Suffolk)

<sup>9</sup> Assumed 0.6% growth in waste generation per annum over the next 24 years.

## Site and time specific factors

3.90 The factors comprising the need for a new approach to waste management and operational services addressed so far in this section indicate a need for new facilities and some point towards this need growing over time. However, there are other factors, those addressed in this subsection, which are more specific about what is needed and when. These are considered below.

### Olding Road, Bury St Edmunds depot

3.91 As explained at paragraph 3.23 above the Bury St Edmunds depot at Olding Road incorporates about a third of the floorspace of a large industrial building, the other end of which is in separate ownership and is occupied by a DHL/NHS logistics operation. The freehold of this adjoining site changed hands in 2013 and now rests with a developer. The DHL/NHS logistics lease expires in approximately two years' time providing the opportunity for redevelopment of the site which would logically include the depot site as well. Whilst the depot building and yard provide adequate accommodation for the depot functions they were not designed for this purpose. They are also in need of significant maintenance in order to extend their life and make them more resource efficient. Senior members of St Edmundsbury Borough Council are therefore broadly supportive of relocating the depot in or around Bury St Edmunds. The redevelopment of the site as part of the development proposals for the wider area could provide a capital receipt to help facilitate the relocation.

3.92 Also explained above (paragraph 3.5) is the fact that there has been an adopted masterplan for the redevelopment of the area of land at the eastern end of the Western Way general employment area in Bury St Edmunds, which includes the depot site, since 2006. The first phase of the "Public Service Village" development was completed in 2009. The rest of the redevelopment is yet to take place but the momentum behind it is increasing. The developer that owns the adjoining site has expressed an interest in partnering with St Edmundsbury Borough Council to deliver the remainder of the PSV scheme and is keen to bring it forward as soon as possible.

3.93 A St Edmundsbury Borough Council officer project team has therefore been formed to initiate the second phase of the masterplan redevelopment. The project has been scoped and had originally intended to have a second phase-specific masterplan in place by July 2015 and to start on site by the second half of 2016. While an adopted masterplan is not yet in place as intended, these target timescales are indicative of the desire of both project partners to deliver phase II at the earliest possible juncture. This has significant implications for the delivery of waste management and operational services and facilities in West Suffolk. If the phase II project is to proceed in line with current intentions, new depot facilities will be required within the next year or two. Taking into account the observation in Planning for Waste Management Facilities that: "*The design, planning and construction phases of new waste facilities can take a considerable period of time. If statutory targets are to be met, sufficient lead in times are required before facilities become operational*",

time is very much of the essence in identifying the right solution for providing depot facilities in the northern half of West Suffolk and delivering them. If that solution is to involve co-location with other facilities the depot-related timescales are likely to impact upon the timing of the provision of those facilities too.

### **New network of waste transfer stations required**

- 3.94 As explained at paragraph 3.3 above the Suffolk Waste Partnership has been working to establish a new network of waste transfer stations, close to major centres of population (and therefore waste arisings) since 2010 to ensure efficient movement of waste from across Suffolk to the Energy from Waste facility (now built and operational). In 2012, work to establish the most appropriate location for a waste transfer station to serve West Suffolk identified that Bury St Edmunds (the largest town in the area) would be the right location for such a facility. Suffolk County Council has since secured planning permission for the redevelopment of the household waste recycling centre site at Rougham Hill in Bury St Edmunds to incorporate a waste transfer station
- 3.95 So, while the Partnership had identified the need for a new network of waste transfer stations in 2010, had decided where the new stations should be located by summer 2011 and had secured planning permission for a new facility in Bury St Edmunds by October 2013, there is still no corresponding facility in place. The need for a new facility has therefore been known for 4 years and, now that the Energy from Waste facility is operational, is more urgent than it has ever been. As had been anticipated, the implementation of the Energy from Waste Facility has changed the focus of waste transfer and haulage across Suffolk and has drawn further attention to the fact that the existing waste transfer stations on the western edge of West Suffolk generate unnecessary waste miles and costs. The exercise that derived the new network of waste transfer stations required was both cost and sustainability driven. Accordingly, the longer it takes to deliver a new facility the more unnecessary costs are being incurred and the more that economic, social and environmental objectives are not being met.
- 3.96 As far as Suffolk Waste Partnership is concerned the delivery of a new waste transfer station in the Bury St Edmunds area is long overdue and, notwithstanding the factors that have delayed its delivery, is a strategic short term priority.

### **Review of waste management and operational facilities** (following the approval of Suffolk County Council's planning application for a waste transfer station and re-positioned household waste recycling centre at Rougham Hill in 2013)

- 3.97 This sub section looks at Suffolk County Council's decision not to immediately implement the planning permission it secured for Rougham Hill (in October 2013) once the outcome of the legal challenge to it was known in April 2014.
- 3.98 After the Rougham Hill planning permission was granted a number of St Edmundsbury Borough Council members, who had always had concerns about the Rougham Hill

proposals (these had been expressed through the Development Control Committee's consideration of the proposals), urged West Suffolk officers to consider other options for delivering the waste transfer facility required.

- 3.99 By the time the challenge to the Rougham Hill decision was concluded in spring 2014 Forest Heath District Council and St Edmundsbury Borough Council had entered into a formal shared services partnership. Further, Suffolk County Council (along with Norfolk County Council and the West Suffolk councils) was soon to submit a bid for their inclusion in the second phase of the Government's One Public Estate programme (see paragraphs 3.74 – 3.77). It was also soon to submit a bid (again, partnering with the West Suffolk councils and others) to the Transformation Challenge Award programme for 2015/16 (see paragraphs 3.70 – 3.73). All of these factors were symptomatic of a growing acknowledgement on the part of the councils of the need to re-examine the delivery of their public services to reduce costs, increase efficiency and improve the quality of those services for end users.
- 3.100 At the same time the councils acknowledged and ultimately agreed that a rare combination of circumstances was (and still is) presenting the opportunity to establish a comprehensive and integrated waste management and operational services facility in West Suffolk through co-location, and with real long term benefits to the Suffolk tax payer (certainly for the duration of the Energy from Waste contract).
- 3.101 The decision taken by the Suffolk Waste Partnership in 2011 to invest in publically owned waste transfer stations in key strategic locations was an important development. While its subsequent work towards establishing a combined transfer station and household waste recycling centre at Rougham Hill had been significant it is clear that there were, by the time the Rougham Hill challenge was concluded, some strong drivers for taking the opportunity to investigate co-locating more public sector facilities at an alternative location. The possibility of including a new depot facility (while relocation and co-location of the facility have been mooted for some time) has only become a realistic option relatively recently (since the adjacent site was bought by a developer). This is an important development which on its own could justify a change in direction due to the significant public benefit it could yield. Nevertheless, the decision not to immediately implement the Rougham Hill planning permission is a significant one.
- 3.102 Ultimately the councils concluded that they had a common interest in exploring the opportunity to promote more integrated working on waste management services (a priority for Suffolk leaders), and one which had the potential to include other partners from the public sector in what could become a significant operational hub.
- 3.103 In Summer 2014 therefore, Suffolk County Council and the West Suffolk councils joined forces in a preliminary evaluation exercise to see whether there was a joint solution to the provision of waste management and operational services and facilities in the West Suffolk area which could prove mutually advantageous.

## **Work carried out since the decision to review waste management and operational facilities**

- 3.104 A report to St Edmundsbury's "Full Council" meeting in June 2014 suggested the possibility of co-locating a replacement depot facility with a new waste transfer station and replacement household waste recycling centre on a site near Bury St Edmunds.
- 3.105 The councils' preliminary evaluation exercise (see paragraphs 3.12 & 3.103 above) concluded that a joint solution on future waste management and operational service delivery could well prove mutually advantageous. Accordingly, the councils committed further to the project and in autumn 2014 a joint West Suffolk and Suffolk County Council project team was formed. The councils commenced work on the assessment of possible options for delivering the waste management and operational facilities they needed to put in place for the future. It is worth noting, however, that by this point the West Suffolk councils had been considering possible options for some time (thus their report to full Council in June).
- 3.106 By February 2015 the councils had arrived at an optimal solution, a "West Suffolk operational hub", which comprised the co-location of a new depot for West Suffolk with the County's proposed waste transfer station and a new household waste recycling centre, as well as the potential to accommodate other partners subject to interest. The West Suffolk councils' work on options and, more specifically sites, for delivering the necessary waste management and operational services and facilities since 2013 had concluded that there were no suitable and available allocated (within the waste or development plans) or previously developed sites in the search area on which a collection of waste management and operational facilities could be located. As a result the councils were forced to consider unallocated greenfield sites. Three possible greenfield sites were identified and assessed and one of the sites, land at Hollow Road Farm, emerged as the most suitable, available and deliverable. Therefore, by February 2015 also, the councils had assessed Hollow Road Farm to have the best potential for accommodating the optimal solution to delivering the facilities required (see paragraph 3.13 and section 6 which explains how the assessment was carried out).
- 3.107 The councils undertook feasibility assessment work on their optimal solution as assessed (the Hollow Road Farm "operational hub"), prepared an initial business case and gained approval of it from all three councils' cabinets. They secured an option to purchase the site in July 2014. Work towards a pre-planning public consultation was commenced and culminated in a public consultation in March and April 2014. The public consultation generated a significant amount of local interest and, ultimately, concerns and objections.
- 3.108 As has already been mentioned at paragraph 3.14 above, one of the key concerns expressed was that Hollow Road Farm was the wrong location for the co-located facilities. Further, a number of responses suggested that it would be better if some of the facilities continued to be provided on their existing sites, or that the facilities would be better

provided on a different site or separate sites. Some of these responses cited specific alternative sites. This feedback made clear the need to formalise the assessment of the options and sites for delivering the waste management and operational facilities which the councils have conducted, to ensure it was properly presented and to make it available to the public.

- 3.109 Since the public consultation the councils have assessed or reassessed the alternative sites raised (one had already been considered) and an additional site which has been promoted more recently. All of these further sites were found to be unsuitable with the result that land at Hollow Road Farm was still considered the optimal site.
- 3.110 Since the public consultation, work on the planning application has been put on hold pending the formalisation of the waste management and operational facilities delivery options and sites assessment processes.

## 4 THE EXISTING PLANNING POLICY POSITION

### Background

- 4.1 The need for new waste and operational facilities having been set out in section 3, this section considers the implications that the relevant planning policy may have for delivering them.
- 4.2 There are four main ways in which planning policy could influence the delivery of the facilities. These are:
1. Through national development control policies dealing with the principle and location of new development (i.e. those within the National Planning Policy for Waste and National Planning Policy Framework);
  2. Through suitable local site allocations (in the case of West Suffolk those contained in the Suffolk Waste Core Strategy, St Edmundsbury Vision documents, the saved policies of the Forest Heath Local Plan 1995 and the emerging Forest Heath Site Allocations Local Plan);
  3. Through local development control policies dealing with the principle and location of new development (those contained in the Suffolk Waste Core Strategy, St Edmundsbury and Forest Heath Core Strategies and the Joint Development Management Policies Document); and
  4. Through local development control policies dealing with layout, design, amenity and impact considerations (also contained in the St Edmundsbury and Forest Heath Core Strategies and the Joint Development Management Policies Document).

The last of these ways is not of relevance at this stage since the key consideration is examining options and sites for delivering the waste management and operational facilities required. This is inherently more strategic than the focus of the types of policies referred to in point 4. The impact of types of policy set out in points 1 to 3 above is considered below.

### Relevant planning policy

#### National development control policies dealing with the principle and location of new development

- 4.3 The national development control policies for waste and waste management development are contained in the National Planning Policy for Waste, the Waste Management Plan for England being too “high-level” to be of relevance (as noted at paragraph 3.58 above). National development control policies for all other kinds of development are contained in the National Planning Policy Framework. These documents are considered below.

#### *National Planning Policy for Waste (October 2014)*

- 4.4 Notwithstanding the above the National Planning Policy for Waste (NPPW) is largely written with plan making in mind. Accordingly, it contains very little of relevance to development

control. Sections 5 and 7 are of most relevance. Section 5, under the heading “Identifying suitable sites and areas” provides:

*Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against each of the following criteria:*

- *the extent to which the site or area will support the other policies set out in this document;*
- *physical and environmental constraints on development, including existing and proposed neighbouring land uses, and having regard to the factors in Appendix B to the appropriate level of detail needed to prepare the Local Plan;*
- *the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport; and*
- *the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential.*

The context to this policy suggests that this advice is provided in relation to plan making so is of limited relevance. Regardless, it is pretty generic and does not state where or on what types of sites waste and waste management development will be acceptable.

- 4.5 Section 7, found under the heading “Determining planning applications”, while aimed at decision taking rather than plan making is equally limited because it provides guidance on the decision making process for waste planning applications rather than on the principle of waste and waste management development and where it can be accommodated. It reads as follows.

*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;*

- *ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located;*
- *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*

#### *National Planning Policy Framework (March 2012)*

4.6 The National Planning Policy Framework (NPPF) was never intended to deal specifically with waste or waste management development as that is the role the NPPW. However, in the more general application of its policies it could, in theory, still be of relevance.

4.7 As with the NPPW much of the NPPF is aimed at plan making so is of limited use. There are two paragraphs which very loosely relate to the principle of certain types of development in certain locations. These are:

#### In section 1 – “Building a strong, competitive economy”, paragraph 22

*Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.*

#### In section 3 – “Supporting a prosperous rural economy”, paragraph 28

*Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.*

4.8 Paragraph 22 indicates that where there is no prospect of an allocated employment site being used for its intended use other alternative uses should be considered on their merits. This suggests that waste management development and fleet depots (sui generis uses) may be acceptable on such sites. However, as with any other alternative use they would have to be assessed on their merits thus there are no guarantees.

- 4.9 Paragraph 28 indicates that sustainable new development in rural areas is acceptable where it supports economic growth. Economic growth is typically associated with employment type uses; waste and waste management development are not classic employment uses. Accordingly, while paragraph 28 indicates some types of development can be acceptable in rural areas it does not appear to have been drafted with waste or waste management development in mind.

### **Suitable local site allocations**

- 4.10 Waste plans, of which the Suffolk County Council Waste Core Strategy is an example, have the scope to allocate sites for waste and waste management development. Development plans, of which the St Edmundsbury Core Strategy and Bury St Edmunds Vision 2031 are example components, have the scope to allocate sites for certain types of waste management development but major waste proposals would normally be expected to be dealt with through waste plans. Development plans also have the scope to allocate sites for most other types of development which would include sites to meet the operational needs of the councils, i.e. sites for depots.
- 4.11 The waste management and operational services and facilities whose future is under consideration serve the West Suffolk area. However, as alluded to in paragraphs 3.22, 3.29 – 3.31 and 3.50 above, their location is strategically important thus they can't simply be located anywhere. The County Council has already demonstrated that Bury St Edmunds is the right location for a new waste transfer station. Further, the existing depot for which a replacement is required is in Bury St Edmunds. Bury St Edmunds is also home to the County Council's household waste recycling centre for the area. The network of recycling centre locations is strategically organised so as to give best coverage for the County and therefore Bury St Edmunds remains the right location for it. Accordingly, the relevant policy will be the waste plan and the development plan which cover the Bury St Edmunds area. These are considered below.

#### *Suffolk County Council Waste Core Strategy 2011*

- 4.12 The Waste Core Strategy allocates sites for two types of development: residual waste treatment; and non-hazardous landfill. Neither of these applies to the facilities sought by the councils in this case, though it is possible that the facilities sought could be co-located with residual waste treatment facilities or non-hazardous landfill facilities.
- 4.13 The Waste Core Strategy allocates 4 residual waste treatment sites and 4 landfill sites. All of these are located in the eastern half of the county, however, and outside the West Suffolk area. The closest sites to Bury St Edmunds are in Eye, Needham Market and Layham – all some distance away and therefore inherently unsuitable.

#### *St Edmundsbury Core Strategy (December 2010)*

- 4.14 The St Edmundsbury Core Strategy makes only strategic site allocations for the St Edmundsbury area. The rest of the allocations for the Borough are contained in the Bury St Edmunds Vision 2031 document (see below).
- 4.15 The Core Strategy contains three strategic allocations. Two of these are in Haverhill and are therefore inherently unsuitable. The third is for 68.28 hectares of employment land east of Suffolk Business Park on the edge of Bury St Edmunds. As explained above, waste management development and fleet depots are sui generis uses; on the face of it, therefore, this allocation would not automatically be suitable for the facilities sought. However, there are plenty of examples of waste management facilities and depot facilities being located on employment sites, not least West Suffolk's existing depots and two of the County's waste transfer facilities in West Suffolk. The "land east of Suffolk Business Park" strategic allocation could therefore be a possibility for delivering the facilities sought.

*Bury St Edmunds Vision 2031 (September 2014)*

- 4.16 The Bury Vision makes numerous allocations for the Bury St Edmunds area. A significant number of these are for strategic housing development and therefore do not offer any potential in respect of the facilities sought. Further allocations are made in the document for housing led mixed use development. However, the uses these refer to other than housing are town centre uses. The combination of housing and town centre uses means these sites have nothing to offer in this case. A handful of other, highly specific, allocations are also made but none relate to the facilities sought.
- 4.17 Of more relevance is Policy BV13 which, in essence, re-allocates the "land east of Suffolk Business Park" site already allocated in the Core Strategy. It states that the site "is allocated for employment uses (use classes B1 and B8)". As explained above there are plenty of examples of waste management and depot facilities being located on designated employment sites. However, this allocation excludes the B2 use permitted on the majority of employment areas and with which the types of facilities sought are likely to have most in common. Policy BV13 therefore reduces, in planning policy terms at least, the potential suitability of the land east of Suffolk Business Park as a location for waste management and operational facilities.
- 4.18 The Bury Vision document, in Policy BV14, also re-allocates the 14 existing general employment areas in Bury St Edmunds. Of these, 10 are allocated for B1, B2 and B8 uses, the remaining four are allocated for B1 and B8 uses only. The policy identifies 7 of the 14 sites as having land available for development as at 1 April 2012. Of these 7, 5 are allocated for B2 use as well as B1 and B8 use. On the face of it therefore 5 of the existing general employment sites might provide a suitable location for the facilities sought. A further two have reduced suitability on the basis that they are not allocated for B2 use. The remaining 7 while also potentially having some suitability are unlikely to have any space available unless it has become available since April 2012.

## Local development control policies dealing with the principle and location of new development

4.19 In view the findings of paragraph 4.2 above it is, again, the waste plan and the development plan for the Bury St Edmunds area that are relevant here. They are considered below.

### *Suffolk County Council Waste Core Strategy 2011*

4.20 The relevant policies of the Waste Core Strategy are as follows.

#### Policy WDM2 General considerations relevant to all waste management facilities

4.21 Policy WDM2 provides that, in general, waste management development will be acceptable so long as the proposals adequately address a number of issues. Crucially, these include both compatibility with neighbouring land use and the potential impact upon agricultural land. What's more, Policy WDM2 is followed by more restrictive policies which are more specific. Policy WDM2 is therefore not particularly helpful in this context and is best read in conjunction with the following policies.

#### Policy WDM5 General Waste Management Facilities

4.22 Policy WDM5 is more helpful because it tells us where general waste management facilities will be acceptable:

*General waste management facilities (other than strategic residual waste management facilities and landfill sites) are considered, in principle, unless otherwise stated, to be suitable for location within the following areas:*

- a) Land in existing waste management use;*
- b) Land in existing General Industrial use (B2 Use Class) or in existing Storage or Distribution use (B8 Use Class) (excluding open air composting);*
- c) Land allocated for B2 and B8 purposes in a Local Plan or Development Plan Document (excluding open air composting);*
- d) Within or adjacent to Agricultural and Forestry Buildings;*
- e) Agricultural and Forestry Land (open air composting only);*
- f) Brownfield land (excluding open air composting);*
- g) Unallocated Former Airfields (open air composting only);*
- h) Waste Water Treatment Facilities (composting and anaerobic digestion only);*
- i) Current and former mineral workings (open air composting and construction, demolition and excavation waste recycling only).*

4.23 It confirms that facilities of the type sought are considered to be suitable for location on land in existing waste management use, land in B2 or B8 use, land allocated for B2 or B8 use,

and land within or adjacent to agricultural or forestry buildings. This provides clearly defined types of locations where waste management facilities will be acceptable. However, Suffolk County Council's Planning & Development Section have advised that while it is not clear from the policy wording, WDM5 does not apply to large scale municipal facilities. Policy WDM5 might therefore offer assistance in delivering small scale or single waste management facilities but would not be of assistance in delivering larger scale or grouped facilities.

Policy WDM7 Waste Transfer Stations, Materials Recycling Facilities, End of Life Vehicle Facilities and Waste Electrical and Electronic Equipment Recovery Facilities

- 4.24 Policy WDM7 confirms that waste transfer stations are acceptable on land falling within the categories set out in Policy WDM5. It also indicates that waste transfer stations can be located at landfill sites but on a temporary basis only. This sheds further light on the discussion at paragraph 4.12 above.

Policy WDM8 Household Waste Recycling Centres

- 4.25 Policy WDM8 applies exactly the same principles as WDM7 except in respect of household waste recycling centres. Additionally, it states that where it can be demonstrated that no suitable sites consistent with Policy WDM5 are available within the area to be served by the household waste recycling centre, the centre will be acceptable on other sites provided these are consistent with Policy WDM2 and are accessible to the public. Of all the facilities sought therefore there would appear to be greatest flexibility afforded to locating household waste recycling centres.

*St Edmundsbury Core Strategy (December 2010)*

- 4.26 The St Edmundsbury Core Strategy, as its name suggests, provides high level policies dealing with the progression and development of St Edmundsbury Borough. It does not therefore provide the kind of policies which deal with the principle of development in particular locations. As a result it is of little relevance in this context. However, Policy CS1 – St Edmundsbury Spatial Strategy, does state that Bury St Edmunds and Haverhill will be the focus for new development. It also provides that “*opportunities to use previously developed land ... for new development will be maximised through a sequential approach to the identification of development locations in settlements*”.

*Bury St Edmunds Vision 2031 (September 2014)*

- 4.27 The Bury St Edmunds Vision is primarily concerned with the allocation of sites within the Bury St Edmunds area and contains little of relevance to the more general principle of development in particular *types* of locations (as opposed to specific sites). It does include one policy of some relevance however, policy BV15.

Policy BV15: Alternative business development within general employment areas

- 4.28 Policy BV15 provides that within 7 of the general employment allocations in Bury St Edmunds the redevelopment or re-use of sites and buildings for alternative commercial business/mixed activities which do not necessarily fit neatly into B use classes will be considered favourably subject to some basic caveats. It is not clear exactly what is meant by the term “alternative commercial business/mixed activities”, which is rather vague, but it is conceivable that this could include waste management and operational facilities. If so, this strengthens the case for locating the facilities sought on allocated employment sites within Bury St Edmunds.
- 4.29 Of the 7 general employment allocations cited by the policy, 4 fall within the 5 allocations identified in paragraph 4.18 above as being the most likely to be able to accommodate some or all of the facilities sought in view of the uses for which they are allocated and the availability of land (as at April 2012 at least) within them.

*Forest Heath and St Edmundsbury Local Plan Joint Development Management Policies Document*  
(December 2015)

DM5 Development in the countryside

- 4.30 Policy DM5 provides that proposals for economic growth and expansion of all types of business and enterprise that recognise the intrinsic character and beauty of the countryside will be permitted where they do not result in the loss of the best agricultural land and do not have significant environmental or highways impacts. It has clear parallels with Paragraph 28 of the NPPF which is considered at paragraph 4.9 above. As concluded there, “economic growth” is typically associated with employment type uses; waste management development is not a classic employment use. Accordingly, while DM5 indicates some types of development can be acceptable in rural areas it does not appear to have been drafted with waste management development in mind.

DM30 Appropriate employment uses and protection of employment land and existing businesses

- 4.31 The relevant parts of Policy DM30 read as follows.

*Any non-employment use proposed on sites and premises used and / or designated on the policies maps for employment purposes, and that is expected to have an adverse effect on employment generation, will only be permitted where the local planning authority is satisfied that the proposal can demonstrate that it complied with other [Joint Development Management Policies] and one or more of the following criteria has been met:*

- a) *there is a sufficient supply of alternative and suitable employment land available to meet local employment job growth requirements;*

...

f) *an alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment site.*

4.32 They indicate that non-employment uses on employment sites will be acceptable as long as they don't have an adverse effect on employment generation. In the circumstances that they would have an adverse effect on employment generation the policy suggests they could still be permitted provided they don't significantly impact employment land supply or if they would provide overriding sustainability benefits.

DM 33 Re-use or replacement of buildings in the countryside

4.33 Policy DM33 permits employment development in the context of the reuse, conversion and alteration of existing buildings subject to certain caveats.

*The reuse, conversion and alteration or extension of buildings in the countryside for the following uses will be permitted where proposals comply with other policies in this and other adopted Local Plans:*

i) *employment (defined for the purposes of this policy as uses within classes B1 and, where appropriate, B2 general industrial, and limited small scale or ancillary storage), where it can be demonstrated that such uses would not create significant levels of traffic, particularly lorries, on rural roads;*

...

*In addition to other policies in the Plan, proposals for the re-use, conversion and alteration or extension of buildings must also satisfy the following criteria:*

...

d) *proposals which would be likely to create a significant number of jobs should be well located in relation to towns and villages or be reasonable accessible by public transport.*

...

4.34 There are several aspects of this policy that mean it is unlikely to be able to offer much in the way of accommodating the waste management facilities sought. The first point is that it permits employment development. As discussed at numerous points in this section, employment development (use classes B1 and B2 in the case of this policy) does not include waste management development which is a sui generis use (although it is accepted it may be similar in character to some B2 uses). Thus, by the letter at least, the policy does not encompass waste development. Second, the types of facilities proposed are likely to generate a degree of traffic, including lorries. Third, while the relocation of the facilities in question wouldn't create a large number of jobs it would mean moving them. Moving them to a countryside location per this policy would mean the site would have to be well located in terms of proximity to settlements of a suitable order. Taking account of these factors therefore, it is unlikely that Policy DM33 affords any options for the delivery of the facilities sought.

## **What would the relevant policy allow in terms of addressing the identified need?**

- 4.35 The above sub section explores the implications of current planning policy for delivering future waste management and operational facilities in West Suffolk, more specifically in the Bury St Edmunds area. It has shown that:
- the facilities could be located acceptably on land in existing waste management use, land in B2 or B8 use, land allocated for B2 or B8 use, and land within or adjacent to agricultural forestry or buildings (provided that they are not large scale facilities);
  - there are a number of existing employment sites in Bury St Edmunds on which the facilities could be located and that while the development plan suggests some are more suitable than others the waste plan indicates all ought to be suitable (though the County Council's Planning & Development Section has confirmed that this is not necessarily the case in respect of large scale facilities);
  - that as at 1 April 2012 only seven of the existing employment sites had any land available;
  - there is a large, as yet undeveloped, allocated employment site which the waste plan indicates could be suitable (though, again, the County Council's Planning & Development Section has confirmed that this is not necessarily the case in respect of large scale facilities);
  - there may be instances in which it would be acceptable to locate the facilities in countryside but a number of important, and possibly difficult to satisfy, criteria would have to be met first; and
  - because of the lack of residual waste treatment site or landfill sites in the Bury St Edmunds area there is no scope for a temporary re-location of the facilities to such a site.
- 4.36 Perhaps more crucially, however, the above sub section reveals that:
- no sites have been allocated for waste management development in West Suffolk or the Bury St Edmunds area;
  - no sites have been allocated for the operational facilities required (e.g. waste collection and municipal services depot); and
  - following advice from the County Council's Planning & Development Section in relation to the application of Policy WDM5 there are no development management policies in place which state the types of locations or land uses at or on which larger scale waste management development will be acceptable.

## **Why does the relevant policy not address the identified need?**

- 4.37 When considering the above question it is important to note that the relevant planning policy may meet the identified need for future facilities provision but only in part, or in certain circumstances. It appears that both the waste management and operational facilities required ought to be able to be located on existing or allocated employment land. However,

it is less clear whether it would be acceptable to locate all of the facilities on such sites together as an “operational hub” as has been proposed. Also, it is not possible to say at this stage (i.e. prior to the detailed site assessment exercise which follows) whether enough land is available on the existing and allocated employment sites to allow some or all of the facilities to be located there.

- 4.38 While there does also appear to be some limited scope for delivering the facilities on a site in countryside there is only one waste specific policy which alludes to this and advice from the originating authority suggests it was only intended to apply to small scale facilities.
- 4.39 Given the shortcomings identified in the above two paragraphs it would appear to be the case that the only way to ensure a proper means of delivery for the facilities sought (through the planning process) would be by allocating a suitable site for them in either the waste plan or the development plan. So why wasn't this done? The reason has to do with timing.
- 4.40 As explained in the “Chronology of events” subsection (paragraphs 3.7 – 3.17) above it was not until:
- Summer 2011 that the County Council concluded it needed a waste transfer facility in or near Bury St Edmunds;
  - Late 2013 that the Olding Road depot came under pressure to relocate following proposals for the second phase of the public service village site; and
  - Summer 2014 that the County Council joined forces with the West Suffolk councils to re-explore the possibility of joint working and co-location in connection with the future waste management and operational facilities for which a need had by that point been established.
- 4.41 In view of the fact that the St Edmundsbury Core Strategy was adopted in December 2010, the Suffolk County Council Waste Core Strategy was adopted in March 2011 and the submission draft of the Bury St Edmunds Vision 2031 was completed in Summer 2013 it would have been impossible for any of these documents to make allowances for all of the facilities for which a need has now been established. While it is theoretically possible that the Bury Vision could have allocated a site for a waste transfer station (the need for which had been established by this point) there are good reasons why an allocation was not sought. The primary reason was the potential for the existing HWRC site at Rougham Hill, together with the adjoining land, to accommodate a waste transfer station and the County Council's work in pursuit of a planning permission accordingly. Further, in view of the approach taken by the councils since summer 2014 and considerable thrust in favour of co-location which now exists it is possible that such an allocation, had one been made, may have become defunct in the fullness of time
- 4.42 It is the case therefore that the relevant waste plan and development plan documents covering the Bury St Edmunds area were prepared before the need for some of the facilities now sought was established. Perhaps more importantly though, most were prepared some time before the need for and commitment to a joint approach to delivering the facilities was

established. A suitable allocation for such facilities in the current plans could therefore simply not have been made.

## **5 ASSESSMENT OF OPTIONS FOR THE PROVISION OF NEW WASTE MANAGEMENT AND OPERATIONAL FACILITIES**

### **Background**

- 5.1 As detailed in the “Chronology of events” subsection the councils have been considering options for the future delivery of waste management and operational services in West Suffolk for some time. The West Suffolk councils began considering the relocation of their Olding Road depot and co-location with other potential public sector partners in late 2013 when the adjoining site changed hands. Then in summer 2014 Suffolk County Council joined forces with the West Suffolk councils in a preliminary evaluation exercise to see if there was joint solution to the provision of waste management and operational services and facilities which could prove mutually advantageous.
- 5.2 In autumn 2014 a joint West Suffolk and Suffolk County Council project team was formed and the councils commenced work on a joint assessment of options for delivering the waste management and operational facilities they need to put in place for the future. By February 2015 the councils had arrived at what they assessed to be the optimal solution, a “West Suffolk operational hub”, which comprised the co-location of a new depot for West Suffolk with the County’s proposed waste transfer station and a new household waste recycling centre, as well as the potential to accommodate other partners subject to interest.
- 5.3 This section recaps, formalises and explains the assessment work carried out and its findings.

### **Objectives**

- 5.4 There are a number of key objectives driving the councils' assessment of options for the delivery of new waste management and operational facilities in West Suffolk. They are as follows.
1. To provide a waste transfer station on a suitable site in the Bury St Edmunds area:
    - As part of a network of strategically located waste transfer sites designed to serve the County Council’s Energy from Waste facility at Great Blakenham most effectively and efficiently; and
    - In order to meet a need which has been identified since summer 2011.
  2. To relocate the existing depot at Olding Road to a more suitable site within the Bury St Edmunds area:
    - To provide strategically located, purpose built or more fit for purpose facilities; and
    - To allow the Bury St Edmunds and Mildenhall depots to be merged.
  3. To reduce the running costs of waste management and operational services:
    - To produce cost savings for the Councils, and therefore the tax payer;
    - by sharing assets, co-locating and joint working; and

- by reducing fleet mileage.
- 4. To provide a long term waste and operational services solution for West Suffolk:
  - by delivering facilities with sufficient capacity to cope with population and business growth; and
  - through the provision of modern, efficient, flexible and adaptable facilities.
- 5. To minimise the environmental impact of the provision of waste management and operational services in West Suffolk and thereby increase their sustainability;
  - through the use of modern purpose-built buildings and facilities;
  - by adopting the latest equipment and technology (including renewables);
  - by reducing fleet mileage;
  - by operating more efficiently.

5.5 In addition to these headline objectives there are numerous additional benefits that the councils would hope to secure through the delivery of waste management and operational facilities for the future. These are the source of further objectives which, while less determinative, are still important. They are:

- To deliver more integrated and customer-focused services and thereby improve the quality of service and user experience for service users and customers;
- To generate new income streams (from property, if appropriate, and services);
- To generate capital receipts through the release of land and property; and
- To allow flexible working patterns and practices.

## The Options

5.6 In seeking to address the identified need for waste management and operational services and facilities in West Suffolk, and thereby meet the above objectives, the councils have considered a number of different means of delivery. All reasonable options have been considered and assessed. They are as follows.

### Option 1 – do nothing

5.7 While it is acknowledged that this is not really an available option, as it doesn't meet the needs identified, it reflects what would happen in the short term if a suitable solution could not be found, or could not be delivered, or if the councils could not agree on a solution. In reality it would only ever be a temporary state as the County has a fall back option in the shape of the Rougham Hill waste transfer station and household waste recycling centre consent.

5.8 The inclusion of Option1 is helpful in that it provides a control for the other options and thereby exposes the cost (or possibly benefit) of doing nothing.

### Option 2 – implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue

- 5.9 Option 2 represents what would happen in the short to medium term if no other solution could be found. The County Council would implement its Rougham Hill consent and the West Suffolk councils would be left to consider how best to meet their need for new depot facilities in Bury St Edmunds. It would meet the identified need for a waste transfer station in Bury St Edmunds and would afford some co-location (the waste transfer station and household waste recycling centre would both be located at Rougham Hill). It would not, however, solve the Olding Road problem; it would leave the West Suffolk councils with poor depot facilities and would adversely impact the public service village development. Further, it would not allow the Bury St Edmunds and Mildenhall depot facilities to be merged.

**Option 3 – implement Rougham Hill planning permission and merge and relocate Olding Road and Holborn Avenue depots**

- 5.10 Option 3 is the first of the options that offer a long term solution to meeting the identified need. As with option 2 it affords some co-location by making use of the existing Rougham Hill consent. It differs in that it includes the relocation of the Olding Road depot to a new site in the Bury St Edmunds area; this would allow the Bury and Mildenhall depots to merged, new depot facilities to be provided and the public service village development to proceed unhindered.

**Option 4 – co-locate all facilities on a new site**

- 5.11 Option 4 involves the co-location on a new site of all of the facilities under consideration. It would thereby solve the problems associated with Olding Road and would allow the Bury St Edmunds and Mildenhall Depots to be merged.

**Option 5 – co-locate waste transfer facility and depot on a new site and leave HWRC at Rougham Hill**

- 5.12 This final option would see the merging and relocation of the Bury St Edmunds and Mildenhall depots which would then be co-located with a waste transfer station on a new site. However, the household waste recycling centre would remain where it is. This solution solves the Olding Road issues and affords some co-location.
- 5.13 Figure 3 below provides a facility by facility analysis of the options.

	<b>Option1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>	<b>Option 5</b>
<b>Waste transfer station</b>	<i>As existing:</i> Red Lodge, Haverhill & Thetford	<i>Co-located:</i> Rougham Hill	<i>Co-located:</i> Rougham Hill	<i>Co-located:</i> New site	<i>Co-located:</i> New site
<b>Bury St Edmunds depot</b>	<i>As existing:</i> Olding Road	<i>As existing:</i> Olding Road	<i>Standalone facility:</i> New site	<i>Co-located:</i> New site	<i>Co-located:</i> New site
<b>Mildenhall depot</b>	<i>As existing:</i> Holborn Avenue	<i>As existing:</i> Holborn Avenue	Closed	Closed	Closed
<b>Household waste recycling centre</b>	<i>As existing:</i> Rougham Hill	<i>Co-located:</i> Redeveloped at Rougham Hill	<i>Co-located:</i> Redeveloped at Rougham Hill	<i>Co-located:</i> New site	<i>As existing:</i> Rougham Hill

**Figure 3: tabular analysis and summary of options assessed**

## Methodology

### Post IAPOS public consultation amendment/addition

- 5.14 In order to ascertain the relative value of each of the options they need to be considered against the councils objectives (set out above). For this to happen the objectives have to be translated into a series of discrete criteria. This has been done and the criteria are set out at paragraph 5.20 below; there are ~~23~~ 24 of them.
- 5.15 The number of options to assess and the number of criteria to assess them against means that a matrix-type methodology is most practical. This allows all of the options to be assessed side-by-side at the same time
- 5.16 In order to aid in comparative assessment of the sites a scoring system has been adopted. This affords each option a score against each criterion. The scoring system has the range +2 to -2. The table below shows what the scores equate to.

<b>Score</b>	<b>Meaning</b>
<b>+2</b>	Significant positive effect
<b>+1</b>	Positive effect
<b>0</b>	Neutral or no effect
<b>-1</b>	Negative effect
<b>-2</b>	Significant negative effect
<b>?</b>	Effect uncertain / unclear

### Post IAPOS public consultation amendment/addition

- 5.17 Each option's scores across all ~~23~~ 24 criteria can then be tallied to give a single score for that option. The performance or value of each option relative to the others can then be

seen. The inclusion of option 1 (see paragraph 5.8 above) enables the remaining 4 options to be assessed against the status quo.

- 5.18 The size of an option's score equates to how well it meets the councils' objectives. The higher the score, the better the option is considered to meet the councils' objectives; and therefore the better the solution it is considered to provide.
- 5.19 In view of the wide variance of factors across the range of options assessed (and the sites they involve), a fixed scoring system could not be set for each criteria (i.e. one which equates a certain circumstance or attainment to a certain score, e.g. 2 facilities co-located equals a +1 score, 3 facilities co-located equals a +2 score). Such a system would be very difficult, if not impossible to apply for the purposes of this assessment. Instead, scores were awarded using a more flexible, relative system which is better suited to this assessment exercise. In order to ensure rigour and transparency with this relative system comments are provided with each score to explain the decision making process.

## Criteria for assessing options

- 5.20 The councils' objectives in delivering new waste management and operational facilities have been translated into a series of discrete criteria against which to assess the options. The criteria are as follows:

### Immediate capital cost / realisation

**Selected to enable assessment to address:** net effect of short term capital costs and receipts associated with each option

**Important factors to consider when assessing:**

- Short term investment in existing facilities to be retained, e.g. renovation works
- Capital receipts from sale of existing sites
- Price/cost of new sites
- Purchase costs of new sites
- Development costs of new facilities

### Long term capital cost / realisation

**Selected to enable assessment to address:** net effect of capital costs and receipts in longer term

**Important factors to consider when assessing:**

- Maintenance costs (higher for older facilities)
- Adaptation costs (more likely/higher for older facilities)

### Long term revenue

**Selected to enable assessment to address:** effect of regular income streams from assets

**Important factors to consider when assessing:**

- Rental income from letting vacated sites/facilities

#### Operational cost / savings

**Selected to enable assessment to address:** relative operational costs / savings of each option

**Important factors to consider when assessing:**

- Cost of running facilities (higher for older facilities)
- Number of cost centres (i.e. number of separate sites)
- Potential for asset/resource sharing
- Management costs

#### Commercial desirability / value to prospective bidders / operators

**Selected to enable assessment to address:** how attractive each option would be to private contractors were the services provided from the facilities and sites in question to be contracted out (and therefore how competitive the contract pricing would be)

**Important factors to consider when assessing:**

- Age, quality and condition of facilities
- Suitability of location
- Scope for efficient and effective operation

#### Availability of sites / ownership

**Selected to enable assessment to address:** the extent to which the councils control the sites the options depend on and therefore the deliverability of the options

**Important factors to consider when assessing:**

- Whether site is owned by Suffolk County Council or one of the West Suffolk councils

#### Suitability of sites

**Selected to enable assessment to address:** the suitability of the sites on which the options depend for delivering the services required and therefore their feasibility in the medium to long term

**Important factors to consider when assessing:**

- Size
- Shape
- Capacity / capacity for growth / capacity for providing additional commercial services / capacity for accommodating new partners
- Constraints
- Environmental sensitivity

#### Proximity of sites to sensitive receptors

**Selected to enable assessment to address:** the compatibility with the uses of the land surrounding the sites on which the options depend

**Important factors to consider when assessing**

- Planning for Waste Management Facilities: A Research Study (ODPM, August 2004)
- Distance from sites to nearest dwellings and number of dwellings

- Distance from sites to other sensitive receptors and number of other sensitive receptors
- Location of dwellings and other sensitive receptors in relation to sites (i.e. upwind or downwind)
- Extent of screening between sites and nearest dwellings and other sensitive receptors
- Acceptability of impact on dwellings / sensitive receptors (if known)

#### Access / highways / transport

**Selected to enable assessment to address:** the likely highways and transport acceptability of each of the options and the effect on their deliverability

#### **Important factors to consider when assessing:**

- Standard / quality / suitability of access to highway
- Proximity to key arterial routes / main roads (particularly A14)
- Proximity / relationship to Suffolk Lorry Route Network
- Proximity to traffic sensitive receptors
- Acceptability of accesses (if known)

#### Key transport / travel distances

**Selected to enable assessment to address:** the transport related sustainability of each of the options

#### **Important factors to consider when assessing:**

- Proximity of all facilities to main population centre (Bury St Edmunds)
- Proximity of collection locations to WTS
- Proximity of WTS to EfW / MRF
- Proximity of WTS to depot

#### Planning status

**Selected to enable assessment to address:** the likely acceptability in planning terms of each of the options and the effect on their deliverability

#### **Important factors to consider when assessing:**

- Existing permissions
- Existing designations / allocations / adopted masterplans or development briefs
- Planning history
- Scope for obtaining permission
- Likelihood of EIA being required
- Compliance with development plan

#### Environmental permit / consent status

**Selected to enable assessment to address:** the likely acceptability in environmental permitting terms of each of the options and the effect on their deliverability

#### **Important factors to consider when assessing:**

- Existing permits
- Permitting history

- Scope for obtaining permits / consents

#### Suitability of facilities

**Selected to enable assessment to address:** the suitability of the facilities on which the options depend for delivering the services required and the effect on their feasibility in the medium to long term

#### **Important factors to consider when assessing:**

- Capacity / capacity for growth
- Current levels of utilisation
- Environmental performance
- Scope for / feasibility of modernisation / improvement
- Flexibility / adaptability

#### Condition of facilities

**Selected to enable assessment to address:** the condition of the facilities on which the options depend and therefore their feasibility in the medium to long term

#### **Important factors to consider when assessing:**

- Age
- Quality
- Condition
- Standard
- Layout

#### Competition with other land uses / potential land uses

**Selected to enable assessment to address:** the nature, extent and relative strength of land uses competing for the sites on which the options rely and their effect of the deliverability of each of the options

#### **Important factors to consider when assessing:**

- Development / redevelopment proposals for existing and proposed sites
- Scope for alternative uses of existing and proposed sites
- Existing land use to be displaced from proposed sites

#### Performance against policy / guidance / initiatives

**Selected to enable assessment to address:** the performance of each option against the relevant planning policy and the objectives of relevant Government initiatives, including the commitments made in successful bids relating to those initiatives (see “Policy and political factors” in section 3 above)

#### **Important factors to consider when assessing:**

- Waste Management Plan for England
- National Planning Policy for Waste
- National Planning Policy Framework
- Planning for Waste Management Facilities: A Research Study
- Transformation Challenge Award objectives and bid commitments
- One Public Estate programme objectives and bid commitments

- Suffolk Waste Partnership Joint Municipal Waste Management Strategy policies

#### Degree of co-location / integration

**Selected to enable assessment to address:** the extent to which each option relies upon or affords co-location (a key strand of the Government's public sector estate rationalisation agenda and a critical factor in improving efficiency) and therefore how cost, resource and asset efficient they are likely to be

#### **Important factors to consider when assessing:**

- Proportion/number of facilities located together on a single site

#### Post IAPOS public consultation amendment/addition

#### Environmental impact (including carbon impact / footprint) Carbon impact / footprint

**Selected to enable assessment to address:** the overall environmental and sustainability credentials of each option

#### **Important factors to consider when assessing:**

- Scope for green energy
- Environmental performance of facilities
- Transport/travel distances
- Embodied carbon/energy of buildings/facilities

#### Commercial opportunities / income generation potential

**Selected to enable assessment to address:** the ability of each option to accommodate income generating activities (e.g. commercial waste services) in addition to statutory / standard municipal services and therefore their ability to create, maintain or grow income streams for the councils

#### **Important factors to consider when assessing:**

- Capacity/space for expansion of/new commercial operations
- Suitability of sites to support expansion of/new commercial operations
- Suitability of facilities to support expansion of/new commercial operations

#### Scope for flexible working patterns, management and staffing arrangements

**Selected to enable assessment to address:** the extent to which each option would allow flexible working patterns, management and staffing arrangements and the implications for the efficiency and flexibility of each option

#### **Important factors to consider when assessing:**

- Number of sites (extent of co-location)
- Workforce size at each site (critical mass required)

#### Scope for green energy

**Selected to enable assessment to address:** potential for and likelihood of implementation of green energy generation systems for each option and the effect on their environmental performance and sustainability

#### **Important factors to consider when assessing:**

- Size of site / facility

- Roof areas and orientation
- Suitability of structures for mounting solar panels
- Exposure / elevation / wind speed
- Acceptability of green energy measures (if known)
- Ownership (affects scope to influence adoption of green energy)

#### Customer experience

**Selected to enable assessment to address:** the quality of service and customer experience each option offers and therefore how well they serve the end user (their primary purpose)

#### **Important factors to consider when assessing:**

- Condition of facilities
- Suitability of facilities
- Scope for provision of level access recycling bins
- Scope for provision of reusable items store
- Scope for provision of additional waste recycling streams / services
- Customer satisfaction survey results

#### Potential restrictions resulting from existing service provider contracts

**Selected to enable assessment to address:** the extent to which any existing contractual arrangements may affect the deliverability of each option

#### **Important factors to consider when assessing:**

- Number of contracts in place
- Contract end dates
- Contract values
- Scope for terminating / renegotiating / relocating contracts

#### Post IAPOS public consultation amendment/addition

##### Traffic

**Selected to enable assessment to address:** the likely traffic related impact of each option

#### **Important factors to consider when assessing:**

- Concentration of traffic
- Vehicle movement generation
- Location / likely location of sites

## Results and analysis

5.21 The completed options assessment matrix can be seen at Appendix A. A summary table is provided as figure 4 below.

Post IAPOS public consultation amendment/addition

	<b>Option1</b> do nothing	<b>Option 2</b> implement Rougham Hill planning permission and leave depots where they are	<b>Option 3</b> implement Rougham Hill planning permission and relocate and merge depots	<b>Option 4</b> co-locate all facilities on new site	<b>Option 5</b> co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill
Immediate capital cost / realisation	-1	-1	-2	-2	-2
Long term capital cost / realisation	-2	-2	-1	-1	-1
Long term revenue	0	0	+1	+2	+1
Operational cost / savings	-2	0	+2	+2	+2
Commercial desirability / value to prospective bidders / operators	0	+1	+1	+2	+1
Availability of sites / ownership	0	+2	-1	-2	-2
Suitability of sites	0	0	+1	+1	+1
Proximity of sites to sensitive receptors	-1	0	0	+1	+1
Access / highways / transport	-1	0	+1	+1	+1
Key transport / travel distances	-1	+1	+2	+2	+2
Planning status	+2	+2	0	-2	-2
Permit / consent status	+2	+1	0	-1	-1
Suitability of facilities	-1	+1	+1	+2	+2
Condition of facilities	-1	0	+2	+2	+2
Competition with other land uses / potential land uses	-1	-1	0	-1	-1
Performance against policy / guidance / initiatives	-2	0	+1	+2	+1
Degree of co-location / integration	-2	+1	+1	+2	+1
Carbon impact / footprint	-2	0	+1	+2	+1
Commercial opportunities / income generation potential	-1	0	+1	+2	+2

/CONTINUED

	<b>Option1</b> do nothing	<b>Option 2</b> implement Rougham Hill planning permission and leave depots where they are	<b>Option 3</b> implement Rougham Hill planning permission and relocate and merge depots	<b>Option 4</b> co-locate all facilities on new site	<b>Option 5</b> co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill
Scope for flexible working patterns, management and staffing arrangements	-1	0	+1	+2	+1
Scope for green energy	0	+1	+2	+2	+2
Customer experience	0	+1	+2	+2	+2
Potential restrictions resulting from existing service provider contracts	0	0	0	0	0
<u>Traffic</u>	<u>-1</u>	<u>-1</u>	<u>0</u>	<u>0</u>	<u>0</u>
<b>Total score</b>	<b>-15 -16</b>	<b>+7 +6</b>	<b>+16</b>	<b>+20</b>	<b>+14</b>

Post IAPOS public consultation amendment/addition

**Figure 4: table showing results of assessment of options against all 23 24 criteria**

Post IAPOS public consultation amendment/addition

5.22 As can be seen from the table, option 4 (co-locate all facilities on a new site) performed the best with a score of +20. It was most closely followed by option 3 (implement the Rougham Hill planning permission and relocate and merge the existing depots) which scored +16 (20% less than option 4). The scores for all five options ranged from **-15 -16** to +20 thus the relative margin between option 4 and 3 is, on the face of it at least, relatively small. Option 5 (co-locate waste transfer facility and existing depots on a new site and leave HWRC at Rougham Hill) performed relatively well but still scored 6 points (30%) less than option 4.

5.23 Looking in more detail at the differences between options 4 and 3 it can be seen that option 4 scored less well against the following criteria:

- Availability of sites / ownership
- Planning status
- Permit / consent status
- Competition with other land uses / potential land uses

However, all of these lower scores relate to the fact that at the time the assessment was carried out there was no suitable site in place (there couldn't have been – the councils hadn't reached a conclusion as to the optimal solution to delivering the facilities required so didn't know what requirements they would have for a site, if indeed they had any). Option 4 was therefore considered less deliverable in relation to these criteria.

5.24 Notwithstanding that fact, the purpose of this exercise is to establish the best option for delivering the services and facilities required in the future – it is a long term solution which is sought. Accordingly, “immediate” delivery factors like the four set out above are less important. Provided there is a good chance of the site being ultimately deliverable the question: “is the site deliverable immediately?”, is not hugely relevant. In this respect, while option 3 scored better than option 4 against these criteria, the +16 score they help option 3 to achieve is not necessarily as competitive as it looks.

5.25 Option 4 scored better than option 3 against 9 criteria. These were:

- Long term revenue
- Commercial desirability / value to prospective bidders / operators
- Proximity of sites to sensitive receptors
- Suitability of sites
- Performance against policy / guidance / initiatives
- Degree of co-location / integration
- Carbon impact / footprint
- Commercial opportunities / income generation potential
- Scope for flexible working patterns, management and staffing arrangements

It is worth noting that several of these criteria go to the heart of the Government’s public estate rationalisation agenda and bids made by the councils to related initiatives. Accordingly, option 4 can be said to perform well against strategic public estate objectives.

5.26 Perhaps more importantly, however, it should be noted that all of the above criteria are important for, if not critical to, the long term success and suitability of the facilities sought. This is significant because, as already stated, the councils are looking for a long term, sustainable solution to their identified service and facility needs. This further crystallises option 4 as the best option for delivering the facilities sought.

## **Optimal solution**

5.27 The assessment exercise carried out by the councils on the possible options for delivering their waste management and operational service and facility needs was designed to identify the best solution taking into account their objectives. The councils therefore have faith in the outcome of the assessment and, given that it scored highest, are satisfied that option 4 represents the current optimal solution. Further, in view of the purpose of the wider exercise they are engaged in, i.e. identifying a lasting solution to meeting current and future needs, the councils are not overly concerned with short term deliverability issues as long as an option’s general deliverability outlook is good.

5.28 Taking into account all of these factors the councils consider option 4 to be the current optimal solution and have proceeded accordingly.

## 6 ASSESSMENT OF SITES FOR THE PROVISION OF NEW WASTE MANAGEMENT AND OPERATIONAL FACILITIES

### Background

- 6.1 As explained at paragraph 3.14 above, by February 2015 the councils had arrived at what they considered to be the optimal solution for delivering the new waste management and operational services required. At this point their priority became to identify the best site on which to locate the development that the optimal solution entailed.
- 6.2 However, the West Suffolk councils' work on both options and sites since 2013 had concluded that there were no suitable and available existing waste management sites, suitably allocated sites or previously developed sites in the search area on which to co-locate all of the facilities sought. As a result the councils were forced to consider unallocated greenfield sites. Three possible greenfield sites were identified and assessed and one of the sites, land at Hollow Road Farm, emerged as the most suitable, available and deliverable. Therefore, by February 2015 also, the councils were able to have established Hollow Road Farm as the best site for the delivery of the optimal "operational hub" solution.
- 6.3 The councils continued their feasibility assessment work on the proposed Hollow Road Farm "operational hub" solution, prepared a business case and gained approval of it from all three councils' cabinets. Work on a planning application was commenced and, with draft proposals taking shape in March 2015, a public consultation was organised for April 2015. The public consultation generated a significant amount of local interest and, ultimately, concerns and objections. As has already been mentioned at paragraph 3.14 above, one of the key concerns expressed was that Hollow Road Farm was the wrong location for the co-located facilities. Further, a number of responses suggested that it would be better if some of the facilities continued to be provided on their existing sites, or that the facilities would be better provided on a different site or separate sites. Some of these responses cited specific alternative sites.
- 6.4 The councils either assessed or reassessed the alternative sites raised through the public consultation process (one had already been considered) and a further alternative site raised subsequently. All of these additional sites were found to be unsuitable with the result that land at Hollow Road Farm was still considered the optimal site.
- 6.5 This section recaps, formalises and explains the assessment work carried out and its findings.

#### Post IAPOS public consultation amendment/addition

6.5a Following completion of the IAPOS report (this report) the councils held a further public consultation. The public consultation sought interested people's views on the IAPOS report and its accompanying Sustainability Appraisal. As part of the public consultation interested

parties were invited to suggest any sites which they felt might be suitable for accommodating the waste and operational facilities required but which did not feature in the report. A number of new sites were suggested. These are detailed at paragraph 6.17a below. The new sites are then assessed alongside the original sites at paragraphs 6.30 – 6.52.

## Objective

- 6.6 The objective of the councils' sites assessment exercise was to find the most suitable, available and deliverable site on which to locate the optimal solution proposals having regard to the relevant law and policy.

## Sequence of sites assessed

- 6.7 In line with the general principles of the sequential test approach to site selection the councils sought to consider the possible sites in the following order:
1. Sites in existing waste management use;
  2. Sites allocated for waste management development (none);
  3. Sites in existing general industrial (B2) or storage and distribution (B8) use;
  4. Sites allocated for general industrial (B2) or storage and distribution (B8) use;
  5. Unallocated brownfield sites (~~none~~);
  6. Unallocated greenfield sites adjacent to existing waste management uses (none); and finally
  7. Unallocated greenfield sites.
- 6.8 The basis of this approach is that if one or more suitable, available and deliverable sites is found at any stage in the process it is not necessary to (and one should not) proceed to the next stage. The site or sites identified will be sequentially preferable to any which would be assessed in later stages.
- 6.9 There were two or three exceptions to the assessment approach set out above which resulted from a site being overlooked (extension to Suffolk Business Park, Bury St Edmunds), public pressure to consider a particular approach to delivering the services required using a particular and previously unconsidered site configuration (split site at Rougham Hill, Bury St Edmunds) and significant public support for a site leading to confirmatory reassessment (Rougham Industrial Estate (Woodlands Business Park), Rougham). More detail is provided on these sites in the next sub section.
- 6.10 As soon as it became apparent that further assessment work was merited the respective sites were assessed prior to any further work being done on later stage sites. This course of events did not affect the ultimate outcome of the assessment. Had either of the late-comer sites proved suitable, available and deliverable the assessment process would have been halted and the relevant site would have been pursued.

### Post IAPOS public consultation amendment/addition

6.10a Further exceptions to the assessment approach were generated as a result of the site suggestions made through the IAPOS public consultation. All of the eligible sites suggested (see paragraph 6.17a below) have been assessed since the public consultation (and therefore sometime after the original batch of sites) meaning that they have not been assessed in the prescribed sequence (see paragraph 6.7 above). However, this will not be allowed to affect the outcome of the assessment as the most sequentially preferable site emerging from the sites assessment (which can be determined regardless of the order in which the sites are assessed) should be the most suitable site.

## **Trawl for sites**

- 6.11 The process of identifying the sites considered in this assessment process began in 2010. While this was well before the councils begun working together to identify a solution to their waste management and operational service and facility needs the Suffolk Waste Partnership had already begun researching possible sites in or near Bury St Edmunds on which to locate a waste transfer station. This work, led by the County Council, was made available to the West Suffolk councils in 2013.
- 6.12 In autumn 2013 the West Suffolk councils conducted an assessment of all of the extant general industrial and storage and distribution allocations in or near to Bury St Edmunds. This included the reassessment of all of the allocated employment sites considered by the County Council in 2010/11 and the Rougham Hill household waste recycling centre site (including the adjoining land). When this proved fruitless (Winter 2013/14) the councils accepted they would have to consider unallocated greenfield sites. A site search was conducted by West Suffolk's property services department which yielded three possible greenfield sites. These sites were assessed and a most suitable, available and deliverable site, land at Hollow Road Farm, emerged. In line with the sequential approach outlined above the site was pursued and proposals for the site were prepared, culminating in a pre-planning public consultation in March 2015.
- 6.13 The public consultation feedback drew a further site to the councils' attention and expressed considerable support for one of the sites which had already been considered and discounted. The additional site was the extension to Suffolk Business Park which had not been allocated (via the conventional approach at least) in autumn 2013 when the councils considered the extant allocations. It was included as a strategic allocation in the Core Strategy but not in a site-specific document per se, consequently it was overlooked.
- 6.14 The already-considered site was Rougham Industrial Estate (Woodlands Business Park), Rougham. The councils assessed the extension to Suffolk Business Park site and re-assessed the Rougham Industrial Estate site; both were discounted on the basis of proximity to/relationship with Bury St Edmunds and, in the case of Rougham Industrial Estate the fact that there were no vacant premises of sufficient size also. A lack of capacity at junction 44 was a further factor working against the Suffolk Business Park extension and

the Eastern Relief Road could be a further factor still if it is not delivered soon (see paragraphs 6.34 & 6.35 below).

- 6.15 One further site was drawn to the councils' attention in spring 2015, after the public consultation. It was in fact two sites located close together; the existing household waste recycling centre site together with the adjoining land at Rougham Hill and the DEFRA land just over 200 metres to the east (also on Rougham Hill). The first of these sites had been considered previously but had been discounted because it was too small to accommodate the three facilities sought. The DEFRA land had not been considered for the same reason. The sites had not been considered together as one site because their combined size was still not sufficient and because a split site approach ran contrary to a mainstay of one of the councils' key objectives, co-location (on a single site).
- 6.16 The Rougham Hill split site was duly assessed but was discounted (see paragraphs 6.32 – 6.33 below).
- 6.17 A full list of sites in order of their first assessment can be seen below. [Location Identification](#) plans for each site can be found at Appendix D. ~~An [Overarching](#) plans of the Bury St Edmunds~~ [and the surrounding](#) area showing all of the sites [in context](#) can be found at Appendix C.

**SWP site search 2010 – 2011** (part of an ongoing site identification and assessment task associated with proposals for a new waste transfer station in the Bury St Edmunds area – sites identified by SCC property department)

- Rougham Industrial Estate (Woodlands Business Park), Rougham (entire allocation)
- Saxham Business Park, Little Saxham (entire allocation)
- Eastern Way general employment area, Bury St Edmunds (entire allocation)
- Mildenhall Road general employment area, Bury St Edmunds (entire allocation)
- Western Way general employment area, Bury St Edmunds (entire allocation)
- Moreton Hall / Suffolk Business Park general employment area, Bury St Edmunds (entire allocation)
- British Sugar, Hollow Road, Bury St Edmunds (built-up area of allocation, i.e. excluding northern half of allocation containing settlement ponds and earthworks)
- Existing household waste recycling centre and adjoining land to the north, Rougham Hill, Bury St Edmunds

**Sites considered autumn 2013** (early site assessment work for possible co-located waste management and operational facilities – sites identified by West Suffolk's property department)

- Anglian Lane, Bury St Edmunds (entire allocation)
- Barton Road, Bury St Edmunds (entire allocation)
- Blenheim Park, Bury St Edmunds (entire allocation)
- British Sugar, Hollow Road, Bury St Edmunds (entire allocation)
- Suffolk Business Park, Bury St Edmunds (entire allocation)

- Chapel Pond Hill, Bury St Edmunds (entire allocation)
- Eastern Way, Bury St Edmunds (entire allocation)
- Enterprise Park, Etna Road, Bury St Edmunds (entire allocation)
- Mildenhall Road, Bury St Edmunds (entire allocation)
- Moreton Hall, Bury St Edmunds (entire allocation)
- Northern Way, Bury St Edmunds (entire allocation)
- Western Way, Bury St Edmunds (entire allocation)
- Greene King, Friars Lane, Bury St Edmunds (entire allocation)
- Rougham Industrial Estate (Woodlands Business Park), Bury St Edmunds (entire allocation)
- Saxham Business Park, Little Saxham (entire allocation)

**Winter 2013/2014** (site assessment work for possible co-located waste management and operational facilities – sites identified by West Suffolk’s property department)

- Land south and west of Bury St Edmunds Golf Club, Tut Hill, Bury St Edmunds
- Land south of A14 / adj. A14 flyover, Symonds Farm, Little Saxham
- Land north of Steve Lumley Planing, Hollow Road Farm, Bury St Edmunds

**Spring 2015** (sites suggested by or receiving significant support from public consultation respondents)

- Extension to Suffolk Business Park, Bury St Edmunds (entire allocation)
- Rougham Industrial Estate (Woodlands Business Park), Bury St Edmunds (entire allocation)\*

**Spring/Summer 2015** (site suggested and promoted by member of the public following public consultation)

- Existing household waste recycling centre and adjoining land to the north + DEFRA land, Rougham Hill, Bury St Edmunds\*\*

\* had already been considered (in the first instance in 2010 – 2011)

\*\* part of site (household waste recycling centre and adjoining land to north) had already been considered in 2010 - 2011

#### Post IAPOS public consultation amendment/addition

6.17a As is explained at paragraph 6.10a above the IAPOS public consultation sought site suggestions from interested parties and a number of new sites were suggested. The details of the sites suggested are as follows.

Of the sites suggested there were 20 new sites eligible for consideration (the ineligible suggestions are set out further below):

- RAF Mildenhall
- FHDC Depot, Holborn Avenue, Mildenhall
- NHS/DHL logistics site, Olding Road, Bury St Edmunds
- Former Saxham railway station site, Little Saxham (part of existing Calor Gas site)

- Former Padley poultry site, Northern Way, Bury St Edmunds
- AJN Steelstock site (and/or adjoining land), Icknield Way, Kentford
- Lorry park and adjacent unused brownfield land, Rougham Hill, Bury St Edmunds
- Rougham airfield, Rougham
- Former Little Chef site and surrounding land, north of the A14, nr Kentford
- Former Little Chef site and adjoining land, south of the A14, nr Kentford
- SCC Highways/Kier depot site, Rougham Industrial Estate, Rougham
- Vacant land at Chapel Pond Hill, Bury St Edmunds
- Vicinity of A14 J40 (including land adjacent to railway line), Higham
- Land south east of Tuddenham (consultation site suggestion was for Bury Road, Tuddenham which does not exist)
- Thetford Road, Ingham
- McRae Estates land between River Lark and A14 (opposite side of A134 to existing HWRC), Bury St Edmunds
- Land west of Symonds Farm, Saxham
- Field between Westley roundabout and Saxham Business Park, Westley
- Land between Rougham Hill, A14 and Rushbrooke Lane, Bury St Edmunds (including formerly proposed Bury St Edmunds Hockey Club site)
- Land south of West Suffolk Crematorium, between Bury St Edmunds and Risby

6 of the “sites” suggested were discarded on the basis that they were duplicates of other suggestions; that their unsuitability was readily apparent (Abbey Gardens, Charter square etc); or that they were too imprecise to enable assessment. These were:

- Land near SCC/Kier highways depot at Rougham Industrial Estate, Rougham (it is assumed this is a greenfield site as there are no brownfield sites nearby which are available – it must therefore be part of the extension to Suffolk Business Park – see “Spring 2015” sites above)
- Saddler’s Farm, Saxham (no record of a “Saddler’s Farm” at Saxham can be found – it has therefore been assumed that this refers to Symonds Farm, Little Saxham which was one of the greenfield sites whose assessment was documented in the original IAPOS report – see “Winter 2013/2014” sites above)
- Hockey club land, Rougham Hill, Bury St Edmunds (this is part of a larger site which has been suggested – see “Land between Rougham Hill, A14 and Rushbrooke Lane, Bury St Edmunds” above)
- Abbey gardens, Bury St Edmunds
- Charter Square, Bury St Edmunds
- Newmarket (no specific site identified)

7 sites that had already been assessed and whose assessment had been documented in the original IAPOS report were suggested through the public consultation. These sites were:

- Rougham Industrial Estate, Rougham
- Saxham Business Park, Little Saxham
- British Sugar, Hollow Road, Bury St Edmunds

- [Anglian Lane, Bury St Edmunds](#)
- [Extension to Suffolk Business Park, Bury St Edmunds](#)
- [Tut Hill, Bury St Edmunds \(assumed to be the same as Land south and west of Bury St Edmunds Golf Club, Tut Hill, Bury St Edmunds – see “Winter 2013/2014” sites above\)](#)
- [Symonds Farm, Little Saxham](#)

[The assessments for these sites have been checked in view of the fact they were suggested despite having been included in the original version of this report \(IAPOS report\).](#)

## Methodology

6.18 In order to identify the best suitable, available and deliverable site having regard to the relevant law and policy the sites need to be assessed against carefully selected criteria (see next sub section) in a logical and staged process. The process is as follows.

1. Consider sites in order of sequential preferability (in groups set out in paragraph 6.7 above) against exclusionary criteria (see below);
2. When one or more sites from any group meet the exclusionary criteria cease assessment against exclusionary criteria and consider successful sites against qualitative criteria;
3. Score sites against qualitative criteria;
4. Evaluate scores and select site.

6.19 For the exercise carried out by the councils this played out as follows.

1. Existing household waste recycling centre site (with adjoining land) considered against exclusionary criteria;  
**SITE UNSUCCESSFUL**
2. Existing general industrial and storage and distribution sites considered against exclusionary criteria;  
**ALL SITES UNSUCCESSFUL**
3. Unallocated greenfield sites considered against exclusionary criteria;  
**2 SITES PASS**
4. Unallocated greenfield sites considered and scored against qualitative criteria;  
**ONE SITE SCORES HIGHER THAN THE OTHER**
5. Overlooked sites, alternative sites and previously assessed sites receiving considerable public support through public consultation process assessed against exclusionary criteria  
**NO SUCCESSFUL SITES – OUTCOME OF ASSESSMENT OF UNALLOCATED GREENFIELD SITES AGAINST QUALITATIVE CRITERIA STANDS**

[Post IAPOS public consultation amendment/addition](#)

6.19a The 20 new eligible sites suggested through the IAPOS consultation have been assessed in the same manner as the original sites. While the summary which follows is not true to the chronology and sequencing of the sites assessment (with particular regard to the sites suggested through the IAPOS public consultation) the exercise of assessing all of the sites (original sites and public consultation suggestions) is now best summarised as:

1. Existing household waste recycling centre site (with adjoining land) considered against exclusionary criteria;  
**SITE UNSUCCESSFUL**
2. Existing general industrial and storage and distribution sites considered against exclusionary criteria;  
**ALL SITES UNSUCCESSFUL**
3. Sites allocated for general industrial or storage and distribution use considered against exclusionary criteria;  
**SITE UNSUCCESSFUL**
4. Unallocated brownfield sites considered against exclusionary criteria;  
**ALL SITES UNSUCCESSFUL**
5. Unallocated greenfield sites considered against exclusionary criteria;  
**FIVE SITES PASS**
6. Unallocated greenfield sites considered and scored against qualitative criteria;  
**VARIETY OF SCORES RETURNED, ONE SITE SCORES HIGHEST (NO TIE/DRAW FOR HIGHEST SCORE)**

The assessment processes are described in more detail below.

### **Exclusionary criteria assessment**

- 6.20 The number of sites to assess and the number of criteria to assess them against means that a matrix-type methodology is most practical. This allows all of the sites in a sequential grouping (see paragraph 6.7 above) to be assessed side-by-side at the same time.
- 6.21 In view of the exclusionary nature of the criteria sites are scored on a pass, fail or “caution” basis against each criterion. A caution score identifies a risk of failure and that further work or information is required to identify whether the site passes or fails that criterion. Further work or information is not however required if the site fails one or more of the other criteria. Sites failing one or more criteria are excluded.

### **Qualitative criteria assessment**

- 6.22 Sites passing the exclusionary criteria assessment proceed to the next round of assessment. In this round sites are considered against assessment criteria to ascertain the overall performance of each site with respect to its suitability, availability and deliverability.

6.23 The number of sites to assess and the number of criteria to assess them against means that a matrix-type methodology is again most practical. This allows all of the options to be assessed side-by-side at the same time.

6.24 In order to aid in the comparative assessment of the sites a scoring system is adopted. This affords each option a score against each criterion. The scoring system has the range +2 to -2. The table below shows what the scores equate to.

Score	Meaning
+2	Significant positive effect
+1	Positive effect
0	Neutral or no effect
-1	Negative effect
-2	Significant negative effect
?	Effect uncertain / unclear

6.25 Each site's scores across all of the criteria can then be tallied to give a single score for that site. The performance of each site relative to the others can then be seen.

6.26 The size of a site's score equates to its combined suitability, availability and deliverability. The higher the score, the more suitable, available and deliverable a site is considered to be.

6.27 In view of the wide variance of factors across the range of sites assessed a fixed scoring system could not be set for each criteria (i.e. one which equates a certain circumstance or attainment to a certain score, e.g. one or more sensitive receptors within 125 metres equates to a -2 score, one or more sensitive receptors between 125 metres and 250 metres equates to a -1 score). Such a system would be very difficult, if not impossible to apply for the purposes of this assessment. Instead, scores were awarded using a more flexible, relative system which is better suited to this assessment exercise. In order to ensure rigour and transparency with this relative system comments are provided with each score to explain the decision making process.

## Criteria for assessing sites

6.28 Sites were considered against two sets of criteria as explained above. The first set of criteria was the "exclusionary criteria", designed to test sites' headline suitability and deliverability. These are set out below with an explanation as to why they were included and the key factors to consider when assessing sites against them.

6.29 The second set of criteria, "qualitative criteria", is set out below the exclusionary criteria. The qualitative criteria were designed to further explore the suitability, availability and deliverability of sites meeting the exclusionary criteria and to allow the relative assessment of such sites.

### Exclusionary criteria

## *Physical*

### Site size and shape

**Reason for inclusion of criterion:** critical to ensuring suitability for accommodating optimal solution development

**Commentary:** The site size requirement for the councils' current optimal solution is 5 hectares minimum. The schedule at Appendix G provides further information on and the justification for this site size requirement.

**Important factors to consider when assessing:**

- Minimum site size requirement
- Usability / workability / suitability of shape
- Usability / workability / suitability of topography

### Flood risk

**Reason for inclusion of criterion:** critical to ensuring suitability for accommodating optimal solution development

**Important factors to consider when assessing:**

- Flood zone
- Risk of fluvial flooding / proximity to water-courses
- Risk of / surface water / flash flooding

## *Access*

### Access to / from primary highway network

**Reason for inclusion of criterion:** critical to ensuring suitability for accommodating optimal solution development

**Important factors to consider when assessing:**

- Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”
- Presence and suitability of any existing accesses
- Known access constraints
- Likelihood of securing suitable access if none existing

## *Location*

### Proximity / relationship to Bury St Edmunds

**Reason for inclusion of criterion:** critical to delivery of optimal solution development

**Commentary:** journey modelling and analysis has been used to assess the transport implications of locations served by the A14 junctions in the vicinity of Bury St Edmunds. Sites should be located near to junctions 42, 43 or 44 in order to ensure operational and cost efficiencies are achieved and sustainability objectives are met. A report on the analysis work can be found at Appendix H.

**Important factors to consider when assessing:**

- Distance from Bury St Edmunds

- Proximity / ease of access to A14
- Nearest A14 junction

Relationship to Suffolk Lorry Route Network

**Reason for inclusion of criterion:** critical to ensuring suitability for accommodating the optimal solution development

**Important factors to consider when assessing:**

- Proximity to network routes
- Order of closest route / routes

Impact on sites of international or national landscape importance

**Reason for inclusion of criterion:** presence of sites of international or national landscape importance could pose a significant threat to the deliverability of the optimal solution

**Important factors to consider when assessing:**

- Proximity of any international or national landscape designations
  - National Parks
  - Areas of Outstanding Natural Beauty
- Likely acceptability of impact

Impact on sites of international or national biodiversity importance

**Reason for inclusion of criterion:** presence of sites of international or national biodiversity importance could pose a significant threat to the deliverability of the optimal solution

**Important factors to consider when assessing:**

- Proximity of any international or national biodiversity designations
  - Natura 2000 sites
  - Ramsar sites
  - Sites of Special Scientific Interest
  - Special Areas of Conservation
  - Special Protection Areas
  - National Nature Reserves
- Likely acceptability of impact

Impact on sites of international or national heritage importance

**Reason for inclusion of criterion:** presence of sites of international or national heritage importance could pose a significant threat to the deliverability of the optimal solution

**Important factors to consider when assessing:**

- Proximity of any international or national heritage designations
  - World Heritage Sites
  - Listed buildings
  - Scheduled monuments
  - Parks and gardens
  - Battlefields
  - English Heritage Sites

- Likely acceptability of impact

## Qualitative criteria

### Proximity to sensitive receptors

**Reason for inclusion of criterion:** to accord with national and local planning policy regarding the amenity impacts of development

**Commentary:** Planning for Waste Management Facilities: A Research Study states with regard to waste transfer stations: “*Sites closer than 250 m from residential, commercial, or recreational areas should be avoided. Transfer routes away from residential areas are also preferable*”.

#### **Important factors to consider when assessing:**

- Distance from:
  - residential areas / dwellings
  - schools
  - hospitals
  - recreation facilities

### Compatibility with surrounding land uses

**Reason for inclusion of criterion:** important consideration in assessing suitability for accommodating optimal solution development

#### **Important factors to consider when assessing:**

- Proximity of surrounding uses
- Compatibility of use classes / uses
- Potential for impact on surrounding land uses or vice versa
- Any benefits or synergistic effects from surrounding land uses or vice versa

### Suitability of local road network and extent to which access would require reliance on local roads

**Reason for inclusion of criterion:** to accord with local planning policy on suitability testing of sites proposed for waste management development and national and local planning policy regarding the highways and transport impact of development

**Commentary:** Planning for Waste Management Facilities: A Research Study states with regard to waste transfer stations: “*Transfer routes away from residential areas are also preferable*”.

#### **Important factors to consider when assessing:**

- Capacity
- Highway safety impacts
- Amenity along highway route
- Proximity of sensitive receptors to route

### Compatibility with NPPF section 4 (Promoting sustainable transport) and NPPfW paragraph 5

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Commentary:** the National Planning Policy for Waste states that local planning authorities should:

*“assess the suitability of sites and/or areas for new or enhanced waste management facilities against each of the following criteria: ... the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport”.*

The National Planning Policy Framework states that local planning authorities should:

*“ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised”*

Sites should accord with the requirements of these policies.

**Important factors to consider when assessing:**

- Scope for rail transport
- Scope for transport by river/barge
- Travel/transport implications of location

#### Potential for loss of best and most versatile agricultural land

**Reason for inclusion of criterion:** to accord with local planning policy on suitability testing of sites proposed for waste management development and national and local planning policy regarding the protection of the best and most versatile agricultural land

**Commentary:** the National Planning Policy Framework states that:

*“Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”*

Sites should accord with this policy.

**Important factors to consider when assessing:**

- Agricultural land value
- Predominant agricultural land value of wider search area

#### Potential for impact on local water environment

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Commentary:** Planning for Waste Management Facilities: A Research Study states with regard to waste transfer stations that:

*“as most facilities are under cover and on concrete hard standing with separate foul water drainage, rainfall is unlikely to come into contact with the waste materials and, as such, water pollution is unlikely”.*

Therefore, while impact on the local water environment is an important consideration the optimal solution proposals are not high risk.

**Important factors to consider when assessing:**

- Groundwater protection or vulnerability designations covering site or surroundings
  - Groundwater Source Protection Zones
  - Aquifers
  - Groundwater Vulnerability Zones
  - Drinking Water Safeguard Zone
- Likely acceptability of impact (if any)

Proximity to areas of land instability

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Important factors to consider when assessing:**

- Evidence of:
  - Geological risk factors
  - Ground workings
  - Mining, extraction & natural cavities
  - Natural ground subsidence
 at or near site
- Impact on developability (if known)

Potential for landscape impact

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Important factors to consider when assessing:**

- Proximity of landscape designations
- Suffolk Landscape Character Assessment
- Existing landscape character/baseline
- Acceptability of likely impact

Potential for visual impact

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Important factors to consider when assessing:**

- Urban / edge of settlement / rural location
- Topography
- Proximity, number and sensitivity of receptors
- Existing level of screening
- Acceptability of likely impact

Potential for impact on biodiversity

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Important factors to consider when assessing:**

- Proximity of biodiversity/wildlife designations
- Ecological value/potential of site

- Potential for loss or fragmentation of habitat
- Acceptability of likely impact
- Opportunities for enhancement

Potential for impact on geodiversity

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Important factors to consider when assessing:**

- Proximity of geodiversity designations
- Geodiversity value of site
- Acceptability of likely impact

Potential for impact on heritage assets (including archaeology)

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Important factors to consider when assessing:**

- Proximity of heritage designations (including heritage assets and conservation areas)
- Archaeological interest/potential of site and surroundings
- Acceptability of any likely impacts

Potential for impact on air quality

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Commentary:** Planning for Waste Management Facilities: A Research Study states with regard to waste transfer stations that:

*“Atmospheric emissions in relation to waste transfer are primarily associated with emissions of combustion products from HGVs”.*

The main consideration is therefore likely to be the air quality impact on those living closest to sites or the main routes to and from them.

**Important factors to consider when assessing:**

- Impact of traffic emissions
- Number and proximity of sensitive receptors to site
- Number and proximity of sensitive receptors to main route to and from site

Potential for impact from odour

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Commentary:** Planning for Waste Management Facilities: A Research Study states with regard to waste transfer stations that:

*“putrescible/municipal wastes can potentially lead to odours, transfer stations not normally associated with dust nuisance”.*

**Important factors to consider when assessing:**

- Number and proximity of sensitive receptors

- Number and proximity of sensitive receptors downwind of site

Potential for impact from flies, vermin and birds

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Commentary:** Planning for Waste Management Facilities: A Research Study states that waste transfer stations are:

*“not normally associated with rodents or birds given that operations tend to take place within a building and waste materials are only present for short periods. Flies may be a problem in hot weather, especially if they are being brought in with the incoming waste”.*

**Important factors to consider when assessing:**

- Number and proximity of sensitive receptors

Potential for impact from noise and vibration

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Commentary:** Planning for Waste Management Facilities: A Research Study states with regard to waste transfer stations that the:

*“main problems associated with noise at waste transfer stations ... :*

- *vehicle manoeuvring on-site along with loading and unloading operations”*
- *Traffic noise on the local road network in relation to HGV movements*
- *Site preparation / engineering works”*

The main consideration is therefore likely to be the noise and vibration impact on those living closest to sites or the main routes to and from them.

**Important factors to consider when assessing:**

- Number and proximity of sensitive receptors
- Number and proximity of sensitive receptors downwind of site
- Number and proximity of sensitive receptors to main route to and from site

Potential for light pollution

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Important factors to consider when assessing:**

- Existing night-time environment / light levels
- Existing levels of screening
- Topography

Potential for impact from litter

**Reason for inclusion of criterion:** to accord with national and local planning policy on suitability testing of sites proposed for waste management development

**Important factors to consider when assessing:**

- Topography

- Existing levels of shelter / landscaping / screening

#### Availability

**Reason for inclusion of criterion:** unavailability could pose a significant threat to the deliverability or timely delivery of the optimal solution

**Commentary:** one of the requirements of the waste transfer station aspect of the current optimal solution proposal is to create a strategic network of waste transfer stations to serve the County Council's Energy from Waste facility. The Energy from Waste contract runs until 2039. For this reason alone the councils will need to be able to obtain either a long leasehold or freehold of the chosen site. If landowners are not prepared to dispose of sites the councils should at least consider the possibility of compulsory purchase. ODPM Circular 06/2004 states:

*“A compulsory purchase order should only be made where there is a compelling case in the public interest. An acquiring authority should be sure that the purposes for which it is making a compulsory purchase order sufficiently justify interfering with the human rights of those with an interest in the land affected”.*

In assessing whether there would be a case for compulsory purchase the councils will have to consider whether there would be a compelling case in the public interest.

#### **Important factors to consider when assessing:**

- Ownership
- Availability for purchase
- Competing interests
- Potential for use of compulsory purchase powers

## Results and analysis

### Post IAPOS public consultation amendment/addition

6.30 The completed matrices for the sites assessment process can be seen at Appendix B (these have been revised to reflect the assessment of the new sites suggested through the IAPOS public consultation). There are three matrices. The first relates to the assessment against the exclusionary criteria of the only existing waste site (household waste recycling centre site and adjoining land at Rougham Hill only), the existing general industrial or storage and distribution sites ~~and~~ the only allocated general industrial or storage and distribution site (extension to Suffolk Business Park) and the unallocated brownfield sites. These sites are grouped together in this first matrix for ease of reference.

6.31 The second matrix relates to the assessment against the exclusionary criteria of the unallocated greenfield sites. The third and final matrix relates to the assessment of the unallocated greenfield sites against the qualitative criteria.

### Post IAPOS public consultation amendment/addition

6.32 Tables summarising the completed matrices and a commentary on each is provided below. The first of these, figure 5, shows the results of the assessment against the exclusionary criteria of the only existing waste site, the existing general industrial or storage and

distribution sites, ~~and~~ the only allocated general industrial or storage and distribution sites and the unallocated brownfield sites.

Post IAPOS public consultation amendment/addition

	Physical		Access	Location				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to BSE	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
Rougham Industrial Estate	Red	Green	Green	Red	Green	Green	Green	Green
Saxham Business Park	Red	Green	Green	Red	Green	Green	Green	Green
Eastern Way, BSE	Red	Green	Green	Green	Green	Green	Green	Green
Mildenhall Road, BSE	Red	Yellow	Green	Green	Green	Green	Green	Green
Western Way, BSE	Red	Green	Green	Green	Green	Green	Green	Green
Moreton Hall / Suffolk Business Park, BSE	Red	Green	Green	Green	Green	Green	Green	Green
British Sugar, Hollow Road, BSE	Red	Green	Green	Green	Green	Green	Green	Green
Anglian Lane, BSE	Red	Green	Green	Green	Green	Green	Green	Green
Barton Road, BSE	Red	Green	Green	Green	Green	Green	Green	Green
Blenheim Park, BSE	Red	Green	Green	Green	Green	Green	Green	Green
Chapel Pond Hill, BSE	Red	Yellow	Green	Green	Green	Green	Green	Green
Enterprise Park, BSE	Red	Yellow	Red	Green	Green	Green	Green	Green
Northern Way, BSE	Red	Green	Green	Green	Green	Green	Green	Green
Greene King, Friars Way, BSE	Red	Yellow	Green	Green	Green	Green	Green	Yellow
Extension to Suffolk Business Park, BSE	Green	Green	Red	Red	Green	Green	Green	Green
Existing HWRC site and land to north + DEFRA land, Rougham Hill, BSE	Red	Green	Green	Green	Green	Green	Green	Green
New sites (post IAPOS public consultation)								
RAF Mildenhall	Green	Green	Green	Red	Green	Green	Green	Green
FHDC Depot, Holborn Avenue, Mildenhall	Red	Green	Green	Red	Green	Green	Green	Green
NHS/DHL logistics site, Olding Road,	Red	Green	Green	Green	Green	Green	Green	Green

BSE	Fail	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Former Saxham railway station site, Little Saxham	Caution	Pass	Pass	Fail	Pass	Pass	Pass	Pass
Former Padley poultry site, Northern Way, BSE	Fail	Caution	Pass	Pass	Pass	Pass	Pass	Pass
AJN Steelstock site (and/or adjoining land), Icknield Way, Kentford	Pass	Pass	Pass	Fail	Pass	Pass	Pass	Pass
Lorry park and adjacent unused brownfield land, Rougham Hill, BSE	Fail	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Rougham airfield, Rougham	Pass	Pass	Pass	Fail	Pass	Pass	Pass	Caution
Former Little Chef site and surrounding land, north of the A14, nr Kentford	Pass	Pass	Pass	Fail	Pass	Pass	Pass	Pass
Former Little Chef site and adjoining land, south of the A14, nr Kentford	Pass	Pass	Pass	Fail	Pass	Pass	Pass	Pass
SCC Highways/Kier depot site, Rougham Industrial Estate, Rougham	Fail	Pass	Pass	Fail	Pass	Pass	Pass	Pass
Vacant land at Chapel Pond Hill, Bury St Edmunds	Fail	Pass	Pass	Pass	Pass	Pass	Pass	Pass

**Key:**  Fail  Caution  Pass

Post IAPOS public consultation amendment/addition

**Figure 5: table showing results of assessment against the exclusionary criteria of only existing waste site, existing general industrial or storage and distribution sites, and only allocated general industrial or storage and distribution site and the unallocated brownfield sites.**

Post IAPOS public consultation amendment/addition

6.33 As can be seen from figure 5, all bar ~~one~~ seven of the existing general industrial or storage and distribution sites, the only allocated general industrial or storage and distribution site, and the only existing waste site and the unallocated brownfield sites failed on the basis of

their size. One of these sites also failed on the basis of its access arrangements and another ~~two~~ four failed on the basis of their relationship to Bury St Edmunds.

6.34 The only site s not to fail on the basis of ~~its~~ their size ~~was~~ were:

- ~~the~~ extension to Suffolk Business Park-;
- RAF Mildenhall;
- Former Saxham railway station site<sup>10</sup>;
- AJN Steelstock site;
- Rougham airfield;
- Former Little Chef site and surrounding land, north of the A14; and
- Former Little Chef site and adjoining land, south of the A14.

The last six of these sites failed on the basis of their distance from Bury St Edmunds or poor geographical relationship with it (“Proximity / relationship to BSE criterion”). Suffolk Business Park ~~it~~ failed ~~instead~~ on the basis of its highway access ~~and~~ and its relationship to Bury St Edmunds. In view of the fact that the site is only an allocation at present and has yet to be developed the stipulations of its allocating policy, BV13, were critical to assessing it. Policy BV13 states that:

*“Prior to the commencement of development, a relief road linking Bedingfield Way with the A14 Rookery Crossroads [eastern relief road] must be completed and made available for use”.*

The stipulation that the eastern relief road must be delivered prior to development commencing is understood to be necessary because junction 44 of the A14 is considered by the Highways Agency and local highway authority to be at or near capacity. It is therefore reasonable to assume that traffic from new development at Suffolk Business Park extension will use junction 45 (access to which will be afforded by the eastern relief road) as their primary means of accessing the A14. This means the site falls foul of the “proximity / relationship to Bury St Edmunds” criterion. The site as a whole lies over a kilometre east of junction 44 and would be accessed by junction 45 which lies almost another 2 kilometres further east.

6.35 The policy text suggests that delivery of the eastern relief road is necessary to make development of the site acceptable in highways terms. While planning permission has been secured for the eastern relief road it is yet to be delivered. At the time of writing, negotiations on its delivery with the owners of the land over which it runs are ongoing. St Edmundsbury Borough Council is understood to have authorisation to initiate compulsory purchase proceedings in order to progress matters if negotiations fail to deliver a satisfactory outcome. In view of the concerns about junction 44 and the fact that junction 45

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<sup>10</sup> The former Saxham railway station site extends to 4.7 hectares whereas the site size requirement established by the councils is 5.0 hectares (see Appendix G). However, it is considered that at 4.7 hectares the site’s size is close enough to the required size to merit its further consideration as part of the sites assessment process.

has been identified as the preferred junction for the Suffolk Business Park extension it is considered that the site must fail this criterion. Further weight may be added to this conclusion if the eastern relief road is not delivered in the short term.

6.35 Accordingly, it is assumed that the delivery of the eastern relief road is necessary to make development of the site acceptable in highways terms. While planning permission has been secured for the eastern relief road it is yet to be delivered. Negotiations on its delivery with the owners of the land over which it runs are ongoing. St Edmundsbury Borough Council is understood to have authorisation to initiate compulsory purchase proceedings in order to progress matters if negotiations fail to deliver a satisfactory outcome but this is at an early stage. As a result, there is no firm programme in place for the delivery of the relief road. While uncertainty remains about the ability to deliver an acceptable means of highway access to this site, and when such access will be able to be delivered, it is considered that the site must fail this criterion.

6.36 In view of the above all of the sites in these first three groupings fail when assessed against one or more of the criteria and have to be discounted.

6.37 Figure 6 shows the results of the next part of the sites assessment process; the assessment of the unallocated greenfield sites against the exclusionary criteria.

Post IAPOS public consultation amendment/addition

	<i>Physical</i>		<i>Access</i>	<i>Location</i>				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to BSE	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
Tut Hill, BSE	Green	Green	Green	Green	Green	Green	Green	Green
Symonds Farm, Little Saxham	Green	Green	Yellow	Red	Green	Green	Yellow	Green
Hollow Road Farm, BSE	Green	Green	Green	Green	Green	Green	Green	Green
New sites (post IAPOS public consultation)								
Vicinity of A14 J40 (Higham)	Green	Green	Green	Red	Green	Green	Green	Green
Land south east of Tuddenham	Yellow	Green	Green	Red	Green	Green	Red	Green
Thetford Road, Ingham	Yellow	Yellow	Green	Red	Green	Green	Green	Green
McRae Estates land between River Lark and A14, BSE	Green	Green	Green	Green	Green	Green	Green	Green
Land west of	Green	Green	Green	Red	Green	Green	Green	Green

Symonds Farm, Saxham	Fail	Pass	Pass	Fail	Pass	Pass	Pass	Pass
Field between Westley roundabout and Saxham Business Park, Westley	Pass	Pass	Fail	Pass	Pass	Pass	Pass	Pass
Land between Rougham Hill, A14 and Rushbrooke Lane, BSE	Pass							
Land south of West Suffolk Crematorium, BSE / Risby	Pass							

**Key:**  Fail  Caution  Pass

**Figure 6: table showing results of assessment against exclusionary criteria of unallocated greenfield sites**

Post IAPOS public consultation amendment/addition

6.38 In contrast to the only existing waste site, the existing general industrial or storage and distribution sites, ~~and~~ the only allocated general industrial or storage and distribution site and the unallocated brownfield sites, all of the unallocated greenfield sites are considered likely to be of a suitable size and shape and therefore pass that criterion<sup>11</sup>. ~~The~~ Symonds Farm, ~~however, fails the “proximity / relationship to Bury St Edmunds” criterion and produces “caution” scores in relation to highway access and potential impact on sites of international or national biodiversity importance. “Vicinity of A14 J40”, “Land south east of Tuddenham”, “Thetford Road, Ingham” and “Land west of Symonds Farm” sites all fail the “proximity / relationship to Bury St Edmunds” criterion given their displacement from Bury St Edmunds. The “Land south east of Tuddenham” site also fails the “impact on sites of international or national biodiversity importance” criterion on the basis that the majority of its assumed area lies within the Breckland Farmland SSSI. The “Field between Westley roundabout and Saxham Business Park” site does not fail the “proximity / relationship to Bury St Edmunds” criterion but does fail the “access to / from primary highway network” criterion in view of its limited highway frontage and curtailed sightlines (which mean that suitable access arrangements cannot be delivered).~~

6.38a The Land south east of Tuddenham and Thetford Road, Ingham sites both generated caution scores in relation to the “site size and shape” criterion because both came from written submissions where the exact location and extent of the site being suggested were not made clear. The Thetford Road, Ingham site generated a caution score in relation to the

<sup>11</sup> The term “considered likely” is used because in the case of “Land south east of Tuddenham” and “Thetford Road, Ingham” the exact location and extent of the sites being suggested is not known thus assumptions have been made.

“flood risk” criterion because the southern part of the area that the respective site suggestion has been assumed to refer to is in flood zones 2 and 3.

6.38b As explained at paragraph 6.21 above the caution scores do not need investigating further in view of the site’s respective sites’ failure on “proximity / relationship to Bury St Edmunds” grounds and, in the case of Land south east of Tuddenham, failure on “impact on sites of international or national biodiversity importance” grounds also. Symonds Farm All of the sites which fail the “proximity / relationship to Bury St Edmunds” criterion lies over 2 kilometres west of A14 junction 42 from their closest Bury St Edmunds A14 junction (junctions 42 - 44), as does junction 41 on which the site would rely for access to the A14.

6.39 The Tut Hill, and Hollow Road Farm, “McRae Estates land between River Lark and A14” (Mc Rae Estates land), “Land between Rougham Hill, A14 and Rushbrooke Lane” (Land at Rougham Hill) and “Land south of West Suffolk Crematorium, BSE / Risby” (Land south of WSC) sites pass all of the other criteria in addition to the “proximity / relationship to Bury St Edmunds”, “impact on sites of international or national biodiversity importance” and “site size and shape” criteriaen. They both all therefore pass the exclusionary criteria assessment and are the only sites which go on to be assessed against the qualitative criteria. The results of this assessment are shown in figure 7 below.

Post IAPOS public consultation amendment/addition

	Proximity to sensitive receptors	Compatibility with surrounding land uses	Suitability of local road network and extent to which access would require reliance on local roads	Compatibility with NPPF section 4 (Promoting sustainable transport) and NPPF paragraph 5	Planning status	Potential for loss of best and most versatile agricultural land	Potential for impact on local water environment	Proximity to areas of land instability	Potential for landscape impact	Potential for visual impact	Potential for impact on biodiversity	Potential for impact on geodiversity	Potential for impact on heritage assets	Potential for impact on air quality	Potential for impact from odour	Potential for impact from flies, vermin and birds	Potential for impact from noise and vibration	Potential for light pollution	Potential for impact from litter	Availability for purchase	Total score
Tut Hill, BSE	-1	+2	+2	0	-2	-1	-1	+2	-1	-1	-1	+2	-1	-1	-1	-1	-1	-1	+1	-2	-7
Hollow Road Farm, BSE	+1	+2	+2	0	-2	-1	-1	+2	-1	-1	-1	+2	-1	+1	+1	+1	+1	-1	+1	+2	+7
New sites (post IAPOS public consultation)																					

McRae Estates land between River Lark and A14, BSE	-1	-1	-1	0	-2	-1	-1	-1	-2	-2	-1	+2	-2	-1	-1	-1	-1	0	+1	+2	-14
Land between Rougham Hill, A14 and Rushbrooke Lane, BSE	-1	-1	0	0	-2	-1	-1	+2	-2	-1	-1	+2	-2	-1	-1	-1	-1	-1	+1	+2	-10
Land south of West Suffolk Crematorium, BSE / Risby	+1	+2	-1	0	-2	-1	-1	+2	-1	-2	-1	+2	-1	+1	+1	+1	+1	-2	0	+2	+1

**Figure 7: table showing results of assessment against assessment criteria of unallocated greenfield sites**

Post IAPOS public consultation amendment/addition

6.40 As can be seen from the table both the Tut Hill and Hollow Road Farm sites scored identically apart from in relation to criteria involving proximity of sensitive receptors and the “availability for purchase” criterion. The same cannot be said for the other three sites which all scored very differently. Like Tut Hill, however, one of the key differences between the McRae Estates land and Land at Rougham Hill sites and Hollow Road Farm was that they scored “-1” with regard to the criteria which relate to the proximity of sensitive receptors. Hollow Road Farm and the Land south of WSC site both scored “+1” against these criteria.

6.40a Tut Hill has two sensitive receptors (dwellings) 125 metres from it, the next nearest sensitive receptors (also dwellings) are 425 metres away. These next nearest sensitive receptors are detached dwellings flanking Newmarket Road and the housing estate to the south of them. In terms of receptors more generally, a small office complex and a golf course adjoin the site. The McRae Estates land has St James Middle School abutting its northern boundary and Bury St Edmunds Rugby Club’s fields abutting its western boundary. Further, the nearest dwelling lies only 160m from site and there are two hotels within 175m. Further still, the site lies 110m from an area zoned as housing within the Bury Vision 2031 concept layout for the South-East Bury St Edmunds strategic allocation (Policy BV7).

6.40b In the case of Land at Rougham Hill the nearest existing sensitive receptor (residential) is 275m away. However, the site includes part of an area identified for housing within Bury Vision 2031 concept layout for the South-East Bury St Edmunds strategic allocation (Policy BV7). This means there are a large number of potential sensitive receptors within part of the site and adjoining or in close proximity to other parts.

- 6.41 At Hollow Road Farm, the nearest sensitive receptors (dwellings) are 305 metres away. These comprise a housing estate of reasonable size and adjacent detached dwellings. The next nearest sensitive receptor (a single dwelling) is over 600 metres away. Additionally, a farm, a road planing company and small scale waste transfer facility lie next to the site. At the Land south of WSC site the nearest existing sensitive receptor (residential) is 400m away. However, the site is only 290m from the area reserved for the relocation of the West Suffolk Hospital within the Bury Vision 2031 concept layout for the West Bury St Edmunds strategic allocation (Policy BV5).
- 6.42 Planning for Waste Management Facilities: A Research Study states with regard to waste transfer stations: “*Sites closer than 250 m from residential, commercial, or recreational areas should be avoided*”. In view of the guidance contained in this well researched and particularly thorough document, notwithstanding its age (it is still referred to in waste management development site selection work), it seems right that the Tut Hill, McRae Estates land and Land at Rougham Hill sites should score lower than the Hollow Road Farm and Land south of WSC sites against criteria where proximity of sensitive receptors has a significant bearing.

Post IAPOS public consultation amendment/addition

- 6.42a The Tut Hill, McRae Estates land and Land at Rougham Hill sites all have either existing sensitive receptors within 250 metres or a significant number of potential sensitive receptors within 250 metres. The potential sensitive receptors identified relate to a housing allocation from an up to date local plan. The allocation, which has been properly planned and delivered, is therefore a clear statement about the location and nature of future development in this part of Bury St Edmunds. In view of this fact the allocation should not be compromised or jeopardised by unrelated and incompatible proposals such as those connected with the delivery of the councils’ waste and operational requirements (notwithstanding the need for them to be met).
- 6.43 While the McRae Estates land and Land at Rougham Hill sites have a significant number of existing or planned sensitive receptors well within 250 metres (or even on them), Tut Hill has only 2 ~~sensitive receptors dwellings,~~ within 250 metres of it (125 metres away) ~~Hollow Road Farm has none within 300 metres. Further, Hollow Road Farm sits adjacent to a farm yard and industrial and waste management uses. Tut Hills lies next to a small office complex and a golf course~~ within 250 metres of it. which while probably not “sensitive receptors” per se but are more sensitive than those adjoining Hollow Road Farm.
- 6.44 It is acknowledged that the overall position with regard to existing sensitive receptors at Tut Hill could be much worse but it must still score negatively on account of there being sensitive receptors located within 250 metres. A score of -1 is therefore applied where proximity of sensitive receptors has a significant bearing on the criteria being assessed against. The Hollow Road Farm and Land south of WSC sites on the other hand must score positively as ~~it has~~ they have no sensitive receptors within 250 metres. It is acknowledged that the position at ~~Hollow Road Farm~~ both sites would be improved if the

nearest sensitive receptors ~~or planned sensitive receptors~~ (existing dwellings in the case of Hollow Road Farm and the planned hospital site in the case of Land south of WSC) were even further away, thus a score of +1 is applied in the case of the relevant criteria.

6.44a Aside from the criteria related to the proximity of sensitive receptors there were nine other criteria which differentiated the sites. These were:

- **Compatibility with surrounding land uses**  
Tut Hill, Hollow Road Farm and Land south of WSC all scored +2 on account of there being no obviously incompatible land uses. McRae Estates land and Land at Rougham Hill scored -1 on the basis that they abut incompatible uses or land allocated for incompatible uses.
- **Suitability of local road network and extent to which access would require reliance on local roads**  
Tut Hill and Hollow Road Farm both scored + 2 as a result of their good existing access arrangements and the suitability of their local road networks. Land at Rougham Hill scored 0 in view of the fact that a suitable access could be delivered but that it would rely on 450 metres of what is currently local road which would need upgrading. The fact that it has the potential in increase congestion is also factored in. Land south of WSC and McRae Estates land both scored -1 because, while suitable accesses can probably be delivered for these sites, significant alterations and improvements to the local highway network would be likely to be needed.
- **Proximity to areas of land instability**  
The only site not to score +2 in relation to land instability was McRae Estates land. It scored -1 as a result of a desktop technical assessment which indicated that it could be at risk of ground instability and that ground conditions were potentially difficult.
- **Potential for landscape impact**  
Tut Hill, Hollow Road Farm and Land south of WSC all scored -1 because they have “medium” landscape sensitivity. Land at Rougham Hill and McRae Estates land have “medium/high” landscape sensitivity and high landscape sensitivity respectively and therefore score -2.
- **Potential for visual impact**  
Tut Hill, Hollow Road Farm and Land at Rougham Hill all scored -1 in due to the limited sensitivity of receptors at and around these locations. McRae Estates Land and Land south of WSC scored -2 due to the number of associated receptors or viewpoints and their higher sensitivity.
- **Potential for impact on heritage assets**  
Tut Hill, Hollow Road Farm and Land south of WSC all scored -1 in view of their archaeological potential and the findings of previous archaeological assessments or investigations. McRae Estates land and Land at Rougham Hill scored -2 however. In the case of McRae Estates land this was because of its proximity to the abbey (an ancient monument), its importance to the setting of the historic core of Bury St Edmunds and its high archaeological potential. Land at Rougham Hill scored -2 because of the site’s high archaeological potential and because it is considered that development at the site would almost certainly impact on prehistoric and medieval below ground remains as well as potential remains from other periods.

- **Potential for light pollution**

The Tut Hill, Hollow Road Farm and land at Rougham Hill sites all scored -1 in view of the fact that, while they are not intrinsically dark, development at these locations would extend light spillage into the countryside. McRae Estates land scored 0 on the basis of the floodlit rugby ground located close by and the light spillage from the main urban area of Bury St Edmunds (and the site's proximity to it). Land south of WSC scored -2 because, while not intrinsically dark, it is detached from the settlement of Bury St Edmunds. Development at the site would create new light sources whose impact would therefore be greater than at the other sites.

- **Potential for impact from litter**

All sites except Land south of WSC scored +1 against this criterion in view of the fact that they are not particularly exposed and have a degree of landscaping or other shelter protecting them from the prevailing wind. Land south of WSC scored 0 on the basis that it is a large east-west oriented site (meaning that it could be exposed to the prevailing wind). Further, the site's visibility means that the impact of any material which does "escape" is likely to be higher.

6.45 The final criterion ~~against which the sites scored differently~~ has the potential to differentiate some of the sites ~~was is~~ "Availability for purchase". Tut Hill scored -2 on account of the site owner being unwilling to dispose of the site if it is to be used to accommodate a waste transfer station (an integral part of the current optimal solution proposals). The land at Rougham Hill site comprises two different ownerships where one owner is not willing to sell the part they own for the proposed use. Despite this the site has been scored +2 to reflect the fact that the part of the site with the owner willing to sell is large enough to accommodate the optimum solution proposals and is also the part of the site which does not fall within the local plan housing allocation. ~~Hollow Road Farm~~

6.45a The remaining three sites, on the other hand, also scored +2 because their owners is have indicated their willingness to dispose of them site for the proposed uses. Aside from the split ownership site therefore, the scoring in this case is simple because the respective positions occupy opposing ends of the spectrum of possible outcomes (thus the -2 and + 2 scores).

6.46 ~~Taking account of the above the sites total scores, Tut Hill: - 7 and Hollow Road Farm: +7, can be evaluated. The cumulative effect of Hollow Road Farm's greater distance from sensitive receptors and its availability for purchase put it firmly in the positive realm. The effect of the opposite outcomes for the same criteria for Tut Hill mean that, taken together with the scores that are the same for both sites (several of which are also negative), it scores negatively. It can be seen from Figure 7 above that the sites' total scores were as follows:~~

- Hollow Road Farm: +7
- Tut Hill: -7
- McRae Estates land: -14
- Land at Rougham Hill: -10

- Land south of WSC: +1

Tut Hill, McRae Estates land and Land at Rougham Hill scored significantly lower than Hollow Road Farm. This has at least in part to do with their relative proximity to sensitive receptors which is explained above. However, in the case of McRae Estates land and Land at Rougham Hill this also has to do with a number of the other differentiating criteria considered above. The scores for McRae Estates land and land at Rougham Hill are so much lower than those for Hollow Road Farm (21 points lower and 17 points lower respectively) that, in relative terms at least, they are not considered sufficiently suitable, available or deliverable as sites on which to accommodate the optimum solution proposals.

6.47 Tut Hill scored 14 points less than Hollow Road Farm which ~~The scores, as with McRae Estates land and Land at Rougham Hill,~~ suggests a large difference in the sites' suitability, availability and deliverability. However, the material differences between these two sites are probably not as large as the numbers might suggest. That said, there are still sufficient and significant enough differences between them to contrast them and therefore to stand Hollow Road Farm apart as the more suitable, available and deliverable site of the two.

6.47a The site which scored closest to Hollow Road Farm was Land south of WSC (+1 versus +7 for Hollow Road Farm). However, Land south of WSC still scored 6 points lower than Hollow Road Farm across four largely unconnected criteria (in contrast to the Tut Hill site where most of the difference in scores was due to proximity of sensitive receptors related criteria). These criteria are:

- Suitability of local road network and extent to which access would require reliance on local roads (Land south of WSC scored -1 compared to Hollow Road Farm's +2 score)
- Potential for visual impact (Land south of WSC scored -2 compared to Hollow Road Farm's -1 score)
- Potential for light pollution (Land south of WSC scored -2 compared to Hollow Road Farm's -1 score)
- Potential for impact from litter (Land south of WSC scored 0 compared to Hollow Road Farm's +1 score)

The two sites' differing scores against these criteria reflect material differences in their suitability for accommodating the optimal solution proposals. The optimum solution proposals (involving the co-location of three facilities) make accessibility, which would be an important consideration for any one of the facilities on its own, a key consideration. The significant highway improvements required to deliver satisfactory access arrangements at Land south of WSC make it less suitable than Hollow Road Farm where the access arrangements are already considered acceptable in principle. Further, the necessarily utilitarian nature of the optimum solution proposals means that the greater visual and light sensitivity of Land south of WSC will make it less suitable than Hollow Road Farm for accommodating them. Finally, even though litter would be carefully controlled at any site, it is likely to be harder to control litter at land south of WSC than at Hollow Road Farm (see

“Potential for impact from litter” bullet point at paragraph 6.44a above). The impact of the litter at Land south of WSC, should it occur, may also be higher.

6.47b It can be seen from the above there is a clear and material difference in the suitability of the two highest scoring sites with Hollow Road Farm being the most suitable. There is an even greater difference in terms of suitability and deliverability between Hollow Road Farm and the other three sites assessed against the qualitative criteria. The sites qualitative assessment has therefore shown Hollow Road Farm to be the most suitable, available and deliverable of the five sites assessed.

6.48 There is a final point which must be made in respect of the availability for purchase of the Tut Hill and Land at Rougham Hill sites. The fact that their respective owners are ~~is~~ unwilling to ~~the~~ sell part or all of their sites if it is to be used to accommodate a waste transfer site for one or more of the proposed uses is not necessarily the be-all and end-all as the possibility of compulsory purchase remains. However, there are strict checks and balances in place which govern the use of such powers, and for good reason. ODPM Circular 06/2004 states:

*“A compulsory purchase order should only be made where there is a compelling case in the public interest. An acquiring authority should be sure that the purposes for which it is making a compulsory purchase order sufficiently justify interfering with the human rights of those with an interest in the land affected”.*

6.49 The assessment of the unallocated greenfield sites against the exclusionary criteria in this exercise has yielded ~~two~~ five sites which might be suitable for accommodating the current optimal solution proposals. The subsequent assessment against the qualitative criteria has shown one site, Hollow Road Farm, to be more suitable, available and deliverable than the other, ~~Tut Hill~~ four. As can be ~~has been explained seen from the~~ above, the results are significant and robust enough to be relied upon in selecting a site ~~to further~~ on which to deliver the optimum solution proposals.

6.50 In view of the fact that the Tut Hill and Land at Rougham Hill sites (which would require compulsory purchase to secure all or part of them for the proposed use) scores significantly lower than Hollow Road Farm against the qualitative assessment criteria, and the fact that only a small part of this difference is down to the site-'s' availability, there is no justification for considering the use of compulsory purchase powers in an attempt to deliver the current optimal solution at Tut Hill or Land at Rougham Hill. The assessment reveals Hollow Road Farm to be a better site in its own right and it would not require the use of compulsory purchase powers to acquire it. With this borne in mind it is unlikely that compulsory purchase of the Tut Hill ~~site~~ or Land at Rougham Hill sites could pass the public interest test.

## **Optimal site**

- 6.51 The assessment exercise carried out by the councils on the possible sites on which they could locate their current optimal solution proposals was designed to identify the most suitable, available and deliverable site having regard to the relevant law and policy. The councils therefore have faith in the outcome of the assessment and, given that it scored highest, are satisfied that Hollow Road Farm is the optimal site. They acknowledge that Hollow Road Farm is an unallocated greenfield site but the assessment exercise has shown it to be sequential test compliant and more suitable, deliverable and available than its sequentially equivalent sites. Further, the fact that this is a one-off proposal designed to deliver a long term solution to the councils' future waste management and operational service and facility needs means that an exception to policy in respect of the site's unallocated greenfield status has merit.
- 6.52 In view of the above factors the councils consider Hollow Road Farm, Bury St Edmunds to be the best site on which to deliver the current optimal solution proposals and have proceeded accordingly.

## **7 CONCLUSIONS**

### **Conclusions in respect of the need for new or replacement waste management and operational facilities**

- 7.1 There are numerous factors in existence which amount to the need for a new approach to delivering waste management and operational services in West Suffolk and, as a result, new or replacement facilities. These factors are born of deficiencies in existing facilities, strategy changes, Government policy and initiatives, increasing demand, pressure to redevelop an existing site and the need for strategically located waste transfer facilities to serve the County Council's Energy from Waste facility now that this is operational.
- 7.2 The urgency of some of the factors is such that the councils will need to take action of some sort in the short term, whether together or on their own, to address the extant and future need.
- 7.3 The councils have chosen to work together to find a joint solution to meeting the need.

### **Conclusions in respect of the existing planning policy position**

- 7.4 The relevant national and local planning policy is not particularly helpful with respect to meeting the need for new waste management and operational facilities. The national policy is relatively unspecific and, where it is more specific, is directed at plan making.
- 7.5 Neither the waste plan nor the development plan allocate any sites for the new facilities which are needed. The relevant documents had already been completed or substantially completed by the time the need for a new strategic facility had been identified.
- 7.6 The development control policies of the waste plan come the closest to meeting the need for the new facilities. However, in the areas which they state would be acceptable for the development required there are no available sites.

### **Conclusions in respect of assessment of options for the provision of new waste management and operational facilities**

- 7.7 In seeking a solution to the delivery of the waste management and operational services and facilities needed the councils have considered all of the reasonable options.
- 7.8 The assessment of these options indicates that co-locating all of the proposed facilities on a single site best meets the councils' objectives. The option of implementing the Rougham Hill planning permission, to provide a new waste transfer station and replacement household waste recycling centre, and merging the Olding Road and Holborn Avenue depot on a new site in Bury St Edmunds also scored well. However, further analysis reveals that

when taking a long term view, which the councils have acknowledged they need to do, the full co-location option is brought further into focus as the best option for meeting the councils' objectives

- 7.9 In line with the findings of the assessment the councils consider that co-locating all of the proposed facilities on a single site (option 4) is the current optimal solution.

## **Conclusions in respect of assessment of sites for the provision of new waste management and operational facilities**

- 7.10 In seeking the right site on which to deliver their current optimal solution proposals the councils have considered numerous sites over a considerable period.

### Post IAPOS public consultation amendment/addition

- 7.11 The assessment exercise conducted has shown there to be no existing waste sites, existing general industrial or storage and distribution sites, ~~and~~ allocated general industrial or storage and distribution sites and unallocated brownfield sites which are suitable, available and deliverable. As a consequence, an unallocated greenfield site, land at Hollow Road Farm, was shown to be the most suitable, available and deliverable site having regard to the relevant law and policy.

- 7.12 Following the application of the exclusionary criteria ~~only two~~ five sites remained (Hollow Road Farm, ~~and~~ Tut Hill, McRae Estates land, Land at Rougham Hill and Land south of West Suffolk Crematorium). However, there were sufficient and significant enough differences between the sites to allow Hollow Road to stand apart as the more suitable, available and deliverable site.

- 7.13 As a result of the assessment the councils consider that Hollow Road Farm is the best site on which to deliver the current optimal solution proposals.

## **Overall conclusion**

- 7.14 Using a policy compliant, robust and proportionate assessment process the councils have determined the best option and site for delivering their waste management and operational facility needs. They have adopted these as their current optimal solution and current optimal site to progress in seeking to meet the identified need.

# Appendix A

Options assessment matrix

## Options assessment matrix

Criteria	Important factors to consider when assessing:	Option 1 – do nothing	Option 2 – implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue	Option 3 – implement Rougham Hill planning permission and merge and relocate Olding Road and Holborn Avenue depots	Option 4 – co-locate all facilities on a new site	Option 5 – co-locate waste transfer facility and depot on a new site and leave HWRC at Rougham Hill
Immediate capital cost / realisation	<ul style="list-style-type: none"> <li>Short term investment in existing facilities to be retained, e.g. renovation works</li> <li>Capital receipts from sale of existing sites</li> <li>Price/cost of new sites</li> <li>Purchase costs of new sites</li> <li>Development costs of new facilities</li> </ul>	<p>-1</p> <p><b>Depots</b> <u>Olding Road</u> Capital investment will be required in aging and inadequate depot facilities – not a sustainable position.</p> <p>Capital implications of not releasing Olding Road for new investment – PSVII.</p> <p><u>Holborn Ave</u> No capital costs / receipts and no imminent investment required.</p> <p><b>WTSs</b> All in private ownership so capital costs/receipts not relevant/applicable.</p> <p><b>HWRC</b> <u>Rougham Hill</u> No capital investment required</p> <p><b>General</b> No site purchase costs</p> <p>No proceeds from selling sites</p>	<p>-1</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> Capital investment to develop / redevelop Rougham Hill.</p> <p><b>Existing depots</b> <u>Olding Road</u> Capital investment will be required in aging and inadequate depot facilities – not a sustainable position.</p> <p>Capital implications of not releasing Olding Road for new investment – PSVII.</p> <p><u>Holborn Ave</u> No capital costs / receipts and no imminent investment required.</p> <p><b>Existing WTSs</b> All in private ownership so capital costs/receipts not relevant/applicable.</p>	<p>-2</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> Capital investment to develop / redevelop Rougham Hill.</p> <p><b>New depot</b> Purchase cost of new depot site.</p> <p>May require a lower level of capital investment than full co-location option but is dependent on finding a suitable depot site.</p> <p><b>Existing depots</b> <u>Olding Road</u> Capital released through sale of Olding Road.</p> <p><u>Holborn Ave</u> Facility would be vacated so could be sold to provide capital receipt.</p> <p><b>Existing WTSs</b> All in private ownership so capital costs/receipts not relevant/applicable.</p>	<p>-2</p> <p><b>All new facilities</b> Purchase cost of large new site.</p> <p>Highest level of capital investment required to develop depot, TS &amp; HWRC on single site.</p> <p><b>Existing depots</b> <u>Olding Road</u> Capital released through sale of Olding Road.</p> <p><u>Holborn Ave</u> Facility would be vacated so could be sold to provide capital receipt.</p> <p><b>Existing WTSs</b> All in private ownership so capital costs/receipts not relevant/applicable.</p> <p><b>Existing HWRC</b> <u>Rougham Hill</u> Capital released through sale of Rougham Hill.</p>	<p>-2</p> <p><b>New depot and WTS</b> Purchase cost of large new site.</p> <p>May require a lower level of capital investment than full co-location option but is dependent on finding a suitable site to co-locate depot and WTS – possibly would lead to a slightly lower level of investment than option 4 - circa £2m less.</p> <p><b>Existing HWRC</b> <u>Rougham Hill</u> HWRC retained so no capital receipts.</p> <p><b>Existing depots</b> <u>Olding Road</u> Capital released through sale of Olding Road.</p> <p><u>Holborn Ave</u> Facility would be vacated so could be sold to provide capital receipt.</p> <p><b>Existing WTSs</b> All in private ownership so capital costs/receipts not relevant/applicable.</p>

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Criteria	Important factors to consider when assessing:	Option 1 – do nothing	Option 2 – implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue	Option 3 – implement Rougham Hill planning permission and merge and relocate Olding Road and Holborn Avenue depots	Option 4 – co-locate all facilities on a new site	Option 5 – co-locate waste transfer facility and depot on a new site and leave HWRC at Rougham Hill
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Long term capital cost / realisation	<ul style="list-style-type: none"> <li>Maintenance costs (higher for older facilities)</li> <li>Adaptation costs (more likely/higher for older facilities)</li> </ul>	<p>-2</p> <p><b>Depots</b> <u>Olding Road</u> Ongoing capital investment will be required in aging and inadequate depot facilities.</p> <p><u>Holborn Ave</u> Some long term capital investment will be required as per asset management programme.</p> <p><b>WTSS</b> All in private ownership so capital costs/receipts not relevant/applicable.</p> <p><b>HWRC</b> <u>Rougham Hill</u> Some maintenance costs will be incurred but these are likely to be low in view of the size and simplicity of the facility.</p>	<p>-2</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> Lower maintenance costs – all facilities fit for purpose.</p> <p><b>Existing depots</b> <u>Olding Road</u> Ongoing capital investment will be required in aging and inadequate depot facilities.</p> <p><u>Holborn Ave</u> Some long term capital investment will be required as per asset management programme.</p> <p><b>Existing WTSS</b> All in private ownership so capital costs/receipts not relevant/applicable.</p>	<p>-1</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> Lower maintenance costs – all facilities fit for purpose.</p> <p><b>New depot</b> Maintenance costs of new depot are likely to be considerably less than Olding Road depot, and similar to Holborn Avenue.</p> <p><b>Existing depots</b> <u>Olding Road</u> N/A (site likely to be sold off in the short term - see above).</p> <p><u>Holborn Ave</u> If the facility is retained and leased there will be ongoing capital required to maintain the facility under an asset management programme. If the property is disposed of there will be no ongoing capital implications</p> <p><b>Existing WTSS</b> All in private ownership so capital costs/receipts not relevant/applicable</p>	<p>-1</p> <p><b>All new facilities</b> Lower maintenance costs – all facilities fit for purpose.</p> <p><b>Existing depots</b> <u>Olding Road</u> None (site likely to be sold off in the short term - see above).</p> <p><u>Holborn Ave</u> If the facility is retained and leased there will be ongoing capital required to maintain the facility under an asset management programme. If the property is disposed of there will be no ongoing capital implications.</p> <p><b>Existing WTSS</b> All in private ownership so capital costs/receipts not relevant/applicable.</p> <p><b>Existing HWRC</b> <u>Rougham Hill</u> None (site likely to be sold off in the short term - see above)</p>	<p>-1</p> <p><b>New depot and WTS</b> Lower maintenance costs – all facilities fit for purpose.</p> <p><b>Existing HWRC</b> <u>Rougham Hill</u> None (site likely to be sold off in the short term - see above).</p> <p><u>Holborn Ave</u> If the facility is retained and leased there will be ongoing capital required to maintain the facility under an asset management programme. If the property is disposed of there will be no ongoing capital implications.</p> <p><b>Existing WTSS</b> All in private ownership so capital costs/receipts not relevant/applicable.</p>
Long term revenue	<ul style="list-style-type: none"> <li>Rental income from letting vacated sites/facilities</li> </ul>	<p>0</p> <p><b>Depots</b> <u>Olding Road</u> Limited opportunity to develop long term revenue streams due site remaining in use/limited capacity and aging facilities</p> <p><u>Holborn Ave</u> Limited potential to release some of the office accommodation for rental income.</p>	<p>0</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> None – site redeveloped to create WTS and repositioned HWRC.</p> <p><b>Depots</b> <u>Olding Road</u> Limited opportunity to develop long term revenue streams due site remaining in use/limited capacity and aging facilities</p>	<p>+1</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> None – site redeveloped to create WTS and repositioned HWRC.</p> <p><b>New depot</b> Opportunities for leasing space to other partners.</p> <p><b>Existing depots</b> <u>Olding Road</u> Scope to become partner in second phase of PSV development and generate revenue from completed development as stakeholder (assuming site not disposed of).</p>	<p>+2</p> <p><b>All new facilities</b> Opportunities for leasing space to other partners.</p> <p><b>Existing depots</b> <u>Olding Road</u> Scope to become partner in second phase of PSV development and generate revenue from completed development as stakeholder (assuming site not disposed of).</p>	<p>+1</p> <p><b>New WTS and depot</b> Opportunities for leasing space to other partners.</p> <p><b>Existing HWRC</b> <u>Rougham Hill</u> None – site still in use.</p> <p><b>Existing depots</b> <u>Olding Road</u> Scope to become partner in second phase of PSV development and generate</p>

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		<p><b>WTSs</b> All in private ownership so long term revenue not applicable.</p> <p><b>HWRC</b> <u>Rougham Hill</u> None – site still in use.</p>	<p><u>Holborn Ave</u> Limited potential to release some of the office accommodation for rental income.</p> <p><b>Existing WTSs</b> All in private ownership so long term revenue not applicable.</p>	<p>second phase of PSV development and generate revenue from completed development as stakeholder (assuming site not disposed of).</p> <p><u>Holborn Ave</u> This option would enable the Holborn Avenue depot to be leased to create a long term revenue stream if the site was retained.</p> <p><b>Existing WTSs</b> All in private ownership so long term revenue not applicable.</p>	<p><u>Holborn Ave</u> This option would enable the Holborn Avenue depot to be leased to create a long term revenue stream if the site was retained.</p> <p><b>Existing WTSs</b> All in private ownership so long term revenue not applicable.</p> <p><b>Existing HWRC</b> <u>Rougham Hill</u> This option would enable the Rougham Hill site to be leased to create a long term revenue stream if the site was retained.</p>	<p>revenue from completed development as stakeholder (assuming site not disposed of).</p> <p><u>Holborn Ave</u> This option would enable the Holborn Avenue depot to be leased to create a long term revenue stream if the site was retained.</p> <p><b>Existing WTSs</b> All in private ownership so long term revenue not applicable.</p>
Operational cost / savings	<ul style="list-style-type: none"> <li>cost of running facilities (higher for older facilities)</li> <li>number of cost centres (i.e. number of separate sites)</li> <li>potential for asset/resource sharing</li> <li>management costs</li> </ul>	<p>-2</p> <p>No operational savings and potential for increased costs – no scope for managing growth.</p> <p>Current WTS operations unsustainable</p> <p>Doesn't provide opportunity to co-locate WDA and WCA activities and realise potential benefits through this.</p> <p>Doesn't provide necessary level of facilities to potentially increase commercial revenue.</p> <p>SEBC / FHDC split operation would remain</p>	<p>0</p> <p>Operational savings for WTS &amp; HWRC. Likelihood of increased costs for depot operations – no scope for West Suffolk to manage growth efficiently, particularly so for growth in Bury St Edmunds</p> <p>Doesn't provide opportunity to co-locate WDA and WCA activities and realise potential benefits through this.</p> <p>Doesn't provide necessary level of facilities to potentially increase commercial revenue.</p> <p>SEBC / FHDC split operation would remain</p>	<p>+2</p> <p>Potential for significant savings, but will be dependent on finding a site of a suitable size and location.</p> <p>Doesn't provide opportunity to co-locate WDA and WCA activities and realise potential benefits through this.</p> <p>SEBC and FHDC depots would be co-located.</p> <p><u>Bringing the depots together in Bury St Edmunds leads to savings pertaining to co-location and a reduction in the costs associated with waste disposal.</u></p>	<p>+2</p> <p>Significant savings – <u>£1.16M over £500k</u> per annum <u>but will be dependent on finding a site of suitable size and location.</u> This option will enable the potential of full co-location efficiencies to be delivered and will provide further opportunities to drive out other potential savings linked to co-location.</p> <p><u>Savings include estimate for vehicle routing efficiencies based on a location close to A14 junctions 42 – 44.</u></p> <p>Potential for different functions to share assets on the same site (e.g. fuel, waste transfer, staff welfare, supervisory management etc).</p>	<p>+2</p> <p>Significant savings – <u>£1.01M per annum similar to option 4</u> but will be dependent <u>on</u> finding a site of suitable size and location for WTS and depot. <u>Less potential for savings than Option 4 because operations are more dispersed.</u></p> <p><u>Savings include estimate for vehicle routing efficiencies based on a location close to A14 junctions 42 – 44.</u></p> <p>Dependant on location, co-location should drive vehicle routing efficiencies.</p> <p>Potential for different functions to share assets on the same site (e.g. fuel, waste transfer, staff welfare, supervisory management etc).</p> <p>SEBC and FHDC depots would be co-located.</p>

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Commercial desirability / value to prospective bidders / operators	<ul style="list-style-type: none"> <li>Age, quality and condition of facilities</li> <li>Suitability of location</li> <li>Scope for efficient and effective operation</li> <li>Control of facilities</li> </ul>	<p>0</p> <p><b>Depots</b> <u>Olding Road</u> Older / poorer quality facilities, less attractive / efficient, location not ideal</p> <p><u>Holborn Ave</u> Good quality facilities</p> <p><b>WTSs</b> Owned by waste service provided so not available to other waste service providers, Red Lodge transfer station location not ideal</p> <p><b>HWRC</b> <u>Rougham Hill</u> Good quality facilities, good location</p>	<p>+1</p> <p><b>Depots</b> <u>Olding Road</u> Older / poorer quality facilities, less attractive / efficient, location not ideal</p> <p><u>Holborn Ave</u> Good quality facilities</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> New facilities at Rougham Hill more efficient and attractive</p>	<p>+1</p> <p><b>All new facilities</b> All new facilities – more efficient and attractive</p>	<p>+2</p> <p><b>All new facilities</b> New facilities, more efficient and attractive and providing greatest potential scope through full co-location</p>	<p>+1</p> <p><b>New WTS and depot</b> New facilities - more efficient and attractive</p> <p><b>Existing HWRC</b> <u>Rougham Hill</u> Good quality facilities, good location</p>
Availability of sites / ownership	<ul style="list-style-type: none"> <li>Whether site is owned by Suffolk County Council or one of the West Suffolk councils</li> </ul>	<p>0</p> <p>Sites known and partly in public ownership.</p> <p>WTSs in private ownership.</p>	<p>+2</p> <p>Sites known and in public ownership.</p>	<p>-1</p> <p>One site known and in public ownership.</p> <p>Other site of medium size to be identified and secured.</p>	<p>-2</p> <p>Large site would need to be identified and secured.</p>	<p>-2</p> <p>Large site would need to be identified and secured.</p> <p>HWRC known and in public ownership.</p>
Suitability of sites	<ul style="list-style-type: none"> <li>Size</li> <li>Shape</li> <li>Capacity / capacity for growth / capacity for providing additional commercial services / capacity for accommodating new partners</li> <li>Constraints</li> <li>Environmental sensitivity</li> <li>Location</li> </ul>	<p>0</p> <p><b>Depots</b> <u>Olding Road</u> Shape of site not ideal and limited space for future growth or partners.</p> <p>Location not ideal.</p> <p><u>Holborn Ave</u> Broadly suitable but limited space for future growth or partners</p> <p><b>WTSs</b> <u>Red Lodge</u> Limited size.</p> <p>Access road is poor and</p>	<p>0</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> Suitable / good.</p> <p>Good location.</p> <p><b>Depots</b> <u>Olding Road</u> Shape of site not ideal and limited space for future growth or partners</p> <p><u>Holborn Ave</u> Broadly suitable but limited space for future growth or partners</p>	<p>+1</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> Suitable / good</p> <p>Good location.</p> <p><b>New depot</b> Should be possible to find a suitable site for new depot</p>	<p>+1</p> <p><b>All new facilities</b> May prove difficult to find a suitable site for a combined depot, WTS &amp; HWRC</p> <p>However, site would be chosen on basis of its suitability (among other things) so should be suitable if can be found.</p>	<p>+1</p> <p><b>New WTS and depot</b> May prove difficult to find a suitable site for a combined depot.</p> <p>However, site would be chosen on basis of its suitability (among other things) so should be suitable if can be found.</p> <p><b>HWRC</b> <u>Rougham Hill</u> Suitable / good.</p> <p>Good location.</p>

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		<p>passes immediately adjacent to dwellings.</p> <p>Well located in terms of Suffolk Lorry Route Network but poorly located in terms of trunk road network given need to travel east from site.</p> <p>Not in SWP “key location” or “desirable location”.</p> <p><u>Thetford</u> Existing industrial estate location. Limited scope for expansion / co-location / partners.</p> <p>Well located in terms of Suffolk Lorry Route Network and trunk road network.</p> <p>Not in SWP “key location” or “desirable location”.</p> <p><u>Haverhill</u> Existing industrial estate location. Good size and plenty of yard space but limited scope for expansion / co-location / partners.</p> <p>Is in an SWP “desirable location” though not a “key location”.</p> <p>Well located in terms of Suffolk Lorry Route Network.</p> <p><b>HWRC</b> <u>Rougham Hill</u> Suitable / good</p>				
Proximity of sites to sensitive receptors	<ul style="list-style-type: none"> <li>• Planning for Waste Management Facilities: A Research Study (ODPM, August 2004)</li> <li>• Distance from sites to nearest dwellings and number of dwellings</li> <li>• Distance from sites to other sensitive receptors and number of other sensitive</li> </ul>	<p>-1</p> <p><b>Depot</b> <u>Olding Road:</u> Surrounding land uses industrial or office</p>	<p>0</p> <p><b>Depots</b> Surrounding land uses industrial or office</p> <p>Nearest dwellings 130m</p>	<p>0</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> Two dwellings within 250m (Rushbrooke Lane).</p>	<p>+1</p> <p><b>All new facilities</b> Site would be chosen on basis of proximity to sensitive receptors (among other things) so ought to be</p>	<p>+1</p> <p><b>New WTS and depot</b> Site would be chosen on basis of proximity to sensitive receptors (among other things) so ought to be</p>

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	<p>receptors</p> <ul style="list-style-type: none"> <li>Location of dwellings and other sensitive receptors in relation to sites (i.e. upwind or downwind)</li> <li>Extent of screening between sites and nearest dwellings and other sensitive receptors</li> <li>Acceptability of impact on dwellings / sensitive receptors (if known)</li> </ul>	<p>Nearest dwellings 130m but screened by other development or mature landscaping</p> <p><u>Holborn Ave</u> Abuts residential development on one side and is very close to it on another.</p> <p>Nearest dwelling 35m.</p> <p>Nearest school 350m.</p> <p>Surrounding land uses are industrial.</p> <p><b>WTSs</b> <u>Red Lodge:</u> Nearest dwelling 210 m.</p> <p>Road to site passes immediately in front of residential development.</p> <p>Surrounding land uses are industrial and agricultural</p> <p><u>Haverhill</u> Nearest dwelling 145m</p> <p>Surrounding land uses are industrial and agricultural.</p> <p><u>Thetford</u> Nearest dwelling 130m</p> <p>Surrounding land uses are industrial and agricultural.</p> <p><b>HWRC</b> Closest dwelling is 250m</p> <p>Handful of dwellings within 250m</p> <p>Parts of hotel within 250m</p> <p>Significant number of new dwellings allocated within 250m</p>	<p>but screened by other development or mature landscaping</p> <p><u>Holborn Ave</u> Abuts residential development on one side and is very close to it on another.</p> <p><b>New WTS &amp; HWRC</b> <u>Rougham Hill</u> Two dwellings within 250m (Rushbrooke Lane).</p> <p>Parts of hotel within 250m</p> <p>Significant number of new dwellings allocated within 250m</p> <p>Consented scheme includes cladding to achieve a sound reduction index of 28 dB.</p> <p>Rougham Hill has appropriate mitigation bearing in mind the existing residential properties. However it would be incumbent on the developer of the new housing to ensure any impacts of the RH facility were adequately mitigated.</p>	<p>Parts of hotel within 250m</p> <p>Significant number of new dwellings allocated within 250m</p> <p>Consented scheme includes cladding to achieve a sound reduction index of 28 dB.</p> <p>Rougham Hill has appropriate mitigation bearing in mind the existing residential properties. However it would be incumbent on the developer of the new housing to ensure any impacts of the RH facility were adequately mitigated.</p> <p><b>New depot</b> Site would be chosen on basis of proximity to sensitive receptors (among other things) so ought to be in an acceptable location.</p>	<p>further than 250m from sensitive receptions</p>	<p>further than 250m from sensitive receptions</p> <p><b>HWRC</b> <u>Rougham Hill</u> Closest dwelling is 250m</p> <p>Two dwellings within 250m (Rushbrooke Lane).</p> <p>Parts of hotel within 250m</p> <p>Significant number of new dwellings allocated within 250m</p> <p>It would be incumbent on the developer of the new housing to ensure any impacts of the RH facility were adequately mitigated.</p>

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Access / highways / transport	<ul style="list-style-type: none"> <li>Standard / quality / suitability of access to highway</li> <li>Proximity to key arterial routes / main roads (particularly A14)</li> <li>Proximity / relationship to Suffolk Lorry Route Network</li> <li>Proximity to traffic sensitive receptors</li> <li>Acceptability of accesses (if known)</li> </ul>	<p>-1</p> <p><b>Depots</b> <u>Olding Road</u> Suitable working access in place.</p> <p>Not particularly close to A14.</p> <p>Must go through/past residential areas to get to.</p> <p>Within centre of population it serves.</p> <p><u>Holborn Ave</u> Suitable working access in place.</p> <p>Not particularly close to A14.</p> <p>Must go through/past residential areas to get to.</p> <p>Within centre of population it serves.</p> <p><b>WTSs</b> <u>Red Lodge</u> Poor highway access, served from B-road and minor road / unclassified road / track.</p> <p>Relatively close to A11 but not highly accessible from / to it.</p> <p>Close to Red Lodge but not to main centre of population (BSE).</p> <p><u>Haverhill</u> Highway access good. Industrial estate location which is accessed directly from A1017.</p> <p>Facility located on south of town but collection areas are to the north.</p>	<p>0</p> <p><b>Depots</b> <u>Olding Road</u> Suitable working access in place.</p> <p>Not particularly close to A11.</p> <p>Must go through/past residential areas to get to.</p> <p>Within centre of population it serves.</p> <p><u>Holborn Ave</u> Suitable working access in place.</p> <p>Not particularly close to A14.</p> <p>Must go through/past residential areas to get to.</p> <p>Within centre of population it serves.</p> <p><b>New WTS and HWRC</b> <u>Rougham Hill</u> Close to A14</p> <p>Working access already in place but will be more intensively used. Highways have approved through planning process.</p> <p>Generally speaking not close to traffic sensitive receptors but will be if adjacent residential allocation is built out.</p>	<p>+1</p> <p><b>New WTS and HWRC</b> <u>Rougham Hill</u> Close to A14</p> <p>Working access already in place but will be more intensively used. Highways have approved through planning process.</p> <p>Generally speaking not close to traffic sensitive receptors but will be if adjacent residential allocation is built out.</p> <p><b>New depot</b> Site would be chosen on basis of access/ highways suitability (among other things) so ought to be at least acceptable in this respect</p>	<p>+1</p> <p><b>All new facilities</b> Site would be chosen on basis of access/ highways suitability (among other things) so ought to be at least acceptable in this respect</p>	<p>+1</p> <p><b>New WTS and depot</b> Site would be chosen on basis of access/ highways suitability (among other things) so ought to be at least acceptable in this respect</p> <p><b>HWRC</b> <u>Rougham Hill</u> Already operational</p> <p>Close to A14</p> <p>Suitable working access.</p> <p>Generally speaking not close to traffic sensitive receptors but will be if adjacent residential allocation is built out.</p>

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		<p>Well placed to serve Haverhill but not main centre of population (BSE).</p> <p><u>Thetford</u> Highway access good. Industrial estate location which is accessed directly from Norwich Road. Norwich Road connects directly with the A11.</p> <p>Facility located on south of the town which is the right side as far as collection areas are concerned.</p> <p>Not particularly well located to serve West Suffolk and not close to main centre of population (BSE).</p> <p><b>HWRC</b> <u>Rougham Hill</u> Already operational</p> <p>Close to A14</p> <p>Suitable working access in place.</p> <p>Generally speaking not close to traffic sensitive receptors but will be if adjacent residential allocation is built out.</p>				
Key transport / travel distances	<ul style="list-style-type: none"> <li>Proximity of all facilities to main population centre (Bury St Edmunds)</li> <li>Proximity of collection locations to WTS</li> <li>Proximity of WTS to EfW / MRF</li> <li>Proximity of WTS to depot</li> </ul>	<p>-1</p> <p><b>Depots</b> Collection rounds cannot be managed as effectively as co-location. SEBC / FHDC split depots remain.</p> <p><b>WTSs</b> Not close to main centres of population.</p> <p><b>HWRC</b> Close to main centre of population</p>	<p>+1</p> <p><b>Depots</b> Collection rounds cannot be managed as effectively as co-location. SEBC / FHDC split depots remain.</p> <p><b>New WTS &amp; HWRC</b> Co-located reducing transport</p> <p><b>New WTS</b> Close to main centre of population.</p>	<p>+2</p> <p>Site would be chosen on basis of proximity to main centre of population (among other things) so ought to be at least acceptable in this respect.</p> <p><b>New WTS &amp; HWRC</b> Co-located reducing transport</p> <p><b>New depot</b> Rounds will be managed</p>	<p>+2</p> <p>Site would be chosen on basis of proximity to main centre of population (among other things) so ought to be at least acceptable in this respect.</p> <p><b>All new facilities</b> Co-located minimising transport</p> <p><b>New depot</b> Rounds will be managed</p>	<p>+2</p> <p>Site would be chosen on basis of proximity to main centre of population (among other things) so ought to be at least acceptable in this respect.</p> <p><b>New WTS and depot</b> Co-located minimising transport</p> <p><b>New WTS</b> Close to main centre of</p>

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		<p><u>Close to population</u> Poor</p> <p><u>WTS to EfW/MRF</u> Poor</p> <p><u>WTS to depot</u> Poor</p>	<p><b>New HWRC</b> Close to main centre of population</p> <p><u>Close to population</u> Good – relocating WTS means freighters won't have to travel west from main centre of population.</p> <p><u>WTS to EfW/MRF</u> Very good - relocating WTS means bulker miles will be reduced.</p> <p><u>WTS to depot</u> Good</p>	<p>most effectively in this option as depots are co-located.</p> <p><b>WTS</b> Close to main centre of population.</p> <p><b>New HWRC</b> Close to main centre of population</p> <p><u>Close to population</u> Good - relocating WTS means freighters won't have to travel west from main centre of population to Red Lodge.</p> <p><u>WTS to EfW/MRF</u> Good - relocating WTS means freighters won't have to travel west from main centre of population.</p> <p><u>WTS to depot</u> Depot location in relation to WTS likely to be good.</p>	<p>most effectively in this option as depots are co-located.</p> <p><b>New WTS</b> Close to main centre of population.</p> <p><b>New HWRC</b> Close to main centre of population</p> <p><u>Close to population</u> Good - relocating WTS means freighters won't have to travel west from main centre of population to Red Lodge.</p> <p><u>WTS to EfW/MRF</u> Very good - relocating WTS means freighters won't have to travel west from main centre of population.</p> <p><u>WTS to depot</u> Excellent</p>	<p>population.</p> <p><b>New depot</b> Rounds will be managed most effectively in this option as depots are co-located.</p> <p><b>HWRC</b> <u>Rougham Hill</u> Close to main centre of population.</p> <p><u>Close to population</u> Good - relocating WTS means freighters won't have to travel west from main centre of population to Red Lodge.</p> <p><u>WTS to EfW/MRF</u> Good - relocating WTS means freighters won't have to travel west from main centre of population.</p> <p><u>WTS to depot</u> Excellent</p>
Planning status	<ul style="list-style-type: none"> <li>Existing permissions</li> <li>Existing designations / allocations / adopted masterplans or development briefs</li> <li>Planning history</li> <li>Scope for obtaining permission</li> <li>Likelihood of EIA being required</li> <li>Compliance with development plan</li> </ul>	<p>+2</p> <p><b>Depots</b> <u>Olding Road</u> Site falls within general employment area designation but is the subject of an approved masterplan for PSV</p> <p><u>Holborn Ave</u> Site lies within employment allocation.</p> <p><b>WTSs</b> <u>Red Lodge</u> Site designated as an "existing waste site" and a "waste site allocation" in the Cambridgeshire County Council Minerals and Waste Site Specific Proposals Development Plan Document.</p>	<p>+2</p> <p><b>New WTS and HWRC</b> Planning permission in place</p> <p><b>Depots</b> <u>Olding Road</u> Site falls within general employment area designation but is the subject of an approved masterplan for PSV</p> <p><u>Holborn Ave</u> Site lies within employment allocation.</p>	<p>0</p> <p><b>New WTS and HWRC</b> Planning permission in place</p> <p><b>New depot</b> Unlikely to be able to find site with suitable planning permission. Therefore planning permission likely to be required for depot. However, depot could go on existing industrial estate.</p>	<p>-2</p> <p><b>All new facilities</b> Planning permission would be required.</p> <p>Unlikely to be able to find site with suitable planning permission.</p> <p>No allocated or policy compliant sites therefore likely to be contrary to policy.</p> <p>EIA may be required.</p>	<p>-2</p> <p><b>New WTS &amp; depot</b> Planning permission would be required</p> <p>Unlikely to be able to find site with suitable planning permission.</p> <p>No allocated or policy compliant sites therefore likely to be contrary to policy.</p> <p>EIA may be required.</p> <p><b>HWRC</b> Planning permission in place</p>

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		<p>Has planning permission.</p> <p><u>Haverhill</u> Site located within a “general employment area” allocated for B1 and B8 uses.</p> <p>Has planning permission.</p> <p><u>Thetford</u> Site located within a “general employment area”.</p> <p>Has planning permission.</p> <p><b>HWRC</b> <u>Rougham Hill</u> Site designated as countryside in LP so HWRC unlikely to be out competing other uses (including agriculture given its location)</p> <p>Not an allocated waste/waste management site.</p>				
Environmental permit / consent status	<ul style="list-style-type: none"> <li>Existing permits</li> <li>Permitting history</li> <li>Scope for obtaining permits / consents</li> </ul>	<p>+2</p> <p><b>All facilities</b> In place</p>	<p>+1</p> <p><b>Depots</b> In place for Olding Road &amp; Holborn Ave</p> <p><b>New WTS &amp; HWRC</b> Application for revised HWRC permit and new WTS permit required.</p> <p>Site already has permit to operate as a waste facility. Consultation with EA suggests new development would be acceptable.</p>	<p>0</p> <p><b>New WTS &amp; HWRC</b> Application for revisions to HWRC permit to include WTS would be required</p> <p>Site already has permit to operate as a waste facility. Consultation with EA suggests new development would be acceptable</p> <p><b>New depot</b> Application for new site required</p>	<p>-1</p> <p><b>All new facilities</b> Application for new site required</p>	<p>-1</p> <p><b>New WTS and depot</b> Application for new site required</p> <p><b>HWRC</b> In place</p>
Suitability of facilities	<ul style="list-style-type: none"> <li>Capacity / capacity for growth</li> <li>Current levels of utilisation</li> <li>Environmental performance</li> <li>Scope for / feasibility of modernisation / improvement</li> </ul>	<p>-1</p> <p><b>Depots</b> <u>Olding Road</u> Not suitable – requires</p>	<p>+1</p> <p><b>Depot</b> <u>Olding Road</u> Not suitable – requires</p>	<p>+1</p> <p><b>All new facilities</b> Very good - purpose built so would meet the most</p>	<p>+2</p> <p><b>All new facilities</b> Very good - purpose built so would meet the most recent</p>	<p>+2</p> <p><b>New WTS and depot</b> Very good - purpose built facilities would meet the</p>

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	<ul style="list-style-type: none"> <li>Flexibility / adaptability</li> </ul>	<p>investment, limited capacity.</p> <p><u>Holborn Ave</u> facilities which meet standards/ capacity. Offices and vehicle workshop are under utilised</p> <p><b>WTSs</b> <u>Red Lodge</u> No fire suppression</p> <p>Marginal capacity for growth - utilisation levels fairly good.</p> <p>Environmental performance could be improved.</p> <p>Some scope for modernisation and improvement.</p> <p>Flexibility and adaptability is limited.</p> <p><u>Thetford</u> Poor onsite traffic management/layout/arrangement. Weighbridge located off site.</p> <p>Older building. No fire suppression</p> <p>Open sided building.</p> <p>Reasonable capacity for growth - utilisation moderate to reasonable. Former HWRC part of site is at a different level and is therefore not currently utilised</p> <p>Environmental performance could be improved.</p> <p>Reasonable scope for modernisation and improvement.</p> <p>Plenty of space for material</p>	<p>investment, limited capacity.</p> <p><u>Holborn Ave</u> Facilities which meet standards/ capacity. Offices and vehicle workshop are under utilised</p> <p><b>New WTS &amp; HWRC</b> Very good - purpose built so would meet the most recent standards and requirements but site constrained size-wise</p>	<p>recent standards and requirements but facilities would be constrained in terms of capacity for growth and flexibility/adaptability by site size.</p> <p>Opportunities to achieve good levels of environmental performance.</p>	<p>standards and requirements.</p> <p>Opportunities to achieve good levels of environmental performance.</p> <p>Combining all three facilities should offer greatest flexibility and adaptability and should have greatest capacity for growth.</p> <p><b>New HWRC</b> Opportunity for HWRC re-use shop</p>	<p>most recent standards and requirements.</p> <p>Opportunities to achieve good levels of environmental performance on new site.</p> <p>Likely to offer capacity for growth.</p> <p><b>HWRC</b> Existing site, very good facility.</p>

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		<p>segregation, big enough, lots of buildings – reasonably flexible and adaptable.</p> <p><u>Haverhill</u> No fire suppression</p> <p>Is capacity for growth – facility underutilised.</p> <p>Environmental performance could be improved. Reasonable scope for modernisation and improvement.</p> <p>Location and underutilisation offer flexibility and adaptability.</p> <p><b>HWRC</b> Existing site, very good facility.</p>				
Condition of facilities	<ul style="list-style-type: none"> <li>• Age</li> <li>• Quality</li> <li>• Condition</li> <li>• Standard</li> <li>• Layout</li> </ul>	<p>-1</p> <p><b>Depots</b> <u>Olding Road</u> Not suitable – old and in relatively poor condition, layout not ideal</p> <p><u>Holborn Ave</u> New facilities which meet standards</p> <p><b>WTSs</b> <u>Red Lodge</u> Moderate/good standard.</p> <p>Older facility/building - condition reflects age and use.</p> <p>Layout/operating environment a bit tight/congested.</p> <p><u>Thetford</u> Moderate/good standard.</p> <p>Older facility with</p>	<p>0</p> <p><b>Depots</b> <u>Olding Road</u> Not suitable – old and in relatively poor condition, layout not ideal</p> <p><u>Holborn Ave</u> New facilities which meet standards</p> <p><b>New WTS &amp; HWRC</b> Good - new facilities would meet the most recent standards and requirements</p>	<p>+2</p> <p><b>New WTS &amp; HWRC</b> Very good - new facilities would meet the most recent standards and requirements</p> <p><b>New depot</b> Very good - new facilities would meet the most recent standards and requirements</p>	<p>+2</p> <p><b>All new facilities</b> Very good - new facilities would meet the most recent standards and requirements.</p>	<p>+2</p> <p><b>New depot &amp; WTS</b> Very good - new facilities would meet the most recent standards and requirements.</p> <p><b>HWRC</b> Very good condition and standard of facility</p>

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		<p>Portakabin offices – condition reflects age and use. Yard resurfaced in 2012-13</p> <p>Layout OK for current capacity but would cause problems with greater throughputs.</p> <p><u>Haverhill</u> Moderate/good standard.</p> <p>Older facility/building - condition reflects age and use.</p> <p>Reasonable/good layout.</p> <p><b>HWRC</b> very good condition and standard of facility</p>				
Competition with other land uses / potential land uses	<ul style="list-style-type: none"> <li>Development / redevelopment proposals for existing and proposed sites</li> <li>Scope for alternative uses of existing and proposed sites</li> <li>Existing land use to be displaced from proposed sites</li> </ul>	<p>-1</p> <p><b>Depots</b> <u>Olding Road</u> Part of general employment area allocation so scope for redevelopment / change of use.</p> <p>Adopted masterplan for PSV.</p> <p>Pressure for PSV to come forward following change in ownership of DHL/NHS logistics premises.</p> <p><u>Holborn Ave</u> Part of general employment area allocation so scope for redevelopment / change of use</p> <p><b>WTSS</b> <u>Red Lodge</u> Site designated as an “existing waste site” and a “waste site allocation” in the Cambridgeshire County Council Minerals and Waste</p>	<p>-1</p> <p><b>Depots</b> <u>Olding Road</u> Part of general employment area allocation so scope for redevelopment / change of use.</p> <p>Adopted masterplan for PSV.</p> <p>Pressure for PSV to come forward following change in ownership of DHL/NHS logistics premises.</p> <p><u>Holborn Ave</u> Part of general employment area allocation so scope for redevelopment / change of use</p> <p><b>New WTS and depot</b> <u>Rougham Hill</u> No plans for redevelopment</p>	<p>0</p> <p><b>New WTS and depot</b> <u>Rougham Hill</u> No plans for alternative redevelopment.</p> <p>Site designated as countryside in LP.</p> <p>Not an allocated waste/waste management site.</p> <p><b>New depot</b> Depends on chosen site</p> <p>Depot may be able to be located on and allocated employment site</p>	<p>-1</p> <p><b>All facilities</b> No suitable allocated site so would probably have to go on a greenfield site where existing land use is likely to be agricultural.</p>	<p>-1</p> <p><b>WTS &amp; depot</b> No suitable allocated site so would probably have to go on a greenfield site where existing land use is likely to be agricultural.</p> <p><b>HWRC</b> <u>Rougham Hill</u> No plans for redevelopment</p> <p>Site designated as countryside in LP so HWRC unlikely to be out competing other uses (including agriculture given its location)</p> <p>Not an allocated waste/waste management site.</p>

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		<p>Site Specific Proposals Development Plan Document thus is unlikely to be outcompeting other uses.</p> <p><u>Haverhill</u> Site located within a “general employment area” allocated for B1 and B8 uses so may be outcompeting employment / industrial uses.</p> <p><u>Thetford</u> Site located within a “general employment area” so may be outcompeting employment / industrial uses.</p> <p><b>HWRC</b> <u>Rougham Hill</u> No plans for redevelopment</p> <p>Site designated as countryside in LP so HWRC unlikely to be outcompeting other uses (including agriculture given its location)</p> <p>Not an allocated waste/waste management site.</p>	<p>Site designated as countryside in LP so proposed WTS and HWRC unlikely to be outcompeting other uses (including agriculture given its location)</p> <p>Not an allocated waste/waste management site.</p>			
Performance against policy / guidance / initiatives	<ul style="list-style-type: none"> <li>Waste Management Plan for England</li> <li>National Planning Policy for Waste</li> <li>National Planning Policy Framework</li> <li>Planning for Waste Management Facilities: A Research Study</li> <li>Transformation Challenge Award objectives and bid commitments</li> <li>One Public Estate programme objectives and bid commitments</li> <li>Suffolk Waste Partnership Joint Municipal Waste Management Strategy policies</li> </ul>	<p>-2</p> <p>No scope for joint working</p> <p>No co-location / integration</p> <p>Not relocated so no opportunities for partners etc</p> <p>No scope for releasing land and property</p> <p>Whole system waste costs: high</p>	<p>0</p> <p>Limited scope for joint working</p> <p>Partial co-location / integration</p> <p>No space for other partners etc</p> <p>No scope for releasing land and property</p> <p>Whole system waste costs: medium</p>	<p>+1</p> <p>Limited scope for joint working</p> <p>Partial co-location / integration</p> <p>New depot site could provide space for other partners</p> <p>Some scope for releasing land and property (Olding Road)</p> <p>Whole system waste costs: low</p>	<p>+2</p> <p>Good scope for joint working</p> <p>Full co-location / integration</p> <p>New site could provide space for other partners</p> <p>Maximum scope for releasing land and property</p> <p>Whole system waste costs: lowest</p>	<p>+1</p> <p>Some scope for joint working</p> <p>Partial co-location / integration</p> <p>New site could provide space for other partners</p> <p>Some scope for releasing land and property (Olding Road)</p> <p>Whole system waste costs: low</p>

Criteria	Important factors to consider when assessing:	Option 1 – do nothing	Option 2 – implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue	Option 3 – implement Rougham Hill planning permission and merge and relocate Olding Road and Holborn Avenue depots	Option 4 – co-locate all facilities on a new site	Option 5 – co-locate waste transfer facility and depot on a new site and leave HWRC at Rougham Hill
Degree of co-location / integration	<ul style="list-style-type: none"> <li>Proportion/number of facilities located together on a single site</li> </ul>	<p>-2</p> <p>Low</p>	<p>+1</p> <p>Medium / high</p>	<p>+1</p> <p>Medium / high</p>	<p>+2</p> <p>High</p>	<p>+1</p> <p>Medium / high</p>
<p><u>Environmental impact (including carbon impact / footprint)</u> <u>Carbon impact / footprint</u></p>	<ul style="list-style-type: none"> <li>Scope for green energy</li> <li>Environmental performance of facilities</li> <li>Transport/travel distances</li> <li>Embodied carbon/energy of buildings/facilities</li> </ul>	<p>-2</p> <p>Travel distances likely highest as no co-location.</p> <p><b>Depots</b> <u>Olding Road</u> Poor energy performance</p> <p>Roof not currently capable of accommodating solar panels</p> <p>Unlikely to be significant wind energy generation potential</p> <p><u>Holborn Ave</u> Reasonable energy performance</p> <p>Good solar energy potential</p> <p>Unlikely to be significant wind energy generation potential</p> <p><b>Existing WTSS</b> Varying environmental performance</p> <p>Privately owned and operated so limited scope to influence adoption of renewable energy</p> <p><b>HWRC</b> <u>Rougham Hill</u> Energy performance not that relevant due to minimal structures.</p> <p>Some solar energy potential (on bund to rear)</p> <p>Unlikely to be significant wind energy generation potential.</p>	<p>0</p> <p>Travel distances likely low as Rougham Hill is located near main centre of population and WTS and HWRC will be co-located.</p> <p><b>Depots</b> <u>Olding Road</u> Poor energy performance</p> <p>Roof not currently capable of accommodating solar panels</p> <p>Unlikely to be significant wind energy generation potential</p> <p><u>Holborn Ave</u> Reasonable energy performance</p> <p>Good solar energy potential</p> <p>Unlikely to be significant wind energy generation potential</p> <p><b>New WTS and HWRC</b> <u>Rougham Hill</u> Energy performance should be better than existing equivalent facilities.</p> <p>Photovoltaic cells will be mounted on WTS roof.</p> <p>Unlikely to be significant wind energy generation potential.</p> <p>Significant embodied / carbon energy in new build.</p>	<p>+1</p> <p><b>New WTS and HWRC</b> <u>Rougham Hill</u> Travel distances likely low as Rougham Hill is located near main centre of population and WTS and HWRC will be co-located.</p> <p>Energy performance should be better than existing equivalent facilities.</p> <p>Photovoltaic cells will be mounted on WTS roof.</p> <p>Unlikely to be significant wind energy generation potential.</p> <p>Significant embodied / carbon energy in new build.</p> <p><b>New depot</b> Travel distances likely low as site near Bury will be sought.</p> <p>Energy performance should be better than existing equivalent facilities.</p> <p>Solar energy potential of new depot will be considered through scheme design.</p> <p>Unlikely to be significant wind energy generation potential</p> <p>Significant embodied / carbon energy in new build.</p>	<p>+2</p> <p><b>All new facilities</b> Travel distances likely lowest as site near Bury will be sought and all facilities will be co-located.</p> <p>Energy performance should be better than existing equivalent facilities.</p> <p>Solar energy potential of new facilities will be considered through scheme design.</p> <p>Unlikely to be significant wind energy generation potential.</p> <p>Highest embodied carbon / energy in new build.</p>	<p>+1</p> <p><b>New WTS and depot</b> Travel distances likely low as site near Bury will be sought and WTS and depot will be co-located.</p> <p>Energy performance should be better than existing equivalent facilities.</p> <p>Solar energy potential of new facilities will be considered through scheme design.</p> <p>Unlikely to be significant wind energy generation potential</p> <p>Significant embodied / carbon energy in new build</p> <p><b>HWRC</b> <u>Rougham Hill</u> Environmental performance not that relevant due to minimal structures.</p> <p>Some solar energy potential (on bund to rear)</p> <p>Unlikely to be significant wind energy generation potential.</p>

Criteria	Important factors to consider when assessing:	Option 1 – do nothing	Option 2 – implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue	Option 3 – implement Rougham Hill planning permission and merge and relocate Olding Road and Holborn Avenue depots	Option 4 – co-locate all facilities on a new site	Option 5 – co-locate waste transfer facility and depot on a new site and leave HWRC at Rougham Hill
Commercial opportunities / income generation potential	<ul style="list-style-type: none"> <li>Capacity/space for expansion of/new commercial operations</li> <li>Suitability of sites to support expansion of/new commercial operations</li> <li>Suitability of facilities to support expansion of/new commercial operations</li> </ul>	<p>-1</p> <p><b>Depots</b> Limited on existing sites—aging facilities for customers, lack of flexibility and capacity to fully pursue commercial opportunities.</p> <p>Potential further limited by separate sites (Olding Road and Holborn Ave).</p> <p><b>WTSs</b> Privately owned</p> <p><b>HWRC</b> Commercial opportunities already in operation – potential to increase.</p>	<p>0</p> <p><b>Depots</b> Limited on existing site aging facilities for customers, lack of flexibility and capacity to fully pursue commercial opportunities.</p> <p>Potential further limited by separate sites (Olding Road and Holborn Ave).</p> <p><b>WTS</b> Can explore possibility of utilising an area of WTS for commercial waste.</p> <p><b>HWRC</b> Potential to increase commercial opportunities.</p>	<p>+1</p> <p><b>Depot</b> Assuming suitable site for locating the depot can be found there is the potential to develop similar commercial opportunities to those outlined for Option 4 (albeit with some continued inefficiency by duplicating waste transfer arrangements).</p> <p><b>WTS</b> Can explore possibility of utilising an area of WTS for commercial waste.</p> <p><b>HWRC</b> Potential to increase commercial opportunities.</p>	<p>+2</p> <p><b>Depot</b> Will result in income in the region of <del>£285+00k</del> per annum from lease of depot facilities and increased commercial activity.</p> <p><b>WTS</b> Can explore possibility of utilising an area of WTS for commercial waste.</p> <p><b>HWRC</b> More space to potentially increase small-scale commercial opportunities including the Re-Use Store.</p>	<p>+2</p> <p><b>Depot</b> If a suitable facility for co-location can be found there is the potential to develop similar commercial opportunities to those outlined for Option 4 <u>(resulting in income of approx. £285k per annum)</u>.</p> <p><b>WTS</b> Can explore possibility of utilising an area of WTS for commercial waste.</p> <p><b>HWRC</b> Commercial opportunities already in operation – potential to increase.</p>
Scope for flexible working patterns, management and staffing arrangements	<ul style="list-style-type: none"> <li>Number of sites (extent of co-location)</li> <li>Workforce size at each site (critical mass required)</li> </ul>	<p>-1</p> <p>Limited due to separate locations</p>	<p>0</p> <p>Some opportunities for WTS and HWRC due to co-location</p>	<p>+1</p> <p>Some opportunities for WTS and HWRC due to co-location</p> <p>Opportunities for depot operations because of two depots relocating</p>	<p>+2</p> <p>Greatest opportunities for flexible work patterns and management arrangements due to full co-location</p> <p>More activity on single site provides more opportunity to work efficiently</p>	<p>+1</p> <p>Some opportunities for WTS and depot due to co-location which will be stronger because of two depots relocating</p>
Scope for green energy	<ul style="list-style-type: none"> <li>Size of site / facility</li> <li>Roof areas and orientation</li> <li>Suitability of structures for mounting solar panels</li> <li>Exposure / elevation / wind speed</li> <li>Acceptability of green energy measures (if known)</li> <li>Ownership (affects scope to influence adoption of green energy)</li> </ul>	<p>0</p> <p><b>Depots</b> <u>Olding Road</u> Roof not currently capable of accommodating solar panels</p> <p><u>Holborn Ave</u> Good solar energy potential</p> <p><b>WTSs</b> <u>Red Lodge</u> Privately owned and operated so limited scope to influence adoption of renewable energy</p> <p><u>Haverhill</u> Privately owned and</p>	<p>+1</p> <p><b>Depots</b> <u>Olding Road</u> Roof not currently capable of accommodating solar panels</p> <p><u>Holborn Ave</u> Good solar energy potential</p> <p><b>New WTS and HWRC</b> <u>Rougham Hill</u> Photovoltaic cells will be mounted on WTS roof.</p> <p>Unlikely to be significant wind energy generation potential.</p>	<p>+2</p> <p><b>New depot</b> Solar energy potential of new depot will be considered through scheme design.</p> <p><b>New WTS and HWRC</b> <u>Rougham Hill</u> Photovoltaic cells will be mounted on WTS roof.</p> <p>Unlikely to be significant wind energy generation potential.</p>	<p>+2</p> <p><b>All new facilities</b> Solar energy potential of new depot will be considered through scheme design.</p> <p>Unlikely to be significant wind energy generation potential.</p>	<p>+2</p> <p><b>New WTS and depot</b> Solar energy potential of new depot will be considered through scheme design.</p> <p><b>HWRC</b> <u>Rougham Hill</u> Some solar energy potential (on bund to rear)</p> <p>Unlikely to be significant wind energy generation potential.</p>

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		<p>operated so limited scope to influence adoption of renewable energy</p> <p><u>Thetford</u> Privately owned and operated so limited scope to influence adoption of renewable energy</p> <p><b>HWRC</b> <u>Rougham Hill</u> Some solar energy potential (on bund to rear)</p> <p>Unlikely to be significant wind energy generation without use of relative large turbines which will require planning permission and could be contentious.</p>				
Customer experience	<ul style="list-style-type: none"> <li>Condition of facilities</li> <li>Suitability of facilities</li> <li>Scope for provision of level access recycling bins</li> <li>Scope for provision of reusable items store</li> <li>Scope for provision of additional waste recycling streams / services</li> <li>General usability / suitability of HWRC</li> <li>Customer satisfaction survey results</li> </ul>	<p>0</p> <p><b>Depots</b> <u>Olding Road</u> Aging facilities for fleet customers and waste, landscapes and commercial customers.</p> <p><u>Holborn Ave</u> New facility, reasonable/good customer experience but limited space means limited exposure to third parties.</p> <p><b>WTS</b> <u>Red Lodge</u> Reasonable user experience/service provision.</p> <p><u>Thetford</u> Reasonable user experience/service provision.</p> <p><u>Haverhill</u> Good user experience/service provision.</p>	<p>+1</p> <p><b>Depots</b> <u>Olding Road</u> Aging facilities for fleet customers and waste, landscapes and commercial customers.</p> <p><u>Holborn Ave</u> New facility, reasonable/good customer experience but limited space means limited exposure to third parties.</p> <p><b>WTS</b> New, purpose built facility – should offer a good customer experience / good levels of customer satisfaction.</p> <p><b>HWRC</b> New, purpose built, split-level facility, should offer a good customer experience / good levels of customer satisfaction for all users.</p>	<p>+2</p> <p><b>Depot</b> New, purpose built facilities – should offer good experience / good levels of customer satisfaction for all users.</p> <p><b>WTS</b> New, purpose built facility – should offer a good customer experience / good levels of customer satisfaction for all users.</p> <p><b>HWRC</b> New, purpose built, split-level facility, should offer a good customer experience / good levels of customer satisfaction for all users.</p>	<p>+2</p> <p><b>Depot</b> New, purpose built facilities – should offer good experience / good levels of customer satisfaction for all users.</p> <p><b>WTS</b> New, purpose built facility – should offer a good customer experience / good levels of customer satisfaction for all users.</p> <p><b>HWRC</b> New, purpose built, split-level facility, should offer a good customer experience / good levels of customer satisfaction for all users.</p> <p>Re-use store to be located on site – will be an additional facility which is sought be some customers (for whom experience / satisfaction will be improved).</p>	<p>+2</p> <p><b>Depot</b> New, purpose built facilities – should offer good experience / good levels of customer satisfaction for all users.</p> <p><b>WTS</b> New, purpose built facility – should offer a good customer experience / good levels of customer satisfaction for all users.</p> <p><b>HWRC</b> Rated as good or very good by &gt;95% of users surveyed.</p>

Criteria	Important factors to consider when assessing:	Option 1 – do nothing	Option 2 – implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue	Option 3 – implement Rougham Hill planning permission and merge and relocate Olding Road and Holborn Avenue depots	Option 4 – co-locate all facilities on a new site	Option 5 – co-locate waste transfer facility and depot on a new site and leave HWRC at Rougham Hill
		<b>HWRC</b> Rated as good or very good by >95% of users surveyed.				
Potential restrictions resulting from existing service provider contracts	<ul style="list-style-type: none"> <li>Number of contracts in place</li> <li>Contract end dates</li> <li>Contract values</li> <li>Scope for terminating / renegotiating / relocating contracts</li> </ul>	0  <b>Depots</b> Services all currently broadly in-house and flexible.  <b>HWRC</b> Contract due for renewal 2019.  <b>WTSs</b> Contracts due for renewal 2019.	0  <b>Depots</b> Services all currently broadly in-house and flexible.  <b>HWRC</b> Contract due for renewal 2019.  <b>WTSs</b> Contracts due for renewal 2019.	0  <b>Depot</b> Services all currently broadly in-house and flexible.  <b>HWRC</b> Contract due for renewal 2019.  <b>WTSs</b> Contracts due for renewal 2019.	0  <b>Depot</b> Services all currently broadly in-house and flexible.  <b>HWRC</b> Contract due for renewal 2019.  <b>WTSs</b> Contracts due for renewal 2019.	0  <b>Depot</b> Services all currently broadly in-house and flexible.  <b>HWRC</b> Contract due for renewal 2019.  <b>WTSs</b> Contracts due for renewal 2019.
<u>Traffic</u>	<ul style="list-style-type: none"> <li><u>Concentration of traffic</u></li> <li><u>Vehicle movement generation</u></li> <li><u>Location / likely location of sites</u></li> </ul>	<u>-1</u>  <u>Traffic spread across six sites so traffic at each site will be less than at a co-located facility.</u>  <u>Separate sites mean vehicle journeys between sites (some of which are a significant distance apart) which wouldn't be necessary at a co-located facility hence more vehicle movements are generated overall.</u>  <u>Involves greatest number of vehicle movements/trips.</u>  <u>Some existing sites are located in urban areas and will be contributing to traffic in these areas.</u>	<u>-1</u>  <u>Traffic spread across three sites so traffic at each site will be less than at a co-located facility but still concentrated on three locations.</u>  <u>Vehicle movements lower than option 1 and does not involve trips to WTS(s) away from main population centre.</u>  <u>Existing depots are located in urban areas and will be contributing to traffic in these areas.</u>  <u>Rougham Hill is an edge of centre / out of centre location thus should help reduce traffic in urban areas.</u>	<u>0</u>  <u>Traffic spread across two sites so traffic at each site will be less than at a co-located facility but still concentrated on two locations.</u>  <u>Significantly reduces number of vehicle movements required when compared to both options 1 &amp; 2.</u>  <u>New depot may be edge of centre / out of centre but due to limited size on its own could still be located in an urban area.</u>  <u>Rougham Hill is an edge of centre / out of centre location thus should help reduce traffic in urban areas.</u>	<u>0</u>  <u>All facilities co-located on one site thus traffic will be concentrated on that site.</u>  <u>Involves lowest number of vehicle movements / trips as a substantial number of vehicle trips undertaken with other options only take place within the site (significantly reduces number of vehicle movements required when compared to both options 1 &amp; 2).</u>  <u>Site is likely to be edge of centre / out of centre thus should help reduce traffic in urban areas.</u>	<u>0</u>  <u>Traffic spread across two sites so traffic at each site will be less than at a co-located facility but still concentrated on two locations.</u>  <u>Significantly reduces number of vehicle movements required when compared to both options 1 &amp; 2.</u>  <u>New WTS and depot site likely to be edge of centre / out of centre thus should help reduce traffic in urban areas.</u>
<b>Total score:</b>		<b>-15 -16</b>	<b>+7 +6</b>	<b>+16</b>	<b>+20</b>	<b>+14</b>

# Appendix B

Sites assessment matrices

**Sites assessment matrix 1 – assessment of the only existing waste site, the existing general industrial or storage and distribution sites, and the only allocated general industrial or storage and distribution site and unallocated brownfield sites against exclusionary criteria**

Pink highlighted text = previously assessed sites suggested as suitable sites in IAPOS public consultation responses (site assessments for these have been reviewed and checked accordingly)

	<i>Physical</i>		<i>Access</i>	<i>Location</i>				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to Bury St Edmunds	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>• Minimum site size requirement</li> <li>• Usability / workability / suitability of shape</li> <li>• Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>• Flood zone</li> <li>• Risk of fluvial flooding / proximity to water-courses</li> <li>• Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>• Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”</li> <li>• Presence and suitability of any existing accesses</li> <li>• Known access constraints</li> <li>• Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>• Distance from Bury St Edmunds</li> <li>• Proximity / ease of access to A14</li> <li>• Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity to network routes</li> <li>• Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national landscape designations                             <ul style="list-style-type: none"> <li>○ National Parks</li> <li>○ Areas of Outstanding Natural Beauty</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national biodiversity designations                             <ul style="list-style-type: none"> <li>○ Natura 2000 sites</li> <li>○ Ramsar sites</li> <li>○ Sites of Special Scientific Interest</li> <li>○ Special Areas of Conservation</li> <li>○ Special Protection Areas</li> <li>○ National Nature Reserves</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national heritage designations                             <ul style="list-style-type: none"> <li>○ World Heritage Sites</li> <li>○ Listed buildings</li> <li>○ Scheduled monuments</li> <li>○ Parks and gardens</li> <li>○ Battlefields</li> <li>○ English Heritage Sites</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>
Rougham Industrial Estate	Nothing of sufficient size vacant	Flood zone 1	Suitable existing access	Not suitably located – site lies east of junction 44 and is therefore outside the required area	Close to “Strategic Lorry Route” (A14) – 500m from A14	None	None	None but noted that site lies 50 – 100m to control tower at Rougham Airfield (grade II listed)
Saxham Business Park	Nothing of sufficient size vacant	Flood zone 1	Suitable existing access	Not suitably located – site lies west of junction 42 and is therefore outside the required area	On “Strategic Lorry Route” (A14)	None	None but noted that western end of site lies within Breckland Special Protection Area buffer zone and 1.4km from Breckland Farmland Site of Special Scientific Interest	None
Eastern Way, BSE	Nothing of sufficient size vacant	Flood zone 1	Suitable existing access	Suitably located – site lies closest to junction 43	Close to “Strategic Lorry Route” (A143) – 1.4 miles from A14	None	None but noted that site lies 150m from Glen Chalk Caves Site of Special Scientific Interest	None

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	<b>Physical</b>		<b>Access</b>	<b>Location</b>				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to Bury St Edmunds	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>Minimum site size requirement</li> <li>Usability / workability / suitability of shape</li> <li>Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>Flood zone</li> <li>Risk of fluvial flooding / proximity to water-courses</li> <li>Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”</li> <li>Presence and suitability of any existing accesses</li> <li>Known access constraints</li> <li>Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>Distance from Bury St Edmunds</li> <li>Proximity / ease of access to A14</li> <li>Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>Proximity to network routes</li> <li>Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national landscape designations <ul style="list-style-type: none"> <li>National Parks</li> <li>Areas of Outstanding Natural Beauty</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national biodiversity designations <ul style="list-style-type: none"> <li>Natura 2000 sites</li> <li>Ramsar sites</li> <li>Sites of Special Scientific Interest</li> <li>Special Areas of Conservation</li> <li>Special Protection Areas</li> <li>National Nature Reserves</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national heritage designations <ul style="list-style-type: none"> <li>World Heritage Sites</li> <li>Listed buildings</li> <li>Scheduled monuments</li> <li>Parks and gardens</li> <li>Battlefields</li> <li>English Heritage Sites</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>

Mildenhall Road, BSE	Nothing of sufficient size vacant	Flood zone 1, 2 & 3	Suitable existing access	Suitably located – site lies closest to junction 43 but is also easily accessible by junction 42 (and will become more so with implementation of Policy BV3 and the proposed Fornham All Saints “bypass”)	On “Zone Distributor Route” (A1101) – 1.4 miles from A14	None but noted that site is within 175 metres of a conservation area and within 1.1km of a Special Landscape Area	None	None but site lies 450m of a Scheduled Ancient Monument (understood to be the a henge and cursus)
Western Way, BSE	Nothing of sufficient size vacant	Flood zone 1	Suitable existing access	Suitably located – site lies closest to junction 42	Close to “Local Access Route” (Newmarket Road), 0.9 miles from A14	None	None	None
Moreton Hall / Suffolk Business Park, BSE	Nothing of sufficient size vacant	Flood zone 1	Suitable existing access	Suitably located – site lies closest to junction 44	Close to “Strategic Lorry Route” (A14) – 0.6 miles from A14	None	None	None
British Sugar Hollow Road, BSE	Nothing of sufficient size vacant	Flood zone 1	Suitable existing access	Suitably located – site lies closest to junction 43	On “Strategic Lorry Route” (A134) – 1.3 miles from A14	None	None	None
Anglian Lane, BSE	Nothing of sufficient size vacant	Flood zone 1	Suitable existing access	Suitably located – site is equidistant between junctions 42 and 43	Close to “Local Access Route” (Newmarket Road) – 1.5 miles from A14	None	None	None
Barton Road, BSE	Nothing of	Flood zone 1	Suitable existing	Suitably located –	Close to “Strategic	None	None but noted that site	None

	<b>Physical</b>		<b>Access</b>	<b>Location</b>				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to Bury St Edmunds	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>Minimum site size requirement</li> <li>Usability / workability / suitability of shape</li> <li>Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>Flood zone</li> <li>Risk of fluvial flooding / proximity to water-courses</li> <li>Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”</li> <li>Presence and suitability of any existing accesses</li> <li>Known access constraints</li> <li>Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>Distance from Bury St Edmunds</li> <li>Proximity / ease of access to A14</li> <li>Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>Proximity to network routes</li> <li>Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national landscape designations <ul style="list-style-type: none"> <li>National Parks</li> <li>Areas of Outstanding Natural Beauty</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national biodiversity designations <ul style="list-style-type: none"> <li>Natura 2000 sites</li> <li>Ramsar sites</li> <li>Sites of Special Scientific Interest</li> <li>Special Areas of Conservation</li> <li>Special Protection Areas</li> <li>National Nature Reserves</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national heritage designations <ul style="list-style-type: none"> <li>World Heritage Sites</li> <li>Listed buildings</li> <li>Scheduled monuments</li> <li>Parks and gardens</li> <li>Battlefields</li> <li>English Heritage Sites</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>

	sufficient size vacant		access	site lies closest to junction 43	Lorry Route” (A143) – 1.6 miles from A14		lies within 300m of Glen Chalk Caves SSSI	
Blenheim Park, BSE	Nothing of sufficient size vacant	Flood zone 1	Suitable existing access	Suitably located – site lies closest to junction 42	On “Local Access Route” (Newmarket Road) – 0.9 miles from A14	None	None	None
Chapel Pond Hill, BSE	Nothing of sufficient size vacant	Flood zone 1 with small parts in flood zone 3	Suitable existing access	Suitably located – site lies closest to junction 43	Adjacent to “strategic lorry route” (A143) – 1.1 miles from A14	None	None	None
Enterprise Park, BSE	Nothing of sufficient size vacant	Flood zone 2 and 3	Access unlikely to be suitable for large volumes of extra traffic	Suitably located – site lies close to junction 43	Close to “Strategic Lorry Route” (A14) – 400m from A14	None	None	None but noted that site lies within 300m of a Scheduled Ancient Monument and Grade I Listed Building (St Saviour’s Hospital) and within 150m of a Conservation Area
Northern Way, BSE	Nothing of sufficient size vacant	Flood zone 1	Suitable existing access	Suitably located – site is equidistant between junctions 42 and 43 (and will become even more accessible by junction 42 with implementation of Policy BV3 and the proposed Fornham All Saints “bypass”)	On “zone distributor route” (A1101) – 1.6 miles from A14	None but noted that site lies immediately adjacent to a Conservation Area and within 825m of a Special Landscape Area	None	None but site lies within 275m of a Scheduled Ancient Monument (understood to be the a henge and cursus)
Greene King,	Nothing of	Majority in flood	Suitable existing	Suitably located –	On “zone	None but noted	None	Site includes or lies within

	<b>Physical</b>		<b>Access</b>	<b>Location</b>				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to Bury St Edmunds	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>Minimum site size requirement</li> <li>Usability / workability / suitability of shape</li> <li>Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>Flood zone</li> <li>Risk of fluvial flooding / proximity to water-courses</li> <li>Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”</li> <li>Presence and suitability of any existing accesses</li> <li>Known access constraints</li> <li>Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>Distance from Bury St Edmunds</li> <li>Proximity / ease of access to A14</li> <li>Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>Proximity to network routes</li> <li>Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national landscape designations <ul style="list-style-type: none"> <li>National Parks</li> <li>Areas of Outstanding Natural Beauty</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national biodiversity designations <ul style="list-style-type: none"> <li>Natura 2000 sites</li> <li>Ramsar sites</li> <li>Sites of Special Scientific Interest</li> <li>Special Areas of Conservation</li> <li>Special Protection Areas</li> <li>National Nature Reserves</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national heritage designations <ul style="list-style-type: none"> <li>World Heritage Sites</li> <li>Listed buildings</li> <li>Scheduled monuments</li> <li>Parks and gardens</li> <li>Battlefields</li> <li>English Heritage Sites</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>
Friars Way, BSE	sufficient size vacant	zone 3 but parts in flood zones 1 & 2 also	access	site lies closest to junction 44	distributor route” (Cullum Road) – 1 mile from A14	that part of the site lies within a Conservation area		150m of one Grade I Listed Building (Theatre Royal) and two Grade II* Listed Buildings (Dog and Partridge Inn and 5 & 6 St Marys Square)
Extension to Suffolk Business Park, BSE	Large enough (54.06 ha)	Flood zone 1	Eastern Relief Road not yet built – Policy BV13 states that relief road must be available for use prior to commencement of development	Not suitably located – most of site lies closest to junction 45 and Policy BV13 is predicated on the delivery of the Eastern Relief Road (providing access to junction 45)	Close to “strategic lorry route” (A14) – 1 mile from A14 – Eastern Relief Road not yet built so not known whether it will form part of Suffolk Lorry Route Network	None	None	None but noted that site lies 50 – 100m to control tower at Rougham Airfield (grade II listed)
Existing HWRC site and land to north + DEFRA land, Rougham Hill, BSE	Total area of two sites is not sufficient	Flood zone 1	Suitable existing access	Suitably located – site lies close to junction 44	Close to “strategic lorry route” (A134) – 600m from A14	None	None	None5
<b>New sites (post IAPOS public consultation)</b>								
RAF Mildenhall	451.0 ha	Flood zone 1	Suitable existing access	Not suitably located – site is approx. 15 miles from Bury St Edmunds	On a “zone distributor route” (A1101)	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	5 listed buildings lie within approx. 100m of the site’s northern boundary (all grade II) and 2 listed buildings lie within 400m from of the site’s south western corner (both grade II)
FHDC Depot,	0.4 ha	Flood zone 1	Suitable existing	Not suitably	Site is 180 metres	None	None but noted that site	None

	<b>Physical</b>		<b>Access</b>	<b>Location</b>				
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<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>• Minimum site size requirement</li> <li>• Usability / workability / suitability of shape</li> <li>• Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>• Flood zone</li> <li>• Risk of fluvial flooding / proximity to water-courses</li> <li>• Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>• Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”</li> <li>• Presence and suitability of any existing accesses</li> <li>• Known access constraints</li> <li>• Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>• Distance from Bury St Edmunds</li> <li>• Proximity / ease of access to A14</li> <li>• Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity to network routes</li> <li>• Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national landscape designations <ul style="list-style-type: none"> <li>○ National Parks</li> <li>○ Areas of Outstanding Natural Beauty</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national biodiversity designations <ul style="list-style-type: none"> <li>○ Natura 2000 sites</li> <li>○ Ramsar sites</li> <li>○ Sites of Special Scientific Interest</li> <li>○ Special Areas of Conservation</li> <li>○ Special Protection Areas</li> <li>○ National Nature Reserves</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national heritage designations <ul style="list-style-type: none"> <li>○ World Heritage Sites</li> <li>○ Listed buildings</li> <li>○ Scheduled monuments</li> <li>○ Parks and gardens</li> <li>○ Battlefields</li> <li>○ English Heritage Sites</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>

Holborn Avenue, Mildenhall			access	located – site is approx. 14 miles from Bury St Edmunds	from a “zone distributor route” (A1101)		lies within an SSSI / SPA Impact Risk Zone	
NHS/DHL logistics site, Olding Road, BSE	2.7 ha	Flood zone 1	Existing access which could be upgraded to serve proposed development	Suitably located – site lies closest to junction 42	Close to “local access route” A1302 (Newmarket Road), 0.9 miles from A14	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	4 listed buildings lie within 500m from of the site’s south eastern corner (all grade II)
Former Saxham railway station site, Little Saxham (part of existing Calor Gas site)	4.7 ha	Flood zone 1	Suitable existing access	Not suitably located – site lies west of junction 42 and is therefore outside the required area	On “strategic lorry route” (A14)	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	None
Former Padley poultry site, Northern Way, BSE	3.5 ha	Flood zone 2 and 3	Existing access which could be upgraded to serve proposed development	Suitably located – site lies closest to junction 43 but is also easily accessible by junction 42 (and will become more so with implementation of Policy BV3 and the proposed Fornham All Saints “bypass”)	On “zone distributor route” (A1101) – 1.6 miles from A14	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	7 listed buildings lie within 500m from of the site’s north eastern boundary (1 grade II* and 6 grade II) and Mildenhall Maltings (grade II) lies 150m from the sites south eastern boundary
AJN Steelstock site (and/or adjoining land), Icknield Way, Kentford	28.4 ha	Most of site lies in flood zone 1 but eastern tip in flood zone 3	Suitable existing access	Not suitably located – site lies west of junction 42 and is therefore outside the required area	On “local access route” and close/adjacent to A14	None	None	The Cock Public House (grade II) and Regal Cottage (grade II) lie within 450m of the site’s south western corner

	<b>Physical</b>		<b>Access</b>	<b>Location</b>				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to Bury St Edmunds	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>Minimum site size requirement</li> <li>Usability / workability / suitability of shape</li> <li>Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>Flood zone</li> <li>Risk of fluvial flooding / proximity to water-courses</li> <li>Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”</li> <li>Presence and suitability of any existing accesses</li> <li>Known access constraints</li> <li>Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>Distance from Bury St Edmunds</li> <li>Proximity / ease of access to A14</li> <li>Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>Proximity to network routes</li> <li>Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national landscape designations <ul style="list-style-type: none"> <li>National Parks</li> <li>Areas of Outstanding Natural Beauty</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national biodiversity designations <ul style="list-style-type: none"> <li>Natura 2000 sites</li> <li>Ramsar sites</li> <li>Sites of Special Scientific Interest</li> <li>Special Areas of Conservation</li> <li>Special Protection Areas</li> <li>National Nature Reserves</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national heritage designations <ul style="list-style-type: none"> <li>World Heritage Sites</li> <li>Listed buildings</li> <li>Scheduled monuments</li> <li>Parks and gardens</li> <li>Battlefields</li> <li>English Heritage Sites</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>

Newmarket (no specific site identified)	DISCARDED – see paragraph 6.17a of IAPOS report							
Lorry park and adjacent unused brownfield land, Rougham Hill, BSE	1.5 ha	Flood zone 1	Existing access which could be upgraded to serve proposed development	Suitably located – site lies close to junction 44	Close to “strategic lorry route” (A134) – 600m from A14	None	None	None
Rougham airfield, Rougham	71.9 ha	Flood zone 1	Suitable access likely to be able to be delivered	Not suitably located – site lies east of junction 44 and is therefore outside the required area	Close to “strategic lorry route” (A14) – 500m from A14	None	None	Rougham Tower (former control tower to RAF Rougham) (grade II) and RAF Rougham: Radar Building (grade II) lie within the site and The Battlies House (grade II) lies within 170m of the site’s eastern boundary
Abbey gardens, BSE	DISCARDED – see paragraph 6.17a of IAPOS report							
Charter Square, BSE	DISCARDED – see paragraph 6.17a of IAPOS report							
Former Little Chef site and surrounding land, north of the A14, nr Kentford	9.7 ha	Majority of site in flood zone 1 but eastern end in flood zone 3	Suitable existing access / egress but from and to A14 eastbound carriageway only	Not suitably located – site lies west of junction 42 and is therefore outside the required area	On “strategic lorry route” (A14)	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	Scheduled monument “Three bowl barrows 750m south west of Pin Farm” lies 180m south of site (on the other side of the A14 and Bury Road).

	<b>Physical</b>		<b>Access</b>	<b>Location</b>				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to Bury St Edmunds	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>Minimum site size requirement</li> <li>Usability / workability / suitability of shape</li> <li>Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>Flood zone</li> <li>Risk of fluvial flooding / proximity to water-courses</li> <li>Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”</li> <li>Presence and suitability of any existing accesses</li> <li>Known access constraints</li> <li>Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>Distance from Bury St Edmunds</li> <li>Proximity / ease of access to A14</li> <li>Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>Proximity to network routes</li> <li>Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national landscape designations <ul style="list-style-type: none"> <li>National Parks</li> <li>Areas of Outstanding Natural Beauty</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national biodiversity designations <ul style="list-style-type: none"> <li>Natura 2000 sites</li> <li>Ramsar sites</li> <li>Sites of Special Scientific Interest</li> <li>Special Areas of Conservation</li> <li>Special Protection Areas</li> <li>National Nature Reserves</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>Proximity of any international or national heritage designations <ul style="list-style-type: none"> <li>World Heritage Sites</li> <li>Listed buildings</li> <li>Scheduled monuments</li> <li>Parks and gardens</li> <li>Battlefields</li> <li>English Heritage Sites</li> </ul> </li> <li>Likely acceptability of impact</li> </ul>
Former Little Chef site and adjoining land, south of the A14, nr Kentford	7.0 ha	Flood zone 1	Suitable existing access / egress but from and to A14 westbound carriageway only	Not suitably located – site lies west of junction 42 and is therefore outside the required area	On “strategic lorry route” (A14)	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	The Cock Public House (grade II), Church of St Mary (grade II*) and Regal Cottage (grade II) lie within 350m of site’s south western corner.  Scheduled monument “Three bowl barrows 750m south west of Pin Farm” lies 195m south east of site.
SCC Highways/Kier depot site, Rougham Industrial Estate, Rougham	1.3 ha	Flood zone 1	Suitable existing access	Not suitably located – site lies east of junction 44 and is therefore outside the required area	Close to “strategic lorry route” (A14) – 500m from A14	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	Rougham Tower (former control tower to RAF Rougham) (grade II) and RAF Rougham: Radar Building (grade II) lie within the site 470m of north west corner of site.
Vacant land at Chapel Pond Hill, Bury St Edmunds	1.0 ha	Flood zone 1	Suitable existing access (access needs to be from Chapel Pond Hill and not from A143)	Suitably located – site lies closest to junction 43	Adjacent to “strategic lorry route” (A143) – 1.1 miles from A14	None	None	None
Land near SCC/Kier highways depot at Rougham Industrial Estate, Rougham	DISCARDED – same as extension to Suffolk Business Park above (see paragraph 6.17a of IAPOS report for more information)							

## Sites assessment matrix 2 – assessment of unallocated greenfield sites against exclusionary criteria

Pink highlighted text = previously assessed sites suggested as suitable sites in IAPOS public consultation responses (respective site assessments have been reviewed and checked accordingly)

	Physical		Access	Location				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to Bury St Edmunds	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>• Minimum site size requirement</li> <li>• Usability / workability / suitability of shape</li> <li>• Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>• Flood zone</li> <li>• Risk of fluvial flooding / proximity to water-courses</li> <li>• Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>• Planning for Waste Management Facilities: A Research Study – on WTSS: “good access to primary road network is crucial”</li> <li>• Presence and suitability of any existing accesses</li> <li>• Known access constraints</li> <li>• Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>• Distance from Bury St Edmunds</li> <li>• Proximity / ease of access to A14</li> <li>• Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity to network routes</li> <li>• Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national landscape designations                             <ul style="list-style-type: none"> <li>○ National Parks</li> <li>○ Areas of Outstanding Natural Beauty</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national biodiversity designations                             <ul style="list-style-type: none"> <li>○ Natura 2000 sites</li> <li>○ Ramsar sites</li> <li>○ Sites of Special Scientific Interest</li> <li>○ Special Areas of Conservation</li> <li>○ Special Protection Areas</li> <li>○ National Nature Reserves</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national heritage designations                             <ul style="list-style-type: none"> <li>○ World Heritage Sites</li> <li>○ Listed buildings</li> <li>○ Scheduled monuments</li> <li>○ Parks and gardens</li> <li>○ Battlefields</li> <li>○ English Heritage Sites</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>
<b>Tut Hill, BSE</b>	Large enough (11.04 ha)	Flood zone 1	Suitable access likely to be achievable	Suitably located – site lies immediately north of junction 42	Lies on “Zone Distributor Route” and within 350m of A14	None	None	None
<b>Symonds Farm, Little Saxham</b>	Large enough (6.52 ha)	Flood zone 1	Initial highways work indicates that a suitable access is achievable given current traffic in the locality and proximity to major trunk road infrastructure. However, following an ‘Appropriate for of Junction Assessment’ a ghost island is considered likely to be required on the A14 slip road. Widening the slip road will require Highways Agency approval and is likely to be very expensive.	Not suitably located – site lies west of junction 42 and is therefore outside the required area	Site lies on A14	None	None but noted that site lies within Breckland Special Protection Area buffer zone and 750m from Breckland Farmland Site of Special Scientific Interest	None

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	<b>Physical</b>		<b>Access</b>	<b>Location</b>				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to Bury St Edmunds	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>• Minimum site size requirement</li> <li>• Usability / workability / suitability of shape</li> <li>• Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>• Flood zone</li> <li>• Risk of fluvial flooding / proximity to water-courses</li> <li>• Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>• Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”</li> <li>• Presence and suitability of any existing accesses</li> <li>• Known access constraints</li> <li>• Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>• Distance from Bury St Edmunds</li> <li>• Proximity / ease of access to A14</li> <li>• Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity to network routes</li> <li>• Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national landscape designations <ul style="list-style-type: none"> <li>◦ National Parks</li> <li>◦ Areas of Outstanding Natural Beauty</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national biodiversity designations <ul style="list-style-type: none"> <li>◦ Natura 2000 sites</li> <li>◦ Ramsar sites</li> <li>◦ Sites of Special Scientific Interest</li> <li>◦ Special Areas of Conservation</li> <li>◦ Special Protection Areas</li> <li>◦ National Nature Reserves</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national heritage designations <ul style="list-style-type: none"> <li>◦ World Heritage Sites</li> <li>◦ Listed buildings</li> <li>◦ Scheduled monuments</li> <li>◦ Parks and gardens</li> <li>◦ Battlefields</li> <li>◦ English Heritage Sites</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>

Hollow Road Farm, BSE	Large enough (6.13 ha)	Flood zone 1	Suitable access likely to be achievable. Site is in a good position adjacent to major road infrastructure at the junction of the A134 and A143 and close to the A14. Also, the location offers the potential to provide two access / egress points; one for heavy operational traffic and another for staff / public access, the separation of which would be beneficial. Initial assessment indicates visibility splays could be achieved and any highway improvements required would be straightforward.	Suitably located – site lies north of junction 43	Site lies adjacent to a “Strategic Lorry Route” (A134 & A143) and within 1.5km of A14	None	None	None
<b>New sites (post IAPOS public consultation)</b>								
Saddler’s Farm, Saxham	DISCARDED – see paragraph 6.17a of IAPOS report							
Vicinity of A14 J40 (including land adj.)	97.7 ha	Flood zone 1	Suitable access should be able to be	Not suitably located –	Parcels lie adjacent to or	None	None but noted that site lies within an SSSI / SPA Impact	One of the parcels lies adjacent to Toll House

	<b>Physical</b>		<b>Access</b>	<b>Location</b>				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to Bury St Edmunds	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>• Minimum site size requirement</li> <li>• Usability / workability / suitability of shape</li> <li>• Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>• Flood zone</li> <li>• Risk of fluvial flooding / proximity to water-courses</li> <li>• Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>• Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”</li> <li>• Presence and suitability of any existing accesses</li> <li>• Known access constraints</li> <li>• Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>• Distance from Bury St Edmunds</li> <li>• Proximity / ease of access to A14</li> <li>• Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity to network routes</li> <li>• Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national landscape designations <ul style="list-style-type: none"> <li>◦ National Parks</li> <li>◦ Areas of Outstanding Natural Beauty</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national biodiversity designations <ul style="list-style-type: none"> <li>◦ Natura 2000 sites</li> <li>◦ Ramsar sites</li> <li>◦ Sites of Special Scientific Interest</li> <li>◦ Special Areas of Conservation</li> <li>◦ Special Protection Areas</li> <li>◦ National Nature Reserves</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national heritage designations <ul style="list-style-type: none"> <li>◦ World Heritage Sites</li> <li>◦ Listed buildings</li> <li>◦ Scheduled monuments</li> <li>◦ Parks and gardens</li> <li>◦ Battlefields</li> <li>◦ English Heritage Sites</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>

to railway line), Higham			provided to some parcels	site lies west of junction 42 and is therefore outside the required area	close to the A14		Risk Zone	Cottage (grade II). Another parcel lies adjacent to the Church of St Stephen (grade II) and The Vicarage (grade II). A further parcel lies approximately 150 from “Barn 20m west of Lodge Farmhouse” (grade II) and 30 Pages Lane (grade II).
Land south east of Tuddenham	Site not defined in response thus area cannot be calculated	Vast majority of area likely to be being referred to is in flood zone 1	Not possible to determine due to lack of clarity about area of land being suggested	Not suitably located – Tuddenham lies approx. 10 miles from Bury St Edmunds	Tuddenham lies on a “local access route”	None	Vast majority of area likely to be being referred to falls within Breckland Farmland SSSI. Surrounding land falls within an SSSI / SPA Impact Risk Zone.	Two listed buildings in Tuddenham (1 no. grade I, 1 no. grade II) and four listed buildings in Cavenham may lie adjacent to the area being referred to (1 no. grade II*, 3 no. grade II)
Thetford Road, Ingham	Site not defined in response thus area cannot be calculated	Southern part of area likely to be being referred to is in flood zones 2 and 3	Not possible to determine due to lack of clarity about area of land being suggested	Not suitably located – Ingham lies approx. 5 miles from Bury St Edmunds	Ingham lies on a “Strategic Lorry Route”	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	Four listed buildings in Ingham may lie adjacent to the area being referred to (1 no. grade II*, 3 no. grade II)
McRae Estates land between River Lark and A14, BSE (opposite side of A134 to existing HWRC)	15.4 ha	Majority of site in flood zone 1 with western edge in flood zone 2	Existing access which could be upgraded to serve proposed development (visibility will need to be considered)	Suitably located – site lies close to junction 44	Site lies on a strategic lorry route” and adjacent to the A14	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	Northern part of site lies adjacent to scheduled monument “Bury St Edmunds Abbey: including the monks’ cemetery and outer precinct and vineyard walls”
Land west of Symonds Farm, Saxham	47.3 ha	Vast majority in flood zone 1, south eastern part in flood zone 3	Suitable access unlikely to be able to be delivered	Not suitably located – site lies west of junction 42 and is therefore outside the required area	Site lies less than 200m from the A14 but is on a minor (single track) road	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	Eastern part of site lies approximately 170 metres from Symonds Farmhouse (grade II)

	<b>Physical</b>		<b>Access</b>	<b>Location</b>				
	Site size and shape	Flood risk	Access to / from primary highway network	Proximity / relationship to Bury St Edmunds	Proximity to Suffolk Lorry Route Network	Impact on sites of international or national landscape importance	Impact on sites of international or national biodiversity importance	Impact on sites of international or national heritage importance
<b>Important factors to consider when assessing:</b>	<ul style="list-style-type: none"> <li>• Minimum site size requirement</li> <li>• Usability / workability / suitability of shape</li> <li>• Usability / workability / suitability of topography</li> </ul>	<ul style="list-style-type: none"> <li>• Flood zone</li> <li>• Risk of fluvial flooding / proximity to water-courses</li> <li>• Risk of / surface water / flash flooding</li> </ul>	<ul style="list-style-type: none"> <li>• Planning for Waste Management Facilities: A Research Study – on WTSs: “good access to primary road network is crucial”</li> <li>• Presence and suitability of any existing accesses</li> <li>• Known access constraints</li> <li>• Likelihood of securing suitable access if none existing</li> </ul>	<ul style="list-style-type: none"> <li>• Distance from Bury St Edmunds</li> <li>• Proximity / ease of access to A14</li> <li>• Nearest A14 junction</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity to network routes</li> <li>• Order of closest route / routes</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national landscape designations <ul style="list-style-type: none"> <li>○ National Parks</li> <li>○ Areas of Outstanding Natural Beauty</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national biodiversity designations <ul style="list-style-type: none"> <li>○ Natura 2000 sites</li> <li>○ Ramsar sites</li> <li>○ Sites of Special Scientific Interest</li> <li>○ Special Areas of Conservation</li> <li>○ Special Protection Areas</li> <li>○ National Nature Reserves</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity of any international or national heritage designations <ul style="list-style-type: none"> <li>○ World Heritage Sites</li> <li>○ Listed buildings</li> <li>○ Scheduled monuments</li> <li>○ Parks and gardens</li> <li>○ Battlefields</li> <li>○ English Heritage Sites</li> </ul> </li> <li>• Likely acceptability of impact</li> </ul>

Field between Westley roundabout and Saxham Business Park, Westley	30.8 ha	Flood zone 1	Suitable access cannot be delivered	Suitably located – site lies immediately south west of junction 42	Site lies adjacent to the A14	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	None
Land between Rougham Hill, A14 and Rushbrooke Lane, BSE (including former proposed BSE Hockey Club site / Hockey Club land)	39.5 ha	Flood zone 1	Existing access which could be upgraded to serve proposed development	Suitably located – site lies close to junction 44	Site lies 400m from a strategic lorry route” and adjacent to the A14	None	None	None
Land south of West Suffolk Crematorium, BSE / Risby	22.9 ha	Flood zone 1	Existing access which could be upgraded to serve proposed development (access would need to be from the Risby road)	Suitably located – site lies immediately north west of junction 42	Site lies on a “zone distributor route” and adjacent to the A14	None	None but noted that site lies within an SSSI / SPA Impact Risk Zone	None
Hockey club land, Rougham Hill, BSE (considered as part of “Land between Rougham Hill, A14 and Rushbrooke Lane, BSE” – see above)	DISCARDED – see paragraph 6.17a of IAPOS report							

**Sites assessment matrix 3 – assessment against qualitative criteria of unallocated greenfield sites passing exclusionary criteria**

Important factors to consider when assessing	
<ul style="list-style-type: none"> <li>• Distance from:                             <ul style="list-style-type: none"> <li>○ residential areas / dwellings</li> <li>○ schools</li> <li>○ hospitals</li> <li>○ recreation facilities</li> </ul> </li> </ul>	Proximity to sensitive receptors
<ul style="list-style-type: none"> <li>• Proximity of surrounding uses</li> <li>• Compatibility of use classes / uses</li> <li>• Potential for impact on surrounding land uses or vice versa</li> <li>• Any benefits or synergistic effects from surrounding land uses or vice versa</li> </ul>	Compatibility with surrounding land uses
<ul style="list-style-type: none"> <li>• Capacity</li> <li>• Highway safety impacts</li> <li>• Amenity along highway route</li> <li>• Proximity of sensitive receptors to route</li> </ul>	Suitability of local road network and extent to which access would require reliance on local roads
<ul style="list-style-type: none"> <li>• Scope for rail transport</li> <li>• Scope for transport by river/barge</li> <li>• Travel/transport implications of location</li> </ul>	Compatibility with NPPF section 4 (Promoting sustainable transport) and NPPF paragraph 5
<ul style="list-style-type: none"> <li>• Extant allocations / designations</li> <li>• Extant planning permissions</li> <li>• Extant allocations / designations / planning permissions on adjacent sites</li> <li>• Planning history</li> </ul>	Planning status
<ul style="list-style-type: none"> <li>• Agricultural land value</li> <li>• Predominant agricultural land value of wider search area</li> </ul>	Potential for loss of best and most versatile agricultural land
<ul style="list-style-type: none"> <li>• Groundwater protection or vulnerability designations covering site or surroundings:                             <ul style="list-style-type: none"> <li>○ Groundwater Source Protection Zones</li> <li>○ Aquifers</li> <li>○ Groundwater Vulnerability Zones</li> <li>○ Drinking Water Safeguard Zone</li> </ul> </li> <li>• Likely acceptability of impact (if any)</li> </ul>	Potential for impact on local water environment
<ul style="list-style-type: none"> <li>• Evidence of:                             <ul style="list-style-type: none"> <li>○ Geological risk factors</li> <li>○ Ground workings</li> <li>○ Mining, extraction &amp; natural cavities</li> <li>○ Natural ground subsidence at or near site</li> </ul> </li> <li>• Impact on developability (if known)</li> </ul>	Proximity to areas of land instability
<ul style="list-style-type: none"> <li>• Proximity of landscape designations</li> <li>• Suffolk Landscape Character Assessment</li> <li>• Existing landscape character/baseline</li> <li>• Acceptability of likely impact</li> </ul>	Potential for landscape impact
<ul style="list-style-type: none"> <li>• Urban / edge of settlement / rural location</li> <li>• Topography</li> <li>• Proximity, number and sensitivity of receptors</li> <li>• Existing level of screening</li> <li>• Acceptability of likely impact</li> </ul>	Potential for visual impact
<ul style="list-style-type: none"> <li>• Proximity of biodiversity/wildlife designations</li> <li>• Ecological value/potential of site</li> <li>• Potential for loss or fragmentation of habitat</li> <li>• Acceptability of likely impact</li> <li>• Opportunities for enhancement</li> </ul>	Potential for impact on biodiversity
<ul style="list-style-type: none"> <li>• Proximity of geodiversity designations</li> <li>• Geodiversity value of site</li> <li>• Acceptability of likely impact</li> </ul>	Potential for impact on geodiversity
<ul style="list-style-type: none"> <li>• Proximity of heritage designations (including heritage assets and conservation areas)</li> <li>• Archaeological interest/potential of site and surroundings</li> <li>• Acceptability of any likely impacts</li> </ul>	Potential for impact on heritage assets (including archaeology)
<ul style="list-style-type: none"> <li>• Impact of traffic emissions</li> <li>• Number and proximity of sensitive receptors to site</li> <li>• Number and proximity of sensitive receptors to main route to and from site</li> </ul>	Potential for impact on air quality
<ul style="list-style-type: none"> <li>• Number and proximity of sensitive receptors</li> <li>• Number and proximity of sensitive receptors downwind of site</li> </ul>	Potential for impact from odour
<ul style="list-style-type: none"> <li>• Number and proximity of sensitive receptors</li> </ul>	Potential for impact from flies, vermin and birds
<ul style="list-style-type: none"> <li>• Number and proximity of sensitive receptors</li> <li>• Number and proximity of sensitive receptors downwind of site</li> <li>• Number and proximity of sensitive receptors to main route to and from site</li> </ul>	Potential for impact from noise and vibration
<ul style="list-style-type: none"> <li>• Existing night-time environment / light levels</li> <li>• Existing levels of screening</li> <li>• Topography</li> </ul>	Potential for light pollution
<ul style="list-style-type: none"> <li>• Topography</li> <li>• Existing levels of shelter / landscaping / screening</li> </ul>	Potential for impact from litter
<ul style="list-style-type: none"> <li>• Ownership</li> <li>• Availability for purchase</li> <li>• Competing interests</li> <li>• Potential for use of compulsory purchase powers</li> </ul>	Availability
	Total score

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	Proximity to sensitive receptors	Compatibility with surrounding land uses	Suitability of local road network and extent to which access would require reliance on local roads	Compatibility with NPPF section 4 (Promoting sustainable transport) and NPPF paragraph 5	Planning status	Potential for loss of best and most versatile agricultural land	Potential for impact on local water environment	Proximity to areas of land instability	Potential for landscape impact	Potential for visual impact	Potential for impact on biodiversity	Potential for impact on geodiversity	Potential for impact on heritage assets (including archaeology)	Potential for impact on air quality	Potential for impact from odour	Potential for impact from flies, vermin and birds	Potential for impact from noise and vibration	Potential for light pollution	Potential for impact from litter	Availability	Total score
Tut Hill, BSE	-1 Nearest sensitive receptor (residential) is 125m away.	+2 Considered compatible - surrounding land uses are golf course and agricultural.	+2 Suitable/acceptable - site lies adjacent to A14, access would need to be onto B1106 (Tut Hill) and then onto A14 but B1106 is a Zone Distributor Route on Suffolk Lorry Route Network.  No sensitive receptors on route between site and A14. Nearest sensitive receptor to route is 305m away.	0 Need to travel / for transport minimised by virtue of being located within junctions between 42 – 44 (inclusive), i.e. close to main centre of population.  For waste development more sustainable transport modes would be rail or river / barge. Rail transport considered unviable / unfeasible given scale of proposals (relatively small) so unlikely to be used. Nearest railway sidings are 2.8 miles away but lie in an area which is proposed for redevelopment thus their future is unclear. Further, highways and traffic impact of getting waste to sidings from site would need to be considered. Also, would need to be established with rail operator whether rail transport was possible.  No scope for transport by river / barge.	-2 Non-conforming – unallocated greenfield site without planning permission.	-1 Land is grades 2 and 3 thus is what is considered "best and most versatile" agricultural land. However most of the land surrounding Bury St Edmunds falls into this category leaving little or no scope for finding a suitable site on land of poorer quality.	-1 Lies in Groundwater Source Protection Zone 2 (Outer Zone) and Groundwater Vulnerability Zone 'Major Aquifer High'. However, given nature of use proposed water pollution is unlikely. This position is supported by Planning for Waste Management Facilities ODPM 2004.	+2 Groundsure report indicates site is unlikely to be at risk from ground instability (see Appendix E).	-1 Site is located in countryside but edge of settlement with adjacent recreational use (golf course) influencing character (described as 'Plateau Estate Farmlands' in SCC Landscape Character map). Not within or adjacent to national or local landscape designations and sensitivity of landscape receptor is considered medium. The impact and magnitude of effects would depend on design and mitigation measures but could be medium so net impact on landscape may be considered 'moderate'.	-1 Visual impact likely to be towards 'low' for most receptors with any degree of sensitivity with possible exception of golf course. An allocated site for a residential urban extension to the north of the golf course may increase receptors but generally site is sheltered by topography (ridge to north).	-1 Within SSSI impact risk zone for Horringer Court Caves, Glen Chalk Caves and Breckland SPA. Natural England will wish to be consulted through the planning process.  Records of badger south of the site but separated by the A14; 6 species of bat within 2km; and other BAP priority species including brown hare.  No onsite assessment undertaken to date.  Nearest County Wildlife Site is Hyde Wood ancient woodland (0.8km to the northwest).  Land immediately to the north and east is designated as local wildlife site (Bury St Edmunds Golf Course) as is land to the south along the A14 (A14 Roadside Verges).  Protected pine trees to the north of the site close to the B1106.  Site features include: • hedgerow with trees to the boundary with B1106 • remnant hedge divides the agricultural land diagonally and forms part of the boundary of the site  Majority of the site is agricultural land - generally low nature conservation value. Existing site features generally occur on boundaries which should be retained.  Scheme design should include a buffer between the site and the golf course LWS and could strengthen the links between the golf course and the A14 corridor.  On site survey will lead to further recommendations.	+2 Site not close to any geological SSSIs, Regionally Important Geodiversity sites or County geo sites (potential RIGS).	-1 Closest recorder heritage asset is over 800m away.  Site is large and in an area of archaeological importance. Undated ring ditch or enclosure on the easternmost point of the site. Has not been the subject of systematic archaeological investigation and there is high potential for important archaeological remains to be defined in this location. Currently insufficient information to determine a planning application on archaeological grounds. Archaeological evaluation required at an early stage.	-1 Main source of emissions likely to be HGVs (Planning for Waste Management Facilities ODPM 2004).  Site is 125 metres from nearest sensitive receptor.  No sensitive receptors on route from site to A14. Nearest sensitive receptor to route is over 750m away. Route B1106 is relatively strategic as recognised in Suffolk Lorry Route Network but increase in traffic from facility would probably be more than marginal.	-1 Nearest sensitive receptor (residential) is 125m away.  Nearest downwind sensitive receptor (residential) is 125m away (NNE direction), then 720m away (Howard Middle School, ENE direction). Howard and Mildenhall estates are closest concentrations of sensitive receptors – edges are within 850m of site and are west and north west of it.  Putrescible/municipal waste will be removed from site as quickly as possible - less than 24 hours. Waste will be handled within building with fast acting doors which will limit if not prevent access by vermin and birds	-1 Nearest sensitive receptor (residential) is 125m away.  Putrescible/municipal waste will be removed from site as quickly as possible - less than 24 hours. Waste will be handled within building with fast acting doors. Misting sprays are proposed to help control any odours should they arise.	-1 Nearest sensitive receptor (residential) is 125m away.  Possible impact for nearest sensitive receptor from activities on site and traffic. Nearest sensitive receptor is not on main route to and from the site. Other sensitive receptors are either much further from the site or lie on the opposite side of the A14 thus any impact is likely to be minimal.  (See two columns to left re proximity of downwind sensitive receptors where for the same distance from the site the noise impact has the potential to be greater for the majority of the time)	-1 Site not intrinsically dark with local light sources (A14 junction) and background spillage from urban area. However new lighting likely to extend spillage into countryside. Some mitigation possible.	+1 Site not particularly exposed. Existing landscaping on some boundaries has potential to reduce wind speed and limit escape of litter.  Proposed development would include significant boundary planting which will help to further control escape of litter.  Other litter control measures also proposed.	-2 Landowner prepared to dispose of site for development of a depot and household waste recycling centre but not prepared to dispose of site for waste transfer station.  Compulsory purchase could be an option if it meets the public interest test and if it would enable the site to be secured within the required timescale and within budget.	-7

	Proximity to sensitive receptors	Compatibility with surrounding land uses	Suitability of local road network and extent to which access would require reliance on local roads	Compatibility with NPPF section 4 (Promoting sustainable transport) and NPPF paragraph 5	Planning status	Potential for loss of best and most versatile agricultural land	Potential for impact on local water environment	Proximity to areas of land instability	Potential for landscape impact	Potential for visual impact	Potential for impact on biodiversity	Potential for impact on geodiversity	Potential for impact on heritage assets (including archaeology)	Potential for impact on air quality	Potential for impact from odour	Potential for impact from flies, vermin and birds	Potential for impact from noise and vibration	Potential for light pollution	Potential for impact from litter	Availability	Total score
Hollow Road Farm, BSE	+1 Nearest sensitive receptor (residential) is 305m away.	+2 Considered compatible - surrounding land uses are general industrial, small scale waste transfer and agricultural.  Potential for synergies with adjoining road planning and skip businesses.	+2 Suitable/acceptable - site lies adjacent to A134 which is a Strategic Lorry Route on Suffolk Lorry Route Network, access would involve up to 350m of local road (Fornham Road) to reach A134 but highway authority have indicated in principle acceptability  No sensitive receptors on route between site and A14. Nearest sensitive receptor to route is 85m away.	0 Need to travel/for transport minimised by virtue of being located within junctions between junctions 42 – 44 (inclusive).  For waste development more sustainable transport modes would be rail or river / barge. Rail transport considered unviable / unfeasible given scale of proposals (relatively small) so unlikely to be used. Nearest railway sidings are 1.6 miles away but lie in an area which is proposed for redevelopment thus their future is unclear. Further, highways and traffic impact of getting waste to sidings from site would need to be considered. Also, would need to be established with rail operator whether rail transport was possible.  No scope for transport by river / barge.	-2 Unallocated greenfield site without planning permission but adjacent to WDMS referenced uses (agricultural buildings and existing small scale waste management). However, Suffolk County Council officers have advised that policy WDMS does not apply to strategic facilities like that proposed.	-1 Land is grade 3 this is what is considered 'best and most versatile agricultural land'. However most of the land surrounding Bury St Edmunds falls into this category leaving little or no scope for finding a suitable site on land of poorer quality	-1 Lies in Groundwater Source Protection Zone 2 (Outer Zone) and Groundwater Vulnerability Zone 'Major Aquifer High'. However, given nature of use proposed water pollution is unlikely. This position is supported by Planning for Waste Management Facilities ODPM 2004.	+2 Groundsure report indicates site is unlikely to be at risk from ground instability (see Appendix F).	-1 Site is located in countryside but edge of settlement with industrial elements (British Sugar) already strongly influencing character (described as 'Plateau Estate Farmlands' in SCC Landscape Character map). Not within or adjacent to national or local landscape designations and sensitivity of landscape receptor is considered medium to low. The impact and magnitude of effects would depend on design and mitigation measures but could be medium so net impact on landscape may be considered 'moderate to moderate/minor'.	-1 Visual impact likely to be towards 'low' for most receptors with any degree of sensitivity. An allocated site for a predominantly residential urban extension to the east may increase receptors but generally site is sheltered by topography.	-1 Within the SSSI impact risk zone for Horringer Court Caves, Glen Chalk Caves and Breckland SPA. Natural England will wish to be consulted through the planning process.  Nearest County Wildlife Site is Farm Covert and Oaks Wood which is ancient woodland (approximately 750m to the north).  Whilst there are records of protected species in the vicinity of the site, on-site inspection by Suffolk Wildlife Trust found no evidence of badgers, assessed very low risk of impact on reptiles and no risk to great crested newts. Bat and breeding bird mitigation suggested.  Land to the south is designated as a local wildlife site (British Sugar Ponds). Site features include: <ul style="list-style-type: none"> <li>scattered scrub and semi-improved grassland</li> <li>broad-leaved tree belt to the western boundary with grass margin</li> </ul> Majority of site is agricultural land – low nature conservation value. Existing tree belt should be retained and light spillage into it should be kept to a minimum during and post construction. No tree or scrub clearance should take place during bird nesting season.	+2 Site not close to any geological SSSIs, Regionally Important Geodiversity sites or County geo sites (potential RIGS).	-1 Closest recorder heritage asset is over 800m away.  Site lies in an area of high archaeological potential. Recent geophysical survey of the site identified a series of anomalies of archaeological interest. Eastern part of 2011 excavation on adjoining site revealed a high density of Roman features – likely to be part of much more extensive possibly multi-period settlement extending into the site. Character of archaeology on adjacent site and recent geophysical survey could form basis of adequate assessment for a planning application.	+1 Main source of emissions likely to be HGVs (Planning for Waste Management Facilities ODPM 2004).  Site is 305m from nearest sensitive receptor.  No sensitive receptors on route from site to A14. Nearest sensitive receptor to route is 85m away. Route (A134 – Compiègne Way) is already a major road and increase in traffic will be marginal)	+1 Nearest sensitive receptor (residential) is 305m away.  Nearest downwind sensitive receptor is 675m away (Hall Farm, NNE direction), then 890m away (E direction). Great Barton is closest concentration of sensitive receptors – edge of settlement is 1.75km from site and is east and ENE of it.  Putrescible/ municipal waste will be removed from site as quickly as possible on site for less than 24 hours. Waste will be handled within building with fast acting doors which will limit if not prevent access by vermin and birds.	+1 Nearest sensitive receptor (residential) is 305m away.  Possible impact for nearest sensitive receptors from activities on site and traffic. However, this is likely to be minimal given distance from site. Main route for traffic from site will pass within 85m of nearest sensitive receptor but route is an A-road dual carriageway thus any impact will be marginal.  (See two columns to left re proximity of downwind sensitive receptors where for the same distance from the site the noise impact has the potential to be greater for the majority of the time)	-1 Site not intrinsically dark with local light sources (A134 and nearby industrial / storage facilities) and background spillage from urban area. However new lighting likely to extend spillage into countryside. Some mitigation possible.	+1 Site not particularly exposed. Existing landscaping on some boundaries has potential to reduce wind speed and limit escape of litter.  Proposed development would include significant boundary planting which will help to further control escape of litter.  Other litter control measures also proposed.	+2 Landowner prepared to dispose of the site for depot, waste transfer station and household waste recycling centre uses, i.e. co-located / combined facility.  Council has secured option to purchase site.	+7	

Proximity to sensitive receptors	Compatibility with surrounding land uses	Suitability of local road network and extent to which access would require reliance on local roads	Compatibility with NPPF section 4 (Promoting sustainable transport) and NPPF paragraph 5	Planning status	Potential for loss of best and most versatile agricultural land	Potential for impact on local water environment	Proximity to areas of land instability	Potential for landscape impact	Potential for visual impact	Potential for impact on biodiversity	Potential for impact on geodiversity	Potential for impact on heritage assets (including archaeology)	Potential for impact on air quality	Potential for impact from odour	Potential for impact from flies, vermin and birds	Potential for impact from noise and vibration	Potential for light pollution	Potential for impact from litter	Availability	Total score
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**New sites (post IAPOS public consultation)**

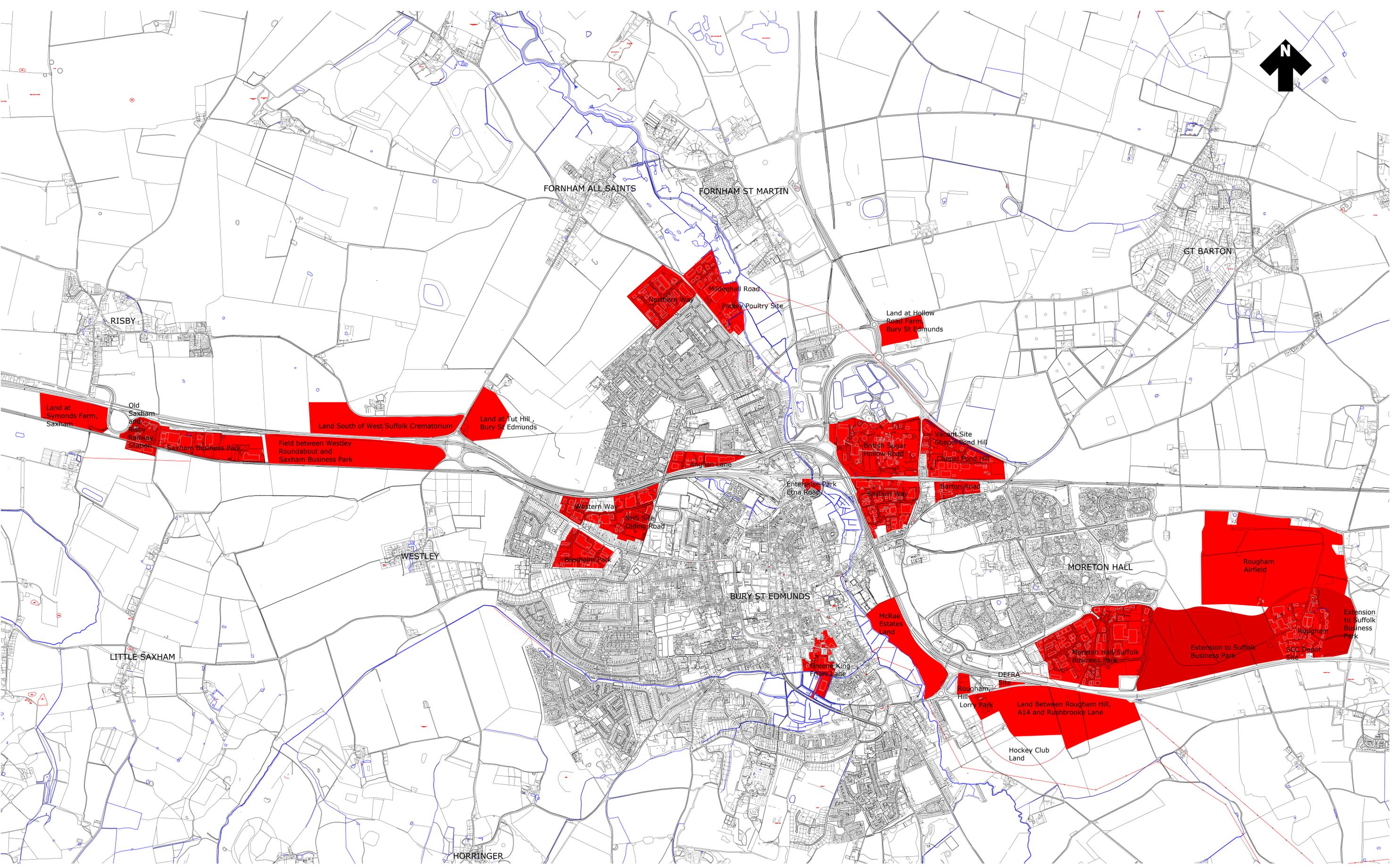
McRae Estates land between River Lark and A14, BSE (opposite side of A134 to existing HWRC)	-1	-1	-1	0	-2	-1	-1	-1	-2	-2	-1	+2	-2	-1	-1	-1	-1	0	+1	+2	-14
<p>Nearest sensitive receptor (St James Middle School) abuts northern boundary of site.</p> <p>Rugby club fields abut site's western boundary.</p> <p>Nearest dwelling lies 160m from site.</p> <p>Two hotels lie within 175m of the site (one at 125m and one at 175m).</p> <p>Further, site lies 110m from area zoned as housing within Bury Vision 2031 concept layout for south-east Bury St Edmunds strategic allocation (Policy BV7).</p>	<p>Not considered compatible – adjoining land uses are a school and rugby club pitches/fields. A bridleway runs along the site's western boundary.</p> <p>Further, while not directly adjoining the site, the future use of the land to the south (residential) is considered incompatible.</p>	<p>Marginal suitability / acceptability. Site lies adjacent to A14. Access would need to be carefully considered in terms of standards and safety.</p> <p>Options:</p> <p>1) Access onto modified roundabout A134/ Rougham Hill. Requires creation of an additional 4<sup>th</sup> arm to existing 3 arm roundabout and then onto A134 and A14.</p> <p>2) Upgrading existing farm access in existing layby – issues with achieving adequate visibility; potential safety concerns relating to driver judgements and close proximity to A14 J44; and left in/ left out will result in additional trips around A14 J44 for onward journeys to the south and also additional trips around the Rougham Hill Roundabout for journeys taking access into the site.</p> <p>Access solution likely to be costly.</p> <p>A134 is a Strategic Lorry Route on Suffolk Lorry Route Network.</p> <p>The site and new access are in close proximity to congested A14 J44 and congested A134 corridor into Bury St Edmunds. There is existing local congestion at peak times. Traffic management exists for existing queue management.</p> <p>Slow moving HGVs would further add to the congestion and may therefore adversely affect road safety.</p> <p>Potential to increase existing congestion (particularly Option 2 above) and safety concerns.</p>	<p>Need to travel/for transport minimised by virtue of being located adjacent to junction 42.</p> <p>For waste development more sustainable transport modes would be rail or river / barge. Rail transport considered unviable / unfeasible given scale of proposals (relatively small) so unlikely to be used. Nearest railway sidings are 1.8 miles away but lie in an area which is proposed for redevelopment thus their future is unclear. Further, highways and traffic impact of getting waste to sidings from site would need to be considered. Also, would need to be established with rail operator whether rail transport was possible (Network Rail response to SCC re Energy from Waste proposal suggests not).</p> <p>No scope for transport by river / barge.</p>	<p>Non-conforming – greenfield 'countryside' site without planning permission.</p> <p>Site is allocated as amenity public open space by Policy BV19 of the Bury Vision 2031.</p>	<p>Land is shown as "Land predominantly in urban use" on relevant map/plan but is likely to be in grades 2 and 3 thus is what is considered "best and most versatile agricultural land. However most of the land surrounding Bury St Edmunds falls into this category leaving little or no scope for finding a suitable site on land of poorer quality.</p>	<p>Lies in Groundwater Source Protection Zone 2 (Outer Zone) and majority of site lies in Groundwater Vulnerability Zone "Major Aquifer High". However, given nature of use proposed water pollution is unlikely. This position is supported by Planning for Waste Management Facilities ODPM 2004.</p>	<p>Groundsure report indicates site could be at risk from ground instability and that there is potential for difficult ground conditions (see Appendix I).</p>	<p>Desk based assessment: site is surrounded by urban land uses but is characterised as 'Valley Meadowlands' (which is "generally unsettled") in East of England Landscape Framework. Not within or adjacent to national designations but recognized in the local plan (Bury Vision 21: BV19) as "an important local area protecting views of the town centre". It defines the river valley and is therefore important in the perception of the landscape locally. The landscape is considered to be sensitive and the impact would be significant.</p>	<p>Desk based assessment: numerous receptors including residential and recreational uses as well as a school and being visible from the A14 and impact on many receptors could be significant.</p>	<p>Site is within the SSSI impact risk zone relating to The Glen Chalk Caves SSSI and Horringer Court Caves SSSI whose importance relates to provision of habitat for hibernating bats. The River Lark corridor is an important corridor in relation to these sites. Natural England would need to be consulted on any proposals through the planning process.</p> <p>Protected and notable species recorded within the 1 km grid in which the site is located include a large number of bird species and some butterfly species.</p> <p>A14 to the northeast and the River Lark to the south west of this site are important wildlife corridors and are designated as local wildlife sites.</p> <p>River Lark is located on the western side of this site. The River Lark runs from south to north through the centre of Bury St Edmunds and is the larger of the two rivers that run through the town. It forms an important wildlife corridor through the town and links several wildlife sites. Its character varies along its length; however several water dependent bird and mammal species use the river including reed bunting, kingfisher and water vole. Otters have also been recorded. Protected and notable species recorded on the River Lark include grass snake and water vole.</p> <p>Site is in arable use and existing landscape features of biodiversity value are confined to the periphery of the site.</p>	<p>Site not close to any geological SSSIs, Regionally Important Geodiversity sites or County geo sites (potential RIGS).</p>	<p>Northern part of site lies adjacent to scheduled monument 'Bury St Edmunds Abbey: including the monks' cemetery and outer precinct and vineyard walls'.</p> <p>SCCAS would not favour development at this location on historic landscape grounds. Development on this site (northern half in particular) has potential to cause deleterious effect on setting of cathedral and historic settlement core when approached from the south-east of the town. This advice was given in connection with LDF preparation (2008) (sites: SS37, SS89 and SS128) and the Bury Vision (policy BV 21).</p> <p>Site also of high archaeological potential for below ground remains. Vineyard of the abbey of St Edmunds was to the north west of the site (BSE 063). A gate and bridge is recorded (BSE Misc). Medieval objects have been found in the northern part of the site (BSE 041). Site lies along south facing valley side of the River Lark, overlooking historic settlement core, and is therefore topographically favourable for early occupation of all periods.</p>	<p>Main source of emissions likely to be HGVs (Planning for Waste Management Facilities ODPM 2004).</p> <p>Nearest sensitive receptors are school and rugby fields abutting the site. Nearest dwelling in 160 metres away. Two hotels lie within 175m of the site.</p> <p>No sensitive receptors on route from site to A14.</p> <p>Nearest sensitive receptor (dwelling) to route is 200m away. However, area of high density housing shown on Bury Vision 2031 South-East Bury St Edmunds strategic allocation (Policy BV7) concept layout is 60m away.</p>	<p>Nearest sensitive receptors are school and rugby fields abutting the site. Nearest dwelling in 160 metres away. Two hotels lie within 175m of the site.</p> <p>Further, area of high density housing shown on Bury Vision 2031 South-East Bury St Edmunds strategic allocation (Policy BV7) concept layout is 60m away.</p> <p>Putrescible/municipal waste will be removed from site as quickly as possible. Waste will be handled within building with fast acting doors. Misting sprays are proposed to help control any odours should they arise.</p>	<p>Nearest sensitive receptors are school and rugby fields abutting the site. Nearest dwelling in 160 metres away. Two hotels lie within 175m of the site.</p> <p>Further, area of high density housing shown on Bury Vision 2031 South-East Bury St Edmunds strategic allocation (Policy BV7) concept layout is 60m away.</p> <p>Potential for impact for nearest sensitive receptors from activities on site and traffic. Main route for traffic from site is 60m from likely location of housing as part of Bury Vision 2031 South-East Bury St Edmunds strategic allocation (Policy BV7) but route is an A-road and one of the main routes into Bury St Edmunds thus any impact in terms of traffic noise and vibration is likely to be marginal.</p> <p>(See two columns to left re proximity of downwind sensitive receptors where for the same distance from the site the noise impact has the potential to be greater for the majority of the time).</p>	<p>Desk based assessment: site not intrinsically dark with local light sources (rugby ground has floodlighting) and background spillage from urban area in proximity.</p>	<p>Site not particularly exposed. Existing landscaping on some boundaries has potential to reduce wind speed and limit escape of litter.</p> <p>Proposed development would include significant boundary planting which will help to further control escape of litter.</p> <p>Other litter control measures also proposed.</p>	<p>Landowner prepared to dispose of the site for depot, waste transfer station and household waste recycling centre uses, i.e. co-located / combined facility.</p>			

	Proximity to sensitive receptors	Compatibility with surrounding land uses	Suitability of local road network and extent to which access would require reliance on local roads	Compatibility with NPPF section 4 (Promoting sustainable transport) and NPPF paragraph 5	Planning status	Potential for loss of best and most versatile agricultural land	Potential for impact on local water environment	Proximity to areas of land instability	Potential for landscape impact	Potential for visual impact	Potential for impact on biodiversity	Potential for impact on geodiversity	Potential for impact on heritage assets (including archaeology)	Potential for impact on air quality	Potential for impact from odour	Potential for impact from flies, vermin and birds	Potential for impact from noise and vibration	Potential for light pollution	Potential for impact from litter	Availability	Total score
Land between Rougham Hill, A14 and Rushbrooke Lane, BSE (including former proposed BSE Hockey Club site / Hockey Club land)	-1 Nearest existing sensitive receptor (residential) is 275m away. However, site includes part of area identified for housing within Bury Vision 2031 concept layout for south-east Bury St Edmunds strategic allocation (Policy BV7).	-1 Considered compatible in terms of current land uses – surrounding use is agricultural or light industrial / industrial. However, future use of the land to the west and including the western part of the site (residential) is considered incompatible.	0 Suitable / acceptable – site lies adjacent to A14 but takes access onto the network via Rougham Hill and then onward to A14 J44, via roundabout with A134. A134 is a Strategic Lorry Route on Suffolk Lorry Route Network. Access would involve up to 450m of local road (Rougham Hill) to reach A134 but the highway authority has indicated in principle acceptability. Rougham Hill would require upgrading. Close proximity to congested A14 J44. Potential to increase congestion and safety concerns on existing congested network at peak times.	0 Need to travel/for transport minimised by virtue of being located adjacent to junction 44. For waste development more sustainable transport modes would be rail or river / barge. Rail transport considered unviable / unfeasible given scale of proposals (relatively small) so unlikely to be used. Nearest railway sidings are 2.1 miles away but lie in an area which is proposed for redevelopment thus their future is unclear. Further, highways and traffic impact of getting waste to sidings from site would need to be considered. Also, would need to be established with rail operator whether rail transport was possible (Network Rail response to SCC re Energy from Waste proposal suggests not). No scope for transport by river / barge.	-2 Non-conforming – unallocated greenfield 'countryside' site without planning permission.	-1 Land is shown as 'Land predominantly in urban use' on relevant map/plan but is likely to be in grades 2 and 3 thus is what is considered 'best and most versatile agricultural land'. However most of the land surrounding Bury St Edmunds falls into this category leaving little or no scope for finding a suitable site on land of poorer quality.	-1 Lies in Groundwater Source Protection Zone 2 (Outer Zone). Approximately half of site lies in Groundwater Vulnerability Zone 'Major Aquifer High' and half in Groundwater Vulnerability Zone 'Major Aquifer Intermediate'. However, given nature of use proposed water pollution is supported by Planning for Waste Management Facilities ODPM 2004	+2 Groundsure report indicates site is unlikely to be at risk from ground instability (see Appendix J).	-2 Desk based assessment: site is located in countryside but edge of settlement. Described as 'Plateau Estate Farmlands' in SCC Landscape Character map. Not within or adjacent to national landscape designations but adjacent a 'Special Landscape Area' (ref. policy DM13) and sensitivity of landscape receptor is considered medium/high. The impact and magnitude of effects would depend on design and mitigation measures but could be medium so net impact on landscape may be considered 'medium/high'.	-1 Desk based assessment: extensive views in and out and topography (site is on relatively high ground, much of it at 60m+) means the site is exposed, particularly from A14 but also from numerous viewpoints to the south. It also shares a substantial boundary with proposed new housing development. Woodland screening can be effective. Urban extension may increase receptors but likely to be tree belts to screen and separate.	-1 The site is within the SSSI impact risk zone relating to The Glen Chalk Caves SSSI and Horringer Court Caves SSSI whose importance relates to provision of habitat for hibernating bats. The River Lark corridor is an important corridor in relation to these sites. Natural England would need to be consulted on any proposals through the planning process. Protected and notable species recorded within the 1 km grid in which the site is located include a large number of bird species and some butterfly species A14 to the north-east and River Lark to the south-west are important wildlife corridors and are designated as local wildlife sites. Site is also in agricultural use with some hedgerows and what appear to be mature trees. There is an area of woodland to the southern boundary, although this is not shown to be ancient woodland the proposals could impact on the biodiversity of this feature.	+2 Site not close to any geological SSSIs, Regionally Important Geodiversity sites or County geo sites (potential RIGS).	-2 No listed buildings etc nearby. Site is of high archaeological potential. There are archaeological finds recorded across the site. Site overlooks the Lark Valley and is topographically favourable for early occupation. A significant assemblage of Bronze Age flint work with Mesolithic, Neolithic and also Iron Age elements has been recorded (RGH 043) and it is highly likely that there are remains of prehistoric activity. Prehistoric artefacts and scatters are recorded in surrounding fields (BSE 046, BSE 098, RGH 048, RGH 053). A historic reference to 'Four Hills' to the north east of the site may refer to barrows or pillow mound rabbit warrens. Part of the site is called 'Bromley Green' in historic documents. There may have been a medieval settlement associated with this (RGH 028). A medieval artefact scatter is recorded in the western part of the site (BSE Misc). Broom plantation, to the south of the site, is shown on the 1880s OS map, and may be a consideration as a historical landscape feature. Development at the site would almost certainly impact on prehistoric and medieval below ground remains as well as potential remains from other periods. High potential for important archaeological remains to be defined.	-1 Main source of emissions likely to be HGVs (Planning for Waste Management Facilities ODPM 2004). Site is 275m from nearest sensitive receptor. No sensitive receptors on route from site to A14. Nearest sensitive receptor (dwelling) to route is 200m away. However, site includes part of area identified for housing within Bury Vision 2031 concept layout for south-east Bury St Edmunds strategic allocation (Policy BV7) and area of low density housing shown on concept layout is 30m from route. Part of route (A134) is already a major road and increase in traffic will be marginal). However, other part of route (Rougham Hill) is not a major road and increase in traffic may be significant.	-1 Nearest sensitive receptor (residential) is 275m away. Nearest downwind sensitive receptor (residential) is 380m away (closest downwind dwelling on Moreton Hall housing area, NNE direction). Moreton Hall housing area is also the closest concentration of sensitive receptors (N and NE direction). Putrescible/municipal waste will be removed from site as quickly as possible. Waste will be handled within building with fast acting doors. Misting sprays are proposed to help control any odours should they arise.	-1 Nearest sensitive receptor (residential) is 275m away. However, site includes part of area identified for housing within Bury Vision 2031 concept layout for south-east Bury St Edmunds strategic allocation (Policy BV7). Potential for impact on nearest sensitive receptors from activities on site and traffic. Main route for traffic from site is 30m from likely location of housing as part of Bury Vision 2031 South-East Bury St Edmunds strategic allocation (Policy BV7). Part of route from site is not a major road thus any impact in terms of traffic noise and vibration could be significant. However, nearest sensitive receptor is currently 275m from this part of route. (See two columns to left re proximity of downwind sensitive receptors where for the same distance from the site the noise impact has the potential to be greater for the majority of the time)	-1 Desk based assessment: site not intrinsically dark but existing light sources are mostly urban background (proximity to Bury) and additions in this area would be noticeable. Proposed development would include significant boundary planting which will help to further control escape of litter. Other litter control measures also proposed.	+1 Site not particularly exposed. Existing landscaping on some boundaries has potential to reduce wind speed and limit escape of litter. Proposed development would include significant boundary planting which will help to further control escape of litter. Other litter control measures also proposed.	+2 Site has split ownership. Landowner of larger portion of site prepared to dispose of the site for depot, waste transfer station and household waste recycling centre uses, i.e. co-located / combined facility. Landowner of remainder of site not prepared to dispose of site for proposed uses and land is under option to a developer in any case. However, part of site with the owner willing to sell is large enough to accommodate the optimum solution proposals and is also the part of the site which does not fall within the local plan housing allocation. Compulsory purchase may be an option if it meets the public interest test and if it this would enable the site to be secured within the required timescale and within budget.	-10	

	Proximity to sensitive receptors	Compatibility with surrounding land uses	Suitability of local road network and extent to which access would require reliance on local roads	Compatibility with NPPF section 4 (Promoting sustainable transport) and NPPF paragraph 5	Planning status	Potential for loss of best and most versatile agricultural land	Potential for impact on local water environment	Proximity to areas of land instability	Potential for landscape impact	Potential for visual impact	Potential for impact on biodiversity	Potential for impact on geodiversity	Potential for impact on heritage assets (including archaeology)	Potential for impact on air quality	Potential for impact from odour	Potential for impact from flies, vermin and birds	Potential for impact from noise and vibration	Potential for light pollution	Potential for impact from litter	Availability	Total score
Land south of West Suffolk Crematorium, BSE / Risby	+1 Nearest sensitive receptor (residential) is 400m away. Site lies 290m from area reserved for re-location of West Suffolk Hospital within Bury Vision 2031 concept layout for west Bury St Edmunds strategic allocation (Policy BV5). Further, site lies 790m from area of lower density housing shown on concept layout for Bury Vision 2031 North-West Bury St Edmunds strategic allocation (Policy BV3).	+2 May be compatible – surrounding uses are agricultural (which is considered compatible) and a crematorium (with which it is considered that some potential for conflict may exist). Potential for conflict with crematorium is likely to depend at least in part on scheme specific factors thus it is not possible to fully assess site's compatibility at this stage. Score of +2 used so as not to unfairly mark site down without knowledge of what scheme would comprise.	-1 Potentially suitable / acceptable subject to highway ownership position and significant improvements – site lies adjacent to A14, access would need to be onto Risby Road (C628) in close proximity to the Crematorium, then onto B1106 (Tut Hill) and then onto A14 J42. There is a right turn lane at the B1106 junction with Risby Road – it is likely that this will require upgrading as will the Risby Road. B1106 is a Zone Distributor Route on Suffolk Lorry Route Network.	0 Need to travel/for transport minimised by virtue of being located adjacent to junction 42. For waste development more sustainable transport modes would be rail or river / barge. Rail transport considered unviable / unfeasible given scale of proposals (relatively small) so unlikely to be used. Nearest railway sidings are 2.9 miles away but lie in an area which is proposed for redevelopment thus their future is unclear. Further, highways and traffic impact of getting waste to sidings from site would need to be considered. Also, would need to be established with rail operator whether rail transport was possible (Network Rail response to SCC re Energy from Waste proposal suggests not). No scope for transport by river / barge.	-2 Non-conforming – unallocated 'countryside' site without planning permission.	-1 Land is grades 2 and 3 thus is what is considered "best and most versatile agricultural land. However most of the land surrounding Bury St Edmunds falls into this category leaving little or no scope for finding a suitable site on land of poorer quality.	-1 Majority of site lies in Groundwater Source Protection Zone 2 (Outer Zone) and Groundwater Vulnerability Zone "Major Aquifer High". However, given nature of use proposed water pollution is unlikely. This position is supported by Planning for Waste Management Facilities ODPM 2004	+2 Groundsure report indicates site is unlikely to be at risk from ground instability (see Appendix K).	-1 Desk based assessment: site is located in countryside but not far from edge of settlement. Described as 'Plateau Estate Farmlands' in SCC Landscape Character map. Not within or adjacent to national or local landscape designations and sensitivity of landscape receptor is considered medium. The impact and magnitude of effects would depend on design and mitigation measures but could be medium so net impact on landscape may be considered 'medium'.	-2 Desk based assessment: extensive views in and out and topography (site is on relatively high ground, much of it at 55m+) means the site is exposed, particularly from A14 but also from other viewpoints including residential. Transient views (from roads) are considered 'moderately sensitive' to change but awarded -2 overall owing to wide extent of viewpoints affected.	-1 Site is within the SSSI impact risk zone relating to Breckland Farmland SSSI and Breckland SPA (its lies approx. 2.9km away). Natural England would need to be consulted on any proposals through the planning process. Hyde Wood ancient woodland is located to the north - the site falls just outside its 500m buffer zone. There are records of a number of protected and notable species associated with the A14 junction and adjacent railway corridor. A14 corridor east of the junction is designated local wildlife site. The site comprises arable land. Existing landscape features include hedgerows which in this context are important for habitat connectivity.	+2 Site not close to any geological SSSIs, Regionally Important Geodiversity sites or County geo sites (potential RIGS).	-1 No listed buildings etc nearby. Site is of archaeological potential. It is in a location that is topographically favourable for early occupation. There is a cropmark of a ring ditch – most likely a prehistoric burial monument – recorded within the site itself (RBY 025). A further ring ditch is recorded to the west (FAS 023). Roman finds are recorded in the County Historic Environment Record to the northwest of the site and an Anglo-Saxon find spot to the southwest (FAS 016) may be indicative of further activity in the area. High potential for important archaeological remains to be defined at this location.	+1 Main source of emissions likely to be HGVs (Planning for Waste Management Facilities ODPM 2004). Site is 400m from nearest sensitive receptor. However, site lies 290m from area reserved for re-location of West Suffolk Hospital within Bury Vision 2031 concept layout for west Bury St Edmunds strategic allocation (Policy BV5), albeit on the other side of the A14. Site is also 790m from area of lower density housing shown on concept layout for Bury Vision 2031 North-West Bury St Edmunds strategic allocation (Policy BV3). No sensitive receptors on route from site to A14. Nearest sensitive receptor to route is 385m away. Route (Tut Hill and road to Risby) does not involve major roads and increase in traffic may be significant).	+1 Nearest sensitive receptor (residential) is 400m away. Nearest downwind sensitive receptor (residential) is 400m away (NNE direction. Howard and Mildenhall estates are closest concentrations of sensitive receptors – edge of housing area is 1.2km from site and is east and ENE of it. However, edge of area of lower density housing shown on concept layout for Bury Vision 2031 North-West Bury St Edmunds strategic allocation (Policy BV3) is 790m away in a NE direction. Putrescible/municipal waste will be removed from site as quickly as possible. Waste will be handled within building with fast acting doors. Misting sprays are proposed to help control any odours should they arise.	+1 Site is 400m from nearest sensitive receptor. However, site lies 290m from area reserved for re-location of West Suffolk Hospital within Bury Vision 2031 concept layout for west Bury St Edmunds strategic allocation (Policy BV5), albeit on the other side of the A14. Site is also 790m from area of lower density housing shown on concept layout for Bury Vision 2031 North-West Bury St Edmunds strategic allocation (Policy BV3). Putrescible/municipal waste will be removed from site as quickly as possible. Waste will be handled within building with fast acting doors. Misting sprays are proposed to help control any odours should they arise.	+1 Site is 400m from nearest sensitive receptor. However, site lies 290m from area reserved for re-location of West Suffolk Hospital within Bury Vision 2031 concept layout for west Bury St Edmunds strategic allocation (Policy BV5), albeit on the other side of the A14. Site is also 790m from area of lower density housing shown on concept layout for Bury Vision 2031 North-West Bury St Edmunds strategic allocation (Policy BV3). Possible impact on nearest sensitive receptors from activities on site and traffic. However, this is likely to be minimal given distance from site. Main route for traffic from site is 385m from nearest sensitive receptor but route has moderate usage at present so increase in noise and vibration may be perceptible. However, part of route (Tut Hill) likely to get significantly busier as a result of Bury Vision 2031 North-West Bury St Edmunds strategic allocation (Policy BV3) on which work has commenced. (See two columns to left re proximity of downwind sensitive receptors where for the same distance from the site the noise impact has the potential to be greater for the majority of the time).	-2 Desk based assessment: site not intrinsically dark but existing light sources are mostly urban background and somewhat distant. Additions in this area would be noticeable.	0 Site potentially quite exposed from west (assuming development would be situated at eastern end of site). Existing landscaping on other boundaries has potential to reduce wind speed and limit escape of litter. Relative visibility of site means impact of any litter created likely to be higher. Proposed development would include significant boundary planting which will help to further control escape of litter. Other litter control measures also proposed.	+2 Landowner prepared to dispose of the site for depot, waste transfer station and household waste recycling centre uses, i.e. co-located / combined facility.	+1

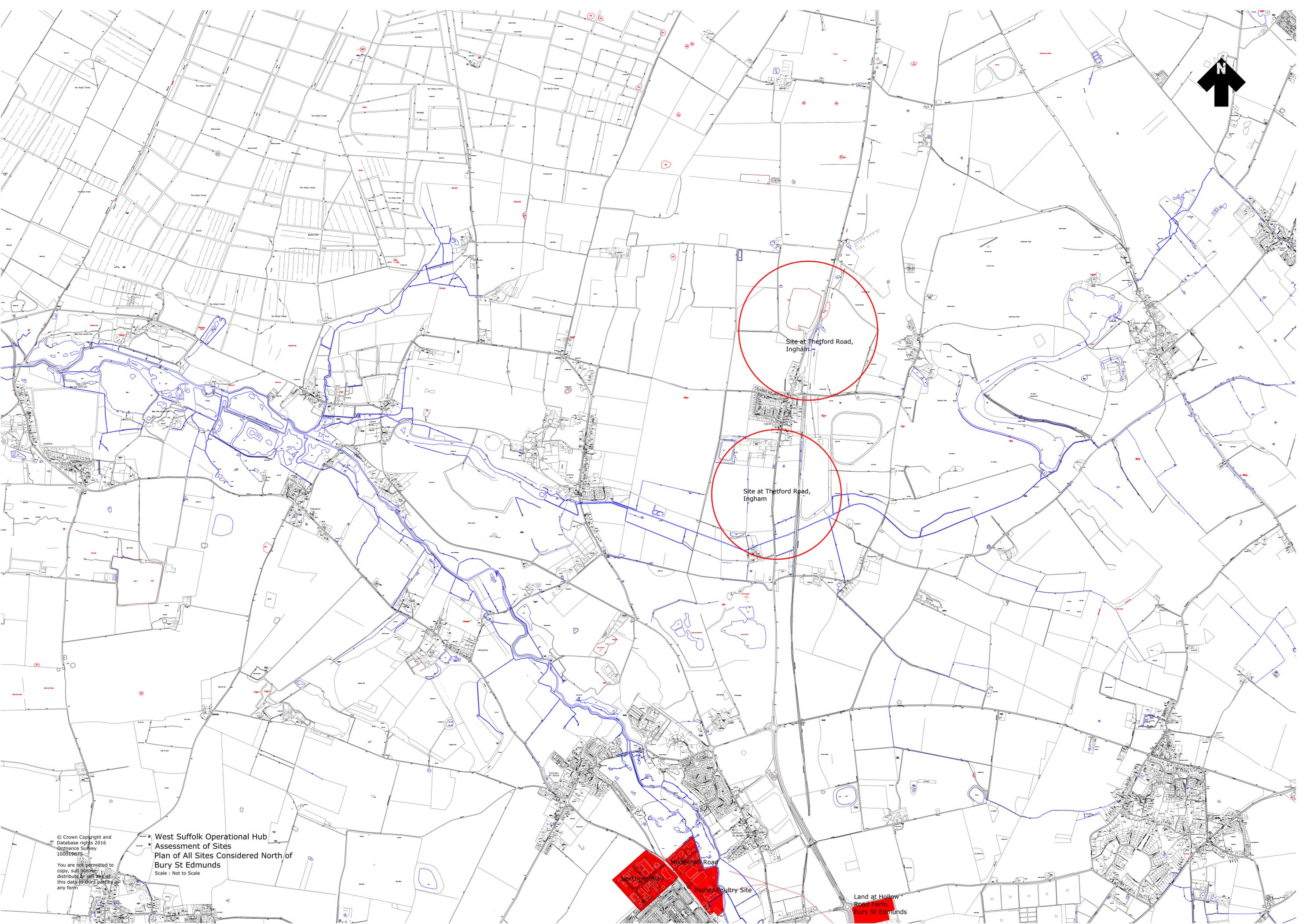
## Appendix C

Plans s showing all sites considered (further plans added)



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West Suffolk Operational Hub  
Assessment of Sites  
Plan of All Sites Considered Bury St Edmunds  
and Surrounding Area  
Scale : Not to Scale



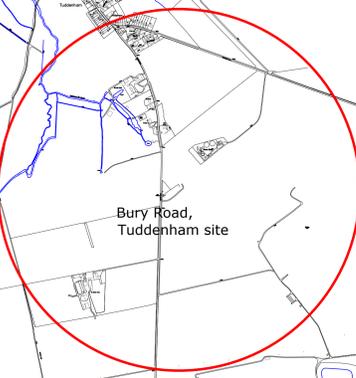
Site at Thetford Road,  
Ingham

Site at Thetford Road,  
Ingham

West Suffolk Operational Hub  
Assessment of Sites  
Plan of All Sites Considered North of  
Bury St Edmunds  
Scale : Not to Scale

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Northern Way  
Middenhall Road  
Pagley Poultry Site  
Land at Hollow  
Road Farm,  
Bury St Edmunds



Bury Road,  
Tuddenham site

AJN Steelstock Site, Icknield  
Way, Kentford, Newmarket

Former Little Chef Site  
North of A14 Near  
Kentford

Former Little Chef Site  
South of A14 Near  
Kentford

Land in the  
Vicinity of  
Junction 40  
A14 Near  
Higham

Land West of  
Symonds Farm,  
Saxham

Land at  
Symonds Farm  
Saxham

Old  
Saxham  
Railway  
Station

Field between Westley  
Roundabout and  
Saxham Business Park

Land South of West Suffolk Crematorium,  
Bury St Edmunds

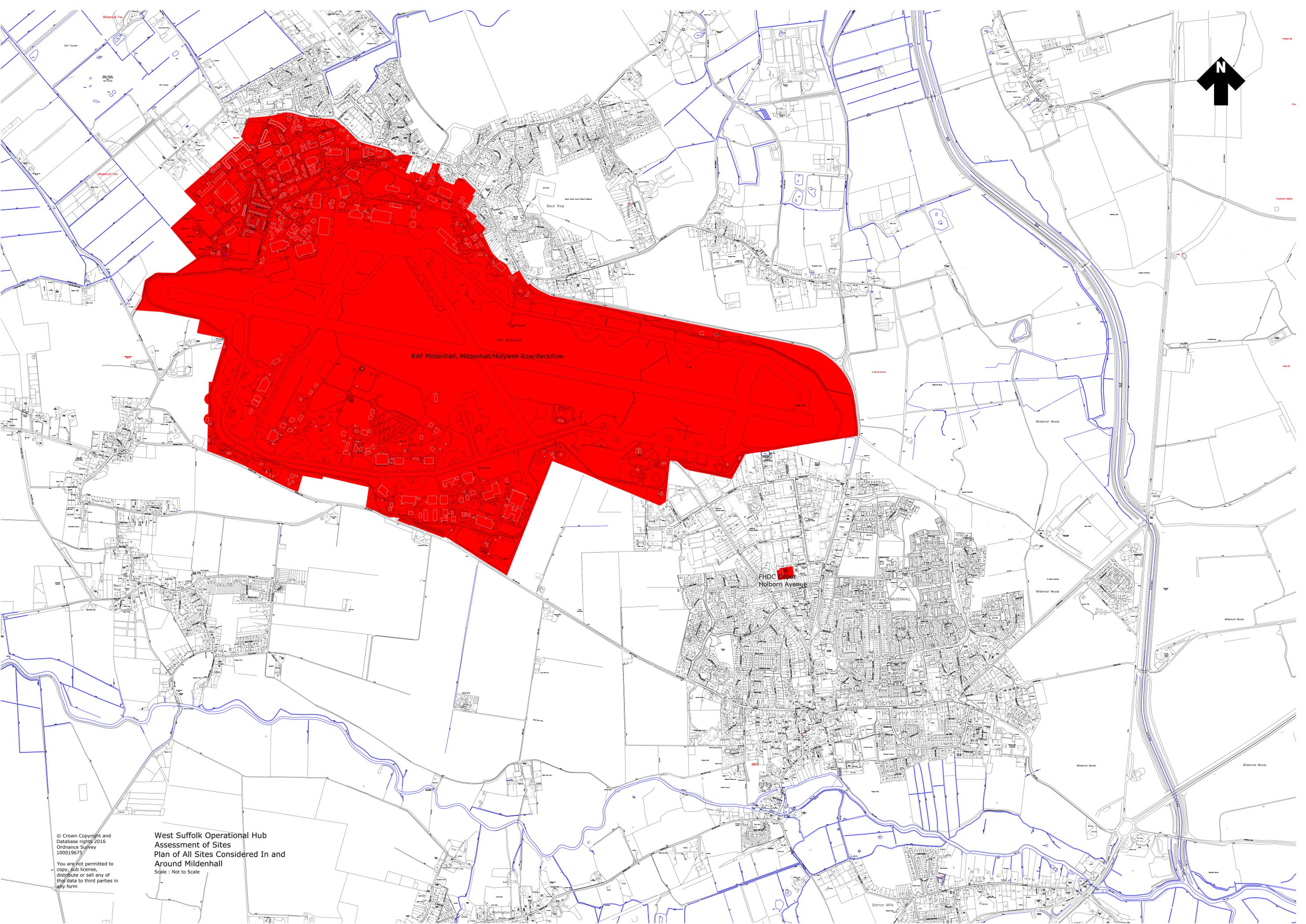
Land at Tut Hill,  
Bury St Edmunds

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West Suffolk Operational Hub  
Assessment of Sites  
Plan of All Sites Considered West of  
Bury St Edmunds  
Scale: Not to Scale

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Western Way



RAF Mildenhall, Mildenhall/Holywell-Row/BeckRow

FHDC Depot  
Holborn Avenue



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Plan of All Sites Considered In and  
Around Mildenhall  
Scale : Not to Scale