



# West Suffolk Operation Hub

## **Consultation Report**

**Prepared by Copper Consultancy Limited for the West Suffolk councils (Forest Heath District Council and St Edmundsbury Borough Council) and Suffolk County Council**

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# 1. Introduction

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The West Suffolk Operational Hub (WSOH) is a proposal by the West Suffolk councils (Forest Heath District Council and St Edmundsbury Borough Council) and Suffolk County Council (the 'partner councils') to relocate a number of waste management and operational facilities to a single site in order to increase efficiency, save money and future-proof waste management for West Suffolk's communities.

This Consultation Report has been prepared to report back on the second round of consultation on the project. This consultation was held in order to scrutinise the work that has been carried out to date.

A first round of consultation was carried out in spring 2015. That consultation was held on a specific preferred site for a WSOH, Hollow Road Farm. As well as receiving significant amounts of feedback about the site proposals itself, many people expressed a concern that the site specific proposals were being presented prematurely and there were also comments that the whole of West Suffolk should have been consulted on the approach of the project (co-locating facilities to a new site) as well as the possible sites for a new facility.

The Public Consultation Plan, published in December 2015, set out the position regarding the second stage of consultation in response to the feedback received:

*This method of consultation is not usually needed to support a proposal of this type, however, your councils wanted to ensure everyone has the opportunity to scrutinise the process so that the most suitable site for a WSOH can be identified. In addition, your councils want to offer everyone an opportunity to suggest alternative sites for consideration.*

This report covers the findings of the consultation including a summary of all the relevant issues that were raised during the consultation and how the partner councils have considered those issues. This Consultation Report has been drafted to help inform the partner councils' decision-making as well as to report back to those who contributed to the consultation on the issues raised, and how they have been considered. This Consultation Report has not been prepared specifically to support a planning application nor has it been prepared to set out the partner councils' next steps for the project.

## 2. Background

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### Project

The West Suffolk Operational Hub proposal is the result of planning for future waste management and operational facilities in the Forest Heath and St Edmundsbury council areas of Suffolk, specifically waste transfer stations, household waste recycling centres and fleet depots.

A number of factors have led to a review by the West Suffolk councils (as the waste collection authority) and Suffolk County Council (as waste disposal authority) of the way in which these facilities and operations are currently delivered and what requirements are needed for the future. Factors such as the need to manage the number of lorry movements on Suffolk's roads in order to increase operational efficiency and to reduce environmental and financial costs, Government initiatives to bring together public services and the opportunities to redevelop existing sites have been of particular influence.

Suffolk County Council and the West Suffolk councils started working together in 2014 to explore the possibility of bringing their facilities together on to one site – co-location. The work carried out indicated that co-location would be advantageous and the councils started to look for possible sites.

Nineteen possible sites were identified. Assessment of these sites indicated that land at Hollow Road Farm on the northern outskirts of Bury St Edmunds might be suitable. The councils subsequently started work on the preparation of a planning application and held a pre-planning public consultation.

The consultation (held in spring 2015) generated a significant amount of local interest with a number of objections, comments and questions. One of the key concerns was the suggestion that Hollow Road Farm was not the optimal site for the co-located facilities. Other responses suggested that the facilities would be better provided from their existing or separate sites.

In response to the feedback the councils decided to combine their assessments of the options and potential sites for the delivery of waste and operations facilities in a publicly available document and that a second consultation would be undertaken.

The second round of public consultation was approved by the partner councils in June 2015. Following this decision, the consultation was run from 8 January 2016 to 19 February 2016. This Consultation Report outlines the findings of this second round of public consultation.

## 3. Consultation approach

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### Lessons learned

During the consultation in spring 2015, feedback was received about the process used to select Hollow Road Farm as a preferred site. Respondents felt that it was unfair to select the site without having consulted on either the options for delivering waste services in West Suffolk in the future or potential alternative sites.

Multiple respondents and stakeholders stated that the process for consultation on a joint operational hub should be similar to that held for the St Edmundsbury Borough Council's Vision 2031, the adopted Local Plan. That consultation was a major, multi-site consultation on the future of the area for the next decade and a half. As such, that level of consultation was considered inappropriate for a site specific project such as the WSOH.

However, the partner councils recognised that wider consultation would benefit the project and should borrow the best practice principles of other planning processes (such as Vision 2031 and Nationally Significant Infrastructure Projects) where possible.

Lessons learned from the first stage of consultation were:

- While impossible to undo work that had already been undertaken, the second consultation should allow scrutiny and comment on the work used to determine the WSOH as the partner councils' preferred option.
- Acknowledgement that Hollow Road Farm could not be considered the 'preferred site' until the site assessment process was scrutinised and people given the opportunity to introduce new potential sites, which the partner councils may not have been aware of.
- As such, consultation needed to be with the whole of West Suffolk, not just the areas surrounding Hollow Road Farm.
- As much information should be provided as is realistically possible without compromising necessarily confidential information or carrying out time consuming and expensive studies on multiple sites.

### Methodology

Following the decision made by the partner councils to consult again, a number of choices were made about the consultation to ensure that it responded to the feedback from the first consultation in a positive manner. The decisions about the second stage of consultation were:

- It would consult on the five options the partner councils considered for the future of waste services in West Suffolk:
  - Option 1: do nothing
  - Option 2: implement Rougham Hill (which has planning permission for waste transfer site alongside the existing Household Waste Recycling Centre), otherwise do nothing
  - Option 3: implement Rougham Hill and merge depots
  - Option 4: co-locate all facilities
  - Option 5: co-locate a waste transfer station and depots, leave HWRC at Rougham Hill
- It would not be site specific, but would instead provide the information used to assess sites to date.

- In keeping with its non-site specific nature, the consultation would be open to the whole of West Suffolk.
- the preparatory work used in decision making to date would be made available for public scrutiny, with the exception of confidential information.

It was decided that the partner councils would publish details of how they intended to consult in advance of the consultation period starting. This approach increases the transparency around consultations, helping ensure that all those with an interest have an equal opportunity to engage during the consultation period.

The decision was also made not to pre-emptively set out the timeline of the partner councils' future decision making process following the completion of the consultation. This was to enable flexibility to appropriately respond to the level and detail of feedback received. As set out above, scrutiny was encouraged on every element of the project and there was also a call for sites. The partner councils wanted to ensure that they had the time to consider comments on the process followed and investigate new sites thoroughly before deciding on the next steps.

### **The Public Consultation Plan**

In December 2015, a 'Public Consultation Plan' (PCP) was published. The PCP set out how the partner councils intended to carry out the second consultation. This process of publishing a document setting out how consultation would be carried out has been borrowed from the process required for Nationally Significant Infrastructure Projects under the Planning Act 2008.

This process is designed to be transparent and fair, ensuring that consultation is carried out in line with a known set of principles. After considering the feedback from the first stage of consultation, the partner councils felt that whilst consultation on this scale was not mandatory for a project of this scale, they would follow it to inform the methodology.

The PCP was approved by the partner councils and published in December 2015. The published PCP can be found in Appendix 1.

### **Approach to feedback collection**

In order to encourage as much feedback as possible to the consultation, the partner councils ensured that there were a number of channels available for people to return their feedback. These channels were detailed in the PCP, on the project website and in the Consultation Summary Booklet.

- The project website hosted an online version of the feedback form that was optimised to work on desktops and laptops, as well as tablets and smartphones. Over half of the feedback received was through this channel (44% on desktop or laptop, 11% on tablet and 3% on smartphone).
- The project has also maintained a dedicated project email address to which people were encouraged to send any further feedback. 12% of responses were received via this email address.
- A printed version of the feedback form was made available at the public exhibitions, the public meeting and on request. The completed forms were collected either at the public exhibitions themselves or posted to West Suffolk House. Over a fifth of responses were received through this channel (21%).
- In addition to the printed feedback forms, letters were also sent to West Suffolk House, making up 10% of the feedback received.

## Issues

Consideration was given to how the feedback form should be structured. As set out above, one of the consultation's goals was to give people the opportunity to scrutinise all of the documentation and the feedback form was designed to facilitate that goal. To do this, the feedback form was structured into four distinct sections as follows:

1. The first section of the feedback form focused on the assessment of options that led to the selection of Option 4 (see page 5) as the partner councils' preferred choice. This section had the only 'closed' question on the feedback form, where respondents were asked "Do you agree or disagree that bringing the facilities listed above to a single site is the best option?".

Respondents were then encouraged to give their views on the process used to determine the best option, whether they felt any options had been missed and whether they thought any other criteria should be used in assessing the options.

2. Following the sequential process used throughout the project, the second section of the form related to the assessment of sites on the basis of the partner councils' decision to progress with Option 4, a WSOH. Each of the 19 assessed sites were listed on the feedback form and respondents were encouraged to give their views on whether they felt the right criteria had been chosen, whether any criteria were missed, and whether they felt the criteria has been correctly applied for each site.
3. Section three of the feedback form was set aside purely for alternative site suggestions for consideration. Respondents were asked to provide as many details about alternative sites as possible.
4. Finally, section four of the form focused on the Sustainability Appraisal. Respondents were asked whether they thought the Appraisal missed any issues, whether there were any other sites that should have been covered from a sustainability point of view, and for their views of the process followed and its conclusions.

Against each of the sections on the feedback form, an open box was given for comment. The partner councils appreciated that the background to the consultation meant that inviting open comment would be more effective than multiple closed questions.

The level and details of the feedback received clearly demonstrated that communities have engaged with this process and scrutinised the information in great detail.

A copy of the feedback form can be found in Appendix 3.



## 4. Consultation activity

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### Public Engagement

As set out in the Public Consultation Plan, the consultation period was promoted through a number of different activities designed to engage the whole of West Suffolk.

- Flyers – An A5 flyer was distributed over two weeks from 4 January 2016 by West Suffolk’s waste collection crews. The collection crews placed the flyers prominently during their normal collection routes. Collection crews were also briefed about the project and the consultation so that they could answer basic questions if necessary. A copy of the flyer can be found in Appendix 2.
- Press releases – West Suffolk promoted the consultation through its normal news and social media channels. This included a press release issued on 8 January 2016. A copy of the press releases can be found in Appendix 2.
- Press coverage – The consultation was covered by local and regional print and broadcast media. Copies of this coverage can be found in Appendix 2.
- Advertisement – A newspaper advertisement was placed in the Bury Free Press on 8 January 2016. Copies of the advertisement can be found in Appendix 2.
- Community representatives – All county, district and borough councillors within the West Suffolk area were sent letters with information about the consultation. In addition, all the parish councils and Members of Parliament in West Suffolk were also sent information. A copy of the letter can be found in Appendix 2.

Social media activity – The partner councils promoted the consultation through its existing social media channels. There were three posts on the councils’ Facebook pages, at the start of consultation on 8 January, one on 9 February and another on 15 February to say ‘deadline tonight’ – these had a combined total of 38 shares and a total reach of up to 5184 people. The councils also tweeted throughout the consultation (17 tweets – combined total of 12,143 impressions and 85 engagements) to remind people of the various consultation events.

### Information availability

The following documents were made available for the consultation:

**Consultation Summary Booklet:** This provided a summary of the WSOH project and the two technical documents referred to below. It was designed to provide a non-technical overview of the information, as well as to direct people to where more specific information could be found within each technical document. 1,500 printed Consultation Summary Booklets were produced and made available at the information points and events listed below. It was also available online at [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh).

**Identification and Assessment of Potential Options and Sites Report (IAPOS Report):** This report and its appendices included the criteria and assessments that were used to (a) determine that co-

locating the previously mentioned services to a single site was the most beneficial course of action for West Suffolk; and (b) the most suitable site for that co-location.

**Sustainability Appraisal:** 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 the most suitable through the site selection process (Hollow Road Farm) was the most sustainable.

All of the information was presented for scrutiny. It was also made clear that should other sites be suggested during the consultation and then taken through the site selection assessment process, revisions would be made to the IAPOS and Sustainability Appraisal.

From the start of the consultation period, 8 January 2016, information was made available on the project’s dedicated webpage: [www.westsuffolk.gov.uk/bins/wsoh](http://www.westsuffolk.gov.uk/bins/wsoh). The webpage was updated during the consultation in response to a concern raised about one of the maps prepared for the consultation, this is covered in more detail in the section on maps on page 10.

Copies of the IAPOS report, Sustainability Appraisal and the PCP were available at a series of ‘information points’ throughout the consultation, at the venues’ normal opening hours. In addition, paper copies of the Consultation Summary Booklet, the feedback form and copies of the IAPOS report and Sustainability Appraisals on CD were available at the information points to take away.

The information points were:

- The Apex, Charter Square, Bury St Edmunds
- The Library, Sergeants Walk, Bury St Edmunds
- West Suffolk House, Western Way, Bury St Edmunds
- Haverhill House, Lower Downs Slade, Haverhill
- District Council Offices, College Heath Road, Mildenhall
- The Library, The Guineas, Newmarket.

### Public Exhibitions

Three exhibitions were held during the first few weeks of the consultation. These dates were chosen to allow time for people to find out about the consultation through promotional activities but also early enough to give people time to consider their feedback after attending an event.

The exhibitions were held at a variety of times to be flexible in enabling as many people as possible to attend.

Location	Date	Time	Attendance
<b>Unitarian Meeting House, Churchgate Street, Bury St Edmunds</b>	Friday 15 January 2016	2.30pm to 6pm	55
<b>The Apex, Charter Square, Bury St Edmunds</b>	Saturday 16 January 2016	10am to 1pm	116
<b>St John’s Centre, St John’s Street, Bury St Edmunds</b>	Tuesday 19 January 2016	4pm to 8pm	46

## Public meeting

A public meeting was also held during the consultation. The meeting consisted of a presentation and an opportunity to ask further questions. The meeting was independently chaired by Brian Parry from the Consultation Institute.

The meeting was held at 7pm on Friday 29 January 2016 at the Athenaeum in Bury St Edmunds. The details of the meeting were included in the published PCP.

Over 200 members of the public attended the event and the questions asked during the event were fed into the issues summaries included later in this report. Minutes of the meeting have been published on the project's dedicated webpage.

## Updates to materials

### Maps

During the consultation period feedback was received about one of the illustrative maps included as part of the Consultation Summary Booklet and exhibition boards to provide context. The concern was that the map, which showed the indicative locations of the site locations, did not depict in full detail a section of residential properties on Barton Hill or the entirety of Barton Road in the same way that the detailed site maps provided in the IAPOS and Sustainability Appraisal did.

Once this was raised, clarification was provided by uploading a more detailed map on the project website and using this in the exhibition material for the final two consultation events.

### Frequently Asked Questions (FAQs)

As well as the consultation materials the project's dedicated webpage had a number of FAQs and responses. These were updated during the consultation period as issues were raised. The FAQs covered:

- The consultation process and how to take part
- Information about the WSOH project (and similar projects elsewhere in the country)
- The process used to initially identify the Hollow Road Farm site
- The Rougham Hill site (which has planning permission for a waste transfer station as well as new Household Waste and Recycling Centre)
- How an operational hub would be managed
- Responses to questions raised (and which were not answered) at the public meeting.

## 5. Feedback from public consultation

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This chapter of the report sets out the findings from consultation with the public, including the methodology used to assess the feedback text received. Separate consultation was also undertaken with statutory bodies, this is reported in chapter 6 of this report.

### Summary of findings

Feedback was collected through a number of different channels including an online feedback form, dedicated email address, and paper feedback forms and letters.

The level of information and detail in the feedback received clearly demonstrates that the majority of those who chose to engage with the consultation spent considerable time and effort in scrutinising the material available and in developing their responses.

Format	Number	Percent
Online – PC/laptop	243	44%
Online – Tablet	61	11%
Online – Smartphone	15	3%
Paper feedback forms	117	21%
Paper letters	56	10%
Emails	65	12%
<b>Total</b>	<b>557</b>	

A total of 557 items of feedback were received. Four of these were duplicate responses submitted and two were completely blank; leading to a total of 551 unique responses. From those responses, 382 individual issues were raised. A number of those issues themselves contain sub-issues.

This incorporated an approximate 145,000 words of feedback. Based on the online forms submitted, the average time spent completing the feedback form was 28 minutes.

Topic	Number of issues raised
Options assessment	55
Site assessment	171
Site suggestion	48
Sustainability appraisal	37
Consultation process	35
Other	36

In order to check how people chose to engage with the consultation, the feedback form asked which documents the respondent had read. The results of this were as follows:

Document	Number reported reading	Percent of those returning forms
<b>Flyer</b>	353	82%
<b>Consultation Summary Booklet</b>	356	82%
<b>IAPOS Report</b>	269	62%
<b>Sustainability Appraisal</b>	243	56%

It is clear from this response that the majority of people who chose to engage with the consultation read the Consultation Summary Booklet as a minimum. A significant proportion also read one or both technical documents. This clearly demonstrates that the consultation’s goal of encouraging people to scrutinise the detailed documentation was successful.

### Question 1

Section 1 of the Feedback Form included the only closed question of the consultation. This was “Do you agree or disagree that bringing the facilities listed above to a single site is the best option [of the five presented]?” For reference, the five options are set out on page 5 of this report.

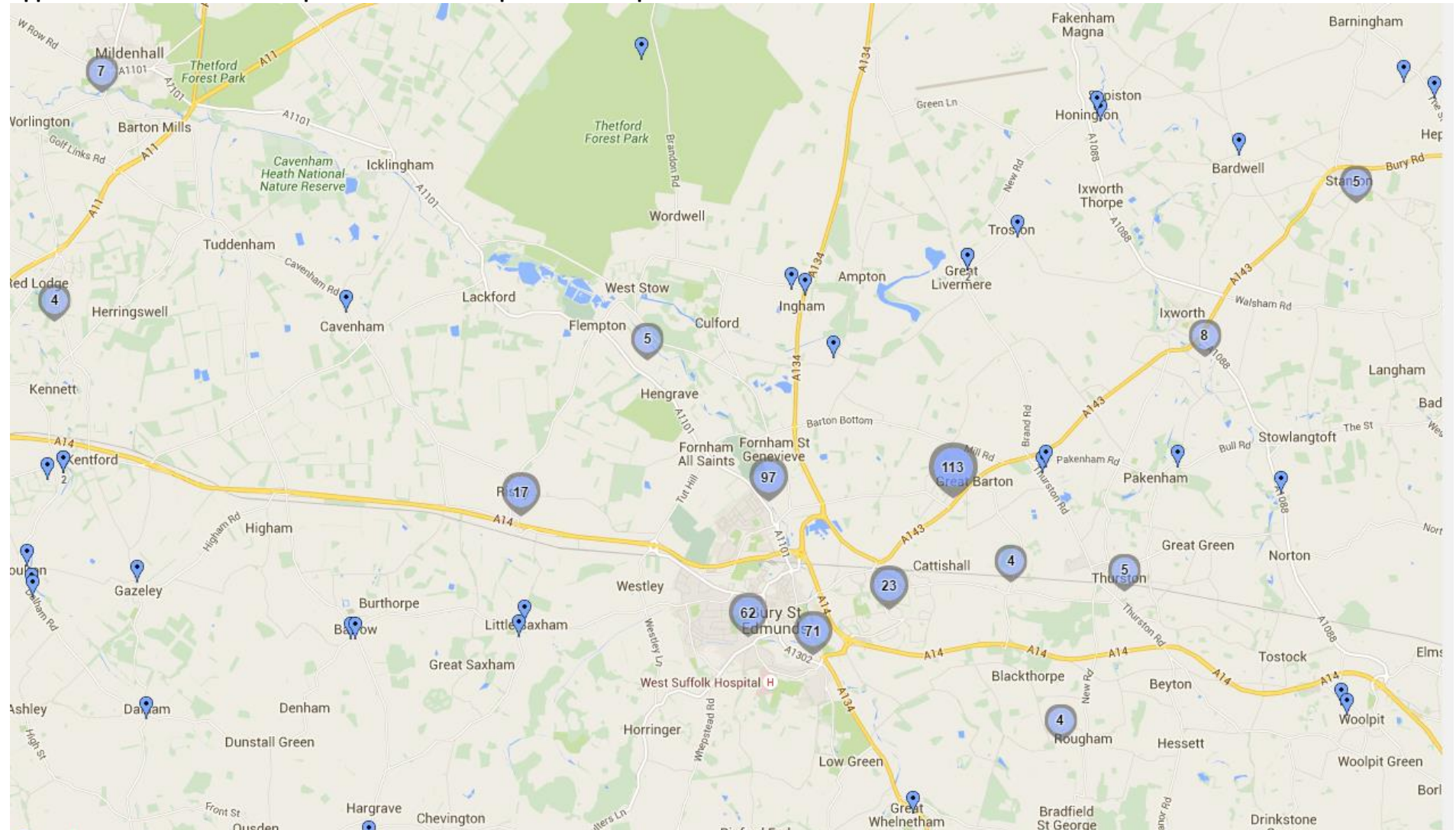
Just less than half of respondents disagreed with the decision (48%) and just over a third agreed with it (35%); a smaller number of people said that they didn’t know (5%) or they didn’t leave an answer (12%).

Question 1		%
Agree	194	35%
Disagree	266	48%
Don't know	26	5%
No answer	65	12%
<b>Total</b>	<b>551</b>	<i>(rounded)</i>

### Maps

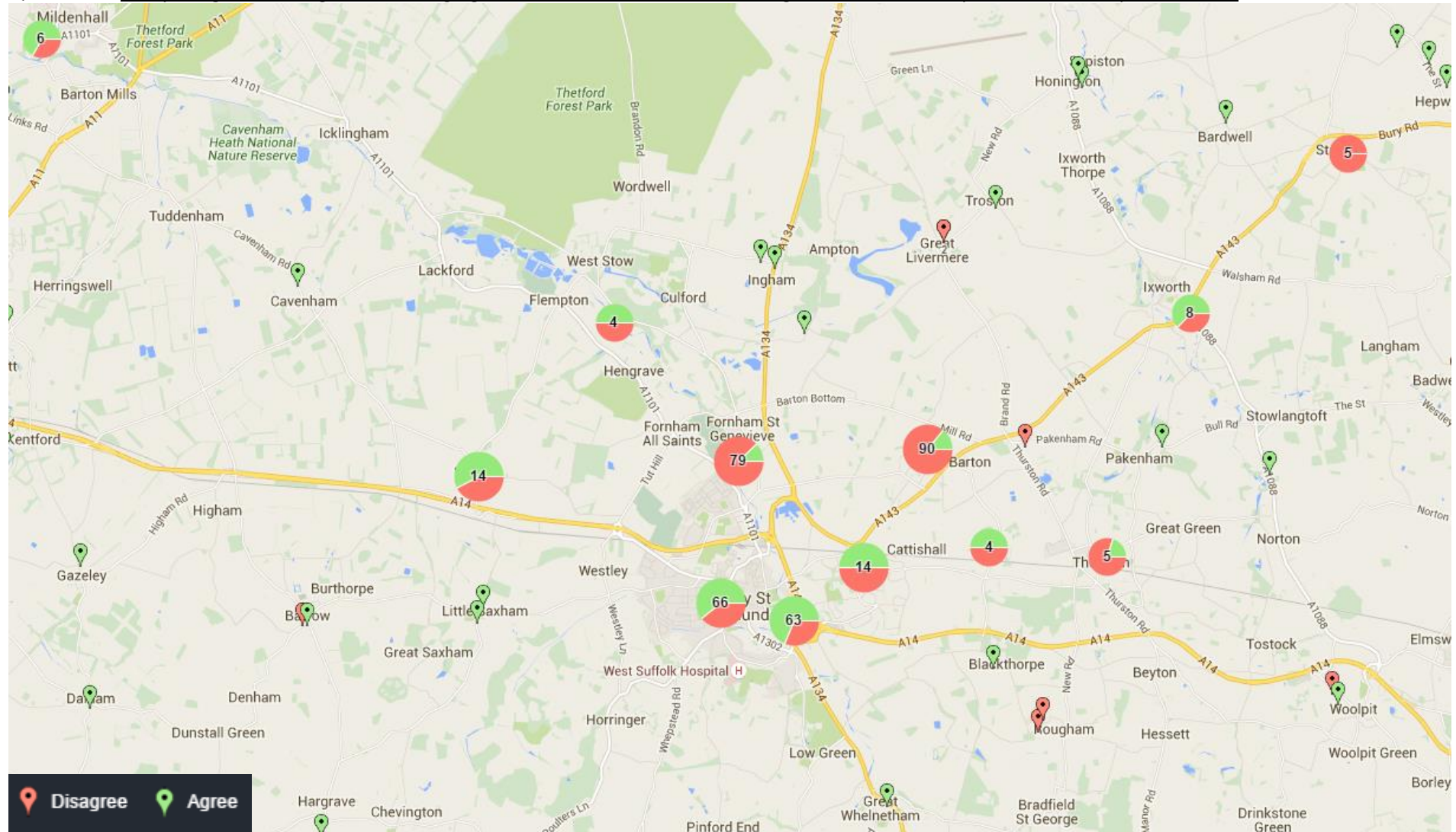
Presented on the following pages are maps that show the approximate geographic distribution of respondents to the consultation, and responses to Question 1. These maps do not show every postcode from which a response was recorded as the map was kept to a larger scale to enable clarity. The majority of responses, however, did come from within the area shown on these maps

### Approximate distribution of responses based on the postcode data provided



Map based on the postcode data that was provided. A number of postcodes outside the area shown have been excluded to enable a clearer map; approximately 88% of responses that included postcodes are mapped on the above (457 postcodes mapped).

**Question 1: “Do you agree or disagree that bringing the facilities listed above to a single site is the best option [of the five presented]?”**



Map based on the postcode data that was provided. A number of postcodes outside the area shown have been excluded to enable a clearer map; approximately 83% of responses agreeing or disagreeing that also provided a postcode (386 responses mapped).

## Approach to analysis

In keeping with the approach taken to the rest of the consultation, the feedback received has been analysed in a transparent manner.

In order to capture each relevant issue, the following process has been used:

1. A piece of feedback is reviewed in its entirety. The matters identified within the feedback are summarised and listed, with due care being taken to ensure specific details are retained where appropriate.
2. When reviewing a piece of feedback, if an issue has already been listed from earlier feedback it is recorded that the issue was mentioned again.
3. Any variations to the previously listed issue have been incorporated into an updated summarisation where possible.
4. Where highly detailed points have been made, rather than attempt summarisation, these are referenced back to the feedback itself.
5. This process creates a thorough list of summarised issues along with a tally of how many times it has been raised.

Following this summarisation process, the project team of staff from the partner councils has reviewed each individual issue, referring back to the original feedback where necessary.

It is important to note that as with any analysis of text-based feedback, there is likely to be difference of opinion on how certain elements are interpreted or summarised. As such, the tally of how many times issues have occurred during feedback should be taken as a guide to how common they were, not an exact figure.

## Feedback – introduction

Below, each of the issues identified in the process laid out above has been detailed along with the number of times it has been mentioned and how the partner councils have considered or responded to it.

How the partner councils have responded to each issue falls into a number of broad categories:

- Some issues have already been covered by existing work. Where this is the case, the table sets out what this information is and how it addresses the issue.
- Some issues have led to additional work being carried out. Where this is the case, the additional work and its conclusions have been set out in the table.
- Some issues will require additional work to be carried out but are prohibitively expensive or time consuming to carry out before the creation of this report. For example, certain detailed surveying work on every identified and suggested site would cost a disproportionate amount of money compared to the clarity the work would bring to decisions making. Alternatively, the additional work may be something the partner councils wish to carry out but that will take a long period of time. Where this is the case, it has been set out in the table.



The format of the issues tables are as follows:

#	Comment	Number	Response
The issue's unique reference number.	The summarisation of the comment or issue identified in feedback.	The number of times this issue has been identified in all feedback. Where the same point has been made several times in the same piece of feedback, the duplicates have not been captured.	Details of the partner councils' consideration of, and response to, the issue.

#### List of Abbreviations Used in Tables:

BSE	Bury St. Edmunds
EfW	Energy from Waste facility (at Great Blakenham, near Ipswich)
FAQs	Frequently Asked Questions, published 12 <sup>th</sup> February 2016 – Appendix 4
F2N	Felixstowe to Nuneaton Rail Project
FHDC	Forest Heath District Council
FRA	Flood Risk Assessment
HGV	Heavy Goods Vehicle
HRF	Hollow Road Farm
HWRC	Household Waste Recycling Centre
IAPOS	Identification and Assessment of Potential Options and Sites Report
MDH	Mildenhall
NPPF	National Planning Policy Framework – <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf</a>
NPPfW	National Planning Policy for Waste – <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf</a>
OPE	One Public Estate
PV	Photo Voltaic
RH	Rougham Hill
SA	Sustainability Appraisal
SCC	Suffolk County Council
SEBC	St Edmundsbury Bourough Council
SF	Symonds Farm
SUDS	Sustainable Urban Drainage Solutions
WSOH	West Suffolk Operational Hub
TH	Tut Hill
WTS	Waste Transfer Station

## Feedback – Section one: Assessment of options

#	Comment	Number	Response Forest Heath District Council, St. Edmundsbury Borough Council, Suffolk County Council
011	Concern regarding the closure of Mildenhall (MDH) and Haverhill as a household usable site. Concern regarding impact on fly-tipping due to increased travel time to access a site. Suggestion that Mildenhall should be upgraded. Linked criticism that the project centralises all of West Suffolk's HWRCs. Specific concern that vehicles from these sites have not been considered at the WSOH, because they were closing.	14	<p>There are no plans to close Mildenhall or Haverhill HWRCs. The partner councils apologise for any unintentional confusion which may have resulted from the leaflet distributed to households.</p> <p>Plans to upgrade Mildenhall HWRC are already underway.</p>
013	<p>Opposition to Option 4.</p> <p>Reasons include;</p> <ul style="list-style-type: none"> <li>- that two centres (predominantly a HWRC on one site, and a waste depot and WTS on the other) should be the approach and opposition to a single site approach</li> <li>- other options would have less impact on communities, help spread out traffic and reduce the risk of accidents on site / that a single site would be a very large industrial area</li> <li>- that the case has not been made for a combined hub</li> <li>- that very few councils combine public recycling centres with bulk waste transfer.</li> <li>- that there is no obvious need for offices on site</li> <li>- that each element of the proposals have different, mutually exclusive requirements</li> <li>- that the option is only being carried forward by momentum</li> <li>- reference to successful sites at March and Thetford.</li> </ul>	97	<p>The Options Assessment has been reviewed in the light of the feedback concerning the two centre/two site approach. The partner councils have concluded from their review:-</p> <p><u>Impact on communities</u></p> <p>This is already considered in the options assessment through the existing criteria (page 50 of the IAPOS), specifically:</p> <ul style="list-style-type: none"> <li>• proximity of sites to sensitive receptors</li> <li>• access/highways/transport</li> </ul> <p>It is the partners' view that the assessment of the options against these criteria covers this matter. Impact on communities is also addressed as part of the sites assessment process (see criteria in Chapter 6). The planning application process for any scheme which is progressed would provide further opportunities to review this issue.</p> <p><u>The case for a combined hub</u></p> <p>The case for the combined hub is set out in Chapter 5 and Appendix A of the IAPOS report via the detail in the options</p>

			<p>assessment process which the councils undertook in order to enable them to identify the best option for meeting their waste and operational needs. This concluded that the combined hub approach would be the best solution.</p> <p>A financial summary that compares options 4 and 5 is set out in demonstrates that over the medium to long term, there is a financial advantage in co-locating facilities based upon savings to the annual revenue costs. There are also a number of other advantages through combining these facilities:-</p> <ul style="list-style-type: none"> <li>• More efficient use of land with the flexibility for future growth within the defined site area, if required;</li> <li>• more opportunities in the future for joint operations and management;</li> <li>• for the Bury St Edmunds area to have a new HWRC with better public facilities (level access and with a reuse shop);</li> <li>• the potential for co-located operations to work more effectively and efficiently out of usual working hours (for example, double shift, weekends) through the site being open longer to service the HWRC;</li> <li>• access to a weighbridge on site;</li> <li>• improved administrative and operational support to the HWRC on site; and</li> <li>• given future uncertainties, greater potential to meet changing demand through combining resources.</li> </ul> <p>The objectives driving the assessment of options for delivery are set out in section 5.4 of the IAPOS report.</p>
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		<p><u>Combining household waste and recycling with bulk waste transfer</u></p> <p>There are examples of combining household waste and recycling with bulk waste transfer in the previously published Frequently Asked Questions (see page 6 of the FAQs). With closer working between councils and as other councils' facilities age it is increasingly likely that they will consider similar approaches. Good design and management of facilities support this approach.</p> <p><u>Onsite offices</u></p> <p>The proposed offices are an integral part of the operational arrangements. They are necessary to support the councils' waste management, markets, landscapes and fleet management operations and need to be at the same place as the depot rather than located elsewhere. They also provide welfare facilities for staff working across the site and for those working out in the community to return to.</p> <p><u>Requirements of various elements of proposed hub</u></p> <p>There is considerable overlap and numerous connections between the three elements of the proposed combined hub (waste transfer station, household waste recycling centre and depot). The connections include:</p> <ul style="list-style-type: none"> <li>• the refuse collection vehicles based at the depot visiting the Waste Transfer Station;</li> <li>• the depot and Waste Transfer Station handling similar materials which can be more efficiently handled together on a single site;</li> <li>• Shared staff between facilities and shared management arrangements across the site.</li> </ul> <p>The overlap and connections is a key reason for co-locating them. The assessments so far, including the technical advice received, have indicated that the requirements of the three elements are not mutually exclusive.</p>
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			<p><u>Project momentum</u> The project's momentum has been changeable. The project was all but halted following the first public consultation while the councils went away to formalise their work up to that point (through the IAPOS report). The IAPOS report confirmed that the councils' assessment of options and sites was robust and reliable and, as a result, the project gathered momentum again. It is the formalisation of the councils' assessment which has afforded it the confidence to proceed and has therefore generated the current momentum, not the other way round.</p> <p><u>Sites at March and Thetford</u> Successful sites at March and Thetford are noted. The proposed HWRC element of the combined hub would include a re-use shop which is a popular facility at the Thetford HWRC.</p>
014	<p>General support for the preferred option and the process used.</p> <p>Reasons include:</p> <ul style="list-style-type: none"> <li>- compliments of the investment in establishing the process</li> <li>- support for the criteria used</li> <li>- support to the ability to easily privatise a single site</li> <li>- the potential ability for heat distribution networks and local electricity generation.</li> </ul> <p>Specific suggestion the case of mileage could have been better made, while still supportive.</p>	86	Noted
032	<p>Criticism of criteria used in deciding on Option 4.</p> <p>Reasons include:</p> <ul style="list-style-type: none"> <li>- scoring system is flawed and/or inherently towards Option 4</li> <li>- that weighting system should have been applied (ranking either human and/or financial considerations more highly)</li> </ul>	70	<p>The options assessment and criteria have been reviewed in the light of the comments received which criticise them. The partner councils respond as follows:</p> <p><u>Scoring and weighting</u></p> <ul style="list-style-type: none"> <li>- The scoring system employed for the options and sites</li> </ul>

	<ul style="list-style-type: none"> <li>- that it looks at current options not future options - mention of the Eastern Relief Road being built.</li> <li>- that it relies on subjective assessment</li> <li>- that far more detail needed of financial case including detailed figures (and statement that this was promised last year) and that it was impossible for people to judge the validity of the case without this [this was a major recurrent point]</li> <li>- that financial figures are being intentionally hidden as they disprove the case for Option 4</li> <li>- that there is no evidence of suggested revenue stream</li> <li>- that traffic issues should have been considered at this stage as well as the site assessment (linked to the point that other options disperse traffic better)</li> <li>- the lack of detailed transport figures / assessments</li> <li>- that it should have included greenbelt retention as a criteria.</li> </ul>		<p>assessments is designed to incorporate all of the issues which are important in the consideration of the options and sites. If there is a factor which is material to the consideration of the options or sites which is not addressed, or adequately addressed by another criterion or by other criteria, it has been/will be included as a criterion in its own right. An additional criterion, "Traffic", has been adopted in the options assessment as a result of the consultation feedback received.</p> <ul style="list-style-type: none"> <li>- The aim has been to ensure that the criteria allow as objective an assessment as possible in each case. The scores for each criterion have not been weighted as this would make the process more subjective, possibly significantly so. Other assessments of this nature avoid weighting for the same reason.</li> </ul> <p><u>Current vs future options</u></p> <ul style="list-style-type: none"> <li>- The options and sites assessments are primarily concerned with options and sites which are deliverable in the short term, such is the need for new waste and operational facilities within West Suffolk (see section 3 of the IAPOS report). However, the options and assessments do not necessarily rule out taking a longer term view (e.g. pursuing compulsory purchase). That said, in view of the urgency of the need and the cost and uncertainty associated with longer terms options these do score less positively.</li> </ul> <p><u>Eastern Relief Road</u></p> <ol style="list-style-type: none"> <li>1. This issue affects one location - the Suffolk Business Park.</li> <li>2. The Suffolk Business Park failed the exclusionary assessment on two grounds. The first was on the basis of its "Proximity/relationship to BSE". The second was that a</li> </ol>
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			<p>suitable access could not be provided due to the fact that the Eastern Relief Road had not been delivered.</p> <p>3. Whether or not the delivery of the relief road continues to arrest development at Suffolk Business Park, the site has also been excluded on the basis of the proximity/relationship with BSE criterion because it relies on A14 junction 45 for access (see paragraphs 6.34 and 6.35 of the IAPOS Report (post public consultation amended version)). Not excluding the site on the basis of the non-delivery of the Eastern Relief Road would not have prevented the site from failing the sites exclusionary assessment therefore. Accordingly, the outcome of the assessment would have been the same..</p> <p><u>Subjectivity of assessment</u></p> <ul style="list-style-type: none"> <li>- (see “Scoring and weighting” above)</li> </ul> <p><u>Financial matters</u></p> <ul style="list-style-type: none"> <li>- A financial summary for the project is contained in section 6 of the report to Joint Cabinet on 14 June 2016. The table in figure 3 specifically compares the financial case for option 4 (full WSOH) with option 5 (depot and transfer station only, HWRC remaining at Rougham Hill). This summary clearly shows the differences in revenue savings between the two options as well as the capital costs.</li> </ul> <p><u>Traffic</u></p> <ul style="list-style-type: none"> <li>- The Options Assessment already includes two criteria relating to traffic and transport (“Access / highways / transport” and “Key transport / travel distances” (see page 52 of the IAPOS). These consider factors such as proximity to traffic sensitive receptors, proximity to main road routes (the aim being to minimise traffic</li> </ul>
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			<p>on minor roads) and journey distances between facilities). A further traffic related criterion, "Traffic", has been added as a result of the consultation feedback received. This new criterion seeks to factor-in the effect of concentrating traffic in one location, the likely location and the impact of traffic there, and the effect on vehicle movement numbers as a result of co-locating or not co-locating facilities. The matter of traffic has therefore been thoroughly considered at the options assessment stage.</p> <p><u>Detailed transport figures</u></p> <ul style="list-style-type: none"> <li>- The Options Assessment includes two transport related criteria which deal with proximity to main road routes (the aim being to minimise traffic on minor roads) and the proximity of the three facilities proposed (taking into account the extent to which they are co-located in each of the five options). These criteria adequately assess the transport considerations as far as the consideration of options is considered. Detailed transport assessments are necessarily site specific so could not be carried out as part of the options assessment. (Estimates of vehicle movements associated with an operational hub (co-locating all three facilities proposed) were provided as part of the previously published Frequently Asked Questions – see page 13).</li> </ul> <p><u>Greenbelt retention</u></p> <ol style="list-style-type: none"> <li>1. Greenbelt has a specific meaning relating to preventing development on land surrounding cities to halt urban sprawl. The land in question is not designated greenbelt. In planning terms it would be considered greenfield land and is designated as "countryside" in the development plan.</li> <li>2. The entire sites assessment methodology is based on use of</li> </ol>
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			greenfield land being a last resort. This is why all previously developed sites, existing employment sites and allocated employment sites are considered before any greenfield sites get considered.
047	Suggestion of delaying the decision. Suggestion the British Sugar factory will close soon anyway and that this is a big site. Statement that there is no urgency, allowing for a considered strategic revision.	3	Pages 27 – 30 of the IAPOS report set out the demand factors and timing issues requiring the progression of the scheme in a timely manner. Representatives from the partner councils are in regular contact with British Sugar. They understand investment is taking place and have not been made aware of any plans to close the British Sugar factory.
050	Objection to selected option on grounds of cost. Includes statement that Option 5 is identified as the cheaper option, requiring £2m less investment.	7	<p>In addition to the capital cost there are other economic, social and environmental factors which should be and have been considered in the options assessment. All of the criteria used in the options assessment are important factors in the consideration of which is the most suitable and deliverable option which is why an option should not be selected on the grounds of cost alone. Whilst option 4 does require one-off extra circa £2 million of capital investment over and above option 5, option 4 returns higher yearly revenue savings for the taxpayer.</p> <p>Other benefits of Option 4 above Option 5 are:</p> <ul style="list-style-type: none"> <li>• Given future uncertainties, greater potential to meet changing demand through combining resources;</li> <li>• More efficient use of land with the flexibility to incorporate future growth within the defined site area, if required;</li> <li>• More opportunities in the future for joint operations and management;</li> <li>• Increased capacity to meet future demand from 20% housing growth and mitigate the associated rise in costs;</li> <li>• For the Bury St Edmunds area to have a modern, purpose built HWRC with improved customer experience (level access and with a reuse shop);</li> <li>• The potential for co-located operations to work more effectively and efficiently;</li> </ul>

			<ul style="list-style-type: none"> <li>• Access to a weighbridge on site; and</li> <li>• Improved administrative and operational support for waste services..</li> </ul>
053	Suggestion that investing in existing sites is the best option. Criticism that this has not been considered.	3	<p>The option 1 scenario involves investing in the existing sites and facilities. In the case of the existing depot considerable investment would be required to bring the facility up to an appropriate standard. Investment could also be made at the household waste recycling centre although the facility is already of a good standard. Investment could not be ensured at the existing waste transfer stations however as these are in private ownership. Further, the option 2 scenario considers the possibility of retaining the existing depot sites and the Rougham Hill site. The Rougham Hill site would see significant investment in this scenario in order to allow it to accommodate a waste transfer station and a new household waste recycling centre.</p> <p>The investment in existing sites has therefore been considered. The options assessment considers each of the options (including options 1 and 2) against numerous criteria and shows that other options involving a greater degree of co-location provide a more suitable means of meeting the councils' waste and operational needs.</p>
055	Support for retaining Rougham Hill HWRC.  Specific points include; - that the community should be consulted on its removal and that it is popular and well used today - adding a compactor to the site could increase efficiency and transport waste directly to Great Blakenham - criticism that it is only being closed to facilitate / support developers' wishes - that retaining the site works well with Option 3 and 5.	126	<p>The support for Rougham Hill HWRC and suggestions for improvement are noted. There are no plans or budget to improve the HWRC at Rougham Hill as a standalone centre. The development of RH as a combined HWRC and Waste Transfer Station would result in some improvement to the HWRC, but this would be far more limited than as part of a co-located hub.</p> <p>The waste is already compacted at the Rougham Hill HWRC.</p> <p>The councils are not taking their decisions on the basis of the wishes of developers. The need for new or replacement waste management and operational facilities is set out in Chapter 3 of the</p>

			IAPOS. The report then outlines how potential options and then potential sites were assessed.
059	<p>Support for expanding RH.</p> <p>Reasons include;</p> <ul style="list-style-type: none"> <li>- its location and transport access.</li> <li>- that this has already been approved and is clearly the financially prudent option due to the council's ownership of it</li> <li>- that there are ways of making a WSOH work on the site using split levels</li> <li>- that even if it cannot provide all of the WSOH service, it could provide most of them (fitting with Options 3 and 5)</li> <li>- that there is land to the south east that could be used</li> <li>- the councils expressed this was the best site in 2012</li> <li>- it uses existing brownfield land, which would be policy compliant</li> <li>- that the potential site separation is minimal (200m) and actually helps address safety concerns.</li> </ul> <p>Suggestion the site could include a hybrid reuse shop to recycle goods back to the community and/or involving charities.</p> <p>Specific comment suggesting the investment in new machinery such as rigid trucks and drag trailers, as well as an on site compactor, would allow optimised use and transport to Great Blakenham and Claydon.</p>	173	<p>The reasons outlined for expanding Rougham Hill and suggestions for improvements are noted. They have been considered in the review of the options assessment. In 2012 the proposal was for two operations, waste transfer station and HWRC, on one site. Since then the proposal has been revised to include a waste collection depot, which has updated the financial, physical and location requirements.</p> <p>The conclusion of the options assessment still shows that Option 4 (rather than Options 3 or 5) is the optimal solution.</p> <p>Having two separate sites with a separation of 200m does not provide the same benefits as a co-located site. It would lead to a sub-optimal arrangement for a favoured site which would not be adequate for the optimal solution.</p>
060	Statement that the Councils are taking the 'easy option'.	3	Noted – although the councils have never considered any option to be 'easy'. The process the partner councils have undertaken has been lengthy and has included searching all possible sites, even those unavailable, and considering all options and detailing them for public scrutiny and suggestions.

067	<p>General statements that the rail network should be used or considered at both an options and site level.</p> <p>Reasons including;</p> <ul style="list-style-type: none"> <li>- most efficient way for transferring bulk waste</li> <li>- linked point to the preference for a stand alone WTS</li> <li>- that rail would offset risk of future fuel cost increases and could tie into future regional plans</li> <li>- it provides links to Great Blakenham are necessary for future-proofing.</li> </ul>	44	A new section (Appendix L) has been added to the IAPOS report which addresses matters pertaining to transferring waste by rail.
069	Support for Option 2	1	Noted.
070	Support for Option 3	11	Noted.
071	Support for Option 4.	10	Noted.
072	Support for Option 5	31	Noted.
077	Support for use of greenfield sites. Reasons include: minimising vehicle mileage on rounds and further from populations	3	Noted.
091	Questions about what will happen to the old sites.	2	Sites have the potential to be leased, sold and/or redeveloped. A number of factors will be taken into account, such as the local property market, when deciding what to do with the old sites.
097	Suggestion of facility name "Waste Treatment Station" and statement that the name "operational hub" is inaccurate and misleading. Additional suggestion that the focus on the 'hub' element of the name has biased decision-making.	2	Noted – this is a working title and there are no plans to change the name of the project at this stage as it reflects its operational nature. Waste is not 'treated' at a waste transfer station, it is bulked, put into large vehicles and taken to the Energy from Waste plant or the Material Recovery Facility at Great Blakenham where it is treated through the energy recovery process to generate electricity or separated into fractions of recyclable materials for onward processing.
110	Comment about the "social effect of redundancy of workers - because presumably the consolidation will reduce cost by consolidating work forces too" has not been considered.	1	The proposals suggest a relatively small reduction in staff numbers. Given the project timescales, we are confident that the majority of staff changes can be dealt with through natural staff turnover, redeployment or decreased use of agency staff. The councils have

			faced similar situations for several years as various staffing restructures have taken place and compulsory redundancy is always the last resort after all other options have been carefully considered.
118	Question "Is it necessary?"	1	The partner councils have considered the alternative options and believe this project (specifically Option 4) is necessary – the IAPOS sets out the demand/requirements on pages 27 – 30 'Need'.
151	Comment that Brownfield sites should be used / looked at in more detail even if excluded for size.	28	<p>Minimum site size requirements are set out in Appendix G of the IAPOS report. They have been developed using expert opinion from operators and designers who have experience of delivering these types of facilities.</p> <p>Site size is a fundamental requirement to deliver Option 4 and therefore is an important criterion in the exclusionary sites assessment.</p>
153	Statement that the potential for accidents / safety risks is greater if depots and HWRC are combined primarily from mixing public and HGV movements. Separate sites would be less hazardous.	30	There is no evidence to support this assertion. Safety will be the highest priority in the design and development of any site. Good design and management will enable the segregation of public and HGV movements where this is required.
157	Opposition to the statement "reduce our fuel use by having a single site close to the town with the highest population".	1	A central location for waste management activities and scope for greater route planning and vehicle route optimisation will lead to reduced fuel use. Currently vehicles travel from the town with the greatest population in West Suffolk (Bury St Edmunds) to the west of the county (Red Lodge) and then back again. Having a site close to the town will reduce mileage. The locational requirements for the hub are set out in appendix H of the IAPOS.
159	Support for Option 1	3	Noted.
171	Statement that Option 4 only scores best as Option 5 does not identify where the new waste transfer site would be.	1	The main difference between Options 4 and 5 is the level of co-location and integration (the amount of services and facilities brought together). This is why Option 4 scores better than Option 5. No site is identified for Option 4 in the same way that no site is identified for a new waste transfer site/depot in Option 5.

173	Disagreement with the focus on BSE and implication that all the waste comes from BSE, as the combined population of the other areas is significantly greater, meaning the majority of waste comes from the West.	3	There is no implication that <u>all</u> the waste comes from Bury. However it is the main centre of population and commercial activity in West Suffolk and as a result generates the largest concentration of waste.
176	Question: Will Option 4 give separate access for the public HWRC or would it be safer with Option 5 and leave HWRC at Rougham Hill?	1	There is no evidence to suggest that the waste transfer station and household waste recycling centre cannot be co-located safely or that co-locating them would be any less safe than having separate facilities.  The design of any scheme proposed would need to ensure the safe operation of the facilities/site for all users. Any scheme pursued would have to meet the relevant safety standards for every aspect of the scheme. These will be explored and considered in part through the planning application process if and when a planning application is submitted.
190	Question why it must be located in Bury when it serves other towns? Statement that services shouldn't operate in the towns.	2	The locational requirements for the operational hub (option 4) and reasoning for them are set out in Appendix H of the IAPOS report. Further information on the formulation of the locational requirements for the waste transfer station in particular are explained at paragraphs 3.3 and 3.7 – 3.8 of the IAPOS report.
192	Question: "How many sites have been visited where a waste transfer station and a public HWRC centre are both operating"?	1	The Frequently Asked Questions (page 6) provides examples of this type of joint operations.
227	Statement that combining a WTS and HWRC (and depot) on a single site is against established practices and that most other councils don't use it.  Each function has different requirements, making a single site suitable for all very difficult to find. If there were many established joint facilities we would have been taken to one on a site tour. Where functions have been co-located there are specific reasons. Statement that joint facilities will inevitably have more opposition due to scale.	40	The Frequently Asked Questions (page 6) provide examples of this type of joint operations. Also, please see response to issue number 013 (above).

<p>228</p>	<p>Statement that the process of deciding on an option, then looking for sites is flawed as Option 4 would inevitably lead to most suitable site being rejected on grounds of available size.</p> <p>Statement it doesn't make sense to assess hypothetical options without appreciation of actual site availability. Whereas, progressing Option 5 would open a range of new potential sites. Additional point that HWRCs need to be near to built up areas / population centres, whereas WTS and depots should be far away from them. Statement that consultation should have been held on the options first if the process was going to be used.</p>	<p>39</p> <p>The partner councils' focus has been on achieving the best solution for delivering the facilities taking into account all of the relevant economic, social and environmental factors. Taking into account all of these factors demonstrates that co-locating the facilities is the best solution to meeting the councils' waste and operational needs. To allow a preference for certain sites or types of sites to determine how the facilities should be delivered would therefore mean not optimising the economic, social and environmental performance of the facilities. Further, when measured over their anticipated 25 year lifetime the economic, social and environmental costs of not pursuing the best performing solution for delivering the facilities would be significant. It is for this reason that a departure from planning policy, which seeks to strictly control new development on unallocated greenfield land (or "countryside"), is considered to be justified.</p> <p>Notwithstanding the above, it can be seen from the sites assessment process that there are likely to be sites available to accommodate all of the possible options, including option 4. While the sites capable of accommodating option 4 in terms of their size are greenfield sites this does not stop them being "available".</p> <p>A site can only be deemed "suitable" or "unsuitable" once the purpose for which it is required is known. If sites have been rejected through the sites assessment process they are necessarily unsuitable. Such sites may be suitable for accommodating other potential options but, as is explained above – selection of the best performing option prior to considering sites is critical.</p> <p>Whilst there is no statutory requirement to undertake public consultation for proposals of this nature the partner councils have decided to do so. The councils have had to make a decision about what is a reasonable and proportionate in the circumstances.</p>
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			<p>Conducting separate consultations for options and sites would have been disproportionate for proposals of this nature and size and would have been artificial in view of the way the project has unfolded (see Chronology at paragraphs 3.7 – 3.17 of the IAPOS report).</p> <p>Waste transfer stations should ideally be located as close as possible to the areas which produce the greatest amount of waste (usually urban areas) in order to reduce mileage and fuel/environmental costs. Similarly a depot, where waste vehicles are parked overnight, needs to be close to major collection routes to avoid increased mileage along country roads.</p>
229	Statement that the respondent has been convinced that there is no safety risk from combining services. Specific gratitude expressed to Mark Walsh and Steve Palfrey for their willingness to answer questions.	2	Noted.
231	Suggestion of four additional criteria; community impact, environmental impact, reputational impact and traffic impact. Analysis and scores for these criteria are presented and conclude that Option 5 scores higher than Option 4.	1	<p>Community, environmental and traffic impact are site-specific matters and should (and are) considered at the site-specific assessment stage.</p> <p>The first three criteria suggested are broad and potentially vague. In particular, it is not clear what “reputational impact” pertains to. The respondent does not provide an indication of the factors that the criteria are designed to reflect and how they should be scored.</p> <p>Some or all of what might be reflected in community impact is already covered under other criteria (e.g. proximity to sensitive receptors and traffic/highways criteria) and the same is true for environmental impact.</p> <p>Further, in relation to community impact much depends on the specifics of the site chosen. The site assessment process follows the options assessment for the reasons explained in the IAPOS report.</p>



			A new "Traffic" criterion has been added to the options assessment to ensure that the traffic related impacts of each of the potential options is fully considered. This is in addition to the two traffic and transport related criteria which already formed part of the assessment.
233	Acceptance that BSE needs a WTS.	1	Noted.
250	Statement that judging the overall waste miles saved doesn't consider the value of those miles being staggered / spread out compared to concentrated on a single site. Linked issue regarding combined environmental impact.	9	<p>A new "Traffic" criterion has been added as a result of the consultation feedback received. This new criterion seeks to factor-in the effect of concentrating traffic in one location, the likely location and the impact of traffic there, and the effect on vehicle movement numbers as a result of co-locating or not co-locating facilities.</p> <p>The existing criterion "Carbon impact/footprint" in the options matrix assesses the combined environmental impact of each of the potential options. Their impact in this regard has therefore been considered within the options assessment.</p> <p>The title of the criterion is not considered to be fully representative of its purpose/role and has therefore been changed to "Environmental impact (including carbon impact/footprint)".</p>
259	Support for Option 5 because there is a demonstrable need to future proof HWRCs in the borough. Specifically for a 24% increase in population by 2030 and the need to match this with capacity.	1	Noted.
262	Specific request to see a detailed 'business case' for each option.	3	<p>By 'business case' it is assumed that the respondents refer to the comparison of the options on financial grounds.</p> <p>An exempt appendix was provided to elected councillors as part of report CAB/SE/15/015 on 10 February 2015 which provided a financial summary of the benefits of the proposed project. This formed part of the basis on which they allowed the project to</p>

			<p>progress. As the project has developed the financial assessment of options has been further developed.</p> <p>Some details are commercially sensitive, particularly before any procurement has taken place (e.g. estimated design and construction costs), and as such the appendix was not publically published. This is standard protocol with commercially sensitive information.</p> <p>Section 6 of the report to Joint Cabinet on 14 June 2016 contains a financial summary for the project which compares the costs and benefits of options 4 and 5 compared to the status quo (option 1). This section of the report will be placed fully in the public domain.</p> <p>The options assessment uses the figures, among other considerations, to assess each potential option against a number of finance related criteria. These are:</p> <ul style="list-style-type: none"> <li>• Immediate capital cost / realisation;</li> <li>• Long term capital cost / realisation;</li> <li>• Long term revenue;</li> <li>• Operational cost / savings;</li> <li>• Commercial desirability / value to prospective bidders / operators; and</li> <li>• Commercial opportunities / income generation potential.</li> </ul>
264	Accusation the project is being driven by the need to free up the land at the depot on Olding Road for development	1	<p>The original adopted PSV Masterplan indicated the depot would need to move to fully develop the site. The opportunity for the WSOH allows the next phase of development at Western Way to take place but it is only part of one of the drivers creating a need for new waste and operational facilities. The standard and location of all the councils' existing waste and operational facilities is the more important consideration. Further, this is only one of four major drivers for a new approach to delivering waste and operational facilities in West Suffolk. Section 3 of the IAPOS report (The Need</p>

			for New or Replacement Waste Management and Operational Facilities) identifies and explains the numerous factors involved.
271	Suggestion that the WSOH should be built on Hollow Road Farm and Rougham Hill retained, in order to best cope with demands from growth.	1	The need to accommodate the housing and employment growth planned in West Suffolk is accounted for in the site size requirements and therefore the sites assessment. In view of the fact that it meets the site size requirements Hollow Road Farm is capable of accommodating a household waste recycling facility that has sufficient capacity to accommodate the planned growth (alongside a waste transfer station and a depot).
273	Statement that the saving from a Hub is not worth it in the long run compared to other options and given the risks from safety and traffic.	1	The matters of safety and traffic are addressed in the responses to issue 032, 153, 176 and 250 above.
274	Statement welcoming the ability to remediate Olding Road.	1	Noted.
309	Accusation that the drive towards a single site (option 4) is based on funds (coming from the Transformation Estate Programme).	2	The opportunity of drawing down £20,000 from the One Public Estate (OPE) programme has been taken as the objectives of the OPE programme have aligned with the objectives of the Hub project to date. This is certainly not the overarching driver for the project (this is just one of a number of policy factors which are themselves only one of four main drivers for the project) but there is no doubt that a single hub meets the objectives of the OPE programme.
311	What would be the contingency plan, should the Hub become inoperable for any reason such as snow. Will this cause collections to be missed.	2	Business continuity planning is already considered within existing operational arrangements and would be incorporated into the operational management of any new facility.
312	Centralisation of services does not necessarily make them cheaper or more efficient.	1	This general comment is accepted and is one of reasons for conducting a comprehensive assessment of the potential options for delivering the waste and operational facilities required. The options assessment considers each potential option against all of the relevant economic, social and environmental factors to determine which is the best performing option overall. In the specific case of the WSOH co-location will be more efficient base on both financial and non-financial criteria.

			Cost and efficiency are important factors. The financial information underpinning the project is based on knowledge from experts in the waste and construction industry
317	Has there been consideration of expanding WSOH, to accept other towns waste (for revenue) which would then cause more traffic?	1	This is a West Suffolk and Suffolk County Council project designed to serve West Suffolk communities only. Towns and areas outside of Suffolk will have their own arrangements for collecting and disposing of waste as well as the appropriate infrastructure. We remain in contact with waste colleagues in neighbouring areas to keep abreast of their planned developments and any potential opportunities for more joined-up working across county borders. However, the focus of our project is the waste management needs of our own residents which can be fulfilled under our own direct control and responsibility.
318	Are there any plans / possibility the hub site might be sold off to a private company?	1	There are no plans to sell the proposed facilities to a private company. The existing depot and household waste recycling facilities are in public ownership. Any new facilities created would also be publicly owned. The existing waste transfer facilities are privately owned but the Suffolk Waste Partnership made the decision to establish a publicly owned waste transfer station in 2011 (see page 16 of the IAPOS report). The delivery of whichever option is pursued will see this come to fruition. All of the facilities proposed would therefore be publicly owned.
321	Motivation should be community interest not council or developer.	2	The councils have to consider numerous factors in pursuing projects such as this. The interests of local communities are an important consideration. The comprehensive options assessment in the IAPOS report seeks to establish the best solution for delivering the waste and operation facilities required having regard to the all of the relevant factors: economic factors, social factors and environmental factors. The interests of local communities will be reflected in all of these categories and have therefore been afforded proper weight in the assessment process. The interests of the "council" or "developers" are not reflected in the assessment process, apart

			from in the case of the councils where councils' interests (e.g. operating economic and efficient services) are driven by the communities' (tax payers') interests.
322	Assertion that there is little difference between options 3, 4 and 5. More information required on the difference to judge objectively.	1	<p>There is a lot of information provided in the IAPOS report. Paragraphs 5.21 – 5.28 provide information to properly consider the results of the options assessment, including important factors to consider in the assessment of each criteria. They conclude that:</p> <p>“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.</p> <p>Taking into account all of these factors the councils consider option 4 to be the current optimal solution and have proceeded accordingly.”</p> <p>For the reasons set out in paragraphs 5.22 – 5.26 it is considered that the above conclusion is sound and is a robust and reliable basis on which to proceed.</p>
333	Objection to the closure of Mildenhall depot as it will increase the distance travelled for these vehicles.	1	<p>Overall, the single hub approach, integrating the activities of the Mildenhall depot with Olding Road depot and the Waste Transfer Station will lead to better route planning across West Suffolk, overall reducing miles and managing growth in housing and</p>

			businesses. Yes, some vehicles will travel further but many others will travel fewer miles so the overall total mileage, and environmental impact, is less. Details of the technical analysis of mileage using Routesmart modelling software can be found at Appendix H of the IAPOS.
343	To co-locate the WTS (including Red Lodge and Thetford) and depots (Olding Road, Bury, and Holborn Road, MDH) on a new site west of BSE, where 70% of the waste stream originates. Evidence provided to support the 70% assertion.	7	<p>Appendix H of the IAPOS report explains the site location criterion used in the site assessment process and provides substantiation for it (including an explanation of the software used – Routesmart). The location criterion is further supported by the work of the Suffolk Waste Partnership between 2011 and 2013 (see paragraph 3.8 of the IAPOS report).</p> <p>The suggestion that the waste transfer station and depots should be co-located on a site west of Bury St Edmunds runs contrary to conclusion of the extensive bodies of work undertaken by the Suffolk Waste Partnership and the councils and is therefore not considered to be the optimal solution to providing the facilities required (as is demonstrated by the options and sites assessments). As well as waste transfer and depot facilities for domestic waste, consideration needs to be given to trade waste traffic (predominantly town centric), cleansing (small sweepers need close access to town), and grounds maintenance (again, town centric) as well as a suitable location for the HWRC.</p>
355	Statement that the councils should have thought about these issues and requirements when planning Great Blakenham.	1	Section 3 (specifically paragraphs 3.2 to 3.17) of the IAPOS report details the evolution of the project to date. The way in which the project has evolved explains why some aspects of the project were not considered earlier. However, the need for a new waste transfer station in Bury St Edmunds was foreseen as part of the Energy from Waste project (Great Blakenham). There are numerous reasons why a waste transfer station has not yet been delivered in or near Bury St Edmunds. However, the fact that it has not presents a valuable co-location opportunity.

357	Criticism of hiring Carter Jonas. Accusation of bias. Suggestion they were hired to prepare a business case.	1	Councils do not always have staff with every skill and level of expertise or experience needed for every aspect of a project. When that is the case the councils will procure a range of technical and professional advisors to work on a project of this scale and complexity.
367	Suggestion to separate black bag and industrial waste handling to reduce impact on communities.	1	The current facilities handle domestic and commercial waste and any new infrastructure will need to do likewise. The commercial waste which would pass through the site would be similar in nature to household waste and there are advantages to handling both types of waste using the same facilities.
374	Suggestion of multiple local Energy from Waste facilities across West Suffolk.	1	Noted. However, this is not the solution which the Suffolk Waste Partnership (which operates as a partnership involving all seven borough/district councils and the county council) opted to take. The approach outlined would likely be unviable due to financial and waste volume issues.

## Feedback – Section two: Assessment of sites

### Notes:

1. The partner councils have only investigated new issues. Where information answering the issue raised has already been supplied in the consultation material the relevant reference (ie page in the IAPOS report, Sustainability Appraisal, Consultation Summary Booklet or Frequently Asked Questions) has been supplied.
2. There are a number of references to exclusionary and qualitative criteria in this table. The sequential approach to assessing the sites, using these criteria is set out below and more detail can be found in Chapter 6 of the IAPOS report.
  - i) Existing waste sites and industrial/brownfield sites are identified and assessed against a range of simple pass/fail tests (exclusionary criteria) designed to identify any significant/irresolvable constraints to development which would prevent the proposed WSOH (Option 4) being delivered.
  - ii) If none of the sites pass the tests, greenfield sites are assessed against the same criteria.
  - iii) Sites passing the exclusionary criteria are then assessed against more detailed criteria (the qualitative criteria) which are designed to determine the sites' suitability, availability and deliverability for accommodating the WSOH (Option 4) proposals.



#	Comment	Number	Response Forest Heath District Council, St. Edmundsbury Borough Council, Suffolk County Council
001	Opposition to Hollow Road Farm (HRF) without specific justification.	42	Noted. In reference to this, and subsequent comments about the Hollow Road Farm site (HRF), it should be noted that the January-February 2016 consultation was about principles, including the criteria used to assess a range of sites, and was not specifically about HRF.
002	Opposition to HRF due to proximity to residents and the centre of town. Also concern of the impact on a rural / pleasant nature of the area. Statement it is unfair to burden a single community with all three facilities (often linked to a reason why Option 4 should be shelved).	83	<p>The councils understand that some people will have concerns about Hollow Road Farm being identified as the most suitable, available and deliverable site for accommodating the WSOH (option 4) proposals.</p> <p>However, the councils have been through the process of detailed options and sites assessments to ensure they select the <i>most</i> suitable, available and deliverable site. It is unlikely that any site would or will be considered perfect for accommodating the WSOH proposals. It is important therefore that the councils pay proper regard to the conclusions of their assessments as they provide the most objective way of determining the most suitable site when considered against all of the relevant economic, social and environmental considerations.</p> <p>In identifying Hollow Road Farm as the most suitable, available and deliverable site the sites assessment process considered Hollow Road Farm's proximity sensitive receptors (primarily houses) with regard to various different matters (traffic, noise, odour, vermin etc.) and the landscape and visual impact of developing the site for the WSOH proposals. The sites assessment (both the original and post consultation amendment versions) find Hollow Road Farm to be the most suitable, available and deliverable of the sites considered.</p> <p>The site is 1.4 miles from the town centre thus is not considered to be too close to it. The location of sites suitable to accommodate the</p>

			<p>operational hub (in locational terms at least) is a balance between finding a location where the proposed use would be acceptable in planning terms and being close enough to Bury St Edmunds (the main population centre in West Suffolk) to enable the proposed WSOH to effectively and efficiently meet the area’s waste and operational needs. If the site were further from Bury St Edmunds its ability to meet these needs would be diminished. Further, other matters such as the suitability of the local highway network and landscape and visual impact may start to weigh more heavily against the location.</p> <p>The WSOH proposal is not about concentrating three different waste and operation facilities on one community. It is about finding the right solution for West Suffolk’s residents by meeting the councils’ waste and operational needs (via the options assessment) and then finding the right site to accommodate those proposals without unduly burdening any community, communities or sectors of society. The options assessment has shown that co-locating all three facilities required is the optimal solution and the sites assessment has shown that Hollow Road Farm would be the most suitable site on which to deliver them. Should the councils proceed with a planning application a number of further checks and balances will be employed during the process of determining the application to assess whether or not its impact in all respects (particularly any impact on the local community) would be acceptable.</p>
003	<p>Opposition to HRF due to impact from increased traffic.</p> <p>Reasons include:</p> <ul style="list-style-type: none"> <li>- concerns of safety</li> <li>- the noise generated</li> <li>- the smell generated (including from waste vehicles and private cars)</li> <li>- the significant increase in local pollution from the increased traffic and 24/7 operations</li> </ul>	113	<p><u>Traffic, transport and highways – assessment to date</u></p> <p>The suitability of, and impact on, the local road network and the extent to which access would require reliance on local roads is one of the qualitative criteria used in the sites assessment (see page 68 of the IAPOS report). Hollow Road Farm scores +2 in this regard because the highway authority have indicated the in principle acceptability of the site in highways terms.</p> <p>The qualitative criteria for “the potential for impact from noise and</p>

<p>- linkages to the sheer quantity of traffic (~600,000 vehicle movements per year)</p> <p>- statement that the issue was only due to the access route (that Compiegne Way as an access would solve this).</p> <p>Specific point that the number of roundabouts means that HGVs will need to be in low gear more for HRF and therefore pollute more.</p>	<p>vibration” includes traffic noise on the local road network in relation to HGV movements. The potential impact from odour and the potential for impact on air quality are also qualitative criteria (see page 71 of the IAPOS report). Hollow Road Farm scores +1 against all of these criteria because the nearest sensitive receptors are located away from the main traffic routes and are over 300 metres from the site itself. Accordingly, it is considered the locating the WSOH proposals at Hollow Road Farm would not cause a significant impact by virtue of highways, transport and traffic related matters.</p> <p><u>Traffic, transport and highways – further assessment</u></p> <p>The detailed assessment of matters such as traffic, highway safety and air quality (pollution) relies on fully worked up proposals which are, inevitably, only available at the application stage (once the scheme design is near to being finalised). Accordingly, these matters are assessed through the application process and would be important factors in its determination. Any planning application submitted is unlikely to be approved if there are outstanding traffic, highway safety and air quality issues.</p> <p>Should a planning application for the WSOH (option 4) proposals be submitted the matters of highway safety and traffic would be considered in a Transport Assessment which would include:</p> <ul style="list-style-type: none"> <li>• a detailed survey of the existing traffic position;</li> <li>• detailed modelling of traffic numbers;</li> <li>• modelling of the effects of predicted traffic flows on key junctions;</li> <li>• an assessment of the existing highway network in the vicinity of the site and its suitability for serving the proposed development;</li> <li>• an assessment of any highway safety implications of the proposed development;</li> <li>• an assessment of any highway improvements necessary to</li> </ul>
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			<p>make the proposals acceptable in highways terms.</p> <p>The transport assessment would then bring all of these factors together in order to assess the overall impact and acceptability of the proposals in highways terms.</p> <p>The transport assessment would be prepared by specialist transport consultants and would be submitted as part of any planning application. During the application process the transport assessment would be scrutinised by the highway authority (as a statutory consultee). Any concerns on the part of the highway authority, should there be any, would be fed back to the local planning authority. The application would be unlikely to be approved while any concerns remained. It would be for the applicant to address the concerns, e.g. by amending the proposals.</p> <p><u>Access from Compiegne Way</u></p> <p>Initial discussions with the highway authority regarding the suitability of Hollow Road Farm (in highways terms) for accommodating the WSOH proposals have indicated that access would be best taken from Fornham Road. At the same time the highway authority has expressed concerns about accessing the site directly from the Compiegne Way roundabout. Accordingly, while this would:</p> <ul style="list-style-type: none"> <li>• Need to be considered through the transport assessment prepared to support any planning application</li> <li>• Need to be considered through the application determination process itself; and</li> <li>• Be subject to the detailed design of any proposed scheme;</li> </ul> <p>it looks very unlikely that an access directly off Compiegne Way would be supported.</p>
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			<p><u>Air quality (including the effect of the number of roundabouts in the vicinity of the site)</u></p> <p>This is a matter which would need to be considered initially via an air quality screening assessment associated with any planning application proposals and through liaison with the local planning authority's environmental health department. If either of the processes identified that an air quality assessment would be required as part of any planning application submitted (in view of the likely impact of the proposed development) detailed air quality modelling would have to be carried out. The air quality modelling would use the traffic survey data and modelling results to produce a detailed picture of the likely air quality impacts of the proposed development. The modelling should be sufficiently precise to take into account the effect of the frequency of roundabouts and junctions as well as queue lengths and queuing times (at peak times) as well as the impact of the sugar beet campaign.. Having considered all of these factors the air quality assessment would reach a conclusion as to the acceptability of the proposed development in air quality terms. As with the transport assessment (see above) the air quality assessment would be scrutinised through the planning application process (in this case by the local planning authority's environmental health department). A planning application would be unlikely to be approved unless the environmental health department were happy with the accompanying air quality assessment and its findings.</p> <p><u>Noise, odour and 24/7 operations</u></p> <p>These matters are all covered by responses in the previously published Frequently Asked Questions (see pages 10-11).</p>
004	<p>Concern regarding the capacity of transport infrastructure at HRF and the nearby junctions / roundabouts.</p> <p>Reasons included: - concerns that the access / junction is dangerous already</p>	126	<p>See response to issue 003 above. The detailed assessment of transport infrastructure capacity relies on fully worked up proposals which are, inevitably, only available at the application stage (once the scheme design is near to being finalised). Accordingly, these matters are assessed through the application process and will be important factors</p>

	<ul style="list-style-type: none"> <li>- that it will cause congestion at Barton Hill and St Saviour's roundabout</li> <li>- concern regarding the existing congestion around the A134 and Barton Hill roundabouts, on the A14 and the access point</li> <li>- that with the proposals to add 1250 homes from Moreton Hall to near Great Barton, will put even more pressure on the network.</li> </ul>		<p>in its determination. Any planning application submitted is unlikely to be approved if there are outstanding transport infrastructure capacity issues.</p> <p>The transport assessment produced to support any application would need to consider the matters raised in relation to this issue, including the North East Bury St Edmunds strategic housing allocation north of Moreton Hall. One of the factors that local planning authorities should take account of in determining whether a planning application should be accompanied by a transport assessment is the cumulative impact of multiple developments within a particular area. This is a factor that the transport assessment would be expected to address therefore.</p>
005	Opposition to HRF due to vermin impact (rats, flies, pigeon, seagulls).	28	<p>There are hundreds of waste transfer stations up and down the country, most of which have no problems with vermin beyond those which are already part of normal countryside or urban living. The chance of any vermin problems at a WSOH is further reduced by the fact that the facility would be new and purpose-built with, among other things, vermin control in mind. It is unlikely therefore that a WSOH would have any additional impact in terms of vermin.</p> <p>The impact of vermin in relation to Hollow Road Farm in particular was considered through the qualitative part of the sites assessment process. This scored Hollow Road Farm +1 in view of the fact that the nearest sensitive receptors are over 300 metres away. This is another factor which reduces the chance of there being any impact on residential amenity from vermin.</p> <p>These issues are answered in the Frequently Asked Questions (page 10) which state:</p> <p>“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</p>

			<p>buildings.</p> <p>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.”</p> <p>Further, there is a lot of good practice at other modern waste transfer stations which the councils plan to learn from in order to run the proposed facility in the most effective fashion (with particular regard to control of vermin).</p>
010	<p>Opposition to HRF due to its contradiction of policy.</p> <p>Policies include:</p> <ul style="list-style-type: none"> <li>- SEBC Green Infrastructure Strategy</li> <li>- Bury Vision 2031</li> <li>- The Borough's Core Strategy Policy CS11.</li> </ul> <p>Statement that use of a site outside of policy (specifically Vision 2031) could undermine that policy. Statement such a big development on greenfield needs to be handled through the policy/plan creation process not one off applications. Positive points of "initiative" lost for breaching policy.</p>	72	<p>Section 4 of the IAPOS report considers the current national and local planning policy picture and how it relates to the WSOH proposal. Paragraphs 4.37 to 4.42 explain why the policy does not address the need for new waste management and operational facilities in West Suffolk, particularly in relation to the fact that they do not allocate a site for such facilities.</p> <p>The fact that a site has not been allocated does not automatically make the proposals contrary to policy. It could be argued that the proposals require an exception to policy in view of the fact that need for them could not have been foreseen (and therefore met through policy). Either way, the planning application process exists as a suitable and appropriate means of assessing the acceptability of the proposals and will provide the necessary safeguards to ensure that any development which comes forward is appropriate and acceptable.</p> <p>One of the matters that will have to be considered through the determination process is whether the proposals compromise or jeopardise planning policy objectives.</p> <p>Page 22 of the Consultation Summary Booklet responds to the question “Why were greenfield sites considered during the research”. The conclusion to the response sets out the process for referral to the</p>

			Secretary of State:  "Approval for any greenfield site to be used for a WSOH would be referred to the Secretary of State as it would be different to what it says in the development plan. The Secretary of State would then consider whether to make the decision at Government level".
015	Support for HRF and the process used.	39	Noted.
016	Support for HRF because of its industrial setting near the factory and farm buildings.	7	Noted.
017	Support for HRF because of its transport links.	6	Noted.
018	Support for HRF because of the prevailing wind reducing potential impact of odour.	3	Noted.
022	Opposition to Rougham Hill (RH) for a WSOH. Including because of its proximity to existing residents.	7	Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider Rougham Hill to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals. Indeed, it failed at the first (exclusionary) stage of the sites assessment due to its size.  In view of the fact that Rougham Hill did not make it past the exclusionary assessment stage, the proximity of existing residents (which was reflected in a number of the criteria for the qualitative assessment) was not considered.
023	Opposition to Rougham Hill (RH) for a WSOH. Including because of traffic impact.	7	See response to issue 022 above.  In view of the fact that Rougham Hill did not make it past the exclusionary assessment stage, the traffic impact of locating the WSOH (option 4) proposals there (which was reflected in one of the criteria for the qualitative assessment) was not considered.
024	Opposition to RH due to new residential development and travellers site.	3	See response to issue 022 above.



			In view of the fact that Rougham Hill did not make it past the exclusionary assessment stage, the proximity of potential sensitive receptors, e.g. housing allocations, (which was reflected in a number of the criteria for the qualitative assessment) was not considered.
027	<p>General statements and concerns about traffic (not site specific).</p> <p>Reasons included:</p> <ul style="list-style-type: none"> <li>- additional traffic should be a major criteria for assessing options and sites</li> <li>- emphasis needs to be placed on choosing a site that does not increase congestion</li> <li>- criteria of ease of getting to the site needs to be included</li> <li>- that there is too much traffic in Bury already</li> <li>- traffic pollution needs to be considered / environmental impact</li> <li>- highlighting that direct access to A14 essential</li> <li>- suggestion the site should be away from commuter roads</li> <li>- observation there has been a lack of consideration of transport policy</li> <li>- concern regarding the estimated ~600,000 additional trips and this impact on a single site.</li> </ul> <p>There was a recurrent issue that projected traffic numbers have been left out and that a full traffic survey needs to be conducted and published.</p>	79	<p><u>Traffic as a criteria in assessing options</u></p> <p>The Options Assessment includes two criteria relating to traffic and transport (“Access / highways / transport” and “Key transport / travel distances”). These consider factors such as proximity to traffic sensitive receptors, proximity to main road routes (the aim being to minimise traffic on minor roads) and journey distances between facilities. A further traffic related criterion, “Traffic”, has been added as a result of the consultation feedback received. This new criterion seeks to factor in the effect of concentrating traffic in one location, the likely location and the impact of traffic there, and the effect on vehicle movement numbers as a result of co-locating or not co-locating facilities. The matter of traffic has therefore been considered as thoroughly as necessary at the options assessment stage.</p> <p><u>Traffic as a criterion in assessing sites</u></p> <p>The issue of traffic by itself is not a criterion for assessing sites. This is because the volume of traffic the proposals will generate is mostly to do with the nature of the proposals and therefore is assessed at the options assessment stage, undertaken before assessment of sites. However, the sites assessment considers the suitability of the local road network and site accesses for accommodating the traffic associated with the best performing option (option 4). A site’s suitability in these terms is determined by a number of criteria, these are:</p> <p>At the exclusionary assessment stage:</p> <ul style="list-style-type: none"> <li>• Access to / from primary highway network;</li> <li>• Proximity / relationship to Bury St Edmunds; and</li> <li>• Proximity to Suffolk Lorry Route Network.</li> </ul> <p>At the qualitative assessment stage:</p> <ul style="list-style-type: none"> <li>• Suitability of local road network and extent to which</li> </ul>

		<p>access would require reliance on local roads.</p> <p>It is therefore the case that ensuring sites are accessible and suitably located in relation to the highway network is an important consideration when assessing sites.</p> <p><u>Ease of accessing sites</u></p> <p>The ease of accessing sites is considered through the following three criteria at the exclusionary stage of the sites assessment process:</p> <ul style="list-style-type: none"> <li>• Access to / from primary highway network;</li> <li>• Proximity / relationship to Bury St Edmunds; and</li> <li>• Proximity to Suffolk Lorry Route Network.</li> </ul> <p>These criteria encompass the following factors:</p> <ul style="list-style-type: none"> <li>• The emphasis placed on good access to the primary highway network by <i>Planning for Waste Management Facilities: A Research Study</i> in respect of waste transfer stations – see <a href="http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/planningandbuilding/pdf/148385.pdf">http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/planningandbuilding/pdf/148385.pdf</a></li> <li>• Distance from Bury St Edmunds;</li> <li>• Proximity / ease of access to A14;</li> <li>• Proximity to roads forming part of the Suffolk Lorry Route Network; and</li> <li>• The order/rank of closest Suffolk Lorry Route Network route / routes.</li> </ul> <p>Ease of accessing sites has therefore been properly considered through the sites assessment process.</p> <p><u>Assessment/consideration of traffic pollution</u></p> <p>Please see “Air quality (including the effect of the number of</p>
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		<p>roundabouts in the vicinity of the site)” section of response to issue 003 above.</p> <p><u>Direct access to A14</u> It is claimed in the comments made that direct access to the A14 is essential. This does not agree with the advice that the councils have received from the highway authority or independent highways consultants to date. Further, Highways England may also take issue with this approach.</p> <p>The councils will have to demonstrate through any planning application they make that their proposals are acceptable in highways terms (whether or not they have direct access to the A14). If they are not able to demonstrate this, any application they make is unlikely to be approved.</p> <p><u>Potential for conflict with commuter routes</u> This would be addressed though a transport assessment – please see the “Traffic, transport and highways – further assessment” section of the response to issue 003 above. Because of the detailed modelling required to assess the impact of a proposed development in terms of the additional traffic it would generate, this is a matter which can only be properly addressed at the planning application stage – once a site has been selected and the proposals have been finalised (or are near to being finalised).</p> <p><u>Transport policy</u> The councils do not consider that there has been a lack of consideration of transport policy. Indeed, the options and sites assessment processes have sought to pay proper regard to transport policy wherever relevant. The initial advice received from the highway authority and independent highways consultants supports this.</p>
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			<p>Further, transport policy would be a key consideration for any transport assessment prepared for the WSOH (option 4) proposals. The transport assessment would need to show that the proposals accord with transport policy, or provide satisfactory reasons if they don't.</p> <p><u>Projected traffic numbers and the need for a full traffic survey</u> Please see "Traffic, transport and highways – further assessment" section of response to issue 003 above.</p> <p>Further information on vehicle movements at this stage in the process can be found in the previously published Frequently Asked Questions. (see link on page 13 of the Frequently Asked Questions). These provide vehicle movement estimates for the West Suffolk Operational Hub proposals.</p>
028	Statement that concerns regarding noise, smell, pollution and operating hours have been properly addressed in the Consultation Summary Document.	1	Noted – these concerns were also addressed in the Frequently Asked Questions.
029	<p>Detailed concerns regarding impact of HRF on Fornham Road (and impact on the villages).</p> <p>Concerns included:</p> <ul style="list-style-type: none"> <li>- lack of capacity of the road network</li> <li>- impact of slow farm vehicles</li> <li>- accident risk during the winter due to tree coverage on the s-bend</li> <li>- increase of traffic on a road used by villagers to go to town</li> <li>- queuing along the road to the HWRC</li> <li>- safety issue for cyclists</li> <li>- question as to whether the police have been consulted about the potential congestion / safety risk.</li> </ul> <p>Additional mention for Livermere Road and Barton Hill. Note that these roads have bus stops and school collection (safety issue).</p>	16	<p>These are all matters which would be considered through the transport assessment prepared to accompany any planning application submitted (assuming that application was for Hollow Road Farm). Please see "Traffic, transport and highways – further assessment" section of response to issue 003 above. Highway safety (both the existing highway safety position and the safety implications of proposed developments) is a key consideration in transport assessments.</p> <p><u>On-road queuing</u> The design of any proposals will seek to minimise and if possible prevent on-road queuing. The transport assessment and highway authority will consider how well the design will achieve this goal. Changes to the scheme design may be required if it is not considered satisfactory in this regard.</p> <p>The Police would be consulted as part of any planning application.</p>

033	Detailed concern regarding impact of HRF (or any site nearby) on Barton Hill / local roads as private vehicles could not be controlled / restricted from using the site unlike HGVs.	5	The issue of the impact of private vehicles on specific parts of the local highway network, and any mitigation required as a result, would be considered as part of any Transport Assessment produced to support a planning application (please see “Traffic, transport and highways – further assessment” section of response to issue 003 above).
034	Opposition to HRF due to noise impact on residents. Specifically the Barton Hill and Fornham areas. Includes concerns regarding (noisy) 24 hour operations.	42	<p>The impact of noise in relation to Hollow Road Farm in particular was considered through the qualitative part of the sites assessment process. This scored Hollow Road Farm +1 in view of the fact that the nearest sensitive receptors are over 300 metres away.</p> <p>Should a planning application for delivering the WSOH (option 4) proposals at Hollow Road Farm be submitted the application may need to be supported by a noise impact assessment. Whether or not a noise impact assessment will be required will be a matter for the local planning authority. If they consider there to be a risk of a significant noise impact occurring they will require an assessment. Such an assessment would model the noise that is likely to be generated by the proposals and then consider its effect on nearby receptors. The results of this modelling process would be used to determine whether the noise impact of the proposed development would be acceptable.</p> <p>Further information on these issues can be found in the previously published Frequently Asked Questions (see pages 10 and 11):</p> <p>“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.</p>

			<p>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.</p> <p>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.”</p>
035	Opposition to HRF due to pollution and air quality impact on residents (including impact of fires). Specifically the Barton Hill and Fornham areas.	22	<p><u>Air Quality and Pollution</u></p> <p>The impact of pollution in relation to Hollow Road Farm in particular was considered through the qualitative part of the sites assessment process. This scored Hollow Road Farm +1 in view of the fact that the nearest sensitive receptors are over 300 metres away from the site and are 85 metres away from the main transport route that would serve the WSOH if it were located at Hollow Road Farm.</p> <p>Air quality is also considered in the Sustainability Appraisal.</p> <p>The matter of air quality is addressed in the “Air quality (including the effect of the number of roundabouts in the vicinity of the site)” section of the response to issue 003 above.</p> <p><u>Fire risk</u></p> <p>The material handled through a waste transfer station (WTS) forming part of a WSOH would be the same as that handled through the existing WTSs serving West Suffolk. The materials and most appropriate methods for handling them are well understood by the managers and operatives of those facilities who are appropriately trained and qualified. The same would be true of any new facility.</p> <p>Any new facility would need to meet the very latest waste management/handling and Building Control standards, including arrangements for fire suppression and control.</p>

<p>036</p>	<p>Opposition to HRF due to odour impact on residents. Specifically the Barton Hill and Fornham areas.</p> <p>Additional point regarding the site's elevation making this impact worse.</p> <p>Statement that the impact from the Sugar Factory is still a concern in the winter, and that the WSOH would instead be all year round. Questioning whether a wind survey has been carried out. Criticism of the criteria for this impact only being 250m, when the closest residents are only 310m away . Statement that the smell is terrible at March, Chittering and Martlesham.</p>	<p>46</p>	<p>The potential impact from odour in relation to Hollow Road Farm in particular was considered through the qualitative part of the sites assessment process. This scored Hollow Road Farm +1 in view of the fact that the nearest sensitive receptors are over 300 metres away from the site and the nearest downwind sensitive receptor is 675m away.</p> <p>Detailed assessment of the potential impact from odour would be carried out in an air quality assessment, if one is required as part of any planning application submitted (see “Air Quality” section of response to issue 003 above). This would take into account the site’s elevation (if elevation is a factor that has a bearing on odour impact) and prevailing wind direction and conditions.</p> <p>The 250m distance from sensitive receptors criterion is based on the findings of <i>Planning for Waste Management Facilities: A Research Study</i> – see <a href="http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/planningandbuilding/pdf/148385.pdf">http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/planningandbuilding/pdf/148385.pdf</a></p> <p>This states that “Sites closer than 250m from residential, commercial or recreational areas should be avoided” (see page 67 of the IAPOS report). At 305 metres away from Hollow Road Farm the nearest dwelling on Barton Hill is 55 metres further from the site than the minimum distance suggested by <i>Planning for Waste Management Facilities</i>. In terms of proximity to sensitive receptors therefore, Hollow Road Farm is considered to be a suitable site for the WSOH (option 4) proposals.</p> <p>The matter of odour is addressed in the previously published Frequently Asked Questions (note that this response is not site specific):</p> <p>“Most material, including all the black bin waste collected from</p>
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			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.” (page 10, Frequently Asked Questions)
037	Opposition to HRF due to safety impact on residents. Specifically the Barton Hill area.	4	<p>Concerns about safety around Barton Hill are noted - matters of safety are addressed in a number of other responses to the issues raised in this section.</p> <p>Any planning application seeking to deliver the WSOH (option 4) proposals at Hollow Road Farm would need to address the issue of safety with particular regard to highway safety and the design of the proposed development itself. On the matter of highway safety, please see “Traffic, transport and highways – further assessment” section of response to issue 003 above</p> <p>The design of any scheme proposed would need to ensure the safe operation of the facilities/site for all users. Any scheme pursued would have to meet the relevant safety standards for every aspect of the scheme. These will be explored and considered in part through the planning application process, if and when a planning application is submitted.</p>
038	Opposition to HRF due to reduction in house prices. Specifically the Barton Hill area. Contrast to £50,000 spent already by the councils to what will be lost by people.	7	<p>The previously published Frequently Asked Questions provide as follows in relation to the impact of the WSOH (option 4) proposals on house prices:</p> <p>“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.” (page 11, FAQs)</p> <p>The matter of the option agreement is addressed on page 22 of the Consultation Summary Booklet.</p>



039	Opposition to HRF due to impact on wildlife / biodiversity / green corridor.	16	<p>The impact on biodiversity in relation to Hollow Road Farm in particular was considered through the qualitative part of the sites assessment process. This scored Hollow Road Farm -1 in view of the fact that there are records of protected species in the vicinity of the site and that development of the site would inevitably have some impact on biodiversity. However, 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. Further, the majority of the site is land which has been used for agriculture and is therefore likely to be of low nature conservation value due to crop production methods.</p> <p>Thought has already been given to how the impact of development at Hollow Road Farm on biodiversity could be mitigated. Initial proposals include:</p> <ul style="list-style-type: none"> <li>• Retention of the existing maturing landscaping belt on the western side of the site;</li> <li>• Minimising light spillage into the landscaping belt during and after construction;</li> <li>• Further landscape planting to the site’s boundaries; and</li> <li>• bat and breeding bird mitigation measures.</li> </ul> <p>It is considered that with appropriate mitigation and any biodiversity enhancements that may be able to be delivered, development of the site can be made acceptable in terms of impact on biodiversity. A detailed assessment of these matters (in the form of an ecological appraisal) will be necessary at the planning application stage. It will be for the local planning authority in consultation with Natural England and the local wildlife trust to determine whether the impact of the development is acceptable in terms of its impact on biodiversity.</p>
042	<p>General opposition to the use of any greenfield site.</p> <p>Includes suggestion that no protective consideration given to greenfield sites and the loss of quality agricultural land (and</p>	122	<p>The entire sites assessment methodology is based on use of greenfield land being a last resort. This is why all previously developed sites, existing employment sites and allocated employment sites are considered before any greenfield sites get considered.</p>

	<p>therefore food self-sufficiency for the area). Statement that neighbouring farmer could lose 'red tractor' status due to cross contamination. Assertion the site is greenbelt. Limited future opportunity to expand.</p>		<p>Page 22 of the Consultation Summary Booklet explains why greenfield sites were considered in the search for suitable sites for the WSOH (option 4) proposals. Paragraphs 6.7 to 6.10 of the IAPOS report set out the approach adopted in more detail.</p> <p><u>Greenbelt</u> Greenbelt has a specific meaning relating to preventing development on land surrounding cities to halt urban sprawl. The land in question is not designated greenbelt. In planning terms it would be considered greenfield land and is designated as "countryside" in the development plan.</p> <p><u>Red Tractor scheme</u> Red Tractor status is not a matter considered relevant to the assessment of sites or any future planning application.</p> <p><u>Future expansion</u> The need for expansion is not anticipated in the foreseeable future as the site size threshold adopted for the sites assessment process allows for facilities of a sufficient size to accommodate the growth planned for West Suffolk over at least the next 20 years and, as waste management continues to change, it is difficult to predict what facilities or land may be required after that time.</p>
043	<p>Criticism of +1 for sensitive receptors on HRF, suggestion that this is an underestimate.</p>	3	<p>The sites assessment has been carried out using a series of matrices. This assists with both the assessment process itself (in terms of comparison and, where relevant, scoring) and with comprehension of the assessment process. In the matrices which include scoring, as is the case with the sites qualitative assessment matrix, the score against each criteria is provided along with a commentary. The commentary is provided to help the assessor assess options or sites against the relevant criterion and to explain the score to anyone reviewing the assessment.</p>

			<p>The commentary in the sites qualitative assessment therefore provides the justification for the +1 score for Hollow Road Farm in relation to the “proximity to sensitive receptors” criterion and the other criteria which are related to the proximity of sensitive receptors.</p> <p>The scoring of Hollow Road Farm against these criteria is analysed/further explained at paragraph 6.44 of the IAPOS report (post public consultation amended version).</p> <p>In the circumstances of this particular assessment (the sites assessment) the councils are confident that the scoring of Hollow Road Farm against the “proximity to sensitive receptors” and related criteria is correct and, together with the scoring against the other qualitative criteria, is a sound basis for the conclusions reached in the IAPOS report.</p>
044	Note of the various negative scores against HRF, indicating it is not suitable or shouldn't be 'very positive'.	3	<p>The purpose of the planning system is to contribute to the achievement of sustainable development (National Planning Policy Framework paragraph 7). Sustainable development is considered to comprise three dimensions; an economic dimension, a social dimension and an environmental dimension. Accordingly, sustainable development is expected to perform an economic role, a social role and an environmental role.</p> <p>The sites assessment by necessity considers only environmental factors. The economic and social factors are considered through the options assessment in addition to further environmental factors. Notwithstanding the fact that the sites assessment considers only environmental factors for Hollow Road Farm and the other sites assessed, particularly with regard to any impacts development at the sites might have, Hollow Road Farm still scores positively. However, when considered alongside the positive score for the option 4 (WSOH) proposals which would be located on the site (if the councils decide to</p>

			<p>pursue such an approach) it can be seen that the proposals as a whole would actually be rather more “positive” than is being alleged.</p> <p>The merits of a development site cannot be considered without having regard to the development proposed for it. In the case of Hollow Road Farm the site and the development proposed for it would deliver economic, social <i>and</i> environmental benefits making it “sustainable development”. It is not reasonable therefore to look at a site simply in terms of the impacts that development of it may cause (and to say that it isn’t suitable or isn’t very positive) as development of almost any site will have impacts of some sort. These impacts must be weighed against the benefits and sustainability of the site and the proposed development in order to properly assess their merit.</p> <p>It is also worth noting that Hollow Road Farm scored more positively (with a score of +7) than any of the other sites which featured in the qualitative assessment. This makes it the most suitable, available and deliverable site assessed (including all of the sites suggested through the IAPOS public consultation – see IAPOS report – post public consultation amended version). The next highest scoring site scored 1.</p>
045	Criticism of vermin assessment for HRF. Suggestion that birds/gulls attracted to the site could cause a hazard on the A14 nearby.	2	Noted. However, it is the partner councils’ view that this is not very likely. That said, if the matter is of concern to the local planning authority’s environmental health team they would be expected to bring it to the case officer’s attention as part of their consultation response on any planning application submitted.
046	Criticism of +2 for HRF under 'suitability of local roads'. Reasons include mixture of light and heavy vehicle, traffic weight during busy periods and the need to turn right into the site, and the sheer volume of traffic.	5	The sites assessment has been carried out using a series of matrices. This assists with both the assessment process itself (in terms of comparison and, where relevant, scoring) and with comprehension of the assessment process. In the matrices which include scoring, as is the case with the sites qualitative assessment matrix, the score against each criteria is provided along with a commentary. The commentary is provided to help the assessor assess options or sites against the relevant criterion and to explain the score to anyone reviewing the

			<p>assessment.</p> <p>The commentary in the sites qualitative assessment therefore provides the justification for the +2 score for Hollow Road Farm in relation to the “suitability of local road network” criterion.</p> <p>The scoring of Hollow Road Farm against these criteria is analysed/further explained at paragraph 6.44a of the IAPOS report (post public consultation amended version).</p> <p>In addition to the above the initial views of the highway authority and a transport consultant have been sought. Both have indicated that the HRF site and the WSOH (option 4) proposals for it, should the site be selected, would be acceptable in highways terms or could be made so without significant improvements to the local highway network.</p> <p>In the circumstances of this particular assessment (the sites assessment) therefore, the councils are confident that the scoring of Hollow Road Farm against the “suitability of local road network” criterion is correct and, together with the scoring against the other qualitative criteria, is a sound basis for the conclusions reached in the IAPOS report.</p>
048	Question if current staff based in Mildenhall will have to travel to Bury each to collect the refuse collection vehicles, to then drive back to Mildenhall for collection. Question if the staff will be reimbursed for this.	4	Staff do not necessarily live near where their work is based. All staff using the WSOH would be subject to the current terms and conditions in their contracts including any compensation that is due for changing their work base .
049	Support for the selection of criteria and their application.	32	Noted.
052	Question of whether there is data showing how large an HWRC needs to be to cope with peak usage. Concern linked to queues outside of the Mildenhall site and the impact this could have on any new site.	2	Noted – the WSOH proposal accommodates Bury’s HWRC activity not any other town’s. Please see response 029 about management of queues.

056	Conditional support if new site is as convenient as Rougham / objection if not.	3	<p>Noted. Any change could lead to inconvenience in terms of accessibility/transport for some people who may need to travel further to a HWRC, but equally it would be more convenient to those who would be closer to any new location.</p> <p>In other respects a new site which accommodated the WSOH (option 4) proposals would provide a new, purpose built, split-level household waste recycling centre facility. This would be more convenient for all users.</p> <p>A new site accommodating the WSOH proposals would also provide a re-use store. This would be an additional facility which is currently sought by some customers. This would make the site more suitable and more convenient for those customers and may also be of use to and improve the customer experience for others.</p>
065	Opposition to Tut Hill. Reasons include; proximity to residents, traffic concerns.	5	<p>Noted.</p> <p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the partner councils do not consider Tut Hill to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals.</p> <p>While the site's qualitative assessment did not consider the issue of traffic, the site scored well in relation to the "suitability of the local road network". This is not therefore a reason which contributed to it being unlikely to be pursued. In relation to "proximity of sensitive receptors" however, Tut Hill scored less well than some of the other sites. This was therefore a factor which contributed to Tut Hill being unlikely to be pursued by the councils.</p>
068	General comment that any site should be away from residential areas / that this should be a criteria itself (specific suggestion of at	40	<p>Explanations for the adoption and application of the 250 metre rule of thumb can be found in the responses to issues 036 above and 288</p>

	least 1km away / other suggestion of at least 500m).		<p>below.</p> <p>To apply the suggested 500 metre or 1 kilometre separation distances would likely result in the selection of a site in open countryside (rather than within a settlement on the outskirts of it) which would fail key planning and sustainability tests. As such, this is not considered a feasible option.</p> <p>Further, the 250 metre rule of thumb has been established through research undertaken by what was the Office of the Deputy Prime Minister. It indicates that where sensitive receptors are located 250 metres or more from a waste transfer station (of the three facilities proposed a WTS is considered to have the most potential for impact) it is considered that the station's impacts on those receptors are likely to be acceptable.</p>
078	Conditional support for HRF if traffic concerns are addressed	2	<p>Noted.</p> <p>In relation to addressing traffic concerns please see:</p> <ul style="list-style-type: none"> <li>• “Traffic, transport and highways – further assessment” section of response to issue 003 above;</li> <li>• Response to issue 004 above; and</li> <li>• “Potential for conflict with commuter routes” section of response to issue 027 above.</li> </ul>
079	Suggestion that site (not specified) should be 'in an industrial area' away from residents	4	<p>Planning policy also considers that development of the kind proposed for WSOH (option 4) should be located on an existing employment or industrial site (or on an existing waste site) if possible (see section 4 of the IAPOS report). This is why all previously developed sites, existing employment sites and allocated employment sites were considered through the sites assessment process before any greenfield sites were considered. Unfortunately there were no existing or allocated employment of industrial sites which were suitable, available and deliverable for the facilities sought.</p>

			In addition to the above it is important to note that locating the WSOH (option 4) proposals in an industrial area would not necessarily ensure that it was kept away from residential areas. Many, if not most, of the industrial areas (known as “general employment areas” in planning terms) in Bury St Edmunds border residential areas. Accordingly, if the WSOH proposals were to be located in one of these areas they could still be located closer to residential development (which is a sensitive receptor) than some of the greenfield sites considered through the sites assessment.
080	Opposition to Barton Road site. Reasons include; inconvenience for existing households, planned homes leading to increased congestion, statement that 'criteria cannot have been applied correctly to have considered Barton Road'.	1	<p>Please see:</p> <ul style="list-style-type: none"> <li>• Response to issue 002 above;</li> <li>• “Traffic, transport and highways – further assessment” section of response to issue 003 above;</li> <li>• Response to issue 004 above; and</li> <li>• “Potential for conflict with commuter routes” section of response to issue 027 above; and</li> <li>• Responses to issues 029, 033, 034, 035, 036, 038, 043, 044, 045 and 046 above.</li> </ul>
081	General suggestion that convenient and local site(s) are needed to stop fly tipping.	8	Noted.
083	<p>Opposition to Saxham Business Park and Symonds Farm site.</p> <p>Reasons include; smell and the prevailing wind, noise, light pollution, effect on property values, traffic concerns, health and safety.</p>	7	<p>Noted.</p> <p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider Saxham Business Park or Symonds Farm the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals.</p> <p>Both Saxham Business Park and Symonds Farm failed the sites exclusionary assessment thus did not get assessed in relation to impact from odour, impact from noise and impact from light pollution. These issues did not therefore contribute to the sites being unlikely to be</p>



			<p>pursued (though they may have done had the sites progressed to the qualitative assessment). Instead it was the sites' distance from Bury St Edmunds which led them to be considered unsuitable and therefore unlikely to be pursued.</p> <p>The issues of traffic and health and safety are not directly assessed through the sites assessment thus they are not factors which have contributed to either of these sites being unlikely to be pursued either.</p> <p>The issue of impact on property prices is not material to planning and was also therefore not considered through the sites assessment process (as set out on page 11 of the FAQs).</p>
084	Question on how the customer experience criteria was evaluated.	1	<p>The customer experience criteria sets out a number of important factors to consider when assessing options (section 5.20 of the IAPOS report):</p> <ul style="list-style-type: none"> <li>• Conditions 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>• Customer Satisfaction survey results.</li> </ul> <p>The options assessment has been carried out using a matrix. This assists with both the assessment process itself (in terms of the comparison and scoring of options) and with comprehension of the assessment process. The matrix provides a score against each criterion along with a commentary. The commentary is provided to help the assessor assess the options against the relevant criterion and to explain the score to anyone reviewing the assessment.</p> <p>The commentary provided in relation to the "customer experience" criterion of the options assessment therefore provides the justification for the scoring of the five options against that criterion. The options</p>

			assessment matrix can be found at Appendix A of the IAPOS report.
085	Comments about opening hours: "opening the site at 9am will impact greatly on residents". "The ability to visit a HWRC as part of essential daily travel would add to the customer experience"	2	<p>Opening hours and operational hours matters to be considered as part of any planning application. Should the councils decide to submit an application it would be for them as applicant to set out the opening hours they wish to adopt for the household waste recycling centre aspect of the proposals. They would also be expected to justify the opening hours sought if they were outside of normal business/operating hours as well as demonstrating that they would not have a significant adverse impact in terms of amenity etc.</p> <p>There would be numerous factors for the councils to consider in deciding what opening hours to apply for. These include:</p> <ul style="list-style-type: none"> <li>• Maximising the usability/availability of the facilities for residents of West Suffolk;</li> <li>• Staff working/shift patterns/HR considerations;</li> <li>• Daylight hours;</li> <li>• Cost; and</li> <li>• Impact on amenity.</li> </ul> <p>The decision as to the opening and operational hours which would be permitted by any planning consent granted for the WSOH (option 4) proposals (if indeed planning permission is granted) would lie with the local planning authority. They would likely make the decision taking into account the applicant's representations, the responses from the public and statutory consultees and their own assessment of the relevant factors.</p> <p>Information on the HWRC opening hours from 1<sup>st</sup> June 2016 can be found at: <a href="http://www.suffolk.gov.uk/planning-and-environment/waste-and-recycling/find-your-nearest-rubbish-tip-or-recycling-centre/">www.suffolk.gov.uk/planning-and-environment/waste-and-recycling/find-your-nearest-rubbish-tip-or-recycling-centre/</a></p>
086	Question about how the construction of the WSOH building will address acoustics. Comments about a 'metal barn like building' generating a lot of noise	1	The design and construction of the buildings which would be required as part of the WSOH (option 4) proposals would be unlikely to cause noise issues. The design of the buildings would be informed by

			<p>successful operational examples and will incorporate measures to reduce noise creation or propagation where appropriate/feasible/required (see below).</p> <p>Should a planning application for delivering the WSOH (option 4) proposals at Hollow Road Farm be submitted the application may need to be supported by a noise impact assessment. Whether or not a noise impact assessment will be required will be a matter for the local planning authority's environmental health team. If they consider there to be a risk of a significant noise impact occurring they will require an assessment. Such an assessment would model the noise that is likely to be generated by the proposals and then consider its effect on nearby receptors. The results of this modelling process would be used to determine whether the noise impact of the proposed development would be acceptable.</p> <p>Further information on noise is provided on page 10 of the previously published Frequently Asked Questions. This provides as follows:</p> <p>"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."</p>
090	Question: "Who owns Hollow Road Farm, and what will they get out of this?"	1	Hollow Road Farm is currently in the ownership of a local landowner and would be subject to a commercial land deal if proposals for that site proceed.
092	Statement: "I trust where you propose to put this site is on council owned land and not land that any body is selling to the council and thereby profiting from it."	1	Noted. Please see response above (090)
094	Support for Hollow Road farm if option taken to buy more land to future proof against additional housing being built.	1	Noted.  On the matter of future proofing/expansion please see the "Future

			<u>expansion</u> " section of the response to issue 042 above.
099	Comments about closure of Rougham Hill HWRC - "Who is going to clear up the rubbish on the roads..." if flytipping occurs?	1	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider Rougham Industrial Estate to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals. Accordingly, the councils do not currently propose to pursue the site.</p> <p>Managing litter is addressed on page 11 of the previously published Frequently Asked Questions which provides as follows:</p> <p>"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. "</p> <p>Should the HWRC move from Rougham Hill to a new location this will be communicated to site users and the wider public in advance of any closure of the site. Fly tipping is an offence and should be reported.</p>
102	Question "Would like to know a little more about the 'location based criteria' that led to the rejection of one of the brown field sites (also please state which this was)."	1	Information on the location based criterion ("proximity / relationship to Bury St Edmunds") can be found at paragraph 6.29 (page 69) and at Appendix H of the IAPOS report (post public consultation amended version). The site that was excluded on the basis of this criterion was Suffolk Business Park. An explanation of why it was excluded can be found at paragraphs 6.33 to 6.36 of the IAPOS.
107	Question: Do the proposed sites have the capacity to cope given the likely increase in housing?	1	Please see the " <u>Future expansion</u> " section of the response to issue 042 above.
111	Note that any site will receive public opposition and that the goal is to find the best site.	3	Noted.

115	Suggestion that a -2 value should not automatically reject a site.	1	<p>Agreed. The methodology employed for the sites qualitative assessment means that it is a site's cumulative score which is most important in determining its suitability, not a significant negative score against any particular criterion or criteria. Sites should not be and have not been excluded on the basis of one or more -2 scores.</p> <p>More information on the methodology for the sites qualitative assessment can be found art paragraphs 6.22 to 6.27 of the IAPOS report (post public consultation amended version).</p>
119	Statement that "site at Hollow Rd is much smaller than Rougham Hill, which is said to be too small - how is this right?"	2	This assertion is incorrect. The Hollow Road Farm site is significantly larger than the existing household waste recycling centre site (and adjoining land in public ownership) at Rougham Hill.
121	Comment that consideration of noise and smell must be an important issue whatever is decided. Comment that although waste will be collected daily from the site (as told at a meeting) the waste waits 14 days for collection at the kerbside so the smell will still be considerable	4	<p>The partner councils agree that noise and odour will be important considerations in the preparation and determination of any forthcoming proposals to deliver the waste and operational facilities required. While these matters have been addressed through the sites qualitative assessment (where they were both the subject of specific criteria against which the sites were assessed) they would be considered in greater detail as part of a planning application were one to be submitted. In this regard please see the responses to issues 034 and 036 above).</p> <p>There are a number of ways to minimise odour and noise generated by waste transfer stations. These are set out on page 10 of the previously published Frequently Asked Questions. The design of any proposals pursued by the councils will be informed by operational examples of such facilities which deal with these issues successfully.</p>
123	<p>Statements that this is a waste of taxpayers money. Includes references to the £50,000 deposit placed on HRF and suggestion that this biases the decision.</p> <p>Specific additional statement that the sensible thing to do would have been to CPO the site wanted, instead of securing the option to</p>	29	<p>The issue of money paid through the option agreement and the assertions in relation to this demonstrating a 'done deal' are addressed in the Consultation Summary Booklet (page 22) which provides as follows:</p> <p>".....while that option remains in place (as the money has been paid) no</p>

<p>buy it. Therefore the 'availability criteria' for HRF was not properly considered.</p>	<p>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 alternative sites which would be more suitable than Hollow Road Farm. “</p> <p>A Compulsory Purchase Order is always a last option and usually only sought when no suitable land is available. The commentary on the availability criteria (page 75 of the IAPOS (post public consultation amendment version)) sets out the position with regard to compulsory purchase powers. It provides as follows:</p> <p>“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:</p> <p><i>“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”.</i></p> <p>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.”</p> <p>It is hard to see how there could be a compelling case in the public interest for the compulsory purchase of Hollow Road Farm as the owner is prepared to dispose of the site at market value. The costs of seeking compulsory purchase would not lead to a cheaper land deal for the partner councils.</p> <p>Were the above not the case the partner councils would also have to consider the potentially significant timescale and costs associated with</p>
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			<p>compulsory purchase orders.</p> <p>The potential for use of CPOs is an important factor in the assessment of sites against the availability criterion in the qualitative assessment. The councils are firmly of the view that the relevant sites have been properly assessed against the availability criterion as is evidenced by the commentary in the qualitative assessment matrix (Appendix B of the IAPOS report (post public consultation amended version)) and paragraphs 6.45, 6.45 and 6.48 – 6.50 of the IAPOS report (post public consultation amended version).</p>
124	Conditional support if Forest Heath and St Edmunds have access to their own HWRC for public use.	1	Noted. The current number of HWRCs in each council area would not be affected by the development of a WSOH. There are no plans to close Mildenhall or Haverhill HWRCs.
125	Noted prevailing winds as an important consideration. Request to see assessment / odour assessment.	5	<p>Prevailing wind direction is one of the factors considered when assessing sites against the “potential for impact from odour” criterion as part of the sites assessment (when considering the nearest downwind receptor) thus it has been properly considered.</p> <p>An odour assessment may be required as part of any planning application – please see response to issue 036 above. Because odour assessments are necessarily site and development specific none have been undertaken to date (in view of the fact that the councils have not decided to pursue a particular option or site yet).</p>
127	Concerns about noise, smell and vibration (not site specific.) Includes request to view similar operations to assess impact.	1	These matters are all addressed in the previously published Frequently Asked Questions (page 6 for similar operations and 10 and 12 for the concerns raised). As part of the project, parish council and community representatives were part of a group who visited similar operations in April 2015.
128	Question: How often will vehicles come in and out of the plant?	2	The previously published Frequently Asked Questions include a link (on page 13) to the estimated traffic movement table which provides these figures.
129	Statement that a site would be dangerous with a high risk of fires. Linked to the lack of clarity of what waste would go through the	17	Please see <u>“Fire risk”</u> section of response to issue 035 above.

	WTS.		The assertion that the WSOH (option 4) proposals, or any part of them, would be dangerous is not correct. A large number of similar facilities (waste transfer stations etc.) operate safely up and down the country. It is unlikely that planning or regulatory approval would be granted for dangerous or risky facilities.
130	Statement that some of the sites considered are too small.	1	This is agreed and is why those sites have been excluded. It is right, however, that these sites were included in the sites assessment process so that interested people can see that they were considered and why they were excluded (rather than them being excluded out of hand with no audit trail).
131	Statement about sites being too far for people who don't drive to get to HWRC.	1	<p>Noted.</p> <p>This is a matter which will need to be considered as part of any transport assessment prepared to support a planning application (if one is forthcoming). Unfortunately any site, including the current HWRC on Rougham Hill, and existing waste transfer/depot facilities will be too far away for some people who don't drive given the size of catchments that facilities of the nature proposed serve.</p> <p>The accessibility by sustainable transport means of any site pursued (for staff and for customers who don't drive or who don't have access to a car) will be an important consideration for the transport assessment. However, the chosen site's accessibility in sustainable transport terms will need to be balanced with other transport considerations such as the site's accessibility for HGV traffic, the suitability of the local road network, the site's proximity to the primary road network and the likely traffic impact of the proposed development (which is likely to depend on the site selected). These other considerations are not necessarily aligned with having a site which is accessible by sustainable transport thus the likelihood for there to need to be a 'balance' or compromise (which the transport statement will need to justify).</p>



132	<p>Criticism of criteria used for site assessment.</p> <p>Comments and criticisms include:</p> <ul style="list-style-type: none"> <li>- scoring system is flawed</li> <li>- weighting system should have been applied (as well as specifically to human and financial considerations)</li> <li>- criteria used is unbalanced</li> <li>- doesn't include the impact on property values</li> <li>- relies on subjective assessment</li> <li>- no detailed transport figures</li> <li>- needs to be redone independently</li> <li>- specific observation that it take no account of number of nearby houses, only the distance to nearest</li> <li>- that the case against other sites not clear enough.</li> </ul>	76	<p><u>Scoring system (and subjectivity)</u></p> <p>The scoring system employed for the sites assessment scores the sites in relation to all of the issues which are considered important in assessing their suitability, availability and deliverability for the WSOH (option 4) proposals. This is achieved by selecting the right criteria (see below).</p> <p>The scoring system is designed to provide a means of clearly and easily comparing the suitability, availability and deliverability of the sites considered.</p> <p>The scoring system is explained at paragraphs 6.24 – 6.27 of the IAPOS report (post public consultation amendment version). It relies on a -2 to +2 scoring range. This affords five possible scores against each criteria (-2, -1, 0, +1 and +2). This allows sufficient variation to differentiate sites but keeps the scoring process as objective and as simple as possible. Employing a more complex system would not guarantee a more reliable outcome, has the potential to be more subjective and would also have the potential to skew the results of the assessment in favour of certain criteria.</p> <p>The scoring system is comparable to the systems employed for similar assessments (e.g. site selection assessments, sustainability assessments) for similar and other types of development proposals. The system is not perfect but high level assessments of this nature (where so many factors are being considered across a number of different options or sites) are unlikely ever to be perfect. However, the system adopted is reasonable and proportionate to the purpose and objectives of the assessment. Further, it is sufficiently robust to provide meaningful and reliable conclusions.</p> <p><u>Weighting</u></p> <p>In designing the sites assessment one of the aims was to ensure that</p>
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		<p>the criteria allow as objective an assessment of the sites as possible. The scores for each criterion have not been weighted as this would make the process more subjective, possibly significantly so. Other assessments of this nature avoid weighting for the same reason.</p> <p><u>Selection of criteria</u> Paragraph 6.29 of the IAPOS report (post public consultation amendment version) provides details of each of the criteria forming part of the sites assessment the reasons why they are included.</p> <p>During the public consultation respondents were invited to comment on the criteria used – whether they were the right criteria and whether there were any other criteria which should be included. No substantive or what is considered to be suitably justified criticism of the criteria adopted was received. Where comments/criticisms were received they have been addressed in other responses to other issues above and below. More criticism was received in relation to the way in which some criteria were scored. This too has been addressed in the responses to other issues above and below.</p> <p>Six new criteria were suggested through the public consultations. However, none of the criteria suggested have been adopted. The criteria and the reasons why they were not adopted are set out below:</p> <ul style="list-style-type: none"> <li>• Ease of access – this is already considered through the ‘Access to / from primary highway network’, ‘Proximity / relationship to Bury St Edmunds’ and ‘Proximity to Suffolk Lorry Route Network’ criteria in the exclusionary assessment and the ‘Suitability of local road network and extent to which access would require reliance on local roads’ criterion in the qualitative assessment.</li> <li>• Ease of travel to work by sustainable transport - this has not been included as it is only one of a number of detailed</li> </ul>
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			<p>transport considerations which will form part of the transport assessment process for any site pursued (see response to issues 131 above). While accessibility by sustainable transport is an important consideration for any proposed development and site the nature of the proposals in this case, which make them predominantly reliant on HGV and private vehicle transport, have the potential to make them less important/significant.</p> <ul style="list-style-type: none"> <li>• Prevailing wind direction – this is one of the factors already considered as part of the ‘potential for impact from odour criterion’ – see response to issue 125 above).</li> <li>• Elevation / wind exposure – this is one of factors already considered as part of the ‘potential for impact from litter criterion’ – see response to issue 036 above.</li> <li>• Impact on historic town / tourism. A large number of waste and operational facilities of varying sizes exist up and down the country including within the development limits of or close to historic towns and those popular with tourists. The facilities proposed are essential pieces of infrastructure whose scale is significantly smaller than many other types of infrastructure and industrial developments and, as a result, it is not considered that they will impact on the historic nature of the town or its tourism potential in a manner other than can be assessed through the existing criteria (e.g. ‘potential for landscape impact’, potential for visual impact and ‘potential for impact on heritage assets’).</li> <li>• Cost of land – this is not considered to be directly relevant to the sites assessment process. To the extent that it is relevant it is considered as part of the ‘availability’ criterion. What is most important at this stage is to establish the relative suitability of the sites and whether they are available for purchase or not. There is no way of fixing/guaranteeing the price for a site without entering into a contract (which carries its own, potentially significant costs). Thus, unless the councils entered</li> </ul>
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		<p>into contracts in relation to all of the sites assessed at the qualitative stage it would be impossible to assess them in terms of 'cost of land'.</p> <p>It is therefore considered that the criteria used within the sites assessment are appropriate and suitable for purpose.</p> <p><u>Property values</u> Please see response to issue 083 above.</p> <p><u>Transport figures</u> Please see the response to issue 083 and the 'Traffic, transport and highways – further assessment' section of the response to issue 003 above.</p> <p><u>Independence of assessment</u> It would be hard, if not impossible, to provide a truly independent assessment of the potential options and sites for delivering the waste and operational facilities required in West Suffolk. This is because any assessment instructed by the councils would not be seen as independent (in view of the fact that the councils would have instructed it).</p> <p>The IAPOS report prepared by Carter Jonas offers a degree of independence in as much as it reviews and formalises the councils' work from the position of not having not been involved in a large majority of it (Carter Jonas having been instructed after the exercise was largely complete). The report demonstrates that the process the councils have been through accords with the relevant law and policy which reduces the possibility that has been designed to pursue a particular agenda.</p> <p>It should also be noted that processes of this nature are rarely independently undertaken. The systems in place (primarily the planning</p>
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		<p>system) rely on the proposer (or applicant) putting together a case for a particular development and/or site and that case being considered by the local planning authority and the relevant consultees through the development plan preparation or planning application processes. This is no different from what is happening here.</p> <p><u>Proximity of sensitive receptors vs number of sensitive receptors</u></p> <p>The approach taken to assessing the “proximity to sensitive receptors” and related criteria follows the findings of “Planning for Waste Management – a Research Study” – see responses to issues 036 and 068 above. The response to issue 068 explains that:</p> <p>“... the 250 metre rule of thumb has been established through research undertaken by what was the Office of the Deputy Prime Minister. It indicates that where sensitive receptors are located 250 metres or more from a waste transfer station (of the three facilities proposed a WTS is considered to have the most potential for impact) it is considered that the station’s impacts on those receptors are likely to be acceptable.”</p> <p>Accordingly, it is considered that the number of sensitive receptors which lie beyond 250 metres from a proposed site must be afforded less weight in the assessment process than the proximity of any sensitive receptors which lie within 250 metres of the site. This is why only limited regard has been paid to the number of sensitive receptors in the vicinity of a site provided they are more than 250 metres away.</p> <p><u>Strength of conclusion re suitability, availability and deliverability of sites</u></p> <p>It is stated that “the case against other sites is not clear enough”. However, it should be noted that the sites assessment process is not about showing that certain sites are not suitable (or available or deliverable), it is about identifying the site that is most suitable,</p>
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			available and deliverable. The sites assessment has achieved this. Paragraphs 6.47, 6.47a, 6.47b, 6.49 and 6.51 of the IAPOS report (post public consultation amended version) explain how Hollow Road Farm can be said to be the most suitable, available and deliverable site and the reliability of this conclusion.
133	Question: "Are you taking away from farm land or woodlands, or open land for wildlife?"	1	If the councils decide to pursue Hollow Road Farm (in view of it having been found to be the suitable, available and deliverable site) and planning permission is secured and the development goes ahead it would result in the loss of a relatively small amount of agricultural land. As this land has been used for agriculture for a number of years there would also be a limited impact on biodiversity (wildlife). However: <ol style="list-style-type: none"> <li>1. there will not be any loss of woodland; and</li> <li>2. this response should be read in conjunction with the responses to issues 039 and 042 above.</li> </ol>
134	Support for removal of Olding Road Depot. Reasons Include: allows more parking for leisure centre and helps traffic congestion	1	Noted.  A public consultation on a revised masterplan for this area (Western Way) took place in January/February 2016. Interested parties may wish to look at the associated information/documentation if they haven't already: <a href="http://www.westsuffolk.gov.uk/Council/Consultations/westernway.cfm">http://www.westsuffolk.gov.uk/Council/Consultations/westernway.cfm</a>
135	Comment that things should be left as they are, but long term planning is required.	1	The full 'need' case for the new waste management and operational facilities sought is set out in Chapter 3 of the IAPOS report. With imminent housing and employment growth creating more waste and a new location and method of treating waste (the Energy from Waste plant at Great Blakenham) it is not feasible to leave operations as they are now.
137	Statement that the majority of Bury residents would put road infrastructure at the top of their priorities.	1	Noted.
142	Comments stating that there is a bias towards HRF in the documents.  Specific reasons included:	33	The aim of the documenting and publishing the options and sites assessment processes was to provide interested parties with information required to scrutinise the process which had originally led the partner councils to identify Hollow Road Farm as the most suitable,

<ul style="list-style-type: none"> <li>- that the points system seemed "very weak"</li> <li>- that it was simply trying to justify spending money</li> <li>- that the decision had already been made</li> <li>- general claim of a flawed process</li> <li>- statement that this will have been influenced by the desire to use sell off land to developers.</li> </ul>	<p>available and deliverable site.</p> <p>The documents published show the councils' 'workings out' and therefore explain how they arrived at this conclusion. It is contended that the IAPOS report (post public consultation amended version) demonstrates that all potential sites have been considered in a manner which is as objective as possible. By making the workings and assessment publicly available, and by consulting on them, the councils have made the process as open and transparent as possible and have given interested parties the opportunity to identify potential weaknesses or flaws in the process. Having reviewed the consultation feedback and having amended the IAPOS report accordingly the partner councils consider they have both carried out and demonstrated that they have carried out a fair and robust assessment of the sites.</p> <p><u>Scoring/points system</u> Please see 'Scoring system (and subjectivity)' section of the response to issue 132 above.</p> <p><u>Claim of justification for spending money</u> There is no evidence for this and it is simply not true. One of the key aims of the WSOH proposals is to save money in the medium to long term. This is why the potential for savings and income generation potential feature in a number of the options assessment criteria. Equally importantly, many of the services which would be provided at the WSOH are statutory (there is a legal obligation to provide them) and so the councils have no choice but to invest in the necessary plant, equipment and facilities. The cost of that statutory obligation is going to increase significantly due to the growth of housing by more than 20% over the next 20 years. The WSOH proposal would help to minimise those increases in costs.</p>
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		<p><u>Claim that a decision has already been made</u></p> <p>Paragraphs 2.1 and 2.2 of the IAPOS report explain that its purpose was to formalise the options and sites assessment work undertaken by the councils over the last 6 years (see ‘Chronology’ paragraphs 3.7 – 3.17 of the IAPOS report). The councils identified Hollow Road Farm as being the most suitable, available and deliverable of the sites known to them as early as February 2015. The above referenced ‘Chronology’ details this. However, since Spring 2015 the councils have been working to establish whether their understanding is correct. The formalisation of the assessment processes and the public consultation have been important steps in this process – a process which is still on-going. So, while Hollow Road Farm has been considered to be the most suitable site for the WSOH (Option 4) proposals it has not been agreed or declared that Hollow Road Farm is the most suitable site or that it will be pursued.</p> <p>The final decision about whether to proceed with the WSOH proposals and, if so, on which site, will be made when the councils have fully considered the public consultation feedback on the IAPOS report and Sustainability Appraisal. The decision about whether to proceed with a planning application for a WSOH on land at Hollow Road Farm is scheduled for St Edmundsbury Borough Council on 28 June and Forest Heath District Council on 29 June. Suffolk County Council already has the necessary democratic approvals.</p> <p><u>Claim of flawed process</u></p> <p>If the assessment/scoring process is of concern please see ‘<u>Scoring system (and subjectivity)</u>’ section of response to issue 132 above. If the whole process of identifying the need for the waste and operational facilities required and the approach to identifying a solution to meeting the need for the facilities (including the background to and formalisation of the process) is of concern please see sections 2 – 4 of the IAPOS report which explain the process in detail. These sections of</p>
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			<p>the report demonstrate that, contrary to what is alleged and taking into account the circumstances of the case and the considerable number of factors involved, a logical and reasonable approach to establishing the best solution for meeting the councils' waste an operational needs has been taken.</p> <p><u>Development pressure on / sale of existing sites</u></p> <p>The longstanding development plans for Western Way and the more recent heightened developer interest are one of two 'site and time specific factors' creating a need for new waste and operational facilities. However the 'site and time specific factors' are only one of four different groups of factors which all contribute to the need for the new facilities. Accordingly, the influence of the development plans for Western Way is limited in this regard. For more information about why the Western Way masterplan was recently revised please see response 134.</p> <p>No decision has been made about whether the other existing sites would be sold or retained if the WSOH (option 4) proposals were to be delivered. The options assessment considers the possibility of both retention and sale of these sites.</p>
144	Suggestion that the proposal should be assessed against a Landscape Visual Impact Assessment.	1	A Landscape Visual Impact Assessment is likely to accompany any planning application which is submitted for the WSOH (option 4) proposals regardless of the site chosen.
145	Suggestion that the landscape and visual impacts of HRF would be substantial or have been ignored, including comments about being an 'eye-sore'	14	The comments do not agree with the assessment of Hollow Road Farm against the 'potential for landscape impact' and 'potential for visual impact' criteria in the sites qualitative assessment. However, neither the assessment against these criteria or the comments are based on a detailed landscape and visual impact assessment of a WSOH development at Hollow Road Farm. Should a planning application be submitted for Hollow Road Farm in respect of the WSOH proposals it is likely that it would need to be accompanied by such an assessment. The assessment would identify the full landscape and visual impact of the

			proposals so that they could be considered through the planning process.
146	Opposition to HRF due to exposure to wind leading to pollution of local area with airborne waste and litter.	5	<p>It should be noted that Hollow Road Farm scored as well as or better than the other sites considered through the sites qualitative assessment.</p> <p>Further, litter would be carefully managed at the proposed facilities, regardless of the site they were located on (see page 11 of the previously published Frequently Asked Questions).</p>
147	Statement that all points show the benefit of an eastern location.	4	There is no evidence for this assertion. The locational criteria for the sites assessment is set out and explained at paragraph 6.29 of the IAPOS report. The justification for it is provided at Appendix H of the IAPOS report.
148	Question as to whether consideration has been given to the 'sustainability' of Golf Club membership.	1	Consideration has not been given to this matter through the assessments carried out.
149	Conditional support for HRF if a greenfield site must be used.	1	Noted.
152	Opposition to HRF due to future expansion of the town, making this site more likely to end up in the middle of town as has happened with the Sugar Factory and for the site to be closer to residents in the future.	6	<p>Noted. However, it is also noted that the sugar factory is located on edge of Bury St Edmunds, not within it.</p> <p>The strategic growth for Bury St Edmunds to 2031 has been allocated in Vision 2031. This shows that Bury St Edmunds is not proposed to expand in the direction of Hollow Road Farm over the plan period.</p>
154	Questions about routes and frequency of lorries between sites.	3	<p>In terms of HGV traffic the impact will be minimal to minor rural roads and can be effectively managed. The majority of HGV traffic coming from the Forest Heath end of West Suffolk to Bury St Edmunds will be directed along the A11 / A14. Some will come along the A1101 but only on certain days when waste is being collected along that corridor or from the Lakenheath area.</p> <p>To put this into perspective, there are only 5 Forest Heath based refuse vehicles working on alternate blue / black bin collections. Based on current vehicle routing patterns on three days of the week traffic will</p>

			<p>be routed via the A11 and A14. On the fourth day 1 vehicle would be routed via the A1101 taking up to two tip runs in a day. There would be 2 vehicles working in Brandon which would route via the A134. On the fifth day 5 vehicles collecting in the Lakenheath area would route via the A1101 from Icklingham. These vehicles would take 2 tip runs on the heavier black collection week (10 movements) and 1 tip run on the lighter blue collection week (5 movements).</p> <p>All of our vehicles are tracked using a system called Quartix. When vehicles roam outside of expected routes we can set-up alarms for supervisors who will investigate why a vehicle has deviated.</p> <p>With a hub approach it is also worth noting that the number of vehicle miles would reduce and that a substantial number of vehicle movements that are currently undertaken would happen within the confines of the site.</p>
155	Question: How many staff will be based at the depot and how are they expected to travel to work? Related concern that this will affect waste miles / footprint. Related note of lack of public transport.	12	<p>Depot staff will be similar in number to those currently based at Olding Road in Bury and Holborn Avenue in Mildenhall (approximately 120 in total). Staff currently drive to work, cycle, motorcycle, walk and lift share (we are not aware of any that currently use public transport which frequently is not available at the start times needed by staff).</p> <p>Any planning application for the WSOH (option 4) proposals would need to consider sustainable transport (see responses to issues 131 and 132 above).</p>
156	Note that RH proposals were rejected by SEBC DCC and that experts stated fitting a WTS and HWRC on one site would be challenging	2	<p>Planning permission has been granted for a co-located waste transfer station and household waste recycling centre at Rougham Hill. It was granted by Suffolk County Council in October 2013. The matter was considered by St Edmundsbury Borough Council's Development Control Committee in a non-decision making capacity – they were asked to make comments only.</p>
161	Detailed concerns about impact of traffic on those using the Tollgate route.	2	<p>Detailed matters to do with traffic would be addressed at any planning application stage. A Transport Assessment would be produced to</p>

			accompany a planning application, including proposals for any mitigation measures. Please see responses to issues 003 and 004 above.
162	Request that the whole area should be reviewed and monitored for a minimum 6 months to establish new road ways, diversions, one way systems etc.	2	<p>Traffic monitoring and highway design matters would be site dependent and would form part of a Transport Assessment accompanying any planning application. Please see responses to issues 003 and 004 above.</p> <p>A traffic survey lasting 6 months is likely to be disproportionate to the scale and nature of the WSOH proposals.</p>
163	Detailed concerns about traffic on Rougham Hill, Cullum Road and Southgate Green roundabouts. Concern about implications of proposed development on Rushbrooke Lane and Moreton Hall.	3	Traffic impact on these areas would be site dependent. Detailed matters of traffic and safety would be addressed at any planning application stage. A Transport Assessment would be produced to accompany any planning application submitted to consider matters of highways safety and traffic, together with proposals for any mitigation measures. Please see responses to issues 003 and 004 above.
164	Criticism that not enough consideration given to vehicle impact, air pollution, eco systems or residents in vicinity of site.	1	<p>These matters have been assessed in part or in full against no less than 13 criteria in the sites assessment. The criteria are:</p> <ul style="list-style-type: none"> <li>• Access to / from primary highway network</li> <li>• Proximity / relationship to Bury St Edmunds</li> <li>• Proximity to Suffolk Lorry Route Network</li> <li>• Impact on sites of international or national biodiversity importance</li> <li>• Proximity to Sensitive Receptors;</li> <li>• Compatibility with surrounding land uses</li> <li>• Suitability of local road network and extent to which access would require reliance on local roads</li> <li>• Potential for impact on local water environment;</li> <li>• Potential for Impact on Biodiversity;</li> <li>• Potential for impact on Air Quality;</li> <li>• Potential for impact from odour</li> <li>• Potential for impact from flies, vermin and birds</li> <li>• Potential for impact from Noise and Vibration.</li> </ul>

			<p>It is therefore contended that the matters referred to have been given sufficient consideration. Further information on the assessment of these matters can be found in responses to the following issues (above):</p> <ul style="list-style-type: none"> <li>• 003;</li> <li>• 027;</li> <li>• 036;</li> <li>• 039;</li> <li>• 040;</li> <li>• 043; and</li> <li>• 132.</li> </ul> <p>Most of these responses relate to the assessment of Hollow Road Farm in particular but the same process was applied to all sites.</p> <p>The above responses also provide details of how the matters referenced in the comments will be further assessed if the WSOH proposals are progressed.</p>
165	Statement that expansion of RH does not fit with statement in Summary Consultation Booklet "the site needs to have good access to the trunk road network so as not to lead to heavy goods vehicles running through residential areas".	1	<p>Noted. As above, any planning application would include a detailed Transport Assessment for a specific site.</p> <p>Further, it should be noted that Option 4, which was identified as the best performing option by the options assessment, does not include the expansion of Rougham Hill. It would instead involve co-locating the household waste recycling facility currently located at Rougham Hill with the other facilities proposed on a new site.</p>
166	Suggestion that criteria for Proximity of site to sensitive receptors at RH would be -2 and Access/highway/transport would be -2 not the 0 and +1 recorded.	1	<p>It is not clear what these comments refer to as the existing household waste recycling centre site at Rougham Hill has not been considered through the sites qualitative assessment process (in which the sites are scored) in view of the fact that it failed the sites exclusionary assessment.</p>
168	Conditional support of Tut Hill: "would not object to it being used for other services excluding the HWRC".	2	<p>Noted.</p>

			However, having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider Tut Hill to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals.
169	Request that traffic flow and accessibility assessment is carried out.	2	Traffic and transport/accessibility assessment would be site dependent and would form part of a Transport Assessment accompanying any planning application – see response ‘Traffic, transport and highways – further assessment’ section of response to issue 003 above.
170	Statement that the figures for additional traffic movement only include lorries and not the domestic traffic.	1	Details of the estimated traffic movements can be found through a link on page 13 of the previously published frequently asked questions (see Appendix 4). They include estimated figures for domestic traffic, based on data from the present Household Waste Recycling Centre site.
172	Statement that plans to develop a WSOH must be considered alongside future development / local plans for Bury St Edmunds and not in isolation.	1	<p>Noted. The IAPOS report explains the background to the WSOH project in detail and provides a chronology of the project to date (see section 3). Paragraphs 4.39 – 4.42 of the report explain why the way in which the project unfolded meant making provision for the WSOH proposals could not have been considered alongside other future development needs through the relatively recently completed development plan preparation process.</p> <p>The WSOH facility is for all West Suffolk’s waste services, not just Bury St Edmunds, and is being considered alongside the knowledge that housing, with its associated requirement for waste collection and disposal, is set to grow by more than 20% over the next 20 years.</p> <p>Please see also the response to issue 010 above.</p>
174	Concerns about HGVs and cars sharing the same site: "consideration must be made to infrastructure and traffic flow to maintain different traffic patterns between the commercial lorries and private vehicles delivering waste to the site".	2	The management of operational vehicles (HGVs etc.) and private vehicles will be important factors to consider in the design and operation of any co-located facilities.
175	Concern that the computer modelling "would be unable to take into	1	There would be careful consideration in the design and operation of

	account the vagaries of humans" and site visitors unintentionally interfering with council operations		such facilities to ensure that this was effectively managed. Details of co-located operations in different parts of the country can be found in the previously published frequently asked questions.
177	Disagreement with the IAPOS report suggesting that the area around the site is already blighted by the British Sugar site therefore building another industrial estate on the site wouldn't make it any worse.	1	The commentary associated with the assessment of Hollow Road Farm against the 'potential for landscape impact' criteria in the sites qualitative assessment does not say that the area is "blighted" by the British Sugar site. It does however say that the "Site is located in countryside but edge of settlement with industrial elements (British Sugar) already strongly influencing character". Notwithstanding this point the comments received do not agree with the assessment of Hollow Road Farm against the 'potential for landscape impact' and criterion in the sites qualitative assessment. However, neither the assessment against this criterion nor the comments received are based on a detailed landscape and visual impact assessment of a WSOH development at Hollow Road Farm. Should a planning application be submitted for Hollow Road Farm in respect of the WSOH proposals it is likely that it would need to be accompanied by such an assessment. The assessment would identify the full landscape and visual impact of the proposals so that they could be considered through the planning process.
179	Statement that "the difference between Rougham Hill and new sites is minimal"	1	Rougham Hill did not pass the sites exclusionary assessment thus it is contended that there are significant and material differences between it and the sites considered through the sites qualitative assessment.
180	Specific traffic concerns. Impact on Compiegne Way and Tut Hill particularly when sugar beet campaign is on.	7	Please see responses to issues 003, 004 and 027 above.
181	Question: Parking of other vehicles - how much space for this?	1	This would be an important consideration for the design for any site and would need to include provision for visitors, staff etc. while paying regard to the relevant policy and guidance on parking.
183	Questions: who owns the land at each option? How much would it cost to purchase land? What land does SCC already own that might be suitable?	1	SCC does not own any land that would be suitable. Landowners have been approached for the sites that pass the exclusionary assessment detailed in IAPOS report.  Please see last bullet point in the ' <u>Selection of criteria</u> ' section of the

			response to issue 132 above regarding the cost of purchasing the relevant sites. The only purchase option agreement (that secures a particular land value) currently in place related to the Hollow Road Farm site.
185	Concern that there is no facility planned for Newmarket, which may lead to fly-tipping. Suggestion that getting to Bury to dispose of items is either a non-green drive or a difficult public transport journey.	1	The HWRC at Newmarket was closed in 2011. Newmarket Recycling Centre at Depot Road is operated by Newmarket Open Door. For opening times and days please see: <a href="http://www.newmarketopendoor.org.uk/recycling-centre">www.newmarketopendoor.org.uk/recycling-centre</a>
188	Against HRF due impact on bat colonies.	1	Please see the response to issue 039 above.
191	Statement that Anglian Lane, Barton Road and Mildenhall Road are all located near busy roads that would not cope with the anticipated 1000 plus movements per day.	1	Noted.  Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider Anglian Lane, Barton Road or Mildenhall Road to be the most suitable, available and deliverable sites on which to accommodate the WSOH (option 4) proposals.  All of the sites failed the exclusionary assessment because they were not large enough thus their suitability in highways/traffic terms was not considered at the qualitative assessment stage (because they did not progress to further assessment). At the exclusionary assessment stage however all three sites passed the highways/traffic related criteria. Highways/traffic matters were not therefore a factor which contributed to Anglian Lane, Barton Road or Mildenhall Road being unlikely to be pursued by the councils.
195	Question: why was RH rejected after being considered suitable on 2012? Is this so it can be sold for other development? If so, for what purpose is the money being raised?	1	The RH site is large enough for a waste transfer station and HWRC, but not for the WSOH proposals (which include a depot). If the hub is progressed, the RH site could be sold and the money used to offset the capital investment in the WSOH. The site could also be retained and leased – please see commentary in relation to ‘Immediate capital cost / realisation’ and ‘Long term revenue’ criteria in the options assessment matrix at Appendix A of the IAPOS report (post public consultation



			amended version).
197	Statement that out of date transport figures have been used (2010).	11	<p>At the point in time when information has been created and then provided to the public the partner councils have endeavoured to use the most up to date information. The 2013 traffic map included in the FAQs (12/02/16) was originally produced for the consultation in Spring 2015. At that time this was the most up to date information available. The partner councils have not reviewed this data from that time because it is about the highway close to the Hollow Road Farm site and the councils have made it clear that they would no longer have a preferred site for a WSOH until the second public consultation had concluded and feedback analysed.</p> <p>All information will be reviewed/updated as part of the development of a planning application for any site and this will include the information required for a Transport Assessment.</p> <p>A traffic survey for the HRF site was undertaken in July 2015 and if a planning application were to be submitted for that site this information would form part of a Transport Assessment accompanying that assessment.</p>
198	Statement "Somebody will get killed here one day. Do you want to vote for that?"	1	<p>Sadly, many people die on this country's roads for a variety of reasons, and no road which takes vehicles of any size or number anywhere can be considered to be 100% 'safe'. Highways and on-site safety are important matters which will be fully considered at the design, planning, permitting and operational stages of the project.</p> <p>With regard to highway safety please see the 'traffic, transport and highways – further assessment' section of response to issue 003 and response to issue 037 above.</p>
204	Comments about the site that was discounted due to a weak bridge: "If the bridge over the A14 that serves the proposed Saxham site is weak, why do I see HGVs using it on a daily basis?" and "have the bridge strengthened".	3	<p>Noted.</p> <p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider any of the Saxham based sites to be the most</p>

			<p>suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals.</p> <p>All of the Saxham sites failed the sites exclusionary assessment on the basis that they are too far from Bury St Edmunds ('proximity / relationship to Bury St Edmunds' criterion) and, in one case, on the basis of site size ('site size and shape' criterion). None of the sites failed on the basis of any of the three highway related criteria. The issues identified in the comments did not therefore contribute to the sites being unlikely to be pursued. Instead it was the sites' distance from Bury St Edmunds which led them to be considered unsuitable and therefore unlikely to be pursued.</p>
206	Suggestion that a lorry shuttle service could operate between Rougham Hill and RIE to transfer waste.	1	One of the key aims of the WSOH (option 4) proposals is to co-locate facilities to reduce 'waste miles' and the associated financial and environmental costs.
209	Statement: "Can appreciate why Hollow Road came out on top".	1	Noted
210	Statement: "It appears that other hubs are not in the middle of a town."	1	<p>It is agreed that a 'central' location is unlikely to be the best location for a waste or operational facilities and, possibly even less so, co-located waste and operational facilities.</p> <p>The site assessment process is based on a number of criteria which are designed to identify the most suitable, available and deliverable site for accommodating co-located waste and operational facilities. The criteria make it unlikely, although not inconceivable, that a site in the middle of town would be assessed to be the most suitable.</p> <p>The site which has emerged from the process as the most suitable, Hollow Road Farm, is located on the edge of the urban area of Bury St Edmunds rather than "in the middle" of it.</p>
211	Opposition to HRF because it's the wrong side of BSE and should be closer to Gt Blakenham and the A14	1	The locational criteria for the sites assessment is set out and explained at paragraph 6.29 of the IAPOS report. The justification for it is provided at Appendix H of the IAPOS report.
212	Statement that skip vehicle movement should be kept on the A14 as	1	Noted

	much as possible.		
218	Question: How will the new site affect current jobs?	1	Dependant on demand there may be a slight reduction in jobs or increase in capacity to take on additional work generated by new housing growth and new commercial opportunities. It is likely that any reduction in staff could be managed through natural staff turnover. In accordance with staff contracts, compensation for moving staff to another base will be paid where appropriate.
219	Question: What will the new site do?	1	<p>This is set out on page 6 of the Consultation Summary Booklet which states:</p> <p>The WSOH project would deliver the following facilities at a single site:</p> <ul style="list-style-type: none"> <li>• a new waste depot for vehicle storage and maintenance;</li> <li>• offices for the waste management teams;</li> <li>• a new centrally located waste transfer station near Bury St Edmunds, where household recycling and waste collections are consolidated before being sent for recycling or energy recovery; and</li> <li>• a new Household Waste Recycling Centre (HWRC) for public use.</li> </ul>
221	Support for HRF for reasons of geography and in order to have the least adverse impact on the town's residents.	1	Noted.
222	Support for HRF for reasons of efficiency and cost: Comments include: it will 'deliver a viable, modern, comprehensive and cost efficient system'.	2	Noted.
223	Request for vehicle movement (HGV/private) analysis to be published. Linked claim that this was promised following the 2015 consultation but is now not being published. Specific statement that the council was asked (under FOI) for information regarding what vehicles an upgraded Fornham Road could accommodate. Tonnage predictions should be included as well.	12	<p>Estimated vehicle movement data has been published and can be accessed via a link on page 13 of the previously published Frequently Asked Questions which can be found at <a href="http://www.westsuffolk.gov.uk/wsoh">www.westsuffolk.gov.uk/wsoh</a>.</p> <p>Analysis of vehicle movements and impacts would form part of the Transport Assessment which would need to accompany any planning</p>

			<p>application submitted (and would be specific to the site that the planning application was for) - see 'Traffic, transport and highways – further assessment' section of the response to issue 003 above.</p> <p>In terms of tonnage predictions, it is anticipated that any hub facility would be designed to accommodate the following (both WTS and HWRC tonnage):</p> <table border="1"> <tr> <td>Residual (kerbside and HWRC)</td> <td>50,598 tonnes</td> </tr> <tr> <td>Recycling (kerbside)</td> <td>15,714 tonnes</td> </tr> <tr> <td>Organic (kerbside)</td> <td>21,830 tonnes</td> </tr> <tr> <td>Organic (HWRC)</td> <td>3,320 tonnes</td> </tr> <tr> <td>Wood (HWRC)</td> <td>3,220 tonnes</td> </tr> <tr> <td>Other (HWRC)</td> <td>11,500 tonnes</td> </tr> <tr> <td><b>Total:</b></td> <td><b>106,182 tonnes</b></td> </tr> </table> <p>The information contained in the table above is an estimate of the full future potential volumes of waste to be handled rather than what can be expected in the short to medium term (including growth estimates).</p>	Residual (kerbside and HWRC)	50,598 tonnes	Recycling (kerbside)	15,714 tonnes	Organic (kerbside)	21,830 tonnes	Organic (HWRC)	3,320 tonnes	Wood (HWRC)	3,220 tonnes	Other (HWRC)	11,500 tonnes	<b>Total:</b>	<b>106,182 tonnes</b>
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225	Concerns about road infrastructure not being strong enough: "will we have deep ruts in the surrounding areas"	1	All highways matters pertaining to a particular site, including suitability of local roads, would form part of a Transport Assessment accompanying any planning application – please see 'Traffic, transport and highways – further assessment' section of the response to issue 003 above.														
226	Suggestion that the fleet depot for lorries, vans and cars needs to be close to the population centre with easy access for employees and on bus routes.	1	Determining the right location for a depot will depend on a number of factors. Accessibility for employees is an important consideration but is only one of these factors all the same. Accessibility for employees will need to be considered through the transport assessment prepared to support any planning application which is submitted – see second bullet point in 'Selection of criteria' section of response to issue 132 above. Having a depot for overnight parking immediately next to the place where the lorries drop off their loads collected during their household rounds would reduce the number of miles covered by bin lorries. Bus														

			transport is not always available for the start times of shifts.
235	Criticism of the assessment that HRF received +2 for "compatibility with surrounding land uses".	2	<p>The sites assessment has been carried out using a series of matrices. This assists with both the assessment process itself (in terms of comparison and, where relevant, scoring) and with comprehension of the assessment process. In the matrices which include scoring, as is the case with the sites qualitative assessment matrix, the score against each criteria is provided along with a commentary. The commentary is provided to help the assessor assess options or sites against the relevant criterion and to explain the score to anyone reviewing the assessment.</p> <p>The commentary in the sites qualitative assessment therefore provides the justification for the +2 score for Hollow Road Farm in relation to the "compatibility with surrounding land uses" criterion.</p> <p>The scoring of Hollow Road Farm against this criterion is analysed/further explained at paragraph 6.44a of the IAPOS report (post public consultation amended version).</p> <p>In the circumstances of this particular assessment (the sites assessment) therefore, the councils are confident that the scoring of Hollow Road Farm against the "compatibility with surrounding land uses" criterion is correct and, together with the scoring against the other qualitative criteria, is a sound basis for the conclusions reached in the IAPOS report.</p>
237	Statement that criteria should be based on: Keeping additional traffic movements within Bury St Edmunds to an absolute minimum. Keeping separation between the proposed unit and existing housing to a maximum. Keeping costs down to a minimum. Keeping visual and environmental impact to a minimum. Using existing resources where possible.	1	<p>Please see 'Selection of criteria' section of response to issue 132 above and responses to 'Section 1: Assessment of Options' feedback issues 032 and 231.</p> <p>It should be noted that the options and sites assessment processes are about balancing a large number of economic, social and environmental factors thus achieving maximums and minimums against some or all of the criteria is not necessarily realistic. Identifying a suitable site or</p>

			option is likely to be more about finding appropriate balance.
238	Statement that we 'would seek assurances that all transfer of waste was carried out inside the new buildings to avoid problems of smells and noise and that there should be sufficient space for all queuing to occur within the site. Road signage will also be required to ensure traffic is directed to avoid Barton Hill.	1	<p>Noted. The design of any facilities would incorporate these objectives. Further details about measures that would be taken to address these potential issues can be found in the previously published Frequently Asked Questions.</p> <p>The matter of road signage, as with all highways matters pertaining to a particular site, would need to be considered through a Transport Assessment accompanying any planning application – please see 'Traffic, transport and highways – further assessment' section of the response to issue 003 above.</p>
241	Statement that 'the new transfer facility should be enclosed to prevent problems with noise, smell, airborne pollution and bird attention.'	1	The Waste Transfer Facility (in effect a large barn-like structure with fast-closing doors) would be enclosed. Further information on this issues can be found in the previously published Frequently Asked Questions.
242	Statement that 'A household recycling facility needs to be as close as possible to the greatest number of users '	1	<p>Determining the right location for a household waste recycling facility will depend on a number of factors. Making the site as accessible as possible to as many people as possible is an important consideration but is only one of these factors all the same.</p> <p>The importance of making the site as accessible as possible to as many people as possible will need to be considered through the transport assessment prepared to support any planning application which is submitted – see second bullet point in 'Selection of criteria' section of response to issue 132 above.</p>
243	Statement that 'the Great Blakenham Energy from Waste plant has some 23 years remaining operational life'	1	The current contract to operate the Energy from Waste facility has 23 years left to operate but this could be extended by a further 5 years should the council wish to do this. The business case for the Energy from Waste plant includes provision of a waste transfer station close to Bury St Edmunds to service it during the lifetime of its contract.
248	Statement that there was no consideration of the Vision 2031 policy and impacts on TH in the assessment.	1	<p>Noted.</p> <p>It is assumed that this comment relates to the Bury Vision 2031 North-</p>

			West Bury St Edmunds strategic allocation (Policy BV3). No reference was made to this allocation in the sites qualitative assessment commentary relating to Tut Hill because it was considered too far from the site for there to be the chance of a significant impact occurring. However, in the case of the additional sites assessed in the post consultation amended version of the IAPOS report, the North-West Bury St Edmunds strategic allocation was referred to where relevant (i.e. in relation to the 'Land south of West Suffolk Crematorium' site). As the strategic allocation is a similar distance from this site as from the 'Tut Hill' site the associated commentary is included more by way of an informative than anything else.
249	Statement that access to HRF, if taken forward, should be from Compiegne Way.	1	Please see ' <a href="#">Access from Compiegne Way</a> ' section of response to issue 003 above'.
252	Needs to be a criteria considering the impact on the historic town and tourism - major risk of impacting this.	4	Please see fifth bullet point in ' <a href="#">Selection of criteria</a> ' section of response to issue 132 above.
254	Statement that Symonds Farm, HRF and TH all have the same transport issues.	1	The suitability of these sites in transport terms has already been considered through the sites assessment process (please see ' <a href="#">Traffic, transport and highways – assessment to date</a> ' section of response issue 003 above) and will be considered further, but only in relation to the site which is pursued, during the preparation and determination of any planning application (please see ' <a href="#">Traffic, transport and highways – further assessment</a> ' section of the response to issue 003 above).
255	Concern regarding the current situation in Risby and concern that any proposals could make this worse. Safety concern regarding the speed of traffic through the Green and near the school. Concern that congestion could increase this risk. Specific concern regarding South Street and its slip road. Specific concern regarding the junction of A14 and Cavenham Road.	2	No sites directly in the Risby/Saxham area passed the sites exclusionary assessment thus it is unlikely that the councils will pursue any of them. One of the new sites suggested through the public consultation that passed the exclusionary assessment comprises land south of the West Suffolk Crematorium. However, the westernmost end of this site is still over 850m from the edge of Risby village. The concerns raised are therefore unlikely to materialise (in relation to the WSOH proposals at least).

257	Concern regarding the railway bridge near junction 41 (of the A14) and concern that it could not handle more traffic.	1	No sites directly in the Risby/Saxham area passed the sites exclusionary assessment thus it is unlikely that the councils will pursue any of them. One of the new sites suggested through the public consultation that passed the exclusionary assessment comprises land south of the West Suffolk Crematorium. However, the westernmost end of this site is still over 850m from the edge of Risby village. The concerns raised are therefore unlikely to materialise (in relation to the WSOH proposals at least).
265	Criticism of the 'availability' criteria as the councils should have the power to CPO the best site. Specific link to TH.	11	This matter is addressed by paragraphs 6.48 to 6.50 of the IAPOS report (post public consultation amended version).  It should also be noted that the sites assessment process identified Hollow Road Farm as the most suitable, available and deliverable site. Tut Hill scored less well and is therefore considered to be less suitable, available and deliverable.
266	Criticism of the lack of assessment of neighbouring roads, especially given the new development at Mildenhall.	1	It is not clear what the point being made here relates to. However, traffic and transport issues (including the suitability of and impact on the local road network) has been extensively assessed through the options and sites assessment processes. Please see ' <a href="#">Traffic as a criteria in assessing options</a> ' section of response to issue 027 above.
267	Suggestion that 'safety' should be a criteria.	1	The partner councils' view is that rather than safety being an issue in its own right (for the purposes of the sites assessment) it is a function of the other considerations, e.g. highways/transport/traffic considerations.  Please also see responses to: <ul style="list-style-type: none"> <li>• The response to 'Section one: Assessment of options' feedback issue 176;</li> <li>• The "<a href="#">Fire risk</a>" section of the response to issue 035 above; and the response to issue 129 above.</li> </ul> <p>In terms of operational safety, operational practices and risk assessments addressing site Health and Safety will be undertaken in the</p>



			same way they are now.
269	Criticism of the approach to modelling route mileage. Statement that this was using route mapping software which ignores considerations such as impact on transportation routes and cannot consider future growth in the area.	2	<p>These comments are noted. However, while it is accepted that no approach to modelling vehicle movements is perfect it is considered that the approach is reasonable and is proportionate to the purpose and objective of the work.</p> <p>Should the proposals for a WSOH progress to planning application stage they will be the subject of further detailed traffic modelling as part of the transport assessment process (see 'Traffic, transport and highways – further assessment' section of response to issue 003 above).</p>
275	Detailed observations on the sustainability appraisal from the West Suffolk environmental services team.	1	These have been addressed in the Statutory Consultee responses in Section 6 of the consultation report.
276	Observation by the West Suffolk environmental team that neither site (TH or HRF) would experience air quality impact.	1	<p>The assessment and scoring of Tut Hill and Hollow Road Farm against the 'potential for impact on air quality' criterion in the IAPOS report has been reviewed by the councils. Having done so the partner councils were happy with the assessment of the sites against this criterion and their consequent scores. They have set out the main reasons for this as follows:</p> <ul style="list-style-type: none"> <li>• The criterion is entitled "potential for impact on air quality". This title accepts that a detailed assessment of air quality is not appropriate at this stage. In view of this fact the criterion considers the factors which could give rise to a potential impact. One such factor is 'number and proximity of sensitive receptors'. 'Planning for Waste Management Facilities: A Research Study' advises in relation to waste transfer stations (under the heading 'General Siting Criteria'):  <i>"Sites closer than 250 m from residential, commercial, or recreational areas should be avoided. Transfer routes away from residential areas are also preferable."</i>  At Tut Hill the nearest sensitive nearest sensitive receptors are</li> </ul>

			<p>only 125m away whereas at Hollow Road Farm the nearest sensitive receptors are 305m from the site.</p> <ul style="list-style-type: none"> <li>• The proximity of sensitive receptors to the site is a key issue in local residents' responses despite the fact that it may not give rise to a significant impact in terms of air quality.</li> <li>• Despite there being sensitive receptors closer to the main route to and from Hollow Road Farm than is the case with Tut Hill, the proportionate increase in traffic on this route which would result from locating the WSOH (option 4) proposals at Hollow Road Farm would be relatively small. In the case of Tut Hill the proportionate increase would be larger.</li> </ul> <p>Further details are provided in Section 6 of this report <i>Consultation with statutory organisations</i>.</p>
279	Statement that the appraisal needs to be re-run to take into account the changes to brown bin collection, which will increase the risk of odour and rats at the site.	9	The new garden waste service will see brown bin waste being delivered directly to the processing location (where the waste is composted), not to any waste transfer station.
280	Assertion that the costs of upgrading / improving the feeder roads from the A14 to HRF have not been considered and would be necessary for safety, capacity and drainage.	5	This would be a matter for any transport assessment prepared to support a planning application for the WSOH proposals (should one be forthcoming). Please see 'Traffic, transport and highways – further assessment' section of response to issue 003 above.
281	Page 110 of the IAPOS stating that road noise will be an impact most of the time. What's the mitigation proposals to deal with that? Assertion that hedges take years to grow.	1	<p>The commentary relating to Hollow Road Farm in the sites qualitative assessment matrix does not state that 'noise will be an impact most of the time'. Instead it includes the following note in relation to the assessment of all sites assessed against the 'Potential for impact from noise and vibration' criterion:</p> <p><i>“(See two columns to left [referring to the 'potential for impact from odour' criterion/column which makes reference to the nearest <u>downwind</u> sensitive receptors for each site] where for the same distance from the site the noise impact has the potential to be</i></p>

			<p><i>greater for the majority of the time)</i>"</p> <p>The only point being made here is that potential for noise impact on sensitive receptors which are located downwind of any of the sites is greater than it would be for identical sensitive receptors located the same distance away in an upwind location, for example. The note does not state, and does not mean, that there "will be a noise impact most of the time".</p> <p>The detailed assessment of noise impact, including the proximity of sensitive receptors (especially downwind sensitive receptors), is a matter for a noise impact assessment. A noise impact assessment is likely to be required as part of any planning application submitted for the WSOH proposals – see response to issue 034 above).</p>
282	General observation there is not enough detail on the proposed mitigation measures making it impossible for the residents to judge the impact of HRF.	1	As stated before, this consultation was not specifically about HRF. Mitigation measures would be fully considered through the preparation and determination of any planning application which is forthcoming once the optimal site is identified and agreed between the councils and a decision taken to proceed with it. Mitigation is necessarily site specific so cannot be considered in any detail before a specific site is identified.
288	Questioning the origin of the 250m radius and whether or not it's just be chosen for convenience.	4	Please see response to issue 068 above.
296	Statement that RH outperforms HRF for a WSOH on capital cost reasons. Specific reasons that it avoids the need to upgrade the feeder roads to HRF, site construction cost would be lower, land purchase cost would be lower.  Linked point that this saving could be used to support front line services.	25	The sites identified at Rougham Hill are not large enough to accommodate an Operational Hub. In addition to the capital cost there are other economic, social, environmental and revenue cost factors which have been considered in the assessment and which the partner councils believe are important factors. Running three operations together on a single site would cost less than having two sites. Capital savings cannot be used to fund revenue costs, including front line services.

297	Statement that RH out performs HRF for a WSOH on transport issues. Specific reasons include that the round trip for WTS lorries would be 5 miles and "the distance from A14 junction 43 to HRF or RH is the same, which would result in greater waste miles for dust carts".	25	The existing household waste recycling centre site at Rougham Hill failed the sites exclusionary assessment and is therefore considered unsuitable for delivering the WSOH proposals. It does not therefore outperform Hollow Road Farm as is asserted.
298	Statement that RH needs to be considered in light of the reduced chance of the proposed 1250 homes going ahead; this due to flood risk and travellers site.	24	The existing household waste recycling centre site at Rougham Hill failed the sites exclusionary assessment and is therefore considered unsuitable for delivering the WSOH proposals.
301	Disagree with objections to HRF based on perceived dangers of public vehicles mixing with waste vehicles, as they can be easily and safely separated on site.	1	Noted.
302	Suggestion that an assessment be made of likely changes to waste related vehicle movements in the historic zone of Bury St Edmunds for both Rougham Hill and HRF as comparisons	1	The provision of the WSOH is very unlikely to lead to an increase in waste vehicle traffic through the historic area of the town.
303	Concern that noise, lighting and smells are inevitable and will be worse in winter. Statement that doors will be left open and existing sites are known for this.	1	These matters are addressed in the previously published Frequently Asked Questions (pages 10 and 11 in particular).
305	Statement that there are only 7 criteria to consider: A. Cost B. Savings C. Access D. Convenience of location E. Minimal interference F. Minimal downgrading of environment for local residents G. Long term capability	1	This comment mixes the issues of options assessment and sites assessment which have to be conducted separately. It also does not acknowledge a large number of economic, social and environmental factors which are critical to the full and proper assessment of the options and sites. Full lists of criteria used for assessing the options and sites are set out in the IAPOS report (post consultation amended version, Chapters 5 and 6) along with the reasons for their inclusion. In the absence of any explanation as to why some or all of these criteria should be removed or new criteria should be added it is contended that the criteria used within the options and sites assessments are appropriate and suitable for purpose.
310	Statement that the assessment of HRF for flood risk is flawed, specifically because the knock on effect of developing the site have not been considered. Highlights downhill flooding from HRF at Compiegne Way and Chapel Pond Hill.	1	The detailed assessment of flood risk will be a matter for a flood risk assessment which will be required as part of any planning application submitted. Detailed assessment of flood risk is necessarily site specific so reasonably can only be carried out once a specific site has been chosen.

			<p>The sites assessment takes account of flood risk at the exclusionary assessment stage. Sites where the majority of the site area falls within flood zone 1 pass the 'flood risk' criterion whereas sites where the majority of the site area lies within flood zones 2 or 3 would score a 'caution' or 'fail'. Paragraph 6.21 of the IAPOS report explains the use of 'caution' scores. A caution score would be applied in relation to flood risk where it is unclear whether the site's flood risk zone status (the zones it is in and the amount of the site in each zone) would preclude development of it.</p> <p>Hollow Road Farm passes the 'flood risk' criteria on account of the fact that the whole site lies in flood zone 1. This means that the development of the site will be acceptable in terms of flood risk subject to the flood risk associated with the development proposals themselves being acceptable. This would need to be demonstrated through a flood risk assessment (see above).</p> <p>The assessment of the flood risk associated with Hollow Road Farm through the sites assessment process is not flawed therefore. If the site is pursued the flood risk posed by the development proposals themselves (WSOH (option4)) will be assessed through a flood risk assessment. It is likely it will be possible to design a development that is acceptable in terms of flood risk.</p>
313	Were existing sites assessed to see if they could be expanded.	1	Yes, an existing site (the existing household waste recycling centre site at Rougham Hill, together with adjoining land and other land nearby) was included in the sites assessment but failed on the basis that it was not large enough (even taking into account the adjoining and additional land).
315	Advised that £50,000 is insignificant and won't affect the site choice.	2	Noted - this matter is addressed on page 22 of the Consultation Summary Booklet.

316	Specific concern regarding congestion around Tollgate Public House and Tesco roundabout when closure of access to A14 via Fornham All Saints and Tut Hill happens.	1	Please see responses to issues 003, 004 and 027 above.
320	Assertion that the councils originally stated HRF was not the preferred site, why is it now.	1	<p>As part of the public consultation on the identification and assessment of potential options and sites for meeting the councils' waste and operational needs (January – February 2016) the councils made it clear that the consultation process was not linked to any specific options or sites for delivering the facilities required as they were seeking views on the process used to assess various options and sites. They also sought alternative site suggestions in case any sites had been missed. The reason for this approach was/is explained on pages 7 and 8 of the Consultation Summary Booklet which states:</p> <p style="padding-left: 40px;">“Land at Hollow Road Farm was assessed to be the most suitable, available and deliverable site. Therefore, by the end of February 2015, the councils considered the Hollow Road Farm site to be the optimal site for accommodating the facilities required.</p> <p style="padding-left: 40px;">A consultation was carried out in advance of submitting a planning application; however this identified the need to consult further on the options and site assessment processes. This consultation is focused on those processes” (page 8, Consultation Summary Booklet).</p> <p>The result of this was that Hollow Road Farm while considered to be the most suitable, available and deliverable sites was not the partner councils' 'preferred' site because a decision to pursue Hollow Road Farm in preference to any other site had not been, and still has not been, taken.</p> <p>It remains the case that the partner councils do not have a preferred</p>

			site. While the IAPOS report (both the original version and the post consultation amended version) identify Hollow Road Farm as the most suitable, available and deliverable site this is different from it being the councils' preferred site until a formal decision is made to progress to a planning application.
323	No way of ensuring HGVs won't use residential routes without alterations to highways.	1	<p>HGVs under the control of the councils will be required not to use residential roads unless it is for operational purposes, such as picking up bins from households.</p> <p>All of our vehicles are tracked using a system called Quartix. When vehicles roam outside of expected routes we can set-up alarms for supervisors who will investigate why a vehicle has deviated.</p>
324	Suggestion that access on HRF should be shifted to the south.	1	<p>This would be a matter to be addressed though the preparation and determination of any planning application submitted if HRF is chosen as the site for a WSOH. It would need to be considered through:</p> <ul style="list-style-type: none"> <li>• The detailed scheme design/layout;</li> <li>• A transport assessment; and</li> <li>• Consultation with the highway authority.</li> </ul> <p>The eventual location of the access would depend on a number of factors including, but not necessarily limited to, highway design requirements and highway safety.</p>
325	Statement that respondent was told owner of HRF was assured no food waste would go on site, which doesn't match with change to brown bins.	2	The new garden waste service will see brown bin waste being delivered directly to the processing location (where the waste is composted), not to any waste transfer station. Residual (black bin) waste will be transported to any proposed WTS for bulking and onward transportation to the Energy from Waste site at Gt Blakenham. This waste contains a proportion of food waste.
326	Statement only current, not planned, residents should be considered.	1	<p><u>Planned growth and provision of services</u></p> <p>Any provider of public services, such as health, transport networks or councils, must consider future demands on their services. It would be too late to start thinking of providing new facilities to cope with the waste generated by thousands of new homes only when those new</p>

			homes have been built.  <u>Planned growth and assessment of impact</u> Please see paragraph 6.42a of the IAPOS report (post public consultation amended version).
328	Statement that only emissions from HGVs have been considered not private vehicles. Criteria are different to what has been considered so far.	4	This is not the case. The 'potential for impact on air quality' criterion considers the impact of traffic emissions from all sources including private vehicles.  It should also be noted that the potential for impact on air quality would be assessed in more detail at the planning application preparation and determination stages. See 'Air quality' section of response to issue 003 above.
329	Questioning assertion that an eastern site is better, as the number of trips travelling east to Great Blakenham will be comparatively small. Statement that centre point of population is J41 (evidence supplied in form #491).	3	This assertion and justification provided contradicts the councils' own assessment.  The council has assessed and considered the matter in detail including through the use of Routesmart software. The locational criteria for the sites assessment, which is a result of this assessment work, is set out and explained at paragraph 6.29 of the IAPOS report. The justification for the criteria (which summarised the assessment work) is provided at Appendix H of the IAPOS report.  The councils consider the findings of the assessment, taking into account the outputs from the Routesmart software, to be a sound and robust basis for the location based criteria included in the sites assessment process undertaken.
330	Statement that availability cannot be assessed as the council has said that it can't approach each land owner for fear of increasing the price for land.	1	There is always a possibility that landowners may consider asking a higher price for their land if someone asks to buy it. It would not be appropriate to ask the owner of every single site if their land was available and, if so, at what cost if the criteria had immediately excluded it due to it being the wrong size or location, for example. Only the landowners of sites which may be suitable would be approached to



			ask if their land was available. A land option at HRF was agreed with the owner once it was identified through the councils' original assessment process as being the most suitable site to secure the price of the land and prevent it from rising.
344	New criteria should be added and reassessed on the basis of financial risk and environmental impact of transport.	1	<p>These matters are already considered as part of the following criteria:</p> <p>Options assessment</p> <ul style="list-style-type: none"> <li>• Immediate capital cost / realisation;</li> <li>• Long term capital cost / realisation;</li> <li>• Operational cost / savings;</li> <li>• Commercial desirability / value to prospective bidders / operators; and</li> <li>• <u>Environmental impact (including carbon impact / footprint).</u></li> </ul> <p>Sites assessment</p> <ul style="list-style-type: none"> <li>• Suitability of local road network and extent to which access would require reliance on local roads; and</li> <li>• Compatibility with NPPF section 4 (Promoting sustainable transport) and NPPfW paragraph 5.</li> </ul> <p>Financial risk is considered to be a factor for any potential site and its development, It is therefore considered that the criteria used within the options and sites assessments are appropriate and suitable for purpose. The assessments of the options and sites against the above listed criteria have been reviewed in light of the feedback but have not been altered.</p>
346	Linked to 117, report from forum organised by Great Barton PC, Risby, Rougham and Rushbrooke, the Fornhams, which held events. The consensus was for SF but new site adjacent to the Greenways Biomass site and proximity to SIE was included as positives. Detailed positives for site in [#511 and #512].	4	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider any of the Saxham based sites to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals.</p> <p>All of the Saxham sites failed the sites exclusionary assessment, on the</p>

			basis that they are too far from Bury St Edmunds ('proximity / relationship to Bury St Edmunds' criterion). This is the primary reason that led to the Saxham sites as a whole being considered unsuitable and therefore unlikely to be pursued though some failed for other reasons as well.
348	Suggestion that a carbon footprint assessment of each site should be undertaken and include; door-to-door collections, anticipated journeys to the HWRC and the bulk transfer to Great Blakenham.	2	The suggested approach is considered disproportionate to the high level options and sites assessments which have been carried out. Such an approach would be more relevant, but not necessarily required, at the planning application preparation stage.
351	Question about how many staff cars, how many fleet vehicles.	1	The traffic movements table to which there is a link on page 13 of the previously published Frequently Asked Questions ( <a href="http://www.westsuffolk.gov.uk/wsoh">www.westsuffolk.gov.uk/wsoh</a> ) includes an estimate of the number of staff cars and fleet vehicles using the site.
352	No mention of 'private hire' vehicles that have to visit the depot.	1	It is not clear what is meant by 'private hire' vehicles in this context. However, the traffic movements table to which there is a link on page 13 of the previously published Frequently Asked Questions ( <a href="http://www.westsuffolk.gov.uk/wsoh">www.westsuffolk.gov.uk/wsoh</a> ) includes an estimate of the number of vehicles using the depot for maintenance, MOTs etc.
353	Why has SEBC changed their mind from when they opposed a combined scheme at RH on the grounds of traffic and local residents, but now want a much bigger site.	1	<p>St Edmundsbury Borough Council has not "changed its mind". The Council's opposition to Rougham Hill was specific to Rougham Hill. The Council, together with Forest Heath District Council and Suffolk County Council is now seeking a suitable site on which to locate the new waste and operational facilities it requires. The sites assessment process that the councils have carried out has demonstrated the existing household waste recycling centre site at Rougham Hill to be unsuitable for a combined hub.</p> <p>Further, in their capacity as waste collection authorities, St Edmundsbury Borough Council and Forest Heath District Council are responsible for collecting waste and, along with Suffolk County Council, disposing of waste. In fulfilling this role the councils have to think about not just the existing households and businesses they have to serve but</p>

			<p>also any planned growth in order that its waste and operational services have the necessary capacity at the appropriate time in the future. This is one of the key reasons why St Edmundsbury Borough Council, along with Forest Heath District Council and Suffolk County Council, is seeking a new site of a specific size on which to deliver new waste and operation facilities.</p> <p>A full justification for the size of site sought is provided at Appendix G of the IAPOS report.</p>
354	IAPOS report implies that the majority of sites were identified when only looking for a WTS, which makes it unsurprising most failed to host a WSOH.	1	<p>The site size requirement for the WSOH (option 4) proposals is greater than for a waste transfer station (WTS) alone. As is being suggested, this means that if a site is too small for a WTS it will also be too small for the WSOH. This doesn't invalidate the sites assessment.</p> <p>Sites considered acceptable in planning terms for a WTS are, in principle at least, likely to be acceptable for the WSOH proposals. It is right therefore that those sites were reviewed and discounted rather than being dismissed without further consideration. The sites assessment process continued until a suitable site or sites were found, as the IAPOS report explains/demonstrates.</p> <p>The purpose of the IAPOS public consultation was to see whether there were any potential sites that the partner councils had missed. A number of new sites were identified through the public consultation. These have now been assessed in the same manner as the original batch of sites.</p>
356	Unclear how most sites received same score for commercial opportunities / income generation.	1	<p>Most of the sites did not score the same for "Commercial opportunities / income generation". Only options 4 and 5 scored the same (+2). Options 4 and 5 scored the same because they are comparable in terms of the elements which would provide the commercial opportunities and would have the same customer base.</p>

358	Suggestion that opponents to the previous RH site were responsible for HRF being taken forward / pushed.	2	A full chronology of and background to the WSOH hub (option 4) proposals is provided at Section 3 of the IAPOS report (see also response to comment 353 above).
360	Consideration needs to be given to the impact of the St Genevieve Lakes Development and the increased traffic / additional residential areas.	1	Noted. Traffic assessment and highways design matters are site dependent and would be fully assessed as part of the Transport Assessment which will need to accompany any planning application made for the WSOH proposals
366	Statement that land at HRF appears to be subject to Environmental stewardship.	1	The information is not considered to be relevant to the assessment of sites or any future planning application.
368	Statement that reference to site "near" BSE but never "in" betrays a pre-determination.	1	This was not the intention – sites near or <i>in</i> Bury St Edmunds are considered by the councils to be suitable in locational terms. However, all sites, whether in or near Bury St Edmunds would need to be assessed against the full set of criteria to determine whether or not they were considered suitable in other respects. As far as the partner councils are aware there are no suitable sites in Bury St Edmunds.
370	Concern that the site at HRF would allow the area to become an industrial area as it grew.	1	If a planning application were made for this site the partner councils would be arguing for it to be treated as an exception in planning terms based on the circumstances of the case (planning law states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise). Planning decisions do not create legal precedents. Further, the fact that this case would have to be treated as a special case (based on its individual merits) for it to be approved only serves to confirm that no precedent would be created by any planning permission which ends up being granted.
375	Accusation that partner councils don't want it in their area.	1	On the contrary, the councils are looking for a site in an appropriate area – in this case in the vicinity of Bury St Edmunds (part of St Edmundsbury Borough Council and Suffolk County Council's area). We are not looking for a site in FHDC because that would be too far from the Energy from Waste facility.

### Feedback – Section three: Site suggestions

#	Comment	Number	Response Forest Heath District Council, St. Edmundsbury Borough Council, Suffolk County Council
006	Suggestion for Suffolk Business Park (SBP). Reasons include: Good site for Waste Transfer Station. Away from housing. Good A14 access. Access to the new proposed link road to Skyliner Way from the A14 at j45. Closer to Gt Blakenham, immediate access off A14, less traffic here than at j43 and Compiègne Way. Comment also that it would be suitable if the HWRC is retained at RH. Surprise that it is excluded on the basis of proximity to BSE and highways access. Acknowledgement that the Eastern Relief Road is required for this. Statement that the original negative score for SBP was given before the Relief Road was granted consent. Suggestion the additional miles are easily balanced by the reduced impact on residents. Supports the green corridor aspiration. Reduces sprawl and impact on wildlife. Designated within Vision 2031. Statement that if there has to be a WSOH, this is the best site for it.	62	Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider the extension to Suffolk Business Park to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.33 to 6.36 of the IAPOS report (post public consultation amended version)).  NB Notwithstanding the findings of the original IAPOS report in relation to the extension to Suffolk Business Park site the councils' assessment of it has been checked as part of their post public consultation work.
007	Support for SBP on the basis of links to A14.	3	Please see response to issue 006 above.
008	Support for SBP on the basis of distance from residents.	2	Please see response to issue 006 above.
030	Suggestion for land at/near Rougham Industrial Estate (RIE). Reasons include: close to A14, industrial area, away from residents and the town.	33	A site suggestion was received for "Land near SCC/Kier highways depot at Rougham Industrial Estate, Rougham". As can be seen in the Sites assessment matrix 1 (at Appendix B of the IAPOS report (post public consultation amended version)), this site was deemed to be the same as the extension to Suffolk Business Park site (please see response to issue 006 above) because there are no brownfield sites of significant size available at Rougham Industrial Estate. Accordingly, the site suggestion was discarded (see paragraph 6.17a of IAPOS report (post public consultation amendment version)).

			<p>If the intention was to suggest Rougham Industrial Estate as a suitable site please see paragraphs 6.32 and 6.33 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B.</p> <p>NB. Notwithstanding the findings of the original IAPOS report in relation to the extension to Suffolk Business Park and Rougham Industrial Estate sites the councils' assessment of them have been checked as part of their post public consultation work.</p>
040	Suggestion/support of Tut Hill (TH). Reasons include proximity to A14 and distance from residents.	18	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider Tut Hill to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals.</p> <p>Contrary to the one of the reasons provided in this piece of feedback for supporting the Tut Hill site, one of the reasons the site was considered less suitable was its limited distance from the nearest dwellings. In relation to "proximity of sensitive receptors" the site scored less well than some of the other sites. This was therefore a factor which contributed to Tut Hill being unlikely to be pursued by the councils.</p> <p>The site's suitability in terms of highways matters and its proximity to Bury St Edmunds was outweighed by other factors including the proximity of sensitive receptors.</p>
041	Statement that the Suffolk Business Park is not suitable 'for all, or part of, any waste hub'. Reasons include: increased traffic on Eastern Relief Road, Lady Miriam Way, Sow Lane and Mount Road, compromising safety of pupils at the Academy	9	Please see response to issue 006 above.

088	Site suggestion: British sugar site. Reasons include: dual carriageway access, keeping pollution and noise in an industrial area, away from residents and businesses. Statement that reasons against are difficult to find.	5	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider the British Sugar site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 and 6.33 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B).</p> <p>NB Notwithstanding the findings of the original IAPOS report in relation to the British Sugar site the councils' assessment of it has been checked as part of their post public consultation work.</p>
089	Site suggestion: Eastern Way. Reasons include: dual carriageway access, keeping pollution and noise in an industrial area, away from residents	1	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider the Eastern Way site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 and 6.33 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B).</p> <p>NB Notwithstanding the findings of the original IAPOS report in relation to the Eastern Way site the councils' assessment of it has been checked as part of their post public consultation work.</p>
093	Site suggestion: RAF Mildenhall. Reasons include: away from public houses and schools, central to east Anglia, using environmental waste incinerator at the site. Statement the Hub does not need to be east of BSE. Would only require a small new section of road.	19	<p>RAF Mildenhall is a site which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The IAPOS report has been amended to include and reflect the assessment of this site and</p>

			<p>the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider the RAF Mildenhall site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 to 6.34 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B). As is set out at paragraph 6.34 of the IAPOS report, despite it being of sufficient size, the RAF Mildenhall site failed the sites exclusionary assessment on the basis of its distance from Bury St Edmunds (“proximity/relationship to Bury St Edmunds” criterion)</p>
095	<p>Site suggestion: Tuddenham/Barrow junction of A14. Reasons include: A14 access, more central, rail access . Land is up for sale soon. Prevailing wind in the right direction.</p>	2	<p>This ‘site’ suggestion was too imprecise as suggested to enable assessment. Assumptions were therefore made as to a series of parcels of land it might apply to. These can be seen in the plan entitled “Vicinity of J40 A14, Near Higham” at Appendix D of the IAPOS report (post consultation amendment version). The name of the site as suggested was changed to “Vicinity of A14 J40 (Higham)” for the purposes of the assessment.</p> <p>The ‘Vicinity of A14 J40’ site is one which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The IAPOS report has been amended to include and reflect the assessment of this site and the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended</p>



			the IAPOS report the councils do not consider the 'Vicinity of A14 J40' site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.37 and 6.38 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 2 at Appendix B). As is set out at paragraph 6.38 of the IAPOS report, despite it being of sufficient size, the 'Vicinity of A14 J40' site failed the sites exclusionary assessment on the basis of its distance from Bury St Edmunds ("proximity/relationship to Bury St Edmunds" criterion).
098	"Not near Bury".	1	Please see paragraphs 3.7 and 3.8 and Appendix H of the IAPOS (post public consultation amended version).
100	"Site should be near largest town e.g. Bury St Edmunds"	1	Noted. This agrees with the councils' approach - please see paragraphs 3.7 and 3.8 and Appendix H of the IAPOS (post public consultation amended version).
101	Site suggestion: link with new hospital site. Reasons include: cost saving	1	This suggestion has not been pursued (aside from the merits/demerits of any particular sites which may be being referred to). The three main reasons for not pursuing the suggestion are: <ol style="list-style-type: none"> <li>1. The hospital is considered to be a 'sensitive receptor' for the purposes of the councils' options and sites assessment process;</li> <li>2. The hospital and WSOH (option 4) proposals are not considered to be compatible land uses (mainly in view of point 1 above); and</li> <li>3. Despite a site having been identified for the relocation of the hospital within the West Bury St Edmunds strategic allocation (Policy BV5, Bury Vision 2031) there aren't, as far as the councils are aware, any definite plans for the hospital to relocate at this moment in time.</li> </ol>
103	Site suggestion: Tuddenham-Bury road. Reasons include: easy access to A14, non residential areas	1	This 'site' suggestion was too imprecise as suggested to enable assessment. Assumptions were therefore made as to the area of land it might apply to. This area is shown on the plan entitled

			<p>'Land south east of Tuddenham' at Appendix D of the IAPOS report (post consultation amendment version). The name of the site as suggested was changed to 'Land south east of Tuddenham' for the purposes of the assessment in view of the fact that there is no "Bury Road" in Tuddenham.</p> <p>The 'Land south east of Tuddenham' site is one which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The IAPOS report has been amended to include and reflect the assessment of this site and the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider the 'Land south east of Tuddenham' site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.37 and 6.38 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 2 at Appendix B). As is set out at paragraph 6.38 of the IAPOS report, despite it being of sufficient size, the 'Land south east of Tuddenham' site failed the sites exclusionary assessment on the basis of its distance from Bury St Edmunds ("proximity/relationship to Bury St Edmunds" criterion).</p>
104	Site suggestion: Ingham-Thetford road. Reasons include: easy access to A14, non residential areas	1	This 'site' suggestion was too imprecise as suggested to enable assessment. Assumptions were therefore made as to the areas of land it might apply to. These areas are shown on the plan entitled 'Thetford Road, Ingham' at Appendix D of the IAPOS report (post consultation amendment version).

			<p>The 'Thetford Road, Ingham' site is one which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The IAPOS report has been amended to include and reflect the assessment of this site and the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider the 'Thetford Road, Ingham' site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.37 and 6.38 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 2 at Appendix B). As is set out at paragraph 6.38 of the IAPOS report, despite it being of sufficient size, the 'Thetford Road, Ingham' site failed the sites exclusionary assessment on the basis of its distance from Bury St Edmunds ("proximity/relationship to Bury St Edmunds" criterion).</p>
105	Site suggestion: former NHS site, next to Council offices. Reasons include: big enough, empty warehousing, in an industrial zone, decent road, not far from A14	1	<p>The 'NHS/DHL logistics site, Olding Road, BSE' is a site which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The site was considered together with St Edmundsbury Borough Council's existing vehicle depot which adjoins it in view of the fact that the WSOH (option 4) proposals, for which a site is being sought, include the replacement of the existing depot. The IAPOS report has been amended to include and reflect the assessment of this combined site and the other sites suggested through the public</p>

			<p>consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider the 'NHS/DHL logistics site, Olding Road, BSE' site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 and 6.33 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B). As is set out at paragraph 6.33 of the IAPOS report, the combined site failed the sites exclusionary assessment because it wasn't large enough ("Site size and shape" criterion)</p>
106	Site suggestion: western side of Bury St Edmunds. Reasons include: likelihood of a 'huge number' of new houses	1	This is too imprecise to enable it to be assessed and is not therefore a site suggestion. Several sites on the western side of Bury St Edmunds (and to the west of Bury St Edmunds) have however been considered as part of the sites assessment process (please see section 6 of the IAPOS report (post public consultation amendment version).
116	Question if any sites near Mildenhall or Newmarket would be acceptable.	1	Please see paragraphs 3.7 and 3.8 and Appendix H of the IAPOS (post public consultation amended version).

117	<p>Site suggestion: Symonds Farm (largely for WTS). Reasons include: if option 3 or 5 is taken forward, it could come out as the best performing site and it would be suitable for rail. Close to A14 with easy access east and west. Few people affected large enough and close for easy transfer. Closer to Newmarket and suited for handling waste from West Cambridgeshire. Recurring comment: To be used in conjunction with RH site if the HWRC was retained there. Existing offer to host WTS. Suggestion there is land to the west available. Landowner is willing to sell. Enables the creation of the public service village at Western Way and the OPEP. Creates possible revenue streams.</p> <p>Criticism of the proximity criteria, stating that it could have easily been a positive if it was described as 'only' 2km from BSE, rather than 'over' 2km.</p> <p>Suggested layout included as a map.</p>	90	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational facilities they require, the councils do not consider options 3 or 5 to be the best performing options for delivering the facilities (please see section 5 of the IAPOS report (post public consultation amended version)).</p> <p>Further, the preparation of the IAPOS report and formalisation of the options and sites assessment processes has enabled the councils to establish that Symonds Farm is not the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.37 and 6.38 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 2 at Appendix B). As is set out at paragraph 6.38 of the IAPOS report, despite it being of sufficient size, Symonds Farm failed the sites exclusionary assessment on the basis of its distance from Bury St Edmunds (“proximity/relationship to Bury St Edmunds” criterion).</p> <p>NB Notwithstanding the findings of the original IAPOS report in relation to Symonds Farm the councils’ assessment of it has been checked as part of their post public consultation work.</p> <p>In relation to rail transport please see Appendix L of the IAPOS report (post public consultation amended version).</p>
136	<p>Site Suggestion: land diagonally opposite Tut Hill, between the railway and the A14. Reasons include: better rail access</p>	1	<p>This site suggestion is understood to be the area of land shown on the plan entitled “Field between Westley roundabout and Saxham Business Park” at Appendix D of the IAPOS report (post consultation amendment version). The name of the site as suggested was changed to “Field between Westley roundabout and Saxham Business Park” for the purposes of the assessment.</p>

			<p>The 'Field between Westley roundabout and Saxham Business Park' site is one which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The IAPOS report has been amended to include and reflect the assessment of this site and the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider the 'Field between Westley roundabout and Saxham Business Park' site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.37 and 6.38 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 2 at Appendix B). As is set out at paragraph 6.38 of the IAPOS report, despite it being of sufficient size and close enough to Bury St Edmunds it failed the sites exclusionary assessment criterion on the basis of its limited highway frontage and curtailed sightlines (which mean that suitable access arrangements cannot be delivered - "access to / from primary highway network" criterion).</p> <p>In relation to rail transport please see Appendix L of the IAPOS report (post public consultation amended version).</p>
139	Site suggestion: area just off the A14. Reasons include: lorries would have a clear run with no roundabouts	1	<p>The councils' sites assessment process has considered a number of sites located adjacent or very close to the A14. The assessment process is detailed at section 6 of the IAPOS report (post public consultation amended version). It indicates that Hollow Road Farm is likely to be the most suitable, available and deliverable</p>

			site on which to deliver the WSOH (option 4) proposals.
143	Suggestion for Saxham Industrial Estate area, specifically for WTS and Depot.	18	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational facilities they require, the councils do not consider option 5 (co-locating WTS and depot on a new site with HWRC remaining at Rougham Hill) to be the best performing options for delivering the facilities (please see section 5 of the IAPOS report (post public consultation amended version)).</p> <p>Further, the preparation of the IAPOS report and formalisation of the options and sites assessment processes has enabled the councils to establish that Saxham Business Park is not the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 and 6.33 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B). As is set out at paragraph 6.33 of the IAPOS report, despite it being of sufficient size, Saxham Business Park failed the sites exclusionary assessment on the basis of there being no sites of sufficient size available and the Business Park's distance from Bury St Edmunds ("proximity/relationship to Bury St Edmunds" criterion).</p> <p>NB Notwithstanding the findings of the original IAPOS report in relation to the Saxham Business Park site the councils' assessment of it has been checked as part of their post public consultation work.</p>
150	Site suggestion: Rougham Airfield. Reasons Include: ideally located for access to A14	1	The 'Rougham Airfield' site is one which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the

			<p>same methodology and criteria used for the original set of sites detailed in the IAPOS report. The IAPOS report has been amended to include and reflect the assessment of this site and the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider the 'Rougham Airfield' site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 to 6.34 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 2 at Appendix B). As is set out at paragraph 6.34 of the IAPOS report, despite it being of sufficient size, the 'Rougham Airfield' site failed the sites exclusionary assessment on the basis of its distance from Bury St Edmunds ("proximity/relationship to Bury St Edmunds" criterion).</p>
186	<p>Site suggestion: land opposite the West Suffolk crematorium at Risby, between the crematorium and the A14. Reasons include: no houses in close proximity, a slip road could be easily added to Westley roundabout, it wouldn't have any affect on the Bury St Edmunds Golf Club, Servest Group HQ or Risby residents</p>	2	<p>The 'Land south of the West Suffolk Crematorium, BSE/Risby' site is one which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The IAPOS report has been amended to include and reflect the assessment of this site and the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider the 'Land south of the West Suffolk Crematorium' site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.39 to 6.47b</p>



			of the IAPOS report (post public consultation amended version) and Sites assessment matrix 3 at Appendix B). As can be seen at paragraph 6.47b, despite 'Land south of the West Suffolk Crematorium' being the second highest scoring site in the sites qualitative assessment, the difference in scores between it and Hollow Road Farm is significant enough to establish Hollow Road Farm as being more suitable, available and deliverable.
189	Site suggestion: Waste depot at Mildenhall Road, ex Padley site. Reasons include: easy access to all areas of the Borough, perfect for workshops and a reuse shop.	9	Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational services they require, the councils do not consider the Mildenhall Road General Employment Area (including the former Padley poultry site which lies within it) to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.33 to 6.33 of the IAPOS report (post public consultation amended version)).  NB Notwithstanding the findings of the original IAPOS report in relation to the Mildenhall Road General Employment Area the councils' assessment of it has been checked as part of their post public consultation work (this includes the more specific assessment of the former Padley poultry site).
193	Site suggestions: Abbey Gardens or Charter Square	1	Both of these sites are unsuitable there have not been assessed by the councils as part of the sites assessment process – please see paragraph 6.17a of the IAPOS report (post public consultation amended version).
205	Suggestion that if the Eldo Farm house development includes another exit/slip road onto the A14, a one-way system to access the hub by road could come off there and back onto the A14 at the former Rougham Cross Roads.	1	This 'site' suggestion was too imprecise as suggested to enable assessment. Assumptions were therefore made as to the area of land it might apply to. The assumed area of land can be seen in the plan entitled 'Land between Rougham Hill, A14 and Rushbrooke Lane, BSE' at Appendix D of the IAPOS report (post consultation amendment version). The assumed site includes the land understood to be owned by Bury St Edmunds Hockey Club

			<p>which was suggested in other responses.</p> <p>The 'Land between Rougham Hill, A14 and Rushbrooke Lane' site is one which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The IAPOS report has been amended to include and reflect the assessment of this site and the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider the 'Land between Rougham Hill, A14 and Rushbrooke Lane' site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.39 to 6.47b of the IAPOS report (post public consultation amended version) and Sites assessment matrix 3 at Appendix B). As can be seen at paragraph 6.47b, 'Land between Rougham Hill, A14 and Rushbrooke Lane' scored significantly lower in the sites qualitative assessment than Hollow Road Farm and is therefore considered less suitable, available and deliverable than Hollow Road Farm.</p>
215	Suggestion: Moreton Hall, land close to the A14 that is going to link up with the A14 at Rougham. Reasons include: no houses here, good access via A14	2	Please see response to issue 006 above.
224	Suggestion: Site near SCC Depot at Rougham for vehicle workshop and somewhere nearby for Recycling Centre. Reason include: right on the A14, away from populated areas.	1	Please see response to issue 030 above.

230	Suggestion of Anglian Way in BSE for an Option 5 solution. Suggestion it is an ideal site for depot and workshop.	2	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational facilities they require, the councils do not consider option 5 (co-locating WTS and depot on a new site with HWRC remaining at Rougham Hill) to be the best performing options for delivering the facilities (please see section 5 of the IAPOS report (post public consultation amended version).</p> <p>Further, the preparation of the IAPOS report and formalisation of the options and sites assessment processes has enabled the councils to establish that Anglian Lane is not the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 and 6.33 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B). As is set out at paragraph 6.33 of the IAPOS report Anglian Lane failed the sites exclusionary assessment on the basis of there being no sites of sufficient size available.</p> <p>NB Notwithstanding the findings of the original IAPOS report in relation to Anglian Lane the councils' assessment of it has been checked as part of their post public consultation work.</p>
244	Suggestion of the lorry park opposite the Rougham Hill HWRC.	2	<p>The lorry park site at Rougham Hill is one which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The lorry park was considered together with the land around it and the land on the opposite side of the road in order to present the largest site possible (see plan entitled 'Lorry park and adjacent unused brownfield land, Rougham Hill' at Appendix D of the IAPOS report</p>

			<p>(post consultation amendment version)). The IAPOS report has been amended to include and reflect the assessment of this 'combined site' and the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider the 'Lorry park and adjacent unused brownfield land, Rougham Hill' site to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 and 6.33 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B). As is set out at paragraph 6.33 of the IAPOS report, the site failed the sites exclusionary assessment because it wasn't large enough ("Site size and shape" criterion).</p>
256	AJN Steelstock (or adjoining land) on Ickneild Way, Newmarket. Currently used for steel stockholding. Near to junctions 39 and 40. It is near an existing rail junction too.	1	<p>The AJN Steelstock site (and/or the adjoining land) at Kentford is a site which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following its suggestion through the IAPOS public consultation the site has been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The IAPOS report has been amended to include and reflect the assessment of this site and the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider the AJN Steelstock site (and/or the adjoining land) to be the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 and 6.34 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B). As is set out at paragraph 6.34 of the IAPOS report, the site failed the sites exclusionary</p>

			assessment on the basis of its distance from Bury St Edmunds (“proximity/relationship to Bury St Edmunds” criterion).  In relation to rail transport please see Appendix L of the IAPOS report (post public consultation amended version).
263	Suggestion that the Hockey Club has land near the HWRC	1	Please see response to issue 205 above.
290	Suggestion of additional unused brownfield land close to the lorry park for further use if required. The old Ipswich road is still there and would mean looking at new access on / off the A14, maybe at the new roundabout already planned to be constructed further east. The road at the bottom of Rougham Hill and Rushbrook Lane be blocked off ensuring everything is accessed from the A14. Suggestion planning permission for this area has already previously been granted.	1	Please see responses to issues 205 and 244 above.
291	Land adjacent to the eastern A14 interchange and between the A14 and the River Lark. Opposite side of the road to the HWRC. Close enough for the HWRC to remain in operation.	1	Please see responses to issues 205 and 244 above.
293	Suggestion of land at Saddler's Farm near Saxham. Reasons include its existing waste usage and possibility of rail links.	2	Please see paragraph 6.17a of the IAPOS report (post public consultation amended version) and response to issue 117 above.
299	Site Suggestion: Field between Westley Roundabout and Saxham Business Park. Reasons Include: twice the size of Symonds Farm site, ideal location despite being greenfield, closer to Bury. The remainder of the new WSOH could be located further along towards the business park, keeping the 2 sites close, but not directly together. Perhaps a wooded area separating them? A new exit from the roundabout could be created with 2 new left hand lanes for household waste recycling only ingress/egress only, and two new ingress/egress lanes for the remainder of the facility’s traffic. It is right beside a railway line for possible future expansion and use of rail to the Great Blakenham site.	1	Please see response to issue 136 above.

300	Site suggestion: Any site with free access to the A14 within working proximity of BSE but away from the centre	1	<p>The partner councils' sites assessment process has considered a number of sites which are located adjacent or very close to the A14, within working distance from Bury St Edmunds and away from its centre. The assessment process is detailed at section 6 of the IAPOS report (post public consultation amended version). It indicates that Hollow Road Farm is likely to be the most suitable, available and deliverable site on which to deliver the WSOH (option 4) proposals.</p>
339	Ex Little Chef site and potentially nearby steel yard near Kentford.	1	<p>This 'site' suggestion was too imprecise as suggested to enable assessment. Assumptions were therefore made as to the parcel or parcels of land it might apply to. These can be seen in the plans entitled 'Former Little Chef site and surrounding land, north of the A14, nr Kentford' and 'Former Little Chef site and adjoining land, south of the A14, nr Kentford' at Appendix D of the IAPOS report (post consultation amendment version).</p> <p>The former Little Chef sites are ones which had not previously been considered by the councils (prior to the IAPOS public consultation that is). Following their suggestion through the IAPOS public consultation the sites have been assessed by the councils using the same methodology and criteria used for the original set of sites detailed in the IAPOS report. The IAPOS report has been amended to include and reflect the assessment of this site and the other sites suggested through the public consultation process.</p> <p>Having undertaken the further assessment work and amended the IAPOS report the councils do not consider either of the former Little Chef sites to be the most suitable, available and deliverable sites on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 and 6.33 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B). As is set out at paragraph</p>

			6.33 of the IAPOS report, despite it being of sufficient size, the sites failed the sites exclusionary assessment on the basis of their distance from Bury St Edmunds (“proximity/relationship to Bury St Edmunds” criterion).
340	Statement Higham has two potential sites with rail access.	1	<p>Please see response to issue 095 above.</p> <p>In relation to rail transport please see Appendix L of the IAPOS report (post public consultation amended version).</p>
361	Current SCC Highways Depot, which would be adequate for a WTS. Suggestion that the depot facility there could be merged with the replacement for Olding Road.	1	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational facilities they require, the councils do not consider locating the proposed waste transfer facility on a site separate from the other facilities sought as being the best performing option for delivering the facilities (please see section 5 of the IAPOS report (post public consultation amended version)).</p> <p>Further, the preparation of the IAPOS report and formalisation of the options and sites assessment processes has enabled the partner councils to establish that Rougham Industrial Estate (including the SCC Highways/Kier depot site which lies within it) is not the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 to 6.33 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B).</p> <p>NB Notwithstanding the findings of the original IAPOS report in relation to Rougham Industrial Estate the councils’ assessment of it has been checked as part of their post public consultation work (this includes the more specific assessment of the SCC Highways/Kier depot site).</p>

362	Linked to SF. Suggestion that the 'virtual quarry' facility at Station Yard could be relocated to the new dedicated WTS, freeing up the site.	1	<p>The councils have based their options and sites assessment on the criteria which are critical to delivering the optimum solution for providing the facilities sought. Aside from the fact that there may be a conflict or conflicts between this and delivering the best site for any requirement Network Rail may have it should be noted:</p> <ul style="list-style-type: none"> <li>• It is not clear whether Network Rail intend to relocate their existing facilities;</li> <li>• It is not known where Network Rail would want to move their facilities to if they were looking to relocate them;</li> <li>• It is not known what the timescale for any relocation would be;</li> <li>• It is not known whether Network Rail would consider their facilities compatible with those that the Council seek;</li> <li>• It is not known whether Network Rail would want to co-locate with the councils.</li> </ul> <p>The councils are already coordinating the requirements of three different councils in addition to bearing in mind the requirements of other possible partners. They do not therefore consider that involving a further, potentially very different interest, is conducive to delivering the facilities sought (and delivering them within a reasonable timescale).</p>
363	Note that the DEFRA site wouldn't suit a WTS or HWRC, but would be idea for a depot and workshops. Specific benefit of using existing 'anechoic' materials to protect communities from noise.	1	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational facilities they require, the councils do not consider locating the proposed depot facility on a site separate from the other facilities sought as being the best performing option for delivering the facilities (please see section 5 of the IAPOS report (post public consultation amended version). Accordingly, the councils do not currently propose to pursue the suggested approach.</p>



			<p>Further, the preparation of the IAPOS report and formalisation of the options and sites assessment processes has enabled the councils to establish that the DEFRA site/land (which was assessed as part of the 'Existing HWRC site and land to north + DEFRA land, Rougham Hill' site in the original batch of sites assessed) is not the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 to 6.33 of the IAPOS report (post public consultation amended version) and Sites assessment matrix 1 at Appendix B).</p> <p>NB Notwithstanding the findings of the original IAPOS report in relation to the 'Existing HWRC site and land to north + DEFRA land, Rougham Hill' site the councils' assessment of it has been checked as part of their post public consultation work.</p>
364	Vacant Land at Chapel Pond Hill - suggested as a good site for a depot and workshops.	1	<p>Having prepared the IAPOS report (and amended it following the recent public consultation) to formalise their assessment of the options and sites for delivering the waste and operational facilities they require, the councils do not consider locating the proposed depot facility on a site separate from the other facilities sought as being the best performing option for delivering the facilities (please see section 5 of the IAPOS report (post public consultation amended version)).</p> <p>Further, the preparation of the IAPOS report and formalisation of the options and sites assessment processes has enabled the councils to establish that the Chapel Pond Hill General Employment Area (including the remaining undeveloped site/land within it) is not the most suitable, available and deliverable site on which to accommodate the WSOH (option 4) proposals (please see paragraphs 6.32 to 6.33 of the IAPOS report (post public consultation amended version) and Sites</p>

			<p>assessment matrix 1 at Appendix B).</p> <p>NB Notwithstanding the findings of the original IAPOS report in relation to the Chapel Pond Hill General Employment Area the councils' assessment of it has been checked as part of their post public consultation work (this includes the more specific assessment of the remaining undeveloped site/land within it).</p>
365	Compostable waste facility at Lackford for future proofing of the compostable waste provision.	1	<p>Compostable waste treatment facilities are not one of the types of facilities the councils are trying to provide or replace (just as the councils are not looking to provide or replace the existing facilities for the treatment of residual waste of recyclable waste). Sites for compostable waste treatment have not therefore featured in the IAPOS report or the assessment processes it details.</p> <p>The new garden waste service which has recently been implemented will see brown bin waste being delivered directly to Lackford (where the waste is composted), not to any waste transfer station. There are no plans in place to move the treatment of garden waste from the facility at Lackford.</p>
373	Suggestion of Rookery Corner which has the right amount of land and is a less damaging alternative.	1	<p>No place or site known as Rookery corner could be found. It is assumed therefore that this site relates to one of the three following sites:</p> <ol style="list-style-type: none"> <li>1. Rougham Industrial Estate (please see response to issue 030 above;</li> <li>2. Extension to Suffolk Business Park (please see response to issue 006 above); or</li> <li>3. Land between Rougham Hill, A14 and Rushbrooke Lane, Bury St Edmunds (including formerly proposed Bury St Edmunds Hockey Club site) (please see response to issue 205 above).</li> </ol>

## Feedback – Section four: Sustainability Appraisal

#	Comment	Number	Response Forest Heath District Council, St. Edmundsbury Borough Council, Suffolk County Council
031	Criticism of the sustainability appraisal. Comments include: too general and vague on many points. Does not sufficiently address the social or environmental impact the traffic will have. Criticism that it appears to be written to justify Option 4. Criticism that it conflates the options and sites and is therefore unreliable. Criticism of the weighting (lack of flood risk should not be a positive but simply a neutral). Criticism of the analysis of green waste.	27	The SA assessment was appropriately detailed and robust to make an informed judgement about the sustainability and suitability of the sites. As it is not usually appropriate in the SA (and often impracticable) to predict the effects of an individual project-level proposal in the degree of detail that would normally be required for an Environmental Impact Assessment or a project, both WSOH solutions options and sites options appraisals were kept at the strategic level. A Transport Statement and travel plan will accompany any planning application.
057	Statement that sustainability is vitally important.	1	Noted
058	Support for appraisal; covered all relevant areas.	24	Noted.
073	Comments about flooding. Areas include; Compiegne Way. A143. Sugar Beet factory area	13	The Environment Agency (Flood Map) has been consulted and the site does not lie within a Flooding Zone, therefore the area is of low flood risk. However the site does exceed the threshold of 1 hectare for flood risk assessment (FRA) purposes. If a planning application were made, an FRA would be required that complies with the Technical Guidance to the National Planning Policy Framework. Any development will require the use of appropriate Sustainable Urban Drainage Solutions (SUDS).
096	Suggestion of using solar panels to provide electricity to run the facility and reduce costs.	1	Noted - The councils will endeavour to ensure that any site design includes low and zero carbon technologies wherever possible, e.g. roof-mounted PV panels on any south-facing pitched roof.
108	Comment that there wasn't "any mention of sustainability in relation to any future road or building developments in the area".	1	The SA addresses factual aspects that can affect the suitability of the site, based on its physical characteristics.
112	Criticism that sustainability appraisal favours HRF. Specific note that assessments between HRF and TH on air pollution etc. appear similar but have very different scores	11	The Sustainability Appraisal sets out the approach to assessing sites in the Non Technical Summary.

		<p>The assessment and scoring of Tut Hill and Hollow Road Farm against the 'potential for impact on air quality' criterion in the IAPOS report has been reviewed by the councils. Having done so the partner councils were happy with the assessment of the sites against this criterion and their consequent scores. They have set out the main reasons for this as follows:</p> <ul style="list-style-type: none"> <li>• The criterion is entitled "potential for impact on air quality". This title accepts that a detailed assessment of air quality is not appropriate at this stage. In view of this fact the criterion considers the factors which could give rise to a potential impact. One such factor is 'number and proximity of sensitive receptors'. 'Planning for Waste Management Facilities: A Research Study' advises in relation to waste transfer stations (under the heading 'General Siting Criteria'):  <i>"Sites closer than 250 m from residential, commercial, or recreational areas should be avoided. Transfer routes away from residential areas are also preferable."</i> <p>At Tut Hill the nearest sensitive nearest sensitive receptors are only 125m away whereas at Hollow Road Farm the nearest sensitive receptors are 305m from the site.</p> </li> <li>• The proximity of sensitive receptors to the site is a key issue in local residents' responses despite the fact that it may not give rise to a significant impact in terms of air quality.</li> <li>• Despite there being sensitive receptors closer to the main route to and from Hollow Road Farm than is the case with Tut Hill, the proportionate increase in traffic on this route which would result from locating the WSOH (option 4) proposals at Hollow Road Farm would be relatively small. In the case of Tut Hill the proportionate increase would be larger.</li> </ul>
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113	Highlighting that sustainability appraisal suggests that co-locating a WTS and a depot on a new site while retaining RH is the most cost efficient solution	1	Co-locating all facilities on a new site creates the opportunity to bring greater long-term flexibility, further opportunities for integration and potential for additional partners which will further improve asset utilisation, improve efficiency, increase capacity and reduce operational costs further.
114	Concern regarding light pollution from HRF. Desire to see light pollution controlled by planning conditions	20	Noted. Lighting design will be submitted as part of any overall site design to the Planning Authority. Exterior lighting will be designed in accordance with BS EN 12464.2.
126	Request to consider future proofing - closeness to commercial and residential properties as well as land suitable for future redevelopment. Specific comments: consider potential development near existing RH site. HRF and TH are too close to future development. Should be away from planned future housing under Bury 2031. Consider future developments at Mildenhall and capacity for increased waste. Statement that a site should be suitable for well over 25 years.	24	Noted. Cumulative effects are considered as a part of the planning process. Cumulative effects have been considered throughout the entire SA process. As part of the review of relevant strategies, plans and programmes and the derivation of SA objectives, key receptors have been identified which may be subject to cumulative effects. The assessment of cumulative effects has identified two positive significant effects of the WSOH proposal over medium and long terms with respect to an overall reduction in the number of lorries and an increase in economic growth within Bury St Edmunds, and one negative effect – development of agricultural land.
178	Question whether the difference in assessment for air quality, odour, vermin, loss of agricultural land, noise and impact on residents between TH and HRF is justified. Ask if it realistically takes into account the effects of the Sugar Beet factory. Assertion these factors are irrelevant for the WSOH give the factory's impacts. Assertion that both sites will have similar impacts if the development in Vision 2031 goes ahead. Assertion that the different scores imply that the impacts cannot be controlled / mitigated.	28	Modern waste transfer stations are enclosed industrial buildings where waste is removed from site regularly. Effective measures to control and mitigate any vermin, birds and smells operate in all modern transfer station buildings. Noise from vehicles moving around within any site would be mitigated by including measures such as screening as part of the overall facility design.

187	Statement: "It's been said that there would be 'no' impact on air quality, odour, flies vermin and birds, no noise or vibration no matter how close so why would this be included in the summary booklet."	1	Any planning application will be supported by a qualitative assessment of air emissions from the facility and will consider impacts from vehicle emissions as well as detailing any required odour abatement controls. Modern waste transfer stations are enclosed industrial buildings where waste is removed from site regularly. Effective measures to control and mitigate any vermin, birds and smells operate in all modern transfer station buildings. Noise from vehicles moving around within any site would be mitigated by including measures such as screening as part of the overall facility design.
200	Question about statements made in appraisal: Item 5 To reduce the effect of traffic on the environment. "How will pouring more traffic onto Barton Hill roundabout achieve this?". Statement that HRF is too far from the A14.	2	A Transport Statement and travel plan will accompany any planning application. Having a waste transfer station means that larger but fewer vehicles travelling along the A14 rather than sending lots of bin lorries longer distances to empty; in turn this will result in cutting carbon, congestion and cost.
201	Question about statements made in appraisal: Item 7 To maintain/improve the quality and local distinctiveness of landscapes/townscapes. "How will building a huge barn, HWRC, and depot, surrounded by trees achieve this?"	1	HRF is currently agricultural land, therefore any development there would potentially lead to a visual impact. This needs to be considered in relation to the industrial nature of the nearby developments and therefore has been assessed that it would not have any significant impacts. Given the level of screening surrounding the site and the industrial nature of the nearby development it is not anticipated that the location of this site will have any significant impacts on landscape.  The Hollow Road Farm site has a gently sloping topography. Sites with moderately sloping terrain can use topography to their advantage, allowing access to lower levels from lower parts.
202	Question about statements made in appraisal: Item 13 To maintain/improve health of the population overall. "By moving camp from Rougham Hill to an enlarged complex at Hollow Rd Farm may improve air quality from one part of the town to the detriment of the other, but how will it improve health overall?"	1	Having a centrally-based WTS, close to the major population centre in West Suffolk will reduce traffic impact across West Suffolk overall through reduced waste miles by having fewer, larger vehicles transporting the waste rather than lots of bin lorries travelling longer distances to empty; in turn this will result in cutting carbon, congestion and cost. Fewer larger vehicles on the road will improve air quality and health impacts overall.

203	Question about statements made in appraisal: To minimise the impacts arising from the provision of waste facilities developments on where people live. "How will moving it from its established location with nearby residents to another location with nearby residents achieve this?"	1	<p>Having a centrally-based WTS, close to the major population centre in West Suffolk will reduce traffic impact across West Suffolk overall through reduced waste miles by having fewer, larger vehicles transporting the waste rather than lots of bin lorries travelling longer distances to empty; in turn this will result in cutting carbon, congestion and cost.</p> <p>Modern waste transfer stations are enclosed industrial buildings where waste is removed from site regularly. Effective measures to control and mitigate any vermin, birds and smells operate in all modern transfer station buildings. Noise from vehicles moving around within any site would be mitigated by including measures such as screening as part of the overall facility design.</p>
213	Statement that the most important appraisal was missed; the need to give priority to long term vehicle movement in congested areas	1	<p>Noted. More detailed proposals will be available with any planning application. Consolidating smaller loads from collection vehicles into larger transfer vehicles reduces hauling costs and waste transportation miles by enabling collection crews to spend less time travelling to and from distant disposal sites and more time collecting waste. This also reduces fuel consumption and collection vehicle maintenance costs, plus produces less overall traffic, transport emissions and road wear. The proximity of the site to the strategic highway network means that there will be less waste transport on local roads.</p>

218	<p>Statement that the sustainability appraisal missed the following:</p> <p>Adverse impact on residents of Fornham, Great Barton (access into Bury)</p> <p>Adverse impact on Fornham Road (Between Fornham and Gt Barton)</p> <p>Adverse impact on amount of extra traffic using St Saviours roundabout</p> <p>Adverse impact on extra traffic using Compiegne Way</p> <p>Adverse impact on A143 between Bury and Gt Barton</p> <p>Adverse impact on Sensory Receptors</p> <p>Adverse impact on Barton Hill (road and residents)</p> <p>Adverse impact on local landscape</p>	1	<p>More detailed proposals will be available with any planning application. Consolidating smaller loads from collection vehicles into larger transfer vehicles reduces hauling costs and waste transportation miles by enabling collection crews to spend less time travelling to and from distant disposal sites and more time collecting waste. This also reduces fuel consumption and collection vehicle maintenance costs, plus produces less overall traffic, transport emissions, and road wear. The proximity of the site to the strategic highway network means that there will be less waste transport on local roads. Appropriate design and screening will form part of any planning application. Given the level of screening surrounding the site and the industrial nature of the nearby developments it is not anticipated that location of this site will have any significant impacts on landscape.</p> <p>Modern waste transfer stations are enclosed industrial buildings where waste is removed from site regularly. Effective measures to control and mitigate any vermin, birds and smells operate in all modern transfer station buildings. Noise from vehicles moving around within any site would be mitigated by including measures such as screening as part of the overall facility design.</p>
245	Statement that RH should have been considered in the SA as it is not a greenfield site.	1	RH has been considered in the SA process.
251	Needs to be a criteria considering the impact on the historic town and tourism - major risk of impacting this.	3	An historic criteria was included in the SA framework against which sites options were appraised.
270	Highly detailed analysis of a number of criteria assessment. [Should be analysed as a whole].	2	Overall sustainability of the sites was presented in the summary and conclusions of the SA Report.
283	"The SA allegedly occurred after the conclusion of the options and site assessment process yet page 12 of the summary states this identified HRF as the optimal site. How come the SA does not even mention HRF?"	1	The SA has been carried out on shortlisted sites that present reasonable and realistic alternatives.



289	Criticism that walking and cycling to work is highlighted for HRF despite the risks of the lack of suitability / safety for this including lack of footpaths.	8	Noted. Walking and cycling to a site will be considered as part of a Transport Assessment, accompanying any planning application.
292	Concern over groundwater pollution at HRF. Note that HRF is near an aquifer, risking ground contamination from a WSOH.	4	This was addressed in the SA report. The site lies in a Source Protection Zone 2 and on a principal major aquifer with high permeability. Any proposal would need to demonstrate that development will not impact on water quality. Mitigation measures can include the use of Sustainable Urban Drainage Systems (SUDS).
294	Request to see more detail on vehicle mileage and emissions, facility energy efficiency, process energy efficient and emissions, renewables and low carbon inclusion, details of the stated "embodied / carbon energy in new build."	2	More detailed proposals will be available with any planning application. Consolidating smaller loads from collection vehicles into larger transfer vehicles reduces hauling costs and waste transportation miles by enabling collection crews to spend less time travelling to and from distant disposal sites and more time collecting waste. This also reduces fuel consumption and collection vehicle maintenance costs, plus produces less overall traffic, transport emissions and road wear. The proximity of the site to the strategic highway network means that there will be less waste transport on local roads. The councils will endeavour to ensure that any site design includes low and zero carbon technologies wherever possible, e.g. roof-mounted PV panels on any south-facing pitched roof.
295	Question of what specific environmental and economic benefits HRF offers over RH.	24	Co-locating all facilities on new site will create the opportunity to bring greater long-term flexibility, further opportunities for integration and potential for additional partners which will further improve asset utilisation, improve efficiency, increase capacity and reduce operational costs further.
304	Statement that all sites need to be revisited and assessed again, taking into account points raised during consultation	5	Points raised during the consultation have been reflected in the Final version of the SA Report.
306	Suggestion that a SA needs to be carried out for Symonds Farm	1	The SA has been carried out on shortlisted sites that present reasonable and realistic alternatives. Land at Symonds Farm failed the initial exclusionary assessment due to its distance from West Suffolk's largest population centre.
307	Concern regarding the remit of the SA specialist. Accusation of bias, specific reference to their website. Suggestion of	4	The assessment has been carried out by an independent, suitably qualified and experienced consultant. A clear methodology for

	independent assessment.		assessment, based on the issues identified during the baseline collection has been derived, and assessment of all possible reasonable and realistic alternatives has been conducted in conformity with a 'Practical Guide to the Strategic Environmental Assessment Directive', 2005 and Planning Practice Guidance.
314	Balance appears to be on economic issues over impact on residents and the landscape.	2	The SA process gives equal weighting and takes into consideration all economic, environmental and social issues associated with this proposal. These considerations were integrated into the SA framework against which assessment of all reasonable and realistic alternatives have been conducted.
332	Note that the SA scores both Option 5 and Option 4 as negatively affecting the quality of life for communities.	1	Some short-term impacts are identified for all options apart from the "Do Nothing" Option. This is due to noise during the construction period.
334	Comment that odour and/or vermin would be bad at whatever site.	2	Any planning application will be supported by a qualitative assessment of air emissions from the facility and will consider impacts from vehicle emissions as well as detailing any required odour abatement controls. Modern waste transfer stations are enclosed industrial buildings where waste is removed from site regularly. Effective measures to control and mitigate any vermin, birds and smells operate in all modern transfer station buildings.
335	Statement that the proposals threatened the "green route" into BSE.	2	Noted.
336	No evidence to support claim that a WSOH will cut energy costs.	1	The councils will endeavour to ensure that site design includes low and zero carbon technologies wherever possible, eg. roof-mounted PV panels on any south-facing pitched roof. Bringing activities together close to Bury St Edmunds would lead to a reduction in waste transportation miles and a reduction in carbon.
359	Statement that Objective 5 and 14 of the SA are incompatible with a single site.	1	Consolidating smaller loads from collection vehicles into larger transfer vehicles reduces hauling costs and waste transportation miles by enabling collection crews to spend less time travelling to and from distant disposal sites and more time collecting waste. This also reduces fuel consumption and collection vehicle maintenance costs, plus produces less overall traffic, transport emissions and road wear. The

			proximity of the site to the strategic highway network means that there will be less waste transport on local roads.
369	Concern regarding impact of noise construction on residents near HRF for 12 months.	1	Noted. Appropriate conditions will be applied to mitigate construction and demolition noise and construction operating hours. HRF is a large site with good transport links which would allow for suitable mitigation.
372	Statement that sustainability is weighted too heavily.	1	A clear methodology for assessment, based on the issues identified during the baseline collection has been derived, and assessment of all possible reasonable and realistic alternatives has been conducted in conformity with "A Practical Guide to the Strategic Environmental Assessment Directive", 2005 and Planning Practice Guidance.

## Feedback – Additional: Comments regarding the consultation

#	Comment	Number	Response Forest Heath District Council, St. Edmundsbury Borough Council, Suffolk County Council
009	Request that the councils listen to the concerns of residents opposed to HRF. Specific point that people are more concerned about quality of life than small cost savings to the councils.	10	This Consultation Report, including the individual response to each identified issue, demonstrates that the partner councils are listening and considering all the feedback and information they have received.
012	Criticism of only holding events in Bury St Edmunds given that it is a 'West Suffolk' wide project.	5	Events were held in BSE because the proposed facility would be in or near Bury. Information was available at information points across West Suffolk and on the website.
019	Support for the Carter Jonas report.	2	Noted.
020	Expression of hope that objectors "read and understand" the documentation.	1	Noted.
021	Criticism of the need for a second consultation, including that HRF was and remains the correct site. Suggestion that HRF is progressed despite local opposition.	2	Noted. The Public Consultation Plan (page 3) confirms that "this method of consultation is not usually needed to support a proposal of this type, however, your councils wanted to ensure everyone has the opportunity to scrutinise the process so that the most suitable site for a WSOH can be identified."
026	Statement that it was not made clear the facility would be operational 24/7.	3	The Frequently Asked Questions (page 11) include information on potential 24/7 operation.
051	[Unclear] "Already you have not consulted residents"	2	Our aim was to consult widely and give as many people as possible the opportunity to respond in a variety of ways.
063	General criticisms of the consultation: 1. comments on materials - too much jargon - too much information to read; 2. times of exhibitions (during working hours); 3. poor or missing information; 4. no detailed pictures; 5. slow to download from website/ people may not have access to the internet;	45	The Public Consultation Plan set out how information would be provided and how people could be supported to access it. 1. The aim of the Consultation Summary Booklet was to provide an easy-to-understand overview of the more technical documents. The opportunity to have the materials made available in alternative formats was offered and a commitment to making reasonable adjustments for people unable to make their representations in writing was made.

<p>6. misleading map not fairly representing homes in Barton Hill (issue regarding the shading of residential areas);</p> <p>7. no information regarding potential sites;</p> <p>8. document only available at 3 locations, the link to the report is incorrect;</p> <p>9. no notification to Great Barton (specifically Livermere Road);</p> <p>10. criticism that staff at drop in events answered 'don't know' to a lot of questions;</p> <p>11. no consideration given to those without cars /no parking at the consultation events (which was therefore discriminatory against the less able);</p> <p>12. consultation summary document has mistakes;</p> <p>13. only reason consultation was pushed to a wider audience was to dilute criticism;</p> <p>14. suggestion that if this level of consultation was carried out earlier there would be less bias in response from certain sites.</p>	<p>2. The exhibitions were held on 3 days across two weeks: Friday 15th January 2.30 - 6pm Saturday 16th January 10am - 1pm and Tuesday 19th January 4pm-8pm.</p> <p>3. Comments about poor or missing information have been reviewed. Further financial and traffic information was provided during the consultation (see FAQs, page 13 onwards). The Consultation Summary Booklet provided an overview of more technical documents, as by its nature could not include the level of detail some respondents requested.</p> <p>4. The consultation was focused on appraising the options for facilities and analysis of sites. The images and pictures included in the documentation reflected this.</p> <p>5. Access to the documents for people who do not have access to the internet and the difficulty of downloading large documents over the internet was recognised in the planning of the consultation and the Consultation Plan sets out a number of alternative ways of accessing the information including via a CD which would be posted out on request and via the 6 information points across West Suffolk.</p> <p>6. This matter was raised first during the drop-in events. The illustrative maps were included as part of the Consultation Summary Booklet and exhibition boards to provide context and showed the indicative locations of the site locations. It did not depict in full detail a section of residential properties on Barton Hill or the entirety of Barton Road in the same way that the detailed site maps provided in the IAPOS did. Once this was raised, clarification was provided by uploading a more detailed map on the project website. This brings together all the separate location plans which are included in Appendix D of the IAPOS report. This more detailed map was also used in the next two exhibition days.</p> <p>7. We believe that appropriate levels of information for the sites was provided, including a detailed plan of each site. Those sites</p>
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		<p>that did not meet the exclusionary criteria had a suitable level of information given they did not meet the basic requirements.</p> <p>8. The document was available at six locations plus on the internet. During the consultation there were occasional notifications of the link not working. These were checked and no problems could be found. Where people identified problems the offer of posting the summary and feedback form plus CD was made.</p> <p>9. Flyers were distributed to all homes in West Suffolk including Great Barton. The consultation was also promoted with newspaper advertising, press releases, social media and direct contact with councillors, including parish councils.</p> <p>10. Noted - this was in part due to a number of the questions being site-specific and more appropriate for a discussion at planning application stage. Some of the staff at the events had a general knowledge of the project and if they were unable to answer a detailed question there were several people available with more expertise, on waste management, planning and selection criteria for example, who could help.</p> <p>11. Access to the consultation was available through 6 information points, via the internet as well as the drop in events. The drop-in events were accessible by public transport as well as by car.</p> <p>12. A number of responses regarding incorrect information pertained to disagreement with the scoring of options and sites. This is addressed elsewhere in the responses to issues. Concerns were raised that the map in the Consultation Summary Booklet and used on the first day of the exhibition was misleading and omitted key roads and communities. This is set out in point 6 above.</p> <p>13. We believe it was appropriate to consult the whole of West Suffolk because this is a consultation on how we manage West Suffolk's waste and council operations in the future.</p>
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			14. Noted.
082	General praise for consultation. Includes; 'presentation was very good', 'much improved on earlier ones' and 'excellent exhibition'.	5	Noted.
120	Statement that it's important that residents are given the chance to view their thoughts and see how the town is progressing.	1	Noted.
122	Statements that the councils will do what they want anyway.	2	The councils are committed to listening to the feedback from all respondents in order to come to a decision on the next steps. Page 22 of the Consultation Summary Booklet sets out the councils' position on the issue of pushing ahead: "The councils are carrying out this consultation specifically to ask people their views about the research and for suggestions for alternative sites which would be more suitable than Hollow Road Farm." There will be further consultation on more detailed, site specific proposals as part of any planning application that comes forward.
140	Statements about making the process difficult / complicated: "I think you try and make this as difficult as possible for members of the public."	4	During the first consultation more detail was requested about the options assessment and site assessment processes. In preparing for the public consultation, careful consideration was given to how to make very detailed technical documents more accessible to members of the public. The Consultation Summary Document was prepared to assist with this and the drop-in events had people who could help to explain issues within the documents. A commitment was also made in the Public Consultation Plan: "Copies of consultation materials will be made available in alternative formats on request and reasonable adjustments will be made if you are not able to make your representations in writing"
167	Concern about the circulation of "an anonymous and inaccurate leaflet, which we assume the Councils are aware of" as it may sway opinion.	1	The councils have no control over leaflets circulated other than their own. All leaflets and information provided by the councils was identified as such.

182	Criticism that consultation was carried out as an afterthought and was flawed. Comment made that people were not consulted before land was bought.	4	The Public Consultation Plan (page 3) acknowledges that "this method of consultation is not usually needed to support a proposal of this type, however, your councils wanted to ensure everyone has the opportunity to scrutinise the process so that the most suitable site for a WSOH can be identified." Page 22 of the Consultation Summary Booklet sets out the land deal arrangements.
208	Statement that the "Partner Councils still appear to favour Hollow Road Farm" and the general accusation that it is a 'done deal'.	7	Page 22 of the Consultation Summary Booklet clarifies the partner councils' position on this: ". . . the research carried out by the partners . . . 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. . . . However, while the option remains in place 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 alternative sites which would be more suitable than Hollow Road Farm."
216	Statements about Hopkins Homes being 'listened to as opposed to the local residents of Fornham and Gt Barton who have not' and having more 'clout'.	2	The councils are committed to listening to all feedback in order to come to a decision on the way forward. It is the detail in the feedback which is considered and responded to rather than any particular respondent's perceived influence or 'clout'.
217	Statements that 'a thousand plus objections cannot be wrong' and 'will undoubtedly increase' if HRF goes ahead.	2	Noted. The consultation encouraged responses, including comments on the criteria used to select a site and suggestions for alternative sites not already considered.
253	Statement that a household survey should have been conducted instead of this consultation.	1	Noted. The 2016 consultation was not linked to a specific site and encouraged people to suggest alternative sites. Should a formal planning application be made for a site then the legal requirements relating to such applications would be met.
258	Observation that the IAPOS report is dated December 2015 and that all of the sites were supposedly identified by February 2015. Question then as to whether the report carries additional analysis.	2	The IAPOS Report (pages 10 to 13) documents the chronology of events and explains how the report formalises the work undertaken to date and its findings and conclusions.



260	Statement that there has been a petition with over 1000 signatures. Respondent requests assurance that this will be treated appropriately. Link to petition is not provided.	1	A petition with 555 signatures was presented to the St Edmundsbury Cabinet meeting on 23 <sup>rd</sup> June 2015. At the meeting it was also noted that a second online petition had received 283 signatories. The partner councils commit to treating the petitions appropriately in the planning process.
261	Question as to how many objections would be needed to make the councils change their minds. Perception that councils are pushing ahead anyway.	2	The councils are committed to listening to the feedback from all respondents in order to come to a decision on the next steps. Page 22 of the Consultation Summary Booklet sets out the councils' position on the issue of "pushing ahead anyway" or a "done deal": "The councils are carrying out this consultation specifically to ask people their views about the research and for suggestions for alternative sites which would be more suitable than Hollow Road Farm."
272	Explicit criticism of the lack of detailed financial details. [Note this is included to ensure it is not under represented, despite being captured in 032 and 132]	1	Further financial detail was provided in the Frequently Asked Questions (page 14) following the public meeting.
277	Statement that it should have been made clear that other sites would be unaffected.	1	The partner councils apologise for any unintentional confusion which may have resulted from the leaflet distributed to households.
284	Criticism that the online form did not save text when using the back button.	1	Noted, we will look into this for future consultations.
285	Concern that feedback will be analysed and scored in a naïve way.	1	The Consultation Report will be publicly available and will provide a detailed analysis of the responses received.
286	Criticism that paper copies of the Sustainability Appraisal were not more readily available.	1	Sustainability Appraisal paper copies were available at all information points. However, we are aware that one was removed from a location. This was replaced as soon as the matter came to our attention. An email address and telephone number was included on all consultation material so people could report documents missing from the information points. The Consultation Summary Booklet (page 19) also stated that printed copies of both documents could be provided to any West Suffolk town or parish council on request, and to individuals if the cost of printing them was covered.

287	Additional specific concern regarding the map; the continuation of Fornham Road through to Great Barton from the A134 roundabout has also been deleted from the document giving the impression that the Hollow Road proposed site is a dead end road and also in isolation from residential property.	8	This matter was raised first during the drop-in events. The illustrative maps were included as part of the Consultation Summary Booklet and exhibition boards to provide context and showed the indicative locations of the site locations. It did not depict in full detail Fornham Road through to Great Barton in the same way that the detailed site maps provided in the IAPOS did. Once this was raised, clarification was provided by uploading a more detailed map on the project website. This brings together all the separate location plans which are included in Appendix D of the IAPOS report. This more detailed map was also used in the next two exhibition days.
319	Question about how the consultation can be concluded without answers to various questions (financial info, traffic studies, future privatisation).	1	Information on some financial and traffic matters was provided, and added to during the consultation period. Specific financial and traffic information would not be available until a site is identified for progress.
341	Accusation that the chair of the public meeting was not impartial.	1	The Chair of the Public Meeting, Brian Parry, from the Consultation Institute, clarified his background and role at the start of the meeting. We believe he was a fair and impartial chair of the public meeting. Details of the Consultation Institute can be found at <a href="http://www.consultationinstitute.org">www.consultationinstitute.org</a> .
347	Statement that statutory bodies should have been consulted as well.	1	Noted, a separate consultation with statutory bodies has been undertaken.
371	Disappointment that there were no representatives from the Highways Agency.	1	Noted.

## Feedback – Additional: Other

#	Comment	Number	Response Forest Heath District Council, St. Edmundsbury Borough Council, Suffolk County Council
025	Criticism that there is no collection of glass recycling in West Suffolk.	1	The waste collection and disposal services remain under regular review to ensure they meet changing regulatory requirements, are affordable, and meet the aspirations of our residents across the county. Glass can be recycled at HWRCs and glass bring banks located across the county
054	<p>General criticism of the Councils.</p> <p>Reasons and accusations include;</p> <ul style="list-style-type: none"> <li>- accusations of arrogance</li> <li>- distrust of their ability to make the right choice</li> <li>- accusation that they will simply override public opinion</li> <li>- accusation bad management</li> <li>- statement elected members aren't from Bury</li> <li>- statement that people don't want another 'Apex fiasco'</li> <li>- accusation that the councils are not listening to residents.</li> <li>- criticism of the closure of Ingham and closure of local waste depots</li> <li>- statement that they're going against their own policy.</li> </ul>	31	<p>Councillors are democratically elected by voters. Part of their remit is to take decisions on behalf of those who live in their own wards and on a more strategic level as part of their role as a District, Borough or County Councillor where they need to take into account a wider area and population. In making strategic decisions, councillors may need to take into account not only the views of people in their own ward, or a part of their ward, but their responsibility to everyone affected. At times councillors need to take a holistic view including public opinion, budgetary impacts, physical effects (e.g. proximity to proposals) service usage, overall services management context and effects on other services. Before taking their decisions, councillors will receive advice, including on matters of policy, from specialists, both their own council staff and/or external consultants.</p> <p>Ingham &amp; other HWRCs</p> <p>A decision was taken to close several HWRCs in 2011 as part of budgetary reductions and service streamlining. Ingham was one of the centres closed as it was a small centre with limited usage and a temporary planning permission due to expire, with the likelihood that permanent planning and modern waste site permit may not be granted.</p>

061	Comments/questions about Haverhill Recycling Site, including: is it part of the proposals, will it be shut, why not improve the facility here, why is it not mentioned	3	Haverhill Household Waste Recycling Centre is not part of these proposals and will not be closed.
064	<p>General statements and questions about project costs. Main focus is the lack of figures and comparisons.</p> <p>Other issues include;</p> <ul style="list-style-type: none"> <li>- request for detail of what has been spent so far</li> <li>- project needs to be cost effective</li> <li>- the cost saving is negligible</li> <li>- consideration of the context of austerity with a statement that 'spend to save' rarely works.</li> <li>- that it is a high risk investment because of the 3.3% yield on capital invested.</li> <li>- the need for explicit cost implication for each option and cost benefits analysis.</li> </ul> <p>Question whether this saving will be passed on to tax payers, especially at a time when the council is starting to charge for brown bin collection.</p> <p>Statement that savings should be used to subsidise brown bin collection.</p>	46	<p>Councils across the UK continue to be under immense pressure to find savings to balance their budgets due to substantial reductions in Central Government funding.</p> <p>A financial case for the WSOH (including what has been spent so far) will be presented as part of a report and recommendations to the West Suffolk councils.</p> <p>Any new facility will not only need to be cost effective in the short term but also capable of handling the significant growth in demand for services that will come from the growth in housing and business in the West Suffolk area.</p>
066	Suggestion that a new leg of the railway is considered for increased rail use for Felixstowe as part of the long term picture. Linked to the F2N project and potential use at SF.	3	A new Appendix L of the IAPOS covers matters to do with use of rail and rail infrastructure.
074	Comments about kerbside facilities including; requests for better kerbside facilities, opposition to paying for brown bin collections. Not explicitly related to this consultation.	13	The waste collection and disposal services remain under regular review to ensure they meet changing regulatory requirements, are affordable, and meet the aspirations of our residents across the county.
075	Suggestion that the French approach to recycling centres should be explored.	1	The councils and several of its officers are members of the Chartered Institute of Waste Management. Through professional development and their own research they remain abreast of developments in waste management at home and abroad.

076	Request that the site is properly signposted	2	Noted.
087	Question: "Will the vehicle depot servicing the council vehicles offer MOTs to the public?"	1	Yes, MOTs would be part of any plans for a depot.
109	Question: "Will the council tax payer benefit from a lower charge?"	1	Decisions about council tax levels are taken each year, usually in February or March, by councillors when they need to take into account every source of income and every expenditure on services. Council tax forms one small part of a council's income. Currently, other income includes a revenue support grant from the Government – but we have been told that will be cut to zero by 2020 so we need to find other ways to make up that gap, or make considerable changes to services. Whether there will be opportunities in the future to reduce council tax, once the budget gaps are filled, will be up to councillors elected to balance the councils' budgets. For more information on where councils get their funds from and where they are spent go to: <a href="http://www.westsuffolk.gov.uk/finance">www.westsuffolk.gov.uk/finance</a>
138	Comments about people being the most important consideration	1	This issue has been reviewed in line with the comments received in relation to the assessment of criteria for both the options and site assessment. Please refer to responses 002, 231 and 321.
158	Suggestion that council should just go ahead and make a decision	3	Noted
184	Concern about any restriction placed on how much waste domestic users can take for recycling and the impact on fly-tipping	1	The number of occurrences of fly tipping have to be strictly monitored and reported to central Government so any impact would be fully understood. Whilst seeking to strike the right balance and protect the public purse, the councils aim to make recycling as easy and accessible as possible for our residents as this is concurrent with the aspirations of the Waste Hierarchy.
194	Statement that it won't just be recycling vehicles but also those attending fleet maintenance.	1	Yes – that is correct – see the vehicle movement estimates table (link in the FAQs on page 13).

196	Question: when is this being submitted to Secretary of State so they can consider whether to make the decision at government level? Proposal goes against Government's suggestion that greenfield sites should not be used if brownfield available	1	<p>The Secretary of State may decide to call in a planning decision that a council has made on an application it has submitted.</p> <p>The process set out in the IAPOS demonstrates that brownfield land has been the first consideration in the site selection process. Only when no suitable brownfield sites were identified was greenfield land considered.</p>
199	Question: What type of waste will be handled - which of the black / brown / blue bins?	1	<p>Any HWRC at the facility would handle the same waste streams as those currently handled at Rougham Hill.</p> <p>The WTS would handle domestic black bin and blue bin waste. It would also handle commercial trade waste and some single stream material like cardboard, white goods, wood and other organic material.</p> <p>They would only be allowed to handle waste types permitted under the Environmental Permit.</p>
207	Praise for the Council for efforts in recycling and waste management	1	Noted
214	Statement that "The only objections are from NIMBYs"	1	Noted
219	Question: Will the Mildenhall site be closing and if so, when?	1	<p>The Mildenhall depot in Holborn Avenue would close under these proposals and its waste collection operation transfer to Bury. The residual cleansing operations for Forest Heath will relocate to a smaller facility in the Mildenhall or Newmarket area to service the Forest Heath area.</p> <p>The Mildenhall HWRC will remain open and is not affected by these proposals.</p>
220	General complaints about services: no police or pcso, village has no school, roads are in a state, no post office or shop	1	Noted. These areas are not included in this proposal – residents are advised to contact the appropriate departments of companies, public service providers or councils.
232	Suggestion that HRF be secured and used for housing by West Suffolk's new housing company.	1	The total number of homes required until 2031 has been set by the adopted St Edmundsbury Core Strategy and the Vision 2031 process has been used to identify land for housing. These sites have all now been identified and allocated through the local plan

			process.
236	Statement that if the new project combines fire, ambulance and police that it should be Barton Hill with easy access to the A14 and new integration centre.	1	There are no current plans to combine this project with fire, ambulance or police.
239	Statement that possibility of funding coming from the sale of Olding Road and Mildenhall sites is not guaranteed, meaning if the Council may have to borrow money impacting on taxpayers and loss of services	1	Councils can use a range of funding methods for any major projects which require large amounts of capital. The costs of these methods, including the cost of borrowing, would be one of the factors to be considered when deciding whether to go ahead with a project. With current and predicted future interests rates, borrowing can sometimes make more financial and commercial sense than other funding models. There are rules for council borrowing which mean we have to demonstrate that borrowing is affordable, prudent and sustainable in order to protect tax payers (under the Prudential Code).
240	Comment ' I am surprised that this plan seems to have come from nowhere, and wonder why it was not included in the local plan from 2013.'	1	This history and development of the project is addressed in section 4 of the IAPOS and specifically in section 4.4.1
278	Observation that the lack of involvement by high level politicians was negative for the project. Also notes lack of information leading to new councillors voting against HRF.	1	Unsure what is meant by 'high level politicians'. Those who have specific responsibility for a number of services – called a portfolio – are the Cabinet members. The Cabinet Members of all three partner councils are involved with this project. At both Forest Heath and St Edmundsbury councils it is the Cabinet who makes the major policy and financial recommendations with every councillor, at meetings of the full councils, then having the opportunity to take part in debates and make final decisions. Every Cabinet member at both councils was involved in considering the West Suffolk Operational Hub project in detail and that information was also available to all councillors.
308	Suggestion project should go to judicial review, specifically citing Councillor Peter Stevens as responsible.	1	'Judicial review is a type of court proceeding in which a judge reviews the lawfulness of a decision or action made by a public body. In other words, judicial reviews are a challenge to the way in which a decision has been made, rather than the rights and wrongs

			<p>of the conclusion reached. It is not really concerned with the conclusions of that process and whether those were 'right', as long as the right procedures have been followed. The court will not substitute what it thinks is the 'correct' decision. This may mean that the public body will be able to make the same decision again, so long as it does so in a lawful way.'</p> <p>(From: Courts and Tribunals Judiciary, <a href="https://www.judiciary.gov.uk/you-and-the-judiciary/judicial-review/">https://www.judiciary.gov.uk/you-and-the-judiciary/judicial-review/</a>)</p> <p>More information, including how to apply for a judicial review, is here: <a href="https://www.justice.gov.uk/courts/rcj-rolls-building/administrative-court/applying-for-judicial-review">https://www.justice.gov.uk/courts/rcj-rolls-building/administrative-court/applying-for-judicial-review</a></p>
327	Criticism of charity collections being put out to tender.	1	Re-use of items disposed of at the HWRCs is part of the overall contract to manage HWRCs that has been in operation for several years. Members of the public can, of course, donate their items for re-use directly to charities of their choice should they wish to do so.
331	Request to reinstate composting service.	1	A new optional garden waste collection service is available to our residents. Details at <a href="http://www.westsuffolk.gov.uk/bins/gardenwaste">www.westsuffolk.gov.uk/bins/gardenwaste</a>
337	Statement that a reuse shop could be placed anywhere.	1	Noted – there are benefits of locating it with the HWRC. Several councils in the UK now have re-use shops co-located with HWRCs
338	Statement that modern vehicle maintenance could be provided wherever the depot is located.	1	Yes, this would be the plan.
342	Statement that Bryn Griffiths said that Cllr Stevens had put forward the HRF.	1	The Hollow Road Farm site was identified after a lengthy research process, which looked at many alternatives, by both Suffolk County Council and the West Suffolk councils. Bryn Griffiths is a member of council staff and Cllr Peter Stevens is a councillor. At decision-making meetings it is always a councillor, usually the relevant Cabinet member, who would put forward proposals, not members of staff.



345	Statement that HWRC should be changed to HwRC because this would bring a recognised change in the green direction which we all aspire to and would be a pioneering step forward.	1	The sentiment is noted and agreed but the suggested change is very subtle indeed.
349	Two sources; one states 'barn like building' the other states 'industrial buildings', which is it.	1	The descriptions are interchangeable and not mutually exclusive. The building would be a steel frame with a roof, cladding and access doors very similar in design to industrial units and agricultural buildings.
350	Need consideration for trade waste (quantity and catchment).	1	Yes, trade waste has been considered in the options assessment and site assessment process.

## 6. Consultation with statutory organisations

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### Consultation

Following the close of consultation with the public, consultation was carried out with a number of statutory organisations in order to get their feedback on the Identification and Assessment of Potential Options and Sites report and Sustainability Appraisal.

12 organisations were consulted. These were:

The National Grid	Environmental Health – St Edmundsbury B.C.
Suffolk Wildlife Trust	Environment Agency
Floods Planning – Suffolk County Council	DEFRA
Natural England	Waste Planning – Suffolk County Council
Highways Authority – Suffolk County Council	Archaeology – Suffolk County Council
Highways England	Anglian Water

Each organisation was sent a letter on 23 February 2016 and asked to provide a response by close of business on 18 March 2016. A copy of the letter can be found in Appendix 4.

Of the 12 organisations, 2 provided responses to the consultation.

### Feedback

Two pieces of feedback were received and are set out fully below, with responses where required

Environment Agency
Comment: As the consultation does not concern a specific site, our Waste Team therefore have no comments to make at this point in time.
Response: Thank you for reviewing the information at this stage in the process.

Environment Team, West Suffolk (Forest Heath District and St Edmundsbury Borough Councils)

Comments:

We broadly agree with the principle of bringing the depot and waste transfer station to one location. Bringing the depot and waste transfer station facilities together in a location close to the main population centre will reduce mileage and therefore vehicle emissions, which will ultimately improve local air quality - for which this Authority (St Edmundsbury Borough Council) has statutory responsibilities. However, we feel that more emphasis could be placed on the reduced mileage and examples of yearly mileage reduction estimates could be provided to demonstrate the benefits more clearly. The relocation of the Olding Road depot will allow for the remediation of a site potentially affected by land contamination, which we welcome.

We welcome that air quality has been considered as one of the qualitative criteria for comparing the unallocated greenfield sites, however, we disagree with the scores provided. Our team undertakes the monitoring for the West Suffolk Councils and has significant data in terms of local air quality. Neither site is considered likely to have a significant impact on relevant receptors (as defined in the regulations and accompanying guidance) that are anticipated to be close to breaching National air quality objectives and both sites are positioned in locations where the route to the A14 has no relevant receptors. Distance to the nearest receptors at both sites are too great to be considered relevant as dispersion of key air pollutants (nitrogen dioxide) associated with HGV movements is relatively rapid over short distances. We consider both sites should score equally in terms of impact on air quality. We are happy to discuss this further if required.

We welcome that the sustainability appraisal addresses air quality and that 'The application will be supported by a qualitative assessment of air emissions from the facility and will consider impacts from vehicle emissions'. We note the reference to the document by the Suffolk Local Authorities – "Air Quality Management and New Development (2011)", and consider this should be replaced with reference to the EPUK & IAQM - "Land-Use Planning & Development Control: Planning For Air Quality (2015)" which is now considered a more appropriate document. We note that in Chapter 5 of the sustainability assessment (Proposals for monitoring) there is provision to monitor for air quality, with performance indicators being 'concentrations of pollutants and AQMA's'. The source of this data being given as the air quality results from this Authorities yearly statutory monitoring programme. The current monitoring programme undertaken by this Authority does not have any locations where the influence of the WSOH can be assessed independently from other committed developments and therefore is unlikely to be a suitable data source to assess the impact of any WSOH on the local air quality. If monitoring of the impact on air quality from the WSOH is required, then specific baseline monitoring at key locations should commence as soon as possible with appropriate funding provided.

Response:

The comments relating to the co-location of the depot and waste transfer station facilities and the reduction in mileage and vehicle emissions this would afford are noted.

Your suggestion that more emphasis could be placed on the reduced mileage (and that examples of yearly mileage reduction estimates could be provided to demonstrate the benefits more clearly) are noted. The councils' view is as follows:

- Sufficient emphasis has already been placed on the reduced mileage that co-location would afford. There are numerous other economic, social and environmental factors which must also be considered in assessing the best option for delivering the councils' waste and operational needs.
- Some estimated traffic figures have already been prepared and published (see Section 6

(page 13) of the previously published [Frequently Asked Questions](http://www.westsuffolk.gov.uk/bins/upload/WSOHFAQs-3.pdf) (<http://www.westsuffolk.gov.uk/bins/upload/WSOHFAQs-3.pdf>) which contains a link to the [Vehicle Movements Table](#)). These figures:

- provide an estimate of the numbers and types of vehicles arriving and leaving a WSOH (option 4) development and the times of day these movements would occur;
  - provide daily traffic figures for the roads in the vicinity of the Hollow Road Farm site, particularly the section of the A134 between the A14 junction 43 roundabout and the Barton Hill roundabout.
- An estimate of yearly mileage reduction is set out in the table below. Estimated figures are based on a co-located Household Waste Recycling Centre, Waste Transfer Station and a Depot on a site close to Junction 43 of the A14. Saving for commercial waste rounds, the cleansing fleet and grounds maintenance fleet would also be expected in addition to the estimated annual reductions set out below.

	Estimated Annual Reduction in Mileage	Estimated % Change in annual mileage	Estimated Annual Change in CO <sub>2</sub> emissions
Bin Rounds (Black, Blue and Brown)	-22,776 miles	-8.27%	-62 tonnes
Suffolk County Council Haulage (Waste Transfer )	-21,051 miles	-36%	-57 tonnes
Annual Total Difference on Status Quo	-43,827 miles		-119 tonnes

CO<sub>2</sub> emissions based on 4.5mpg, 2.68kg per litre

- A high level assessment of the traffic implications of the various options for delivering the waste and operational services required has been carried out as part of the options assessment. Even without detailed traffic modelling it is possible to see that co-locating the facilities required together on one site close to West Suffolk's main centre of population will reduce vehicle movements when compared to the status quo and when compared to the other service delivery options assessed and any sites located away from Bury St Edmunds.
- Detailed traffic figures will be produced as part of the transport assessment prepared to support any forthcoming planning application (once a site has been chosen and the scheme design is near to being finalised).

The benefits of relocating the existing depot and thereby allowing the remediation of a site (Olding Road) potentially affected by local contamination are also noted.

The partner councils have noted your comments on air quality and scoring in relation to the sites qualitative assessment. We have reviewed our assessment and scoring of Tut Hill and Hollow Road Farm against the 'potential for impact on air quality' criterion accordingly. Having done so we are happy with the assessment of the sites against this criterion and their consequent scores. The main reasons for this are as follows:

- The criterion is entitled "potential for impact on air quality". This title accepts that a detailed assessment of air quality is not appropriate at this stage. In view of this fact the criterion considers the factors which could give rise to a potential impact. One such factor is 'number and proximity of sensitive receptors'. 'Planning for Waste Management Facilities: A Research Study' advises in relation to waste transfer stations (under the heading 'General Siting Criteria'):

*"Sites closer than 250 m from residential, commercial, or recreational areas should be avoided. Transfer routes away from residential areas are also preferable."*

At Tut Hill the nearest sensitive receptors are only 125m away whereas at Hollow Road Farm the nearest sensitive receptors are 305m from the site.

- The proximity of sensitive receptors to the site is a key issue in local residents' responses despite the fact that it may not give rise to a significant impact in terms of air quality.
- Despite there being sensitive receptors closer to the main route to and from Hollow Road Farm than is the case with Tut Hill, the proportionate increase in traffic on this route which would result from locating the WSOH (option 4) proposals at Hollow Road Farm would be relatively small. In the case of Tut Hill the proportionate increase would be larger.

In view of the above factors it is felt that scoring Tut Hill -1 and Hollow Road Farm +1 is reasonable. Further, the scoring system adopted means that the sites' scores do not conflict with your assessment that "Neither site is considered likely to have a significant impact on relevant receptors". Only scores of + or - 2 would have suggested a significant effect. The table below which is the basis for the sites assessment scoring process (taken from the IAPOS report – paragraph 6.24) helps explain this point.

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

Regardless of the outcome of the assessment of the Tut Hill and Hollow Road Farm sites against the 'potential for impact on air quality' criterion, and regardless of whichever site the partner councils decide to pursue, a detailed air quality assessment will be prepared and submitted as part of any planning application if one is required.

The Sustainability Appraisal has updated to reflect the feedback received:

pages 26 and 119, "Suffolk Local Authorities – Air Quality Management and New Development 2011" has been updated to reflect EPUK & IAQM "Land-Use Planning & Development Control: Planning For Air Quality (2015)".

page 78, 'Table 16: The SA Monitoring Framework' has been updated to reflect the fact that air quality results from specific baseline monitoring at key locations will be used.

In terms of monitoring, once any decision is made to proceed with a planning application the requirement for baseline monitoring of air quality at key locations will be considered.

## 7. Conclusions

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As is self-evident in the feedback tables set out in this report, those who chose to engage with the consultation did so in a detailed and thoughtful way. The consultation was based on two highly detailed, technical reports, and the feedback received showed a great deal of scrutiny of these documents.

As a result of the issues identified a number of changes have been made to the technical documents and further actions taken. The partner councils' detailed responses to the issues raised are set out in Sections 5 and 6. The section below provides a high level summary of how the issues raised have been addressed.

### Options Assessment

- The Options Assessment criteria and process have been reviewed in the light of comments made and one new options assessment criterion has been added (traffic).
- All financial related criteria and commercial opportunities / income generation criteria have been rechecked in view of comments received.
- A range of comments were made concerning the co-location of all facilities to a single site (option 4). There is a financial advantage in co-locating facilities based upon savings to the annual revenue costs as set out in the updated IAPOS options assessment matrix. There are also a number of other advantages through combining these facilities:-
  - Given future uncertainties, greater potential to meet changing demand through combining resources;
  - More efficient use of land with the flexibility to incorporate future growth within the defined site area, if required;
  - More opportunities in the future for joint operations and management;
  - Increased capacity to meet future demand from 20% housing growth and mitigate the associated rise in costs;
  - For the Bury St Edmunds area to have a modern, purpose built HWRC with improved customer experience (level access and with a reuse shop);
  - The potential for co-located operations to work more effectively and efficiently;
  - Access to a weighbridge on site; and
  - Improved administrative and operational support for waste services.

### Site Assessment

- The Site Assessment criteria and process have been reviewed in the light of the comments and no changes have been made.
- 20 new sites have been assessed.

- Six other suggested sites were not pursued on the basis that they were duplicates of other suggestions, were immediately identified as not suitable (e.g. Abbey Gardens and Charter Square) or were too imprecise to enable assessment.
- Seven sites that we had already assessed were also suggested and these have been re-checked against the site selection criteria.
- The physical and access characteristics of most of the suggested sites did not meet the exclusionary criteria.
- Three passed the exclusionary criteria and were then assessed against qualitative criteria (McRae Estates land between River Lark and A14, Land between Rougham Hill, A14 and Rushbrooke Lane, Bury and Land south of West Suffolk Crematorium, near Risby).
- Assessment against the qualitative criteria indicated that Hollow Road Farm is still the most suitable and deliverable site. The closest potential alternative is now the field south of Risby Crematorium (previously it was Tut Hill).

### **The Sustainability Appraisal:**

- The new sites identified during the consultation have been considered by the Sustainability Appraisal and added into the report.
- Of the three new sites that progressed to the qualitative assessment stage, two of these sites, McRae Estates land between River Lark and A14, BSE and Land between Rougham Hill, A14 and Rushbrooke Lane scored significantly negatively and therefore have not been considered to be reasonable and deliverable alternatives to be included in the SA assessment.
- One site, Land south of West Suffolk Crematorium, has scored significantly higher resulting in a positive scoring and therefore has been taken forward in the SA process as a reasonable, deliverable and realistic alternative to the Hollow Road Farm site.
- Throughout the appraisal some scores have been reviewed on the basis of the feedback received. However, this has not led to any changes to scores in the final version of the SA document.

### **Key Issues: Proximity/Relationship to Bury St Edmunds**

Some respondents raised concerns about the proximity/relationship to Bury St Edmunds criteria, in the main proposing that it should be reviewed and the area expanded in order to include additional sites which they felt would be more suitable. The partner councils have reviewed the locational requirements for the operational hub (option 4) and reasoning for them are set out in Appendix H of the IAPOS report; however, this has not led to any changes. Further information on the formulation of the locational requirements for the waste transfer station in particular are explained at paragraphs 3.3 and 3.7 – 3.8 of the IAPOS report.

### **Key Issues: Traffic and transport**

Concerns were raised about the local impact from traffic that would come from a WSOH in response to both the Options Assessment and Site Assessment criteria.

In response to this 'traffic' has been added as a criterion to the options assessment at appendix A of the IAPOS. Full details of this can be found in response to issue 032 in Section One of the Feedback Tables.

In terms of the issues raised about traffic concerns in the site assessment criteria, a chosen site would be subject to more detailed design and a comprehensive Transport Assessment as part of any planning application. Concerns regarding the access and egress to the chosen site, including traffic safety, would be addressed as part of more detailed design and incorporated into the Assessment.

Additional sites suggested through the consultation have also been subject to review and comment from our technical advisors on highways as well as the Local Highway Authority.

### **Key Issues: Proximity of Residents/Impact on Residents – Hollow Road Farm**

Concerns about proximity of residents to sites have been reviewed following the feedback. The partner councils understand that some people will have considerable concerns about Hollow Road Farm being identified as the most suitable, available and deliverable site for accommodating the WSOH (option 4) proposals.

However, the councils have been through the process of detailed options and sites assessments to ensure they select the most suitable, available and deliverable site. It is unlikely that any site would or will be considered perfect for accommodating the WSOH proposals and there are always likely to be people who would feel they need to oppose a site for a number of reasons, no matter where it was. It is important therefore that the councils pay proper regard to the conclusions of their assessments as they provide the most objective way of determining the most suitable site when considered against all of the relevant economic, social and environmental considerations.

In identifying Hollow Road Farm as the most suitable, available and deliverable site the sites assessment process considered Hollow Road Farm's proximity to sensitive receptors (primarily houses) with regard to various different matters (traffic, noise, odour, vermin etc.) and the landscape and visual impact of developing the site for the WSOH proposals. Notwithstanding this fact the sites assessment (both the original and post consultation amendment versions) found Hollow Road Farm to be the most suitable, available and deliverable of the sites considered.

The site is 1.4 miles from the town centre thus is not considered to be too close to it. The location of sites suitable to accommodate the operational hub (in locational terms at least) is a balance between finding a location where the proposed use would be acceptable in planning terms and being close enough to Bury St Edmunds (the main population centre in West Suffolk) to enable the proposed WSOH to effectively and efficiently meet West Suffolk's waste and operational needs. If Hollow Road Farm were further from Bury St Edmunds its ability to meet these needs would be diminished. Further, other matters such as the suitability of the local highway network and



landscape and visual impact may start to weigh more heavily against the location if it were further away from the town.

The WSOH proposal is not about concentrating three different waste and operation facilities on one community. It is about finding the right solution to meeting the partner councils' waste and operational needs (via the options assessment) in order to fulfil residents' requirements for their recycling and waste to be handled - and then finding the right site to accommodate those proposals without unduly burdening any community, communities or sectors of society. The options assessment has shown that co-locating all three facilities required is the optimal solution and the sites assessment has shown that Hollow Road Farm would be the most suitable site on which to deliver them. It is assessed to be the most suitable site taking into account, among other things, the impact on the communities nearest to it. Should the councils proceed with a planning application a number of further checks and balances would be employed during the process of determining the application to assess whether or not its impact in all respects (particularly any impact on the local community) would be acceptable.

### **Concluding Remarks**

This Consultation Report has covered the findings of the consultation including a summary of all the relevant issues that were raised during the consultation and how the partner councils have considered them. It will now be used to inform the partner councils' decision-making as well as to report back to those who took part in the consultation.

## Appendix 1: Public Consultation Plan

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### **The West Suffolk Operational Hub** Public Consultation Plan December 2015



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*Photo courtesy of GMMDS/Recycle for Greater Manchester*

# 1. Public Consultation Plan

## 1.1 What is this document?

- 1.1.1 A West Suffolk Operational Hub (WSOH) is a proposal by the West Suffolk councils (Forest Heath District Council and St Edmundsbury Borough Council) and Suffolk County Council (the 'partner councils') to relocate a number of waste management and operational facilities to a single site in order to increase efficiency, save money and future-proof waste management for West Suffolk's communities.
- 1.1.2 This Public Consultation Plan (PCP) has been prepared to set out how your councils will consult on the site selection criteria and assessment. By publishing this plan in advance of the consultation, your councils wish to enable as many people as possible to engage with the process and to be fully informed about what the project entails.
- 1.1.3 The intention is to consult across West Suffolk on the site selection criteria, whether we considered all the sites we should have looked at and subsequent assessment of sites in order to ensure that everyone has an opportunity to give their feedback on the process.
- 1.1.4 This method of consultation is not usually needed to support a proposal of this type, however, your councils wanted to ensure everyone has the opportunity to scrutinise the process so that the most suitable site for a WSOH can be identified. In addition, your councils want to offer everyone an opportunity to suggest alternative sites for consideration.
- 1.1.5 This document sets out the following information:
  - a summary of the background to the project;
  - details of the forthcoming consultation activities;
  - how to provide feedback to the consultation; and
  - the next steps for the project.

## 1.2 West Suffolk Operational Hub

- 1.2.1 A West Suffolk Operational Hub would include a waste depot for vehicle storage and maintenance, a waste transfer station and a household waste recycling centre at a new purpose-built facility, replacing a number of existing facilities.
- 1.2.2 The proposal to relocate these services to a single site was made by the West Suffolk councils in conjunction with Suffolk County Council. This proposal was made following careful consideration of all the options available for the future management of waste services management and operations. **Scrutiny of this proposal is part of this consultation.**
- 1.2.3 Following the proposal to relocate to a single site, an extensive site search was carried out. Nineteen sites were identified and a comprehensive assessment was carried out to determine the most suitable site for a WSOH.
- 1.2.4 The councils' assessment has identified Hollow Road Farm as their proposed site for the WSOH. The consultation will allow the public to feedback on whether or not this initial assessment was correct. **Scrutiny of this assessment is part of this consultation.**
- 1.2.5 This consultation also intends to establish whether there are any alternative sites for a WSOH.

### Key benefits of a West Suffolk Operational Hub

Bringing waste services together on one site would allow us to:

- make savings for taxpayers by sharing buildings, machinery and operating costs;
- reduce our fuel use by having a single site close to the town with the highest population;
- cut energy costs, for example through use of solar panels and collecting/using rainwater;
- improve the household waste recycling centre by making it easier to reach the containers;
- provide a new area where reusable goods can be sold;
- build a transfer station which will allow your councils to reduce the lorry miles travelled and minimise the use of Suffolk's rural roads;
- plan for the future with a site which is big enough to cope with population and business growth; and
- a modern vehicle maintenance workshop which will be able to generate income (helping to reduce overall costs) from other fleet operators.

## 2. Project background

### 2.1 Planning for the future

- 2.1.1 The WSOH proposal is the result of planning for future waste management and operational facilities in the Forest Heath and St Edmundsbury council areas of Suffolk (these two councils are collectively known as West Suffolk), specifically waste transfer stations, household waste recycling centres and fleet depots.
- 2.1.2 A number of factors have led to a review by West Suffolk (as the waste collection authority) and Suffolk County Council (as waste disposal authority) of the way in which these facilities and operations are currently delivered and what requirements are needed for the future. Factors such as the need to reduce the number of lorry movements on Suffolk's roads in order to increase operational efficiency and to reduce costs, Government initiatives to bring together public services and the opportunities to redevelop existing sites have been of particular influence.
- 2.1.3 Suffolk County Council and the West Suffolk councils started working together in 2014 to explore the possibility of bringing their facilities together on to one site – co-location. The work carried out indicated that this co-location would be advantageous; the councils started to look for possible sites accordingly.
- 2.1.4 Nineteen possible sites were identified. Assessment of these sites indicated that land at Hollow Road Farm on the northern outskirts of Bury St Edmunds might be suitable. The councils subsequently started work on the preparation of a planning application and held a pre-planning public consultation.
- 2.1.5 The consultation (held in spring 2015) generated a significant number of objections, comments and questions. One of the key concerns was the suggestion that Hollow Road Farm was not the optimal site for the co-located facilities. Other responses suggested that the facilities would be better provided from their existing or separate sites.
- 2.1.6 In response to the feedback the councils decided to combine their assessments of the options and potential sites for the delivery of waste and operations facilities in a publicly available document and that a second consultation on the issue could be undertaken.
- 2.1.7 The second round of public consultation was approved by the partner councils in June 2015. Following this decision, consultation will run from 8 January 2016 to 19 February 2016.
- 2.1.8 This consultation will allow everyone to scrutinise the findings of the site assessments, as well as put forward alternative suggestions. There is currently no decision on the site for the WSOH; however the existing assessment indicates that Hollow Road Farm is the best performing option. If there is an alternative site for the WSOH, the partner councils would very much like to hear about it so it can be investigated and assessed.
- 2.1.9 More information about the project and sites, including a detailed Sustainability Appraisal, can be found from 8 January 2016 on its dedicated webpage: [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)

## 3. Consultation

### 3.1 What we are consulting on

- 3.1.1 During this consultation, we are consulting on the following:
- 3.1.2 **The need for a single site (a West Suffolk Operational Hub):** this covers the process used to establish the need for a joint operational hub including a waste services depot, a waste transfer station and household waste recycling centre at a single site. The partner councils have agreed that a WSOH as described above is the right solution for West Suffolk, however scrutiny and comments related to this identified need are very welcome as are suggestions for alternative options.
- 3.1.3 **The site selection criteria and the way it was applied:** this includes details about the identified sites, the criteria used to evaluate a potential site for the WSOH, and the assessments for each of the nineteen sites. This is an opportunity for the public to suggest sites that the WSOH partner councils may not have considered yet or to give reasons why one of the rejected sites should be reconsidered.
- 3.1.4 **Sustainability appraisal:** alongside the site assessment work, a sustainability appraisal was also carried out to:
- test if a single site approach is the most sustainable option; and
  - evaluate if the site identified as the most suitable through the site selection process (Hollow Road Farm) was the most sustainable.
- 3.1.5 This sustainability information is being presented for consideration as extra background for scrutiny and comment.
- 3.1.6 In consulting on these matters, we are inviting scrutiny of the documents set out in section 3.3 below.
- 3.1.7 As part of this consultation we welcome suggestions of additional options or alternative sites. All credible suggestions will be considered.
- 3.1.8 All relevant matters raised during the consultation will be responded to as part of a Consultation Report and a summary will be published on the WSOH webpage.

### 3.2 How we are consulting

- 3.2.1 The consultation will run from 8 January 2016 to 19 February 2016. Information will be available throughout this period for members of the public to review and give feedback.

## Promotion

- 3.2.2 We will promote the consultation using the following methods.
- 3.2.3 Flyers – information about the consultation and where to find additional information will be delivered to households across West Suffolk by waste collection crews over a two-week period from 4 to 15 January 2016.
- 3.2.4 Newspaper advertising – advertisements will be placed at the start of consultation in the Bury Free Press and the Bury Mercury.
- 3.2.5 Press releases – we will issue a number of press releases before the start of and during the consultation in order to raise awareness through local media. We will also use social media (Facebook and Twitter).
- 3.2.6 Elected representatives – we will be directly contacting all of the parish councils in West Suffolk and borough, district and county councillors to let them know about the consultation and ask them to encourage people in their areas to take part.

## Drop-in events

- 3.2.7 We will be holding three drop-in events. All of the consultation documents will be available for review and members of the project team will be available to discuss the proposals and answer questions.
- 3.2.8 Please note that the project team may not be able to answer every question put to them at drop-in events. Anything that cannot be answered on the day should be submitted as part of your response to the consultation, where it will be considered within a Consultation Report.

Drop-in events		
Date	Time	Location
Friday 15 January 2016	2.30pm – 6pm	Unitarian Meeting House, Churchgate Street, Bury St Edmunds
Saturday 16 January 2016	10am – 1pm	The Apex, Charter Square, Bury St Edmunds
Tuesday 19 January 2016	4pm – 8pm	St John's Centre, St John's Street, Bury St Edmunds



## Public meeting

- 3.2.9 Following these drop-in events there will be a public meeting for people who still have questions about the project. The meeting will involve a presentation on the project, with the opportunity to ask questions afterwards. It may not be possible to answer all questions at the meeting, however everything raised during the meeting will be considered, along with other feedback received, and responded to in any subsequent Consultation Report. The meeting will have an independent chair.

Public meeting		
Date	Time	Location
Friday 29 January	7pm	Athenaeum, Angel Hill, Bury St Edmunds

## 3.3 What information is available and where you can find it

### Information

- 3.3.1 The following documents have been prepared as part of this consultation.
- 3.3.2 **Consultation Summary Booklet:** This will provide a summary of the WSOH project and the two technical documents referred to below. It is designed to provide a non-technical overview of the information, as well as directing people to where more specific information can be found within each document.
- 3.3.3 **Identification and Assessment of Potential Options and Sites Report (IAPOS Report):** This report and its appendices include the criteria and assessments used to (a) determine that co-locating the previously mentioned services to a single site is the most beneficial course of action for West Suffolk; and (b) the most suitable site for that co-location.
- 3.3.4 Any comments on this report are welcome. These could include critiques of the processes used, suggestions of other options and suggestions of alternative sites.
- 3.3.5 **Sustainability Appraisal:** 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 the most suitable through the site selection process (Hollow Road Farm) was the most sustainable.
- 3.3.6 This information is being presented for scrutiny. Should other sites be suggested during the consultation and then taken through the site selection assessment process, revisions would be made to the Sustainability Appraisal.
- 3.3.7 All comments regarding the proposals and information in the Sustainability Appraisal are welcome.

## Where to find information

- 3.3.8 The documents listed above will be available from 8 January 2016 to 19 February 2016.
- 3.3.9 **Online** –the project webpage will have all the consultation documents available for viewing online or to download from 8 January.
- The project webpage is: [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)
- 3.3.10 **Information points** – copies of the IAPOS Report, Sustainability Appraisal and this consultation plan will be available to review at each information point during normal opening hours. In addition, paper copies of the Consultation Summary Booklet and CDs containing the IAPOS Report and Sustainability Appraisal will be available to take away. The information points are:
- The Apex, Charter Square, Bury St Edmunds
  - Library, Sergeants Walk, Bury St Edmunds;
  - West Suffolk House, Western Way, Bury St Edmunds;
  - Haverhill House, Lower Downs Slade, Haverhill;
  - District Council Offices, College Heath Road, Mildenhall; and
  - Library, The Guineas, Newmarket
- 3.3.11 **Drop-in events** – all of the consultation documents will also be available to review at the three drop-in events. In addition, paper copies of the Consultation Summary Booklet and CDs (see below) will be available to take away.
- 3.3.12 **Issue via CD** – all of the consultation documents will be available on a CD that can be collected from any of the information points or public exhibitions, or can be posted to you on request.
- 3.3.13 **Issue hard copy** – the full Identification and Assessment of Potential Options and Sites Report and Sustainability Appraisal documents can be provided in hard copy but this may incur a cost of up to £30 to cover print and delivery. Copies of the documents will be supplied (free of charge) to any West Suffolk parish or town council on request for display locally.
- 3.3.14 Copies of consultation materials will be made available in alternative formats on request and reasonable adjustments will be made if you are not able to make your representations in writing.

## 4. How to tell us your views

### 4.1 Feedback

- 4.1.1 Please consider the following notes when providing feedback.
- 4.1.2 When suggesting new sites or options for delivering the WSOH and its objectives, detailed information backed by evidence (where available) is preferred in order that the suggestion can be effectively reviewed.
- 4.1.3 Clear identification of whether comments relate to the site criteria, site assessments or Sustainability Appraisal will enable us to evaluate information more effectively.
- 4.1.4 A large amount of information will be publicly available. Questions raised during this consultation that are not answered within the IAPOS Report or Sustainability Appraisal will need to be submitted on a feedback form, by email or through the post. Responses to such questions will be given in the subsequent Consultation Report which will be published on the WSOH webpage.
- 4.1.5 We are committed to carrying out a thorough review of the responses so no date has been set for the publication of the Consultation Report. Much will depend on how many responses we receive, how wide-ranging they are, how many other sites need to be considered and what the next steps should be, for example.

### 4.2 Deadline

- 4.2.1 The consultation will close at midnight on 19 February 2016.
- 4.2.2 If you are submitting your feedback online, it must be submitted by midnight on 19 February. If you are submitting your feedback in writing, it must be received by Monday 22 February to ensure that we will be able to consider it.
- 4.2.3 As long as contact details are provided (address or email) we will contact you to confirm your feedback has been received. The details of how to contact us are at the end of this document.

### 4.3 Methods

- 4.3.1 If you are not able to make your representations in writing please let us know and reasonable adjustments will be made.
- 4.3.2 **Online feedback form** – the project webpage [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh) will host a feedback form, through which you can leave feedback. There will be a specific section in which alternative sites can be suggested.

- 4.3.3 **Paper feedback form** – to make the process quicker and more efficient, we would like to encourage people to complete the feedback form online. However, paper copies of the feedback form will be available for collection and completion at the public exhibitions, public meeting and information points.
- 4.3.4 **By email** – emails can be sent with feedback to [wsoh@westsuffolk.gov.uk](mailto:wsoh@westsuffolk.gov.uk)
- 4.3.5 **By post** – written feedback can be sent to the address below.

West Suffolk Operational Hub Consultation Feedback  
West Suffolk House  
Western Way,  
Bury St Edmunds IP33 3YU

## 5. Next steps

### 5.1 Review of feedback

- 5.1.1 Following the close of consultation, the WSOH project team will review all of the feedback received. The project team includes staff and senior managers from Suffolk County and West Suffolk councils. The team is responsible for the day-to-day running of the project to deliver a shared waste operational hub in West Suffolk but does not take decisions relating to policy or development control (planning permissions). The project team will consider whether or not the councils should proceed with the West Suffolk Operational Hub and which location to propose to each Council's Cabinet. If the Cabinets decide to proceed, a planning application will be submitted to the SEBC Development Control Committee (Planning) for consideration. Any application would be subject to public consultation in the usual way.
- 5.1.2 All feedback will be individually considered.
- 5.1.3 Feedback received will be summarised and the number of times the same matter is raised will be recorded. All of the relevant issues will then be compiled and organised by issue and site for initial consideration by the project team and portfolio holders.
- 5.1.4 Following the review of the feedback provided, the WSOH project team will consider whether any of the information provided affects the assessments within the IAPOS Report or Sustainability Appraisal or their conclusions. Where appropriate, new sites will be subjected to the assessment criteria and judged against the other sites.
- 5.1.5 Details of the feedback received, as well as how the WSOH project team has reviewed it and considered suggested sites, will be published in a Consultation Report. This will be publicly available and include details of the WSOH partner councils' next steps for the project.
- 5.1.6 Should any further suitable sites for the WSOH be identified, a further site specific consultation may be held before any planning application is submitted.

## 6. Contact us

Telephone: 01284 763233  
Email: [wsoh@westsuffolk.gov.uk](mailto:wsoh@westsuffolk.gov.uk)  
Post: West Suffolk Operational Hub, West Suffolk House, Western Way,  
Bury St Edmunds IP33 3YU

# Appendix 2: Promotional material

## Flyer

### How should we deal with your waste in the future?

We want to combine our waste services on to a single site near Bury St Edmunds instead of having them spread across West Suffolk. This is your opportunity to have a say on the West Suffolk Operational Hub.

There will be an initial cost to building new facilities but the investment will make it cheaper for taxpayers in the long run.

Having the site near to the largest population centre will also cut the miles travelled by bin lorries – cutting carbon, congestion and cost.

Bringing teams together from three councils means a reduction in staff and other costs.



We've looked at 19 sites... tell us what you think of our assessment and the criteria we used.

Please turn this flyer over to find out how to make your views known.



### The West Suffolk Operational Hub consultation starts on 8 January and ends on 19 February 2016

More information and a feedback form available from 8 January: [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)

Come and find out more information at these drop-in events:

- Friday 15 January 2016, 2.30pm – 6pm  
Unitarian Meeting House, Churchgate Street, Bury St Edmunds
- Saturday 16 January 2016, 10am – 1pm  
The Apex, Charter Square, Bury St Edmunds
- Tuesday 19 January 2016, 4pm – 8pm  
St John's Centre, St John's Street, Bury St Edmunds

Public meeting:

- Friday 29 January, 7pm  
Athenaeum, Angel Hill, Bury St Edmunds

From 8 January view the documents, pick up a summary and feedback form (also available on CD) at these locations:

- The Apex, Charter Square, Bury St Edmunds;
- Library, Sergeants Walk, Bury St Edmunds;
- West Suffolk House, Western Way, Bury St Edmunds;
- Haverhill House, Lower Downs Slade, Haverhill;
- District Council Offices, College Heath Road, Mildenhall; and
- Library, The Guineas, Newmarket.

For more information about how to take part in the consultation visit the website: [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh), email: [wsoh@westsuffolk.gov.uk](mailto:wsoh@westsuffolk.gov.uk) or call: 01284 763233

18 December 2015

## **Public Consultation Plan sets out next steps for West Suffolk Operational Hub**

Three partner councils looking to create a single site for waste and vehicle management in West Suffolk have published a plan for the next stage of consultation which will start on 8 January and finish six weeks later on 19 February 2016.

Forest Heath District Council, St Edmundsbury Borough Council and Suffolk County Council put forward plans for a single, shared West Suffolk Operational Hub (WSOH) earlier this year on land to the north of Bury St Edmunds. The councils carried out a pre-application consultation for the Hollow Road Farm site – considered to be good practice before any planning application is formally submitted.

In a joint statement, the councils' three Cabinet members responsible for waste management – Cllr David Bowman (Forest Heath), Cllr Matthew Hicks (Suffolk County) and Cllr Peter Stevens (St Edmundsbury) – said: "It became evident from the comments and questions we received that some people in West Suffolk believed there may be other options to consider. The partner councils had carefully considered the way we should manage waste in the future, researched a number of options and identified a potential site but we accept that we did not share enough of this information with residents. We will now put that right by making the research publicly available so people can read it for themselves and let us know if they think there is a more suitable option."

The Public Consultation Plan, which is available online at [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh) sets out what information will be available, where people can view it, details of three drop-in exhibitions and a public meeting, how to provide feedback and how that feedback will be used. From 8 January 2016 the partner councils will be consulting on:

- the need for a single site (a West Suffolk Operational Hub);
- the site selection criteria and the way it was applied (with an opportunity for the public to suggest sites that the WSOH partner councils may not have considered yet, or to give reasons why one of the rejected sites should be reconsidered).

A Sustainability Appraisal (which looks at the environmental, social and economic effects of any future proposals) will also be available as additional background information for scrutiny and comment.

From 8 January information will be available online [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh) and at these places:

- West Suffolk House, Western Way, Bury St Edmunds;
- Library, Sergeants Walk, Bury St Edmunds;
- The Apex, Charter Square, Bury St Edmunds;
- District Council Offices, College Heath Road, Mildenhall;
- Library, The Guineas, Newmarket; and
- Haverhill House, Lower Downs Slade, Haverhill.

There will also be information available and people to talk to at the following events.

**Drop-in events:**

Friday 15 January, 2.30pm to 6pm, Unitarian Meeting House, Churchgate Street, Bury St Edmunds

Saturday 16 January, 10am to 1pm, The Apex, Charter Square, Bury St Edmunds

Tuesday 19 January, 4-8pm, St John's Centre, St John's Street, Bury St Edmunds

**Public meeting:**

Friday 29 January, 7pm, Athenaeum, Angel Hill, Bury St Edmunds.

**ENDS**



## **EMBARGOED UNTIL 0.01AM FRIDAY 8 JANUARY**

### **Give us your views on dealing with West Suffolk's household waste**

A six week consultation, starting today (8 January), is asking people across West Suffolk to give their views on how local household waste should be dealt with in the future.

Partner councils Forest Heath District and St Edmundsbury Borough, who are responsible for picking up bins from households, along with Suffolk County Council, who is responsible for disposing of the waste collected, are looking to relocate their West Suffolk waste management facilities to a single site, called a West Suffolk Operational Hub. The Hub would need to be near the town with the largest population, Bury St Edmunds.

A West Suffolk Operational Hub would include:

- a waste depot for vehicle storage and maintenance, to replace the one in Olding Road, Bury St Edmunds;
- offices for waste management teams;
- a waste transfer station (an enclosed industrial building) where household recycling and waste collections are consolidated before being sent to the Materials Recycling Facility or the Energy from Waste facility at Great Blakenham for recycling or energy recovery; and
- a Household Waste Recycling Centre for public use, to replace the one at Rougham Hill.

Cllr Peter Stevens, St Edmundsbury Cabinet member responsible for waste management, said: "Bringing these services together into a single hub not only makes the best use of taxpayers' money but also frees up land for development, including the second stage of the Public Service Village in Western Way which will create new jobs. Now we are encouraging anyone with a stake in the future of waste management services – that's everyone who has their bins picked up by the councils – to look at our research and give us their views."

Having concluded that a single site was the best option for waste services in the area, the partner councils then assessed 19 potential sites against a range of criteria, such as size, shape, location (including access to major road networks)

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and closeness to people, protected animals or buildings to work out which ones might be a suitable location for the hub.

Cllr Matthew Hicks, Suffolk County Council's Cabinet member responsible for waste management said: "Locating these services together on a single site means we will be able to manage waste more effectively in the future. The transfer station will mean bin lorries can spend more time collecting waste from households, and vehicles will spend less time travelling up and down the A14 to the Energy from Waste and recycling facilities. We are asking people to give their views on the idea of having a hub, the sites we assessed and the criteria we used to assess them. All views received will help to inform decisions taken by the partner councils."

Along with a Consultation Summary Booklet, a detailed report which looks at all the options (the Identification and Assessment of Potential Options and Sites Report) and a Sustainability Appraisal, which assesses the environmental, social and economic effects are available online at [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh) The website also lists six locations where this information will be available from, three drop-in events where people can get more information, a public meeting, a series of Frequently Asked Questions (FAQs) and an online feedback form.

Cllr David Bowman, Forest Heath's Cabinet member responsible for waste management said: "While a shared hub needs to be near Bury St Edmunds and the A14, this consultation affects everyone in West Suffolk because we all put our bins out each week for collection and we need to make sure that the service is managed as efficiently and cost-effectively as possible for every taxpayer."

In 2015 the partner councils announced that land at Hollow Road Farm, to the north of Bury St Edmunds, was in their view, the optimal site for a WSOH. However, due to the level of public feedback, the partner councils agreed to look at the process again. They are now seeking views from the public on the rationale for a hub and the criteria for where one may be located as well as any sites that may have been overlooked.

**ENDS**

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**NOTE 1**

From 8 January information will be available online [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh) and at these places:

- West Suffolk House, Western Way, Bury St Edmunds;
- Library, Sergeants Walk, Bury St Edmunds;
- The Apex, Charter Square, Bury St Edmunds;
- District Council Offices, College Heath Road, Mildenhall;
- Library, The Guineas, Newmarket; and
- Haverhill House, Lower Downs Slade, Haverhill.

**Drop-in events:**

Friday 15 January, 2.30pm to 6pm, Unitarian Meeting House, Churchgate Street, Bury St Edmunds

Saturday 16 January, 10am to 1pm, The Apex, Charter Square, Bury St Edmunds

Tuesday 19 January, 4-8pm, St John's Centre, St John's Street, Bury St Edmunds

**Public meeting:**

Friday 29 January, 7pm, Athenaeum, Angel Hill, Bury St Edmunds.

**NOTE 2**

There are a number of FAQs on the website: [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)

They include, for example:

- Why do the partner councils believe a single WSOH is a good idea?
- Why is it important to have facilities together on one site when they are currently operating well at different locations?
- What are the 'other sites' which could be released for development?
- Are there any other sites like the suggested WSOH in operation?
- How did you assess sites?
- A site selection process was carried out in 2012 and Rougham Hill was chosen why isn't that site being used any more?
- Will there be smells coming from any site that has so much rubbish going through its gates?
- How would you stop pests, rats and other vermin, and birds being attracted to the site (and any properties nearby)?
- How would the environmental impact of any site be considered?

## Still time to have your say on waste hub

There is still time for people to send in their views about whether a partnership of councils should build a shared facility to deal with waste from West Suffolk's households and, if so, where it could be located. The consultation about a proposed West Suffolk Operational Hub closes at midnight on Friday 19 February.

Forest Heath District, St Edmundsbury Borough and Suffolk County councils are working together on the project that could bring together:

- a waste depot for vehicle storage and maintenance, to replace the one in Olding Road, Bury St Edmunds;
- offices for waste management teams;
- a waste transfer station (an enclosed industrial building) where household recycling and waste collections are consolidated before being sent to the Materials Recycling Facility or the Energy from Waste facility at Great Blakenham for recycling or energy recovery; and
- a Household Waste Recycling Centre for public use, to replace the one at Rougham Hill (which would be the only HWRC affected).

There are a number of ways in which people can respond.

- Online feedback form through the hub webpage [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)
- Paper feedback form, available from these locations
  - West Suffolk House, Western Way, Bury St Edmunds;
  - Library, Sergeants Walk, Bury St Edmunds;
  - The Apex, Charter Square, Bury St Edmunds;
  - District Council Offices, College Heath Road, Mildenhall;
  - Library, The Guineas, Newmarket; and
  - Haverhill House, Lower Downs Slade, Haverhill
- Email to [wsoh@westsuffolk.gov.uk](mailto:wsoh@westsuffolk.gov.uk)
- Post to West Suffolk Operational Hub Consultation Feedback, West Suffolk House, Western Way, Bury St Edmunds, IP33 3YU.

December 24<sup>th</sup> 2016

# Have your say on site of proposed new waste hub

Controversial plans for a waste hub for west Suffolk are set for further scrutiny, with residents asked to suggest any alternative sites after people protested against a greenbelt site just outside Bury St Edmunds.

Suffolk County, Forest Heath District and St Edmundsbury Borough councils are looking to create a single site for waste and vehicle management and have published a plan for the next stage of consultation which will start on January 8 and finish six weeks later on February 19.

The consultation comes after many residents of Bury St Edmunds, the three Forham villages and Great Barton opposed the preferred site on Hollow Road Farm, with concerns over noise, smell and traffic.

In a joint statement a spokesman

**Matt Reason**

[matt.reason@archant.co.uk](mailto:matt.reason@archant.co.uk)

for the councils said: "It became evident from the comments and questions we received that some people in west Suffolk believed there may be other options to consider.

"The partner councils had carefully considered the way we should manage waste in the future, researched a number of options and identified a potential site, but we accept that we did not share enough of this information with residents.

"We will now put that right by making the research publicly available so people can read it for themselves and let us know if they think there is a more suitable option."

The public consultation plan, which is available online at [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh), sets out what information will be available, where people can view it, details of three drop-in exhibitions and a public meeting, how to provide feedback and how that feedback will be used.

The consultation documents will all be published on January 8 and will include a justification from the councils about how they selected Hollow Road Farm from a long list of 19 sites. The site north of Bury is currently farmland.

Alternatives suggested have included near Risby, at the Saxham business park, and at the top of Rougham Hill on the old A45 and adjoining government-owned land.

However, the two west Suffolk councils stands to lose a £50,000 deposit on Hollow Road Farm if they go elsewhere.

## Consultation process

From January 8 the partner councils will be consulting on:

- The need for a single site, which would see current sites in Mildenhall and Bury close, making land available for development.

- The site selection criteria and the way it was applied – with an opportunity for the public to suggest alternatives.

The information will be available online [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh).

There will also be information available and people to talk to at the following drop-in sessions:

January 15 (2.30pm to 6pm), Unitarian Meeting House, Churchgate Street, Bury;

January 16 (10am to 1pm), The Apex, Charter Square, Bury; January 19, (4-8pm), St John's Centre, St John's Street, Bury.

A public meeting will take place on January 29 at 7pm, at the Athenaeum, Angel Hill, Bury.

East Anglian Daily Times Page 5

December 25<sup>th</sup> 2015

## Residents' suggestions wanted for alternative location

# Consultation date is set for waste hub site

**BY PAUL DERRICK**  
[paul.derrick@buryfreepress.co.uk](mailto:paul.derrick@buryfreepress.co.uk)  
Twitter: @BfpPaul

**A date has been set for a new consultation to suggest alternative sites for a waste hub in West Suffolk following a public backlash to council bosses' preferred option.**

Residents can have their say on the location of the West Suffolk Operational Hub from January 8 to February 19.

It follows fierce opposition to St Edmundsbury Borough, Forest Heath District and Suffolk County Councils' preferred site at Hollow Road Farm, on the outskirts of Bury St Edmunds.

Petitions containing 844

signatures were presented to St Edmundsbury in June with concerns raised about the site's countryside location, proximity to houses, the potential for increased traffic and a 'negative environmental impact'.

Hollow Road Farm was chosen out of 19 possible sites and the consultation will look at how these were assessed.

It will examine the need for a single site for the hub's various services including a waste service depot, waste transfer station and household waste recycling centre. Residents will also be able to suggest alternative sites and give reasons why one of the rejected sites should be reconsidered.

A joint statement from the councils said: "It became evi-

dent from the comments and questions we received that some people in West Suffolk believed there may be other options to consider.

"The partner councils had carefully considered the way we should manage waste in the future, researched a number of options and identified a potential site but we accept that we did not share enough of this information with residents.

"We will now put that right by making the research publicly available so people can read it for themselves and let us know if they think there is a more suitable option."

From January 8 information will be available online at [www.westsuffolk.gov.uk](http://www.westsuffolk.gov.uk) where a public consultation

plan has already been published.

Information can also be found at West Suffolk House, in Western Way, Bury; Bury Library, in Sergeants Walk; The Apex, in Bury; District Council Offices, in College Heath Road, Mildenhall; Newmarket Library, in The Guineas and Haverhill House, in Lower Downs Slade.

Drop in events will be held on January 15, 2.30pm to 6pm at the Unitarian Meeting House, in Churchgate Street, Bury; January 16, 10am to 1pm at The Apex and January 19, 4-8pm at St John's Centre, in St John's Street, Bury.

There will be a public meeting on Friday, January 29 at 7pm at the Athenaeum, on Angel Hill, Bury.

Bury Free Press, Page 4

# Date is set for new waste hub consultation

A date has been set for a new consultation to suggest alternative sites for a waste hub in West Suffolk after a public backlash to council bosses' preferred option.

Residents can have their say on the location of the West Suffolk Operational Hub from January 8 to February 19.

It follows fierce opposition to St Edmundsbury Borough, Forest Heath District and Suffolk County Councils' preferred site at Hollow Road Farm, on the outskirts of Bury St Edmunds.

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Hollow Road Farm was chosen out of 19 possible sites and the consultation will look at how these were assessed.

It will examine the need

for a single site for the hub's various services including a waste service depot, waste transfer station and household waste recycling centre.

Residents will also be able to suggest alternative sites and give reasons why one of the rejected sites should be reconsidered.

A statement from the councils said: "The partner councils had carefully considered the way we should manage waste in the future, researched a number of options and identified a potential site but we accept that we did not share enough of this information with residents.

"We will now put that right by making the research publicly available so people can read it for themselves and let us know if they think there is a more suitable option."

Information can be found at Haverhill House, in Lower Downs Slade, Haverhill, and will also be available online at [www.westsuffolk.gov.uk](http://www.westsuffolk.gov.uk) from January 8.

Haverhill Echo, page 5

# Waste hub consultation starts in bid to clear up 'misconceptions'

**Matt Reason**

matt.reason@archant.co.uk

Plans to revolutionise how waste in west Suffolk is managed by building a controversial "waste hub" near Bury St Edmunds have been put out to public consultation today.

This latest round of consultation on the West Suffolk Operational Hub comes after widespread opposition to the original site near Fornham St Martin on Hollow Road Farm.

The Forest Heath District, St Edmundsbury Borough and Suffolk County Council project would see a hub near Bury created for household waste recycling, a waste transfer station and a refuse vehicle depot.

The current situation has been labelled not fit for the future, with bins being collected across west Suffolk and taken to the transfer station in Red Lodge before then making the journey back eastwards to the Energy from Waste incinerator at Great Blakenham. However, the level

## Where the public can have its say

From today the partner councils will be consulting on:

- The need for a single site, which would see current sites in Mildenhall and Bury close, making land available for development
- The site selection criteria and the way it was applied – with an opportunity for the public to suggest alternatives. The information will be available online at

[www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)  
Drop-in sessions will take place on:

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of opposition to Hollow Road, which St Edmundsbury cabinet member for operations Paul Stevens conceded had delayed plans, has led to the three councils releasing in extensive detail the reasoning behind the project.

Mr Stevens said: "We are asking people to come forward with site suggestions if they think we have missed any. We have released the full

criteria for people to assess. We are nowhere near a planning application and nothing is decided. Bringing these services together into a single hub not only makes the best use of taxpayers' money but also frees up land for development."

The consultation documents released today show 19 sites were assessed before choosing Hollow Road

Farm. Matthew Hicks, county cabinet member for waste management, said: "There are some misconceptions about what modern waste management is like, and we hope to clear those up. This is not landfill, as a county we have put an end to landfill and that is why we built the Energy from Waste plant. There are no big piles of rubbish in the open air and no gulls circling. The transfer station will mean bin lorries can spend more time collecting waste from households, and vehicles will spend less time travelling up and down the A14."

David Bowman, Forest Heath cabinet member, stressed that this was a "real consultation" and all feedback would be taken on board. He said: "While a shared hub needs to be near Bury and the A14, this consultation affects everyone in west Suffolk because we all put our bins out each week for collection. We need to make sure that the service is managed as efficiently as possible for every taxpayer."

# Consultation starts in bid to clear up 'misconceptions' over waste hub

By Matt Reason

[matt.reason@archant.co.uk](mailto:matt.reason@archant.co.uk)

Plans to revolutionise how waste in West Suffolk is managed by building a controversial "waste hub" near Bury St Edmunds have been put out to public consultation today.

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The current situation has been labelled not fit for the future, with bins being collected across West Suffolk and taken to the transfer station in Red Lodge before then making the journey back eastwards to the Energy from Waste incinerator at Great Blakenham. However, the level of opposition to Hollow Road, which St Edmundsbury cabinet member for operations Paul Stevens conceded had delayed plans, has led to the three councils releasing in extensive detail the reasoning behind the project.

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January 13<sup>th</sup> 2016

COUNCIL

## Public consultation has begun on future of waste centres

A CONSULTATION has begun on a decision to create a single site for waste and vehicle management in West Suffolk.

Forest Heath District Council, along with their partners St Edmundsbury Borough Council, and

Suffolk County Council have put forward plans for a single, shared West Suffolk Operation Hub on land to the north of Bury St Edmunds.

Last week, the News reported the Mildenhall waste centre was likely to close.

This was incorrect – it is the vehicle depot that is set to close in Mildenhall.

It would have no affect on the Mildenhall Household Waste Recycling Centre off the A1065. We apologise for this error.

Have your say on the plans by going to [westsuffolk.gov.uk/wsoh](http://westsuffolk.gov.uk/wsoh) or by dropping into the District Council Offices in Mildenhall, or at Newmarket Library.

The consultation runs until February 19.

Newmarket Journal, Page 5

Sites considered to save on £35m annual costs by district

# Why councils want a single waste hub site

BY LAURA SMITH  
laura.smith@jpress.co.uk  
Twitter:

**Collecting rubbish from homes is an expensive business – across Suffolk it costs around £35 million each year.**

Forest Heath District, St Edmundsbury Borough and Suffolk County councils have put forward a proposal to locate waste services in West Suffolk on one site, which is aimed at saving money, increasing efficiency and future-proofing waste management.

They are looking to build a barn-like building called a waste transfer station, which would mean larger but fewer vehicles travelling along the A14 (cutting carbon, congestion and cost). Inside it, the

**Delivering a shared hub for a waste transfer station, depot, and HWRC will bring significant long term benefits and opportunities**

contents of your black and blue bins would be dropped off by the bin lorries and then transferred into larger vehicles and transported along the A14 to Great Blakenham.

Blue bin recycling is delivered to the Materials Recovery Facility for sorting before being recycled and black bin waste is delivered to the Energy from Waste facility to produce electricity.

The councils are also looking to build a new depot for

their fleet of lorries, vans and cars, alongside offices and welfare facilities for the people who work there.

This would bring together the Mildenhall depot (Holborn Avenue) and Bury depot (Olding Road) and save money by reducing building costs and making the vehicle rounds more efficient.

Finally, they are looking to move the Bury Household Waste Recycling Centre (HWRC) from Rougham Hill to the site as well.

This would mean they could have a modern, purpose built HWRC making reuse and recycling even easier.

The councils believe delivering a shared hub for a waste transfer station, depot, and HWRC will bring significant long term benefits and opportunities.

Bury Free Press  
Pages 4-6

# How did they decide on Hollow Road Farm site?

Having identified a single site as the best option for delivering the waste facilities required, the partner councils moved on to look for the most suitable site for the hub.

Nineteen potential sites were identified and tested against a range of criteria, such as size, shape, location (including access to major road networks) and closeness to people, protected animals or buildings, to assess their suitability for accommodating the optimal WSOH solution.

This assessment was carried out as follows:

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 location-based criteria.

3) As none of the sites



PHOTO COURTESY OF: GMMWDS/RECYCLE FOR GREATER MANCHESTER).

Inside a waste transfer station in Manchester

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.

5) This left two remaining sites, which were then assessed against more detailed criteria to determine which was the better site.

6) The results of this assessment (of Tut Hill and Hollow Road Farm), indicated that Hollow Road Farm was the optimal site for delivering the proposed WSOH.

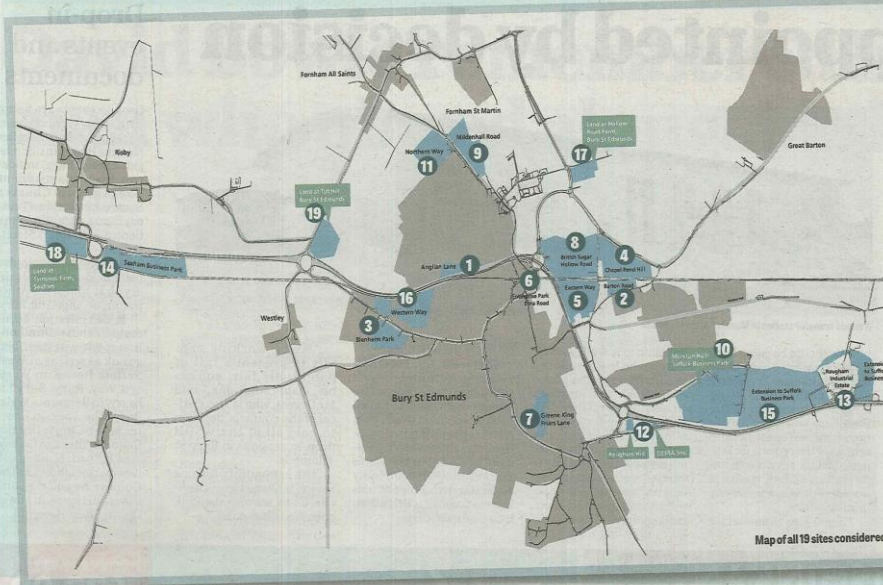
The councils continued

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, including that Hollow Road Farm was the wrong location for the co-located facilities.

# WASTE COLLECTION SPECIAL FEATURE

councils and Suffolk County Council. Decisions taken now will also future-proof management of rubbish across the area



## The 19 sites

### BROWNFIELD SITES:

1. Anglian Lane
2. Barton Road
3. Blenheim Park
4. Chapel Pond Hill
5. Eastern Way
6. Enterprise Park
7. Friars Way (Greene King)
8. Hollow Road (British Sugar)
9. Mildenhall Road
10. Moreton Hall/Suffolk Business Park
11. Northern Way
12. Rougham Hill (existing site and with DE-FRA land to the north)
13. Rougham Industrial Estate
14. Saxham Business Park
15. Suffolk Business Park extension
16. Western Way

### GREENFIELD SITES:

17. Hollow Road Farm
18. Symonds Farm
19. Tut Hill

## Assessment of Tut Hill and Hollow Road Farm

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

## Tut Hill and Hollow Road Farm site options

This table shows the council's assessment of Tut Hill and Hollow Road Farm site options for a one-hub waste site.

**REACTION FROM RESIDENTS: SEE PAGE 6**

Bury Free Press  
Pages 4-6

# Disappointed by decision

A group of residents say they spent nine hours on Saturday discussing the technical documents released as part of the councils' latest consultation on the proposed West Suffolk Operational Hub (WSOH).

Spokesman Adrian Graves, a resident with more than 40 years' experience in the transport and waste industry, said those who met were 'disappointed' to see Hollow Road Farm given so much weight in reports purporting to be for a 'non-site specific consultation'.

He said: "We welcome the fact they (the councils) have come out with what they said they would but it's a bit light on statistical information, which we were led to believe we would get, and, though we were assured this was a fresh start, too much of this information is still exclusively focused on the benefits of Hollow Road Farm.



A waste transfer station in March, Cambridgeshire

"We should be going back to the drawing board and I don't think we are," he added.

The group, consisting largely of members of the Fornhams and Great Barton Communities Forum, has also criticised the reports for failing to include any financial information, including what it would cost to upgrade existing infrastructure.

"There's no financial in-

formation in it at all," said Mr Graves, who has questioned the efficacy of a combined site.

He added: "In their traffic analysis and so on there's no real understanding, or indication they understand, that by sticking with the combined hub concept they're going to impose the congestion and vehicle movements associated with all three functions of one small, compressed area on lo-

cal roads and junctions."

Last week, Cllr Peter Stevens, St Edmundsbury's cabinet member for waste management, said he hoped this consultation would help address people's misconceptions about the modern treatment of waste but Mr Graves said he and others completely understand what the councils want to do and it is that which is cause for concern.

"We're working rapidly to present a raft of potentially fair, equitable, viable solutions," said Mr Graves, who is also critical of the councils' decision to hold all of the WSOH drop-in sessions in Bury St Edmunds.

The community forums have established a new website. Go to: [www.westsuffolkoperationalhub.co.uk](http://www.westsuffolkoperationalhub.co.uk)

## Drop-in events and documents

Drop in events are being held today (Friday) from 2.30-6pm at the Unitarian Meeting House, in Churchgate Street, Bury; tomorrow from 10am-1pm at The Apex in Charter Square, Bury, and on Tuesday from 4-8pm at St John's Centre, in St John's Street, Bury.

A public meeting is also being held on Friday, January 29 at 7pm at the Athenaeum, on Angel Hill, Bury.

■ Consultation documents can be found online at [www.westsuffolk.gov.uk](http://www.westsuffolk.gov.uk) as well as at West Suffolk House, in Western Way, Bury; Bury Library, in Sergeants Walk, Bury; The Apex, in Charter Square, Bury; District Council Offices, in College Heath Road, Mildenhall; Newmarket Library, in The Guineas, Newmarket, and Haverhill House, in Lower Downs Slade, Haverhill.

Bury Free Press  
Pages 4-6

# New council waste hub 'trying to do too much', claim its opponents

**Matt Reason**  
West Suffolk reporter  
matt.reason@archant.co.uk

A consultation on controversial plans for a waste hub in west Suffolk has been labelled "a gross insult" to the intelligence of opponents to the scheme, after statements made about clearing up "misconceptions".

The three councils behind the hub, which would bring a range of waste and council services on to one site near Bury St Edmunds, hope to modernise waste management while saving taxpayers' money.

The project is a partnership between Suffolk County, Forest Heath District and St Edmundsbury Borough councils. Last week a second round of consultation was launched in response to widespread opposition to the preferred site on Hollow Road Farm, near Fornham St Martin.

The councils said, along with allowing public scrutiny of their decision making process so far, the consultation was hoped to clear up "misconceptions" about the hub and modern waste management in general.

However, Adrian Graves, from Great Barton, said the idea hub opponents were either promoting misconceptions or were ill-informed about it themselves was insulting.

He said: "They have been peddling this line from the beginning and it is an insult."

"We are very clear on what the hub is proposed to be and do not have any 'misconceptions'."

"We have visited transfer stations in Cambridgeshire so know what they look like."

"The statement about 'misconceptions' is a gross insult to the intelli-



■ Three village signs in Fornham St Martin, one of which is getting its anti-waste hub site message across  
Photograph: GREGG BROWN

gence of the community. We have a number of people living within the villages around Bury who have a lot of experience of large public projects. We are not NIMBYs – I would feel sorry for whoever had to live near this hub.

"We are looking at 1,000 truck movements a day. By combining the transfer station with the domestic waste centre is just going to make it worse."

"They are trying to do too much with one site. Everywhere else in the country the transfer stations are split from the domestic waste centres. The hub is supposed to be everything, a taxi MOT centre, council vehicle depot, it is too much."

Mr Graves also raised concerns

that all of the released technical documents, published on January 8, pointed to why Hollow Road Farm was the best site, despite the council promising to reconsider all sites and any other suggested sites.

One of the several misconceptions referred to by the councils, at a press briefing last week, was the description of the hub as a "tip" by those campaigning against the Hollow Road Farm site.

Cabinet members from all three councils stressed that the site would not be "smelly" and that waste would not remain on site for long before being transferred to Great Blakenham for incineration or recycling. A spokeswoman for the coun-

## The consultation

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- The information will be available online [www.west-suffolk.gov.uk/wsoh](http://www.west-suffolk.gov.uk/wsoh)

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- Today, 10am to 1pm, The Apex, Charter Square, Bury
- Tuesday, 4-8pm, St John's Centre, St John's Street, Bury

- A public meeting will take place on January 29 at 7pm, Athenaeum, Angel Hill, Bury

cils encouraged anyone who had a view on their research to take part in the consultation and stressed that every part of the West Suffolk Operational Hub project was under consultation, including whether the hub itself is the best way to move forward.

She added: "This consultation is all about showing our workings out which led us to the site at Hollow Road Farm."

"The information we have made available clears the misconception that we want to create a large smelly dump with seagulls circling above."

Consultation held on proposals for centralised waste transfer station

# Public have their say on waste disposal

**BY ADAM HOWLETT**  
adam.howlett@buryfreepress.co.uk  
Twitter: @BfpAdam

## People have been given a chance to voice their opinions on plans for a centralised waste hub in Suffolk.

St Edmundsbury Borough, Forest Heath District and Suffolk County Councils hosted a number of consultation meetings to show how they came up with the preferred site location of Hollow Road Farm in Bury for the planned West Suffolk Operational Hub.

Around 60 people attended a meeting at the Unitarian Meeting House in Bury on Friday with a further 100 attending a meeting at the Apex on Saturday.

Most seemed to agree with the essence of the proposal, saying they thought the premise of a centralised waste hub was a good idea.

However, some had concerns about the councils' preferred site option.

Others questioned why there had been no costing completed for all 19 of the potential waste hub sites.

One Bury resident said: "I can see the point of avoiding taking the waste up there and then bringing it all the way back and I think they have chosen the right place for it in Bury. I would have thought that they could have supplied some comparative costing figures for each site though."

Adrian Graves, from Great Barton, said the case for an all-

in-one combined hub had still not been conclusively made.

He added: "With the news of what they are planning to do at RAF Mildenhall, if ever there was a further justification for that the transfer element of the operational hub should be to the west of Bury St Edmunds, this is it."

Cllr Matthew Hicks, Suffolk County Council's cabinet member for environment and public protection, said the council hadn't created business plans for every site but had worked out Bury was best suited to host the hub.

He said: "We have used a computer programme to model precisely where we want to put this transfer station and we are certain it makes good financial sense for that to be

in Bury St Edmunds".

A St Edmundsbury Borough Council spokeswoman said: "It has been really encouraging to see so many people taking an interest in how we deal with their waste by coming along to our drop-in sessions, asking questions and engaging with the consultation process. We would like to thank them all and remind people that there is a public meeting on January 29 in the Athenaeum at 7pm.

"The councils welcome as many comments as possible on any or all of the questions in the feedback form, available online at [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh) or at the various information points, such as Bury library, the Apex and West Suffolk House."

Bury Free  
Press Page 2

# Waste hub concerns back on the agenda at meeting

**Chris Shimwell**  
chris.shimwell@archant.co.uk

Contentious proposals for a single waste hub for west Suffolk saw between more than 100 people turn out for a hotly-debated public meeting on Friday.

Councils involved claim the plan to shut down a number of sites and move everything to Hollow Road Farm, at Fornham St Martin, near Bury St Edmunds, would “increase efficiency, save money and future-proof waste management for west Suffolk’s growing communities”.

However they faced many questions from an audience who had a number of concerns about the proposals to replace the Bury waste depot at Olding Road, the Mildenhall waste depot in Holborn Avenue and the household waste recycling centre at Rougham Hill.

“There’s clearly widespread concern and very deep concern about the volumes of traffic that are going to be imposed on one small area of the community by the process of bringing three elements of the operation together in this one mega-hub,” said Adrian Graves, from Great Barton, who was at the meeting at The Athenaeum in Bury.

The proposal has been put forward by St Edmundsbury Borough Council,

**“We’ve got to cope with increased houses in the Bury area which is the main centre of population.”**

**St Edmundsbury cabinet member Peter Stevens**

Forest Heath District Council and Suffolk County Council, with a public consultation running until February 19.

St Edmundsbury cabinet member Peter Stevens was also at the meeting. Speaking afterwards, he said: “As I said to the audience on Friday, we have to take difficult decisions on behalf of the whole borough but we wanted this whole new, open consultation so everybody was aware of what we’re trying to do.”

“We’re planning for the future. We’ve got to cope with increased houses in the Bury area, which is the main centre of population.

“We have to transfer the waste economically along the A14 to Great Blakenham (site of an energy-from-waste incinerator) for the next 25 years.”

However in addition to traffic worries, Mr Graves said there was “strongly-held enthusiasm and

support” for keeping the household waste recycling centre at Rougham Hill.

“Even people who live in close proximity to that side of town support it,” he said. “The borough owns the estate, it owns the land (so) it doesn’t have to go out and spend money buying another piece of land.

“There’s also another piece of land owned by the council beyond the existing site which would allow them to upgrade it and futureproof it.”

The new hub has come about as Suffolk County Council looks to upgrade its waste transfer facilities.

Last February, the councils decided the Hollow Road Farm site was the best location and a consultation was carried out in advance of a planning application, but this found there needed to be more consultation on the options and site processes, which is what this consultation has focused on.

Mr Graves said described the last consultation as a “fiasco” but said the council told the meeting they wanted to know what people thought for this consultation. “They have said they’re in listening mode. Let them prove that they’re actually listening,” he said.

**■ To find out more about the plans and to have a say, visit [www.westsuffolk.gov.uk/bins/wsoperationalhub.cfm](http://www.westsuffolk.gov.uk/bins/wsoperationalhub.cfm)**

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East Anglian Daily Times  
Page 14



Public have until Friday, February 19 to have their say

# Councils face grilling at waste hub meeting

**BY ADAM HOWLETT**  
adam.howlett@buryfreepress.co.uk  
Twitter: @bfpadam

## Council chiefs were grilled at a heated public meeting on Friday about the proposed West Suffolk Waste Hub.

More than 200 people packed the Athenaeum in Bury St Edmunds to voice their opinions on the multi-million pound project.

Suffolk County, St Edmundsbury Borough and Forest Heath District Councils have put forward proposals to bring together a waste transfer station, household waste recycling centre and vehicle depot at a single site.

They argue this will reduce the total number of vehicle

movements needed to transport waste which would cut the money the council spends on fuel and staff time, reduce the carbon footprint and futureproof Suffolk's waste disposal network.

Bryn Griffiths from Suffolk County Council told the meeting the scheme would save the taxpayer money.

He said: "By putting them together, that journey home that costs money, wastes staff time, costs fuel and puts extra trucks on the roads doesn't have to happen."

A variety of concerns were voiced about the scheme, especially the increase in traffic a single hub would attract. It was revealed a combined site would host 900-930 vehicle movements a day.

Adrian Graves from Great Barton said he couldn't see how that number of vehicle movements could be handled with "roads and infrastructure that are already inadequate".

"Will the council explain how it believes it can accommodate this traffic?" he said.

Many questioned whether having a combined site was the answer at all, saying the concentration of vehicles it would generate could be mitigated by splitting the sites.

Others suggested including the hub in plans for the Suffolk Business Park at Moreton Hall.

Some members of the public were concerned about the £50,000 retainer fee the council has already paid to secure

land at the Hollow Road Farm site.

"If the decision is not to go for Hollow Road Farm site, how much is the council going to be out of pocket?" one audience member asked.

Some were worried that the councils' previous preferred site at Hollow Road Farm had already been chosen, that the decision was already a "done deal".

But councillor Matthew Hicks said there was no preferred option at this stage and that the team were keen to hear views, adding: "We are in listening mode."

The consultation runs until February 19. Visit [www.westsuffolk.gov.uk/bins/wsoperationalhub.cfm](http://www.westsuffolk.gov.uk/bins/wsoperationalhub.cfm) to have your say on the plans.

February 10<sup>th</sup> 2016

## Have your say on new waste hub plan

THERE is just a week left to have your say on proposals for a new waste hub.

The consultation on the proposed West Suffolk Operational Hub is set to end at midnight on Friday, February 19.

The hub is a joint project being planned by St Edmundsbury Borough Council together with Forest Heath District Council and Suffolk County Council.

It is set to bring together a waste depot, a waste transfer station and a household waste recycling centre for the public to use.

Fill out the form online at [westsuffolk.gov.uk/wsoh](http://westsuffolk.gov.uk/wsoh).

Cambridge News, Page 12

February 10<sup>th</sup> 2016

### RECYCLING

## Last chance to have your say on proposed hub

JUST over one week remains to have your say on a proposed West Suffolk Operational Hub in the area.

Forest Heath District Council are asking for resident's views until midnight on Friday, February 19 on whether a partnership of councils should build a shared facility to deal with waste from local households.

They are also asking where it should be located in the town.

FHDC will be working with St Edmundsbury Borough Coun-

cil and Suffolk County Council to look at where a waste depot could be located for vehicle and storage maintenance, offices for waste management teams, a waste transfer station, and a household waste recycling centre for public use.

The recycling centre at Mildenhall will be staying open under the plans.

Have your say at [westsuffolk.gov.uk/wsoh](http://westsuffolk.gov.uk/wsoh), email [wsoh@westsuffolk.gov.uk](mailto:wsoh@westsuffolk.gov.uk) or go to the library in Newmarket.

Newmarket News,  
Page 9

February 11<sup>th</sup> 2016

### COUNCIL

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It is set to bring together a waste depot, a waste transfer station and a household waste recycling

centre for the public to use, as well as offices for waste management teams.

You can pick up a paper copy of the consultation form at Haverhill House in Lower Downs Slade, or fill out the form online at [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh).

Haverhill News,  
Page 5

February 12<sup>th</sup> 2016



Bury Free Press, page 3

February 18<sup>th</sup> 2016

### Last chance to have a say on waste hub plan

BURY ST EDMUNDS: Tomorrow is the final opportunity for residents to have a say on a new proposed waste hub at Hollow Road Farm. Go to [www.westsuffolk.gov.uk/bins/wsooperationalhub.cfm](http://www.westsuffolk.gov.uk/bins/wsooperationalhub.cfm) for information.

East Anglian Daily Times  
Page 5

February 19<sup>th</sup> 2016



Bury Free Press, page 5

21<sup>st</sup> April 2016

# Villagers clear over waste hub plan

**Matt Reason**

matt.reason@archant.co.uk

“Ignore us at your peril.”

That is the message from west Suffolk villagers to council chiefs after a consultation on controversial plans for a waste hub near Bury St Edmunds.

More than 551 people took part in the consultation, which came about after widespread opposition to original plans for a joint recycling centre, waste transfer station and vehicle depot in Hollow Road Farm, near the Fornham villages.

The preliminary results of the consultation have now been released by St Edmundsbury Borough Council, along with partners Suffolk County and Forest Heath District councils.

Adrian Graves, from the Villages' Community Forum, said the responses were robust, clear and strong.

“There are more than 145,000 words from over 500 people,” he said.

WEST



■ A notice makes villagers' feelings clear.

Picture: GREGG BROWN

“This is not a quick yes or no – people have given thought-out responses. This is a substantial response and they [the councils] ignore us at their peril.

“The majority of people have supported Symonds Farm [at Saxham

near Bury] as the preferred site. Also it is clear that the idea of having every service on the same site is not supported by many people.

“The expansion of the recycling centre at Rougham Hill is widely supported – people like Rougham Hill

and do not want to see it go.” He said the issue of having the waste transfer station – which would see waste loaded on to larger lorries to be incinerated in Great Blakenham – and the recycling centre on one site created concerns over traffic impact.

He added: “1,750 vehicle movements per day is a colossal amount. That is around 630,000 a year.”

Initial findings show a substantial opposition to Hollow Road Farm, which was put forward as the council's preferred site.

The council is currently analysing the detailed data and preparing its full response.

A spokeswoman said: “We thank everyone across west Suffolk for contributing to the operational hub consultation. We are now working through the issues raised and a report will go to the Forest Heath and St Edmundsbury cabinets and councils in June for decisions about the next steps.”

To view the preliminary results go to [www.westsuffolk.gov.uk/wswh](http://www.westsuffolk.gov.uk/wswh)

East Anglian Daily Times, Page 6

April 22<sup>nd</sup> 2016

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Bury Free Press, Page 5

**The West Suffolk Operational Hub consultation starts on 8 January and ends on 19 February 2016**

More information and a feedback form available from 8 January:  
**[www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)**

**Come and find out more information at these drop-in events:**

- Friday 15 January 2016, 2.30pm – 6pm  
Unitarian Meeting House, Churchgate Street, Bury St Edmunds
- Saturday 16 January 2016, 10am – 1pm  
The Apex, Charter Square, Bury St Edmunds
- Tuesday 19 January 2016, 4pm – 8pm  
St John's Centre, St John's Street, Bury St Edmunds

**Public meeting:**

- Friday 29 January, 7pm  
Athenaeum, Angel Hill, Bury St Edmunds


**From 8 January view the documents, pick up a summary and feedback form (also available on CD) at these locations:**

- The Apex, Charter Square, Bury St Edmunds;
- Library, Sergeants Walk, Bury St Edmunds;
- West Suffolk House, Western Way, Bury St Edmunds;
- Haverhill House, Lower Downs Slade, Haverhill;
- District Council Offices, College Heath Road, Mildenhall; and
- Library, The Guineas, Newmarket.

For more information about how to take part in the consultation visit the website: [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh), email: [wsoh@westsuffolk.gov.uk](mailto:wsoh@westsuffolk.gov.uk) or call: 01284 763233

[Skip to main content](#)

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**West Suffolk**  
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Home > Resident > Bins and recycling > West Suffolk Operational Hub

## West Suffolk Operational Hub

A West Suffolk Operational Hub (WSOH) is a proposal by Forest Heath District Council, St Edmundsbury Borough Council and Suffolk County Council (the 'partner councils') to manage your waste by relocating a number of facilities to a single site. This would increase efficiency, save money and future-proof waste management for West Suffolk's growing communities.



**The partner councils carried out a consultation across West Suffolk from 8 January to 19 February 2016. They consulted on:**

- work carried out to date on the WSOH project
- assessment which says a hub on a single site is the best way of delivering the facilities required
- process for assessing a suitable site.

These documents provided background information to the consultation:

- assessments showing that relocating various waste facilities to a single site is the best strategy for West Suffolk
- methods used to work out where a WSOH should go
- [Sustainability Appraisal](#) which looks at environmental, social and economic effects.

We also welcomed suggestions for alternative sites for a WSOH.

### In this section

- [When are my bins emptied?](#)
- [Which bin do I use?](#)
- [Garden waste collection](#)
- [My bin hasn't been emptied](#)
- [Bulky items](#)
- [Street cleaning](#)
- [Recycling and recycling centres](#)
- [Recycling sacks, replacement or bigger bins](#)
- [Electrical, clinical and hazardous waste](#)
- [Assisted bin collections](#)
- [Waste planning guidance](#)
- [West Suffolk Operational Hub](#)

### Contact details

#### WSOH

## Consultation documents

The consultation ran from **8 January to 19 February 2016**.

- [Preliminary consultation findings April 2016](#)

These documents provide background information:

- [Identification and Assessment of Potential Options and Sites \(IAPOS Report\)](#)
- [Sustainability Appraisal](#)
- [Consultation Summary Booklet](#) (summarises the two documents above)
- [Detailed map of all sites considered](#)
- [FAQs](#)
- **Exhibition boards**
  - [Welcome](#)
  - [Why have a single hub?](#)
  - [Key benefits](#)
  - [Assessment of sites](#)
  - [The 19 sites](#)
  - [Sustainability appraisal](#)
  - [Frequently asked questions](#)
  - [Next steps](#)
- [Notes from public meeting on 29 January 2016](#)
- [Presentation given at the public meeting](#)



#### WSOH

 Customer Services  
01284 763233

 [wsoh@westsuffolk.gov.uk](mailto:wsoh@westsuffolk.gov.uk)

- [PDF Feedback form](#)

## Public Consultation Plan

A [Public Consultation Plan \(PCP\)](#) set out how the consultation would be carried out and next steps after it closed.



## Press releases

- [Give us your views on dealing with West Suffolk's household waste - press release 8 January 2015](#)
- [Public Consultation Plan sets out next steps for West Suffolk Operational Hub - press release 18 December 2015](#)

## Further background to WSOH process

[Further background](#)



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## Appendix 3: Feedback Form

### West Suffolk Operational Hub – Consultation 2016 Feedback Form

The West Suffolk Operational Hub (WSOH) is a proposal by the West Suffolk councils (Forest Heath District Council and St Edmundsbury Borough Council) and Suffolk County Council (the 'partner councils') to relocate a number of waste management and operational facilities to a single site in order to increase efficiency, save money and future-proof waste management for West Suffolk's communities.

The partner councils are consulting on the WSOH, specifically on the work carried out to date on the project, the assessment of a single site hub as the optimal solution and on the site assessment process for that single site.

This form is designed to be read in conjunction with the Consultation Summary Booklet. Additional, detailed information can be found in the *Identification and Assessment of Potential Options and Sites Report* and the *Sustainability Appraisal*.

Please provide the following information\*:

Name:

Address:

Postcode:

Email address:

A number of documents have been prepared for the consultation, please tick the ones you have read.

<input type="checkbox"/>	Flyer (delivered to homes)
<input type="checkbox"/>	Consultation Summary Booklet
<input type="checkbox"/>	Identification and Assessment of Potential Options and Sites Report
<input type="checkbox"/>	Sustainability Appraisal

\*Data protection: The West Suffolk councils (Forest Heath and St Edmundsbury) and Suffolk County Council are committed to respecting your privacy and will comply with all applicable data protection and privacy laws. We require the personal information to understand where more than one response is made from a particular person, and will use postcode information to analyse where responses have come from. We will share this information with third party providers who are working for us on the consultation. Apart from those third parties working on the consultation, data will not be shared or sold to any third parties and we will dispose of it securely when it is no longer required.



## Section 1: Assessment of options

In 2014, a joint project team was set up to consider five options for delivering waste management services. Analysis of each option found that co-locating all facilities on a single site was the best solution. This joint re-location option has been called the West Suffolk Operational Hub (WSOH).

More information about the options assessment stage can be found in the Identification and Assessment of Potential Options and Sites report (IAPOS Report). The Consultation Summary Booklet, which summarises this document, includes information about the options considered and the criteria used to assess them.

### The West Suffolk Operational Hub

The WSOH project would deliver the following facilities at a single site:

- A new single waste depot for vehicle storage and maintenance;
- Offices for the waste management teams;
- a new centrally located waste transfer station near Bury St Edmunds, where household recycling and waste collections are consolidated before being sent for recycling or energy recovery; and
- a new Household Waste Recycling Centre (HWRC) for public use.

This would replace the following council-owned facilities:

- Bury St Edmunds Waste Depot at Olding Road;
- Mildenhall Waste Depot at Holborn Avenue; and
- HWRC at Rougham Hill.

**1. Do you agree or disagree that bringing the facilities listed above to a single site is the best option?**

Agree

Disagree

Don't know

**We would like your views on:**

- **the process we used to determine the best option;**
- **whether you think we missed any options for delivering West Suffolk's waste services in the future;**
- **whether you think there are other criteria we should be using to assess options.**

COMMENTS BOX:

A large, empty rectangular area intended for providing comments or responses.

*Please feel free to use additional space and include it with your response.*

3



## Section 2: Assessment of sites

Following the decision to take forward the WSOH proposal, a search for sites was carried out. Existing waste sites, industrial sites and brownfield sites were first evaluated. None of these sites was found to be suitable for the WSOH. Following this, three greenfield sites were evaluated from which Hollow Road Farm was identified by the partner councils as the most suitable site for a new multi-facility hub.

More information about the options assessment stage can be found in the Identification and Assessment of Potential Options and Sites report (IAPOS Report). There is also a Consultation Summary Booklet which summarises this document.

### Existing waste sites, industrial sites and brownfield land considered:

■ Anglian Lane, Bury St Edmunds (BSE)	■ Extension to Suffolk Business Park, BSE
■ Barton Road, BSE	■ Greene King, Friars Way, BSE
■ Blenheim Park, BSE	■ Mildenhall Road, BSE
■ British Sugar, Hollow Road, BSE	■ Moreton Hall / Suffolk Business Park, BSE
■ Chapel Pond Hill, BSE	■ Northern Way, BSE
■ Eastern Way, BSE	■ Rougham Industrial Estate
■ Enterprise Park, BSE	■ Saxham Business Park
■ Existing HWRC site and land to north + DEFRA land, Rougham Hill, BSE	■ Western Way, BSE

### Greenfield sites considered:

■ Hollow Road Farm, BSE
■ Symonds Farm, Little Saxham
■ Tut Hill, BSE

## 2. We would like your views on:

- whether you think we have the right criteria for assessing the sites;
- whether you think there are other criteria we should be using to assess sites, and what they should be;
- whether you think we applied the criteria to each site correctly.

Please be as specific as possible with any concerns.

Please note there is a separate section (3) where alternative sites can be suggested.





### Section 3: Site suggestions

#### 3. Do you know of any other sites we should consider?

If you have any alternative sites that should be considered for a WSOH, please provide the details below. Please do not re-submit sites that have already been assessed (these are listed in Section 2 of this feedback form).

Full address of site and/or description:

Site size (if known):

What is the site currently used for?

What is the nearest junction of the A14 to the site?

Why is this a good site for the WSOH?

*Please feel free to use additional space and include it with your response.*

6

## Section 4: Sustainability Appraisal

Following the conclusion of the site assessment process, the partner councils commissioned an independent Sustainability Appraisal of the identified options. The Sustainability Appraisal is carried out under a different process to the assessment of options and sites; its purpose is specifically to assess the potential environmental, social and economic effects of any future proposals.

The independent Sustainability Appraisal concluded that the WSOH was the best option and that, from the sites tested, Hollow Road Farm was the most suitable one.

The full Sustainability Appraisal is available as part of this consultation. It is also summarised in the Consultation Summary Booklet.

### 4. We would welcome your views on the Sustainability Appraisal.

We would particularly like your views on:

- whether you think that the Sustainability Appraisal missed any issues that ought to have been considered;
- whether there are any other sites you believe we should assess from a sustainability point of view;
- the Sustainability Appraisal process and conclusions.



COMMENTS BOX:

A large, empty, light grey rectangular area intended for providing comments or feedback.

*Please feel free to use additional space and include it with your response.*

**Please send your completed form to:  
West Suffolk Operational Hub consultation feedback  
West Suffolk House  
Western Way  
Bury St Edmunds IP33 3YU**

## Appendix 4: Frequently Asked Questions

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### **West Suffolk Operational Hub Frequently Asked Questions 12 February 2016**

#### **Glossary of terms and abbreviations**

WSOH	West Suffolk Operational Hub
SA	Sustainability Appraisal
HWRC	Household Waste Recycling Centre
SCC	Suffolk County Council
IAPOS	Identification and Assessment of Potential Options and Sites

#### **Section 1: About the consultation process**

##### **Who is running this consultation?**

Three councils are working together: Forest Heath District Council, St Edmundsbury Borough Council (who work together as the West Suffolk councils) and Suffolk County Council.

Forest Heath and St Edmundsbury are responsible for collecting waste from households and Suffolk County is responsible for disposing of it (usually by sorting it for recycling at the Materials Recycling Facility or by recovering energy to generate electricity at the Energy from Waste plant in Great Blakenham, near Ipswich).

##### **Why are you carrying out this consultation?**

1. To publish information in the public domain for scrutiny and comment which explains how and why the partner councils decided to:
  - a) Propose to combine their facilities onto 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 Options and Sites Report (IAPOS Report) and Sustainability Appraisal (SA).
3. To invite suggestions on:
  - a) why any of the sites already considered would be a good location for a WSOH, or
  - b) alternative sites not considered so far.

##### **How long does the consultation run for?**

It runs from 8 January for six weeks until 19 February 2016.



### **Who can take part?**

Anyone, and particularly those who live or work in West Suffolk. This includes individuals, councils and amenity or other interest groups.

### **How can we find out more information?**

Information is available online: [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh) and at these places:

- The Apex, Charter Square, Bury St Edmunds <https://www.theapex.co.uk>
- Library, Sergeants Walk, Bury St Edmunds;  
<http://suffolklibraries.co.uk/branches/bury-st-edmunds-library>
- West Suffolk House, Western Way, Bury St Edmunds;  
<http://www.westsuffolk.gov.uk/contact-us.cfm>
- Haverhill House, Lower Downs Slade, Haverhill;  
<http://www.westsuffolk.gov.uk/contact-us.cfm>
- District Council Offices, College Heath Road, Mildenhall;  
<http://www.westsuffolk.gov.uk/contact-us.cfm>
- Library, The Guineas, Newmarket  
<http://suffolklibraries.co.uk/branches/newmarket-library>

Details of information point opening times can be found via the web links above.

There will also be information available and people to talk to at the following events:

#### **Drop-in events:**

Friday 15 January, 2.30pm to 6pm, Unitarian Meeting House, Churchgate Street, Bury St Edmunds

Saturday 16 January, 10am to 1pm, The Apex, Charter Square, Bury St Edmunds

Tuesday 19 January, 4-8pm, The Centre (by St John's Church), St John's Street, Bury St Edmunds

#### **Public meeting:**

Friday 29 January, 7pm, Athenaeum, Angel Hill, Bury St Edmunds.

### **What information is available?**

There are two documents setting out the detail behind the decision to create a single, shared West Suffolk Operational Hub.

- 1) **Identification and Assessment of Potential Options and Sites Report (IAPOS Report)**: 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:** 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.

Downloadable versions are available on the website or on a CD to take away from the information points, along with feedback forms and copies of the **Consultation Summary Booklet**, which provides a summary of the WSOH project and the two technical (IAPOS and SA) documents. It is designed to provide a non-technical overview of the information, as well as directing people to where more specific information can be found within each document.

**Exhibition boards** will be on display at the drop-in events and there will be people with a detailed knowledge of the WSOH there to discuss the project.

**Feedback forms** will be available on the website and at all of the events and information points.

All of the above information is available online: [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)

Copies of consultation materials will be made available in alternative formats on request and reasonable adjustments will be made if you are not able to make your representations in writing.

#### **What questions are you asking?**

- 1) Do you agree or disagree that bringing the facilities to a single site (Option 4) is the best option?
- 2) 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.
- 3) Do you know of any other sites we should consider?
- 4) We would welcome your views on the Sustainability Appraisal.

#### **What if I have comments that don't fit your questions? Or suggestions to make about alternative sites?**

There will be space on the feedback form for comments and suggestions, or you can also email or write to us.

#### **How can I send you my comments?**

Online feedback form: [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh). There will be a specific section in which alternative sites can be suggested.

Paper feedback form: to make the process quicker and more efficient, we would like to encourage people to complete the feedback form online. However, paper copies of the

feedback form will be available for collection and completion at the public exhibitions, public meeting and information points.

Email: [wsoh@westsuffolk.gov.uk](mailto:wsoh@westsuffolk.gov.uk)

Post: written feedback can be sent to:

West Suffolk Operational Hub Consultation Feedback  
West Suffolk House  
Western Way,  
Bury St Edmunds, IP33 3YU

### **What will happen to all the responses?**

- All feedback will be individually considered.
- Feedback will be summarised and the number of times the same matter is raised will be recorded.
- All of the relevant issues will then be compiled and organised by issue and site for initial consideration by the WSOH project team (staff and councillors).
- The team will consider whether any of the information provided affects the assessments within the IAPOS Report or Sustainability Appraisal or their conclusions. Where appropriate, suggested alternative sites will be subjected to the assessment criteria and judged against the other sites.
- The project team will consider whether or not the councils should proceed with the West Suffolk Operational Hub and which location to propose to each Council's Cabinet. If the Cabinets decide to proceed, a planning application will be submitted to the SEBC Development Control Committee (Planning) for consideration.
- Any application would be subject to public consultation in the usual way.

### **When will the summary of responses be publicly available?**

We are committed to carrying out a thorough review of the responses so there is currently no date for this. Much will depend on how many responses we receive, how wide-ranging they are, how many other sites need to be considered, what the next steps should be, for example.

### **How will I know you have received my feedback?**

If you supply your email address or postal address we will confirm that your feedback has been received.

## **Section 2: About the 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.

### **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.

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**

#### **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 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.

#### **There is a 'size and shape' criteria, how much land is required for a WOSH?**

Five hectares of land is required. More details are included in Appendix G of the IAPOS Report.

#### **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 (which is publicly available on [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)) 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.**

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

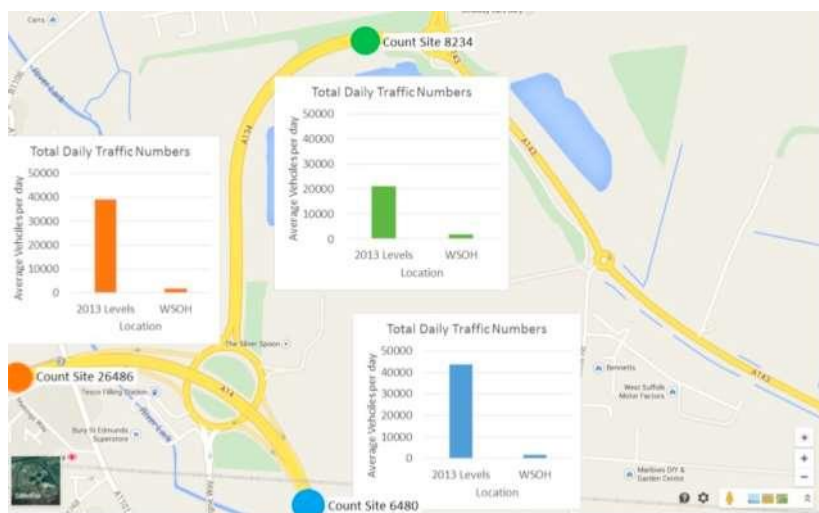
A [vehicle movement table](#) estimates the numbers using an operational hub site (wherever that site is located). The HWRC vehicle numbers are an average of weekday and weekend traffic. The table reflects Monday to Friday operational vehicle movements (weekends will be significantly lower for all but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

See the financial information in the [presentation at the public meeting](#)

A full business case for an operational hub would be developed for a specific site.

**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.

## Appendix 5: Statutory organisation consultation

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Forest Heath & St Edmundsbury councils



### West Suffolk Operations

**Our ref:** MJW230216  
**Your ref:**  
**Contact:** Mark Walsh  
**Direct Dial:** 01284 757300  
**Email:** [mark.walsh@westsuffolk.gov.uk](mailto:mark.walsh@westsuffolk.gov.uk)

23 February 2016

Dear Sir / Madam,

### **West Suffolk Operational Hub (WSOH) Consultation**

The West Suffolk Councils (Forest Heath and St Edmundsbury) together with Suffolk County Council are considering co-locating a number of waste and street scene operations onto a single site in Bury St Edmunds. It is anticipated that such a move would release a number of current sites for alternative use and create operational efficiencies for the taxpayer.

Following a period of investigation, the councils conducted an initial consultation on a specific site at Hollow Road Farm in the spring of 2015. This resulted in significant concerns being raised by local residents and a commitment by the councils to consult further on the case for a WSOH, the site selection criteria that was used, the sites reviewed against this criteria and a sustainability assessment that has been prepared for the project. The councils also made it clear that they would no longer have a preferred site for a WSOH until the second public consultation had concluded and feedback analysed.

This second period of public consultation lasted for six weeks and closed last week on Friday 19 February 2016. We would now like to consult selected statutory consultees on our work and ask that you review the information placed in the public domain and provide any comments to us **by the close of Friday 18 March 2016.**

You are advised that this consultation does not concern a specific site but provides our rationale and the work we conducted in coming to the position that we did before consulting on the specific Hollow Road Farm site in early 2015.

Based on this second round of public consultation a decision will be made whether to proceed to a formal planning application for a specific site. This will involve further consultation as part of the Development Control process and include with Statutory Consultees.

For your information I have enclosed a summary booklet used for the public consultation which has just closed. The more detailed documents referred to in this summary, along with other information (e.g. frequently asked questions) can be found at the WSOH consultation web pages at <http://www.westsuffolk.gov.uk/wsoh>.

Please email your response to me at [mark.walsh@westsuffolk.gov.uk](mailto:mark.walsh@westsuffolk.gov.uk).

I would like to take this opportunity to thank you for your time in considering these documents and providing any comments. If you require any further information please do not hesitate to contact the undersigned.

Yours faithfully.

A handwritten signature in black ink, appearing to read 'Mark Walsh', written in a cursive style.

Mark Walsh  
**Head of Operations**

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