

Updated West Suffolk Operational Hub Frequently Asked Questions (FAQs)

June 2016

Glossary of terms and abbreviations

FHDC	Forest Heath District Council
HWRC	Household Waste Recycling Centre
IAPOS	Identification and Assessment of Potential Options and Sites
Partner councils	Forest Heath District Council St Edmundsbury Borough Council Suffolk County Council
SA	Sustainability Appraisal
SCC	Suffolk County Council
SEBC	St Edmundsbury Borough Council
WSOH	West Suffolk Operational Hub

1) Consultation and public opinion

(Note: the first two questions relate to why the councils carried out the consultation and what information was supplied. Subsequent questions and responses are new, from June 2016).

a) Why did the council carry out a consultation earlier this year?

The partner councils carried out a six-week consultation from 8 January to 19 February 2016. The aims were as follows.

1. To put information into the public domain for scrutiny and comment which explained how and why the partner councils decided to:
 - a) propose to combine their facilities on to one site (a West Suffolk Operational Hub); and
 - b) how they originally concluded that Hollow Road Farm, on the northern outskirts of Bury St Edmunds, was the most suitable location.
2. To invite comments on two documents - the Identification and Assessment of Potential Options and Sites Report and the Sustainability Appraisal.

3. To answer these questions and provide comments:
- Do you agree or disagree that bringing the facilities to a single site (Option 4) is the best option?
 - We would like your views on whether you think we have the right criteria for assessing the sites and whether you think there are other criteria we should be using to assess sites.
 - Do you know of any other sites we should consider?
 - We would welcome your views on the Sustainability Appraisal.

b) What information was made available?

- 1) [Identification and Assessment of Potential Options and Sites Report \(IAPOS Report\) \(December 2015\)](#): This report and its appendices include the criteria and assessments used to (a) determine that bringing together waste management services on to a single site is the most beneficial course of action for West Suffolk; and (b) an appropriate site for that co-location.
- 2) [Sustainability Appraisal \(December 2015\)](#): A Sustainability Appraisal was undertaken to test (a) if a single site approach is the most sustainable option; and (b) if the site which was identified as an appropriate site through the site selection process (Hollow Road Farm) was the most sustainable.

c) What responses did you get to the consultation?

- 551 unique responses (557 in total but four were duplicates and two were blank).
- 382 separate issues were raised.
- 48% of those responding disagreed that a single site for all the facilities (option 4) was the best option.
- 35% agreed that option 4 was the best option.
- Some respondents raised issues with the criteria and way the sites were assessed (top issues raised were about potential traffic impacts near Hollow Road Farm and opposition to use of greenfield land).
- 33 sites were suggested (seven had already been assessed previously and six were discarded due to them being imprecise or readily apparent as unsuitable).
- Full details are in the [WSOH Consultation Report](#).

d) What did you do with the consultation responses?

- We published a [Preliminary Consultation Report](#) in April 2016 in which set out all the submissions from people taking part in the consultation.
- We spent three months considering all the responses.
- The 20 eligible sites put forward through the consultation were considered carefully through the exclusionary and qualitative review process

([exclusionary criteria](#) were about service delivery matters – was the site big enough, for example, while [qualitative criteria](#) looked at things such as how close a site was to homes, roads or the impact on biodiversity).

- Following the consultation feedback an additional criterion, looking at the [impact of traffic pressure](#) for each of the options, was added to help further assessment.
- The options assessment was re-run to take account of the new traffic criterion.
- Following assessment against the exclusionary criteria, five sites (Hollow Road Farm and Tut Hill plus three new sites, land south of the McCrae Estates land between the River Lark and A14, land between Rougham Hill, A14 and Rushbrooke Lane and land south of the West Suffolk Crematorium) went through to further assessment (qualitative criteria), which looked at factors such as distance from homes, local road network, impact on the landscape, heritage, and air quality.
- Hollow Road Farm received the highest score, with land south of the crematorium next and then Tut Hill.

e) Why have you have ignored our comments and objections to Hollow Road Farm being the preferred site, such as traffic issues, proximity to housing, pollution, smells and so on?

We haven't ignored any comments, objections or opinions. After the first consultation and public response in 2015, the Council made a commitment to:

1. de-select Hollow Road Farm as its preferred option;
2. put all the information it had that suggested a hub was the best option and Hollow Road Farm was the best site out into the public domain for further public consultation; and
3. through that further consultation, encourage the public to suggest any alternative sites the councils should consider.

We have read and responded to (through the Final Consultation Report), but not necessarily agreed with, every submission. During the consultation period we opened up our background papers and wiped the slate clean. We said that we would carefully consider every point made by the public and every new location suggested and true to our word that is exactly what we have done.

Our responses show where some of the issues have already been answered in the IAPOS report or Sustainability Appraisal A (such as proximity to housing and smells) while others, such as traffic, cannot be answered until we have formal approval to go ahead with a specific site. At that point detailed traffic assessments and other required studies would be submitted as part of the planning application.

The Cabinet papers report that when all the new locations are run past the revised criteria the Hollow Road Farm site still comes out best by quite a long way.

f) You have already paid a deposit on the land at Hollow Road Farm so despite the majority of responses being against this site wasn't it always going to be the favoured site?

In February 2015 a number of sites were assessed, leading to Hollow Road Farm being identified as the most suitable location for a shared facility. A land option was agreed with the owner to secure the price should proposed development be approved. This is standard business practice which stops the price rising (if a planning application is successful, for example). If another site had been assessed as being made more favourable we would have looked to get a land option for that site as well but Hollow Road Farm has consistently, through assessment against 28 different criteria, come out as being the best site.

2) Planning issues

a) Why is SEBC making the planning decision and not SCC, who decided the Rougham Hill application?

Following legal advice, SCC took the decision about the Waste Transfer Station at Rougham Hill (as it was the planning authority for matters relating to waste) under the Town and Planning Act. The transfer station is not the largest element of the WSOH – the combination of depot, workshops, offices and so on would be greater – so it is the borough council which is the Local Planning Authority with primary responsibility.

b) But SEBC is the planning authority so aren't you bound to approve it?

As SEBC is the Local Planning Authority it must follow regulations and processes set out in planning law because applications must be determined on legal grounds. The Development Control Committee is independent of the rest of the council's functions and its councillors must weigh all the facts before taking the decision.

c) If the Development Control Committee gives approval, is that it or is there another step?

The Secretary of State for Communities and Local Government can choose to call in a planning application to see whether he or she would wish to take a decision on it.

d) Household Waste Recycling Centres often have queues at peak times – how would you stop people queuing dangerously on the roads around Hollow Road Farm?

A site on any location would be designed to contain queuing within the site and not on local roads. The exact details of how that would be managed, along with how the whole site would be managed, would be submitted as part of a planning application. We have noted the importance the public attaches to this issue and will give it serious consideration in the site design and ensure that it is addressed in any planning application in future.

e) Why not choose a site where the waste can be moved by rail instead of lots of trucks on the roads, especially as the Great Blakenham Energy from waste plant is next to the railway?

Suffolk County Council carried out a detailed assessment of the rail network when it was looked to build the EfW in Great Blakenham. An information bulletin setting out their findings is at:

http://committeeminutes.suffolkcc.gov.uk/LoadDocument.aspx?rID=0900271181137870&qry=c_committee%7e%7eScrutiny+Committee

The amount of waste going into a waste transfer station at Bury St Edmunds would not be enough to justify moving by rail, taking into account construction costs of sidings (both in Bury and at Great Blakenham where the facilities to enable transportation of waste by rail do not exist). The distance to be travelled – 24 miles from Bury to Great Blakenham does not make that cost viable. However, it is not simply about cost – the SCC investigation concluded: ‘. . . there was no guarantee that use of the busy main line or other track lines could be secured and if its use was secured it is likely it would be restricted to the least busy periods which would probably mean waste unloading operations having to be undertaken during periods that make the facility a bad neighbour.’

There are more details in [appendix L](#) of the IAPOS (amended June 2016) report.

3) Sites

a) Have traffic assessments to measure the impact on Hollow Road Farm been carried out at this point, taking account of the sugar beet traffic, for example?

When we carried out the second consultation earlier in 2016 we said that we would not have a preferred site and stopped any further work on Hollow Road Farm. We did not want to invest in further work if a better site was put forward during the consultation. If the councils agree to progress with the WSOH project at Hollow Road Farm then a full planning application would be developed. This

would need to include a detailed Transport Assessment, which would take into account a range of highways issues, including potential impacts on local traffic.

b) There are concerns about the traffic impact of having all three facilities on a single site – especially all the HWRC traffic – and about the dangers of mixing cars with large lorries – isn't that a reason for keeping them separate?

The potential traffic impacts have been assessed and we believe that with the right mitigation we can minimise impacts. However, there would need to be a full transport assessment as part of any planning application if the councils give the go-ahead to the WSOH project. That is when all the detail about the potential impacts and how they could be managed, including safety of all users, would be available.

c) What process did you go through to identify Hollow Road Farm as the most suitable site?

Having identified the best option to deliver services, the partner councils moved on to look for the most suitable site. Potential sites were originally identified and tested against criteria to determine whether they would be able to host a WSOH, and which would be the best site to take forward.

This assessment happened in the following stages.

1. 16 existing waste sites and industrial/brownfield sites were identified and assessed against a range of simple pass/fail tests considered vital for the delivery of a WSOH.
2. 15 of the sites failed on the important 'site shape and size' criteria. The remaining site failed on two criteria based on location.
3. As none of the sites above passed the tests, three greenfield sites were assessed against the same criteria. These were Tut Hill, Hollow Road Farm and Symonds Farm.
4. Symonds Farm failed the proximity criteria due to its location being too far from Bury St Edmunds
5. This left two remaining sites, which were then assessed against more detailed criteria to determine which would be the most suitable to take forward.
6. The results of this assessment of the two remaining sites (Tut Hill and Hollow Road Farm), found that Hollow Road Farm was the better of the two for delivering a WSOH.

Since that original decision, a further 20 potential sites were identified through the consultation process. Each of those went through the assessment process with the result that land south of the West Suffolk Crematorium (north of the A14) scored higher than Tut Hill but still considerably less than Hollow Road Farm (+1 against HRF's +7).

Full details of how the assessments were made and the criteria used to assess sites are in [Chapter 6 of the IAPOS \(amended June 2016\)](#) report.

d) Why have you rejected keeping the Rougham Hill HWRC site – especially as the savings difference between the two is so small?

We came to the view that the Household Waste Recycling Centre should move on the following grounds.

1. It is cheaper therefore better for the tax payer.
2. The new Household Waste Recycling Centre will be improved to include split level provision and a re-use shop giving a better service to the public.
3. Co-location is better operationally making the service simpler to run and opening up the opportunity for future savings which we have not quantified at this point.
4. We know that the number of households in Bury is set to grow and the new site will allow us to future proof for this eventuality. If we stay in the same location we will face future costs to make the site suitable for the greater volume of waste arising from more households.

Previous West Suffolk Operational Hub FAQs

From January 2016

(Note: these FAQs were developed specifically for the Jan/February 2016 consultation and that references to documents relate to those published in January 2016.)

West Suffolk Operational Hub (WSOH) project

Why do the partner councils believe a single WSOH is a good idea?

Suffolk County Council is establishing a new long-term network of waste transfer stations, close to major centres of population and waste arisings.

St Edmundsbury Borough Council is looking to replace its ageing Bury St Edmunds depot for its waste and street cleansing fleet.

St Edmundsbury and Forest Heath District Council work together and operate the waste collection service in partnership across West Suffolk.

A shared hub provides an opportunity to bring waste transfer and waste collection together on the same site to reduce costs, increase efficiency and reduce the impact on the road network, cut carbon and improve the environmental performance of buildings. It would also release sites in Bury St Edmunds and Mildenhall for other uses.

What would be included at a WSOH?

A WSOH would deliver:

- a new depot for vehicle storage and maintenance;
- offices and facilities for the waste management teams and operational staff;

- a new centrally-located waste transfer station near Bury St Edmunds, where household waste collections are consolidated before being sent to the Materials Recycling Facility or the Energy from Waste facility at Great Blakenham; and
- a new Household Waste Recycling Centre (HWRC) for public use (replacing the one at Rougham Hill).

Why is it important to have all that on one site when they are currently operating well at different locations?

Planning for waste services needs to happen over the long term. Our communities are growing and some of our sites are already at capacity. Some of our facilities are also old and inefficient.

Combining facilities on a new single site allows operations to share facilities and potentially come together in a combined structure. It also reduces the number of property assets we need to maintain and releases them for other purposes.

Our research has also shown that combining facilities on a single site, close to Bury St Edmunds where the majority of West Suffolk's waste is produced, reduces waste miles which over the long term delivers substantial savings.

Sites

What are the 'other sites' which could be released for development?

The St Edmundsbury Western Way vehicle depot in Bury St Edmunds would close and all services would move if a suitable site for a WSOH is found. A masterplan currently exists for the Western Way site and a consultation about a revised masterplan is due to be carried out in early 2016. ***(June 2016 NOTE: [The revised Western Way masterplan](#) has now been approved by St Edmundsbury Borough Council and implementing it would require the depot to move.)***

The Forest Heath Holborn Avenue vehicle depot in Mildenhall would close with most services moving to a shared hub site.

The new waste transfer station would accept waste and recyclables, currently taken to private sector sites at Red Lodge and Thetford. Once bulked into larger vehicles it would be taken to a recycling facility or the energy from waste plant at Great Blakenham, or to green waste processing sites.

The current Rougham Hill household waste recycling centre would close and relocate to a WSOH. There are no plans to reduce the number of household waste recycling centres.

Are there any other sites like the suggested WSOH in operation elsewhere?

Examples include:

Ellesemere Port, Cheshire:

<http://hesimm.co.uk/sectors/ellesemere-port/>

Southwark, London

<http://www.veolia.co.uk/southwark/integrated-waste-management-facility/integrated-waste-management-facility/facility>

Earlswood, Surrey:

<http://www.getsurrey.co.uk/news/local-news/earlswood-recycling-depot-expanded-after-6504987>

<http://www.sitasurrey.co.uk/developments/earlswood-depot-and-materials-bulking-facility/site-design>

Kelso, Scottish Borders:

<http://www.itv.com/news/border/update/2014-11-11/work-beings-on-1-8million-facility-in-kelso/>

Wallyford, East Lothian

<https://www.mclh.co.uk/projects/kinwegar-recycling-centre-waste-transfer-station-wallyford/>

Bridport, Dorset:

<http://realwestdorset.co.uk/2010/08/broomhills-top-choice-for-bridport-waste-station/>

Section 3: Site Assessment

There is a 'size and shape' criteria, how much land is required for a WSOH?

Five hectares of land is required. More details are included in [Appendix G of the IAPOS Report \(December 2015\)](#)

Wouldn't the new extension to Suffolk Business Park be a suitable location for the West Suffolk Operational Hub?

The Suffolk Business Park Extension has been part of the assessment. It did not progress beyond our first 'sift' of sites and locations due to the fact that it is accessed from Junction 45 of the A14. This is too far east to gain some of the efficiencies we are seeking; for example it would lead to an additional bin round (£165,000 per annum for vehicle and staff) than a site which would access the A14 via Junction 43.

The councils have paid money to the owners of the land at Hollow Road Farm– does this mean it's a 'done deal'?

No, it doesn't. The research carried out by the partner councils indicated that Hollow Road Farm was potentially the most suitable site. An option agreement was made with the landowner to give confidence to the councils that they would be able to acquire the necessary land to carry out the development if it gained planning permission. The agreement also secured a price which means the councils can effectively fix the cost of the land.

However, while that option remains in place (as the money has been paid) no planning application has been made. The councils are carrying out this consultation specifically to ask people their views about the research and for suggestions for potential alternative sites which the public may believe would be more suitable than Hollow Road Farm.

If Hollow Road Farm is still the 'best performing option' why is it no longer the 'preferred site'?

In advance of submitting a planning application for the Hollow Road Farm site we carried out a pre-application consultation (this is in addition to the formal consultation that would take place once a planning application is submitted). That consultation showed there were concerns among local communities so we agreed to ask people to scrutinise our research and give them the opportunity to comment on it. Whilst we believe the research shows Hollow Road Farm is the most suitable site we welcome and are open to alternative suggestions and ideas.

Section 4: Other sites

A site selection process was carried out in 2012 and Rougham Hill was chosen why isn't that site being used anymore?

At that time Suffolk County Council was looking to create a new waste transfer station and improve the Household Waste Recycling Centre already on site. Discussions with the West Suffolk councils led to further research into the feasibility of combining all the waste management services, including a new fleet depot to replace the two in Bury St Edmunds and Mildenhall. Having assessed that option and agreed it would be a good idea, the councils then needed to find a new site because Rougham Hill is not large enough to accommodate all three service delivery functions

What will happen to the Rougham Hill HWRC if a WSOH were delivered?

It will move to the new WSOH, wherever that is located.

What happens to the existing waste transfer sites?

The waste transfer sites that are currently used are provided by commercial waste management companies and also accept waste from other sources. It is for the companies that own and operate these sites to confirm their future plans.

Section 5: Managing a WSOH

What facilities and operations will be located at the site?

A waste and street services depot. This is effectively a building containing a vehicle workshop to maintain our fleet along with offices for administration of the function and staff welfare facilities.

A waste transfer station. This is an industrial style building where waste and recyclable material is deposited within segregated bays to be loaded into large vehicles for transportation to processing sites elsewhere.

A household waste recycling centre. This will be similar to the current facility at Rougham Hill in Bury would mean we can have a modern, purpose built HWRC making reuse and recycling even easier when you visit.

Will there be smells come from any site that has so much rubbish going through its gates?

Most material, including all the black bin waste collected from households, will be stored within the enclosed waste transfer station building and removed from site regularly. Effective measures to control smells operate in all modern transfer station buildings such as fast acting doors, de-odourising sprays and specialist ventilation.

How would you stop pests, rats and other vermin, and birds being attracted to the site (and any properties nearby)?

Modern waste transfer stations are enclosed industrial buildings where waste is removed from site regularly. Effective measures to control vermin, birds and smells operate in all modern transfer station buildings.

Concerns about birds, including seagulls, will be further addressed by ensuring that the design of buildings on the whole site, and materials used, act as a deterrent to nesting.

Would there be noise from the site?

It is expected that construction of a WSOH would take around 12 months, so there would be some construction noise during that time. This would be controlled through conditions attached to any planning permission for the site.

Once in operation there would be some low levels of noise, mainly from vehicles moving around the site. The design will include features which minimises vehicle movement and incorporates screening. A noise assessment will be carried out to support the planning application for any site. If the assessment identifies that noise mitigation measures are required to make the development acceptable these measures would be incorporated into the design of the facility. Overall noise levels have to be maintained within guidelines.

A WSOH could potentially operate at night– how would you manage noise and lighting at night?

Although possible, the need to work at night (after 10pm and before 6am) would be rare. However, 24/7 consent would provide some flexibility if we ever needed a small overnight operation sometime in the future.

The household waste recycling centre would only be open to the public during the advertised hours, and in daylight only for health and safety reasons.

Other parts of the site would require lighting. This will be designed to minimise light spillage from the site and will be switched off when not required.

Wouldn't the site create litter and lead to fly tipping?

Good management processes would limit litter – these would include netting lorries taking recycling or rubbish away from the site and ensuring that vehicles are cleaned down effectively. In addition, the Environmental Permit for a site will require the site to be properly managed. If any littering or fly tipping occurs a team would be sent out to pick it up.

If there are houses nearby would any consideration be given to the impact on house prices?

The effect of development and proposed development on property prices is not a material consideration in planning decisions so cannot be taken into account by those deciding whether or not to grant planning permission.

How would the environmental impact of any site be considered?

The partner councils will need to find out whether an Environmental Impact Assessment Screening Opinion is needed for a potential site. This determines whether a proposal is likely to have a significant effect on the local environment and therefore whether it requires an Environmental Statement to be submitted in support of a planning application.

If an application does require an assessment there is a prescribed process which has to be followed. If an Environmental Impact Assessment is not required then a site's environmental impact would be considered through a number of different assessments which will be submitted with any planning application, and reviewed by the local planning authority as decision maker. These assessments may include:

- an ecological assessment
- a landscape and visual impact assessment
- a noise assessment
- a land contamination assessment.

Other types of assessment may also be required.

What kind of mitigation measures can be put in place to reduce the impact of a WSOH?

Depending on location, the facility may be screened to minimise any visual impact.

A noise assessment will be carried out to support the planning application for any site. There will be some noise from the vehicles moving around the site so the overall facility design will include measures like screening to keep the impact to a minimum.

Modern waste transfer stations are enclosed industrial buildings where waste is removed from site regularly. Effective measures to control vermin, birds and smells operate in all modern transfer station buildings.

Traffic impact will be assessed as part of any planning application.

Have you considered the extra distance some people will have to travel to the new Household Waste Recycling Centre? Do you think this might cause a fall in recycling rates?

While it's true some people may need to travel further to their HWRC, equally there will be others who will be closer to it. All users will find additional facilities on a modern, purpose built HWRC making reuse and recycling even easier.

How will the traffic be affected by so many services being used on one site?

Traffic impact will be assessed as part of any planning application. It is not possible to say at this stage what any impact might be until the location is decided.

Section 6: Responses to questions from the public consultation meeting on 29 January 2016 that were not answered at the time.

[Public meeting presentation](#)

During the assessment has a projection been made of the number of traffic movements into the site at Hollow Road Farm?

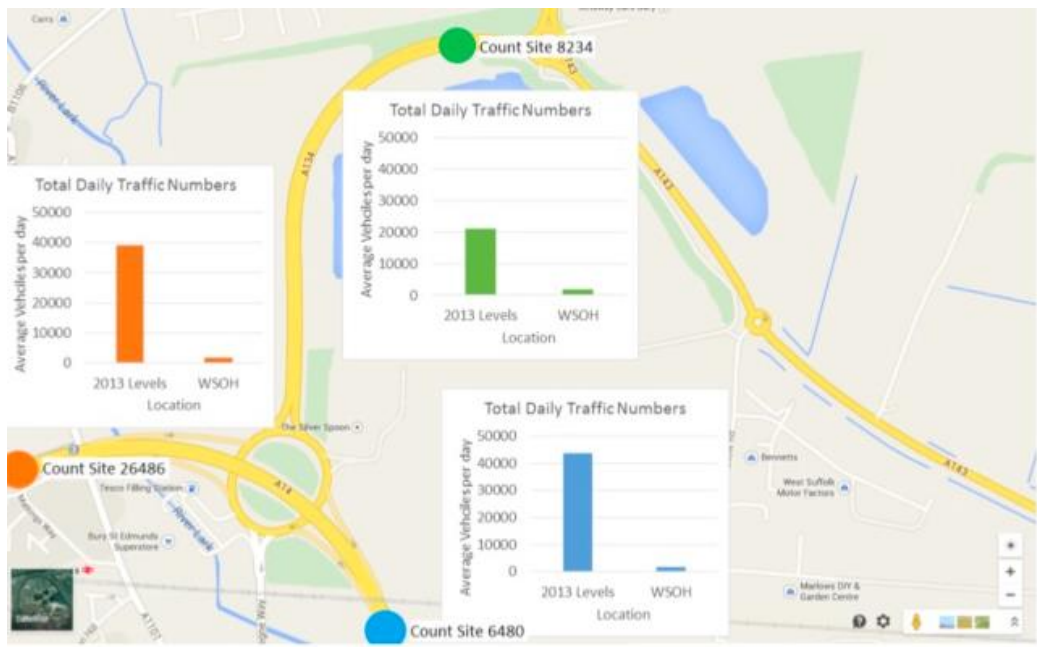
A [vehicle movement table](#) estimates the numbers using an operational hub site (wherever that site is located). The HWRC vehicle numbers are an average of weekday and weekend traffic. The table reflects Monday to Friday operational vehicle movements (weekends will be significantly lower for all but the HWRC traffic). Most of the LGV (Large Goods Vehicle) movements on and off site are outside of peak traffic periods.

In relation to traffic movements, can you provide a map which identifies the roads where there would be an increase in traffic movements, especially refuse freighters?

No, because any such map would relate to a specific site and at this stage no site has been selected. Maps, as part of fully detailed traffic studies, would need to be submitted as part of any planning application (which would include an eight-week public consultation period). Traffic information collected so far is incomplete.

Quoting 900 traffic movements a day is meaningless – how many vehicle movements a day would be using the dual carriageway between the sugar beet roundabout (A14 Junction 43) and the Barton Hill roundabout?

This will depend upon the location of the site selected. Up-to-date data on traffic movements would be collected as part of any planning application. The graphic below uses traffic count numbers from 2013 and estimated levels of WSOH traffic based on the [vehicle movement table](#) for the roads that were identified in the question.



A traffic study was undertaken on Barton Hill – when will the results of this study be published?

The traffic study was part of a wider piece of work specifically relating to Hollow Road Farm. This work was not completed following the decision to step back, look at all sites again and consider any viable alternatives. Please see response to Question 2 about traffic studies.

How many taxis currently go to Western Way for their MoT tests as part of the requirement for their licences?

On average we have eight a day.

The financial data so far has been very poor and not very useful. What is the full financial information so people can make their own decisions? Is there more information on the financial model used, the financial gain and costs for locating all of the operations on to one site?

The financial background to the need for a waste transfer station near Bury St Edmunds is included in the business case which was developed for the Energy from Waste facility at Great Blakenham. That business case showed a reduction in residual waste disposal costs of waste around £8 million a year. We know bringing facilities together will reduce costs for waste collection as well as disposal (reducing the energy, staff and fuel costs are obvious ones, for example if we have one site instead of three). Capital would also be released by freeing up sites which would no longer be needed (which could help with construction

costs) as well as savings from not needing to invest in maintaining and modernizing current sites. All of this would be taken into account in developing a business case for an operational hub once we decide on a site (because some of those costs are dependent on factors such as mileage, for example, and cost of construction).

There is confusion and conflicting information over whether green waste would be taken on to a hub site. Will green waste be taken to the site?

Currently, garden waste collected from household brown bins is delivered directly to the site where it is composted – there are no current plans to use the hub site to transfer the waste collected from brown bins. Bearing in mind the lifetime of an operational hub is at least 25 years, changes such as contractual arrangements or legislation for garden waste may mean the hub would need to be used for onward transfer of brown bin garden waste. Street sweepings, HWRC garden waste and material from our own grounds maintenance (grass cuttings from the green spaces we maintain, for example) may be taken to the hub site for onward transfer.

The Household Waste Recycling Centre will receive garden waste. Composting will not take place at a hub site

How much money has the Government given you for this project and will you lose it if it's not completed within a certain timeframe?

As part of a wider Norfolk/Suffolk submission, the Government's [One Public Estate Programme](#) (a Government commitment to release the value of public sector land and property) awarded £20,000 through the Transformation Challenge Award, which included funding for the hub project. There is no time limit on spending the money and no specific funding has been allocated to the project as yet.