West Suffolk Operational Hub – Final Sustainability Appraisal Report May 2016

Proposed operational hub for West Suffolk comprising Vehicle Depot, Waste Transfer Station and Household Waste Recycling Centre

Prepared for Suffolk County Council, St Edmundsbury Borough Council and Forest Heath District Council

Irina Davis

Sustainability Appraisal Consultant

Contents

Post public consultation amendment/addition:

Appendices

Tables

Non-Technical Summary

Post public consultation amendment/addition:
~~This is a summary of the Sustainability Appraisal (SA) Report for the proposed West Suffolk Operational Hub (hereafter referred to as WSOH) comprising a Vehicle Depot, Waste Transfer Station (WTS) and Household Waste Recycling Centre (HWRC) and encompasses findings of the first two stages of the SA process including developing the scope and assessing reasonable alternatives for the proposed WSOH.~~

This is a summary of the Final Sustainability Appraisal (SA) Report for the proposed West Suffolk Operational Hub (hereafter referred to as WSOH) comprising a vehicle depot, Waste Transfer Station (WTS) and Household Waste Recycling Centre (HWRC) and encompasses findings of the first three stages of the SA process including developing the scope, assessing reasonable alternatives for the proposed WSOH and appraising significant changes as a result of public consultation.

~~This SA Report, incorporating requirements of the Strategic Environmental Assessment (SEA) Directive, is a complementary exercise to the site selection process for the proposed WSOH and aims to assess its sustainability in terms of environmental, social and economic effects of the proposed alternative solutions for this proposal, as well as site alternatives. The SA process is an iterative process and this SA Report accompanies the "Report on Identification and Assessment of Potential Options and Sites, December 2015" prepared by Carter Jonas in order to assess its findings in terms of their sustainability and provide recommendations for improvement. Thus it enables the decision making authorities to make an informed decision about the suitability and sustainability of the option put forward, and ensures that the choice made in respect of site selection is robust and justified.~~

This Final SA Report, incorporating requirements of the Strategic Environmental Assessment (SEA) Directive, is a complementary exercise to the site selection process for the proposed WSOH and aims to assess its sustainability in terms of environmental, social and economic effects of the proposed alternative solutions for this proposal, as well as site alternatives. The SA process is an iterative process and this Final SA Report accompanies the Carter Jonas Report "Identification and Assessment of Potential Options and Sites (IAPOS), December 2015 (amended May 2016)" in order to assess its findings in terms of their sustainability and provide recommendations for improvement. Thus it has enabled the decision making authorities to make an informed decision about the suitability and sustainability of the option put forward, and ensured that the choice made in respect of site selection is robust and justified.

~~Although this SA report is a standalone document and presents findings of the SA process, it should be read in conjunction with the 'Report on Identification and Assessment of Potential Options and Sites, December 2015' by Carter Jonas which outlines in detail options considered before the decision is made to choose a single site approach for WSOH as a most suitable option, and describes different stages of the site selection process. The findings of the Carter Jonas Report have identified a single site approach as the most suitable option to proceed with this proposal and Hollow Road Farm as the only viable site for the WSOH proposal. Therefore, the aim of this SA Report is twofold: to test if a single site approach is the most sustainable option against reasonable alternatives to proceed with this proposal; and to evaluate if the site for the WSOH proposal, identified through the site selection process carried out by Carter Jonas, is the most sustainable option against other realistic and reasonable alternatives.~~

Although this Final SA report is a standalone document and presents findings of the SA process, it should be read in conjunction

with the IAPOS, December 2015 (amended May 2016)' by Carter Jonas which outlines in detail options considered before the decision is made to choose a single site approach for WSOH as a most suitable option, and describes different stages of the site selection process. The findings of the Carter Jonas Report have identified Hollow Road Farm as the only viable site for the WSOH proposal and a single site approach as the most suitable option to proceed with this proposal. Therefore, the aim of this Final SA Report is twofold: to test if a single site approach is the most sustainable option against reasonable alternatives to proceed with this proposal; and to evaluate if the site for the WSOH proposal, identified through the site selection process carried out by Carter Jonas, is the most sustainable option against other realistic, deliverable and reasonable alternatives.

Overview of the proposal

The proposal is to co-locate the functions to provide a combined service area for the waste collection and waste disposal authorities comprising Vehicle Depot, Waste Transfer Station (WTS) and Household Waste Recycling Centre (HWRC). It provides an opportunity to bring waste transfer and waste collection together on the same site to reduce costs and increase efficiency. The proposal can become an asset to the community because it assists in achieving recycling goals, increases the public's knowledge of proper materials management, and diverts materials that would otherwise burden the existing disposal capacity.

There is also a set of opportunities in Bury St Edmunds to create one coordinated 'public sector estate' that has the potential to lead to integration and improvement of services, better public access, regeneration and greater commercial advantages.

The Councils agreed that greater long-term efficiencies could be gained through co-locating a new WTS, HWRC and vehicle and administration depot into a single new facility in or close to Bury St Edmunds. Such proposals would also create the opportunity to co-locate the current Forest Heath depot (based in Mildenhall) at this new facility, combining the activities currently undertaken on five separate sites into one (council deliveries to Red Lodge and Thetford waste transfer stations, Rougham Hill HWRC, St Edmundsbury and Forest Heath depots). Developing a single site approach would mean that Olding Road and Mildenhall Depots would close and the land be made available for other opportunities such as development or leased to an alternative occupier.

The project follows a proposal by Suffolk County Council to develop a waste transfer site at Rougham Hill, Bury St Edmunds, adjacent to an existing HWRC. This was part of the county council's review of waste transfer provision as waste transfer needs are changing with the development of the Energy from Waste plant at Great Blakenham, near Ipswich.

Whilst planning permission has been approved for the Rougham Hill site, this alternative proposal offers the potential to be better for customers and to provide synergies and efficiencies between waste operations in the town. In addition, this project supports the relocation of the depot from its current location in Olding Road due to the planned development of Phase 2 of the Public Sector Village initiative.

Need for the Sustainability Appraisal

The Sustainability Appraisal is required as part of the preparation of a plan, programme or policy. Its role is to promote sustainable development by assessing the extent to which the emerging proposal, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. There is no requirement to carry out a Sustainability Appraisal for project-level proposals, however, due to the WSOH proposal outlining a new and more integrated approach to waste management within the county, the process of selecting the right option and site

for the WSOH proposal should be handled in a thorough and robust manner. The proposal is, therefore, recommended to be subject to the SA process. The SA provides an opportunity to consider ways by which this proposal can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the proposal might otherwise have. By doing so, it can help make sure that the aims of this proposal are the most appropriate given the reasonable alternatives.

Post public consultation amendment/addition: ~~Given that the proposal at Hollow Road Farm is not likely to be in line with the statutory development plan policy, the SA will consider all reasonable alternatives/options - both in terms of solutions and sites - to provide a robust basis upon which to proceed and the departure from the plan can be justified by reference to proven sustainability advantages of the proposed option. This SA document will assess these identified suitable options in terms of their sustainability by providing comparative analysis with other reasonable alternatives, identifying their impacts, suggesting mitigation measures, and making recommendations.~~

Given that the proposal at Hollow Road Farm is not likely to be in line with the statutory development plan policy, the SA has considered all reasonable alternatives/options - both in terms of solutions and sites - to provide a robust basis upon which to proceed and the departure from the plan can be justified by reference to proven sustainability advantages of the proposed option. This Final SA document has assessed these identified suitable options in terms of their sustainability by providing comparative analysis with other reasonable alternatives, identifying their impacts, suggesting mitigation measures, and making recommendations.

~~The SA process should inform and influence the development of plans, policies and programmes early in the process with the aim of making them more sustainable. This SA Report accompanies the Report on Identification and Assessment of Potential Options and Sites, December 2015 by Carter Jonas and presents information on the likely effects of implementing the WSOH proposal; both documents are being issued for public consultation. The appraisal process has been carried out in accordance with Office of the Deputy Prime Minister Guidance, 'A Practical Guide to the Strategic Environmental Assessment Directive', issued in September 2005.~~

The SA process should inform and influence the development of plans, policies and programmes early in the process with the aim of making them more sustainable. The Final SA Report accompanies the Carter Jonas Report IAPOS, December 2015 (amended May 2016) and presents information on the likely effects of implementing the WSOH proposal; both documents were issued for public consultation running from 8 January to the 29th February 2016. The appraisal process has been carried out in accordance with Office of the Deputy Prime Minister Guidance, 'A Practical Guide to the Strategic Environmental Assessment Directive', issued in September 2005.

Appraisal Methodology

The 18 SA framework objectives were used consistently to appraise the proposal and were developed from the work undertaken to review the list of relevant plans and programmes and the identified baseline position, including the key sustainability issues:

Environmental

1. To maintain/ improve air and water quality (including HGV movements) in line with national standards limits
2. To conserve soil resources and quality
3. To use water and mineral resources efficiently, and re-use and recycle where possible
4. To reduce waste
5. To reduce the effects of traffic on the environment
6. To maintain/ improve biodiversity and geodiversity
7. To maintain/ improve the quality and local distinctiveness of landscapes/ townscapes
8. To reduce contributions to climate change

9. To move treatment of waste up the waste hierarchy
10. To reduce vulnerability to flooding
11. To conserve and, where appropriate, enhance areas of historical and archaeological importance

Social

12. To maximise opportunities for new/ additional employment
13. To maintain/ improve health of the population overall
14. To minimise the impacts arising from the provision of waste facilities developments on where people live

Economic

15. To achieve sustainable levels of prosperity and economic growth
16. To encourage and accommodate both indigenous and inward investment
17. To encourage efficient patterns of movement in support of economic growth
18. The One Public Estate Programme

Alternatives considered

In conducting SA, Responsible Authorities must appraise the likely significant environmental effects of implementing the policy and any reasonable alternatives. Each alternative can be tested against the SA objectives, with positive as well as negative effects being considered, and uncertainties about the nature and significance of effects noted.

Alternatives considered often include scenarios termed 'do nothing' and 'business as usual'. 'Do nothing' means not introducing a policy or proposal where none already exists. 'Business as usual' means a continuation of a policy or proposal, as an alternative to preparing a new one.

The following options were considered in terms of solutions options for WSOH proposal for the SA assessment:

Option 1	do nothing
Option 2	implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue
Option 3	implement Rougham Hill planning permission and relocate depots
Option 4	co-locate all facilities on new site
Option 5	co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill

Post public consultation amendment/addition:
~~In the SA assessment of the proposed sites, Responsible Authorities must appraise the likely significant environmental effects of implementing any reasonable alternatives. For this purpose, a thorough site selection process has been carried out (see Report on Identification and Assessment of Potential Options and Sites, December 2015 by Carter Jonas) and assessment has been applied to all potential sites using primary criteria approach to shortlist the sites for further secondary assessment. All possible sites have been considered however, apart from Hollow Road Farm, they have not passed the primary criteria assessment either due to insufficient size or access issues. Therefore, it has been identified that there are no other reasonable alternative sites that could be included for a comparative assessment alongside Hollow Road Farm site to evaluate which sites present the most sustainable solution and should be put forward as the most suitable and viable option. For the purpose of this SA process it is not considered appropriate to include sites that have failed to pass primary criteria assessment as practically reasonable alternatives. Thus this SA document will include scenario 'business as usual'. In this case, 'business as usual' will include a continuation of a policy or proposal, as an alternative to preparing a new one – implementing planning permission for WTS and HWRC at Rougham Hill site and using Rougham Hill site as a reasonable realistic alternative for the SA process.~~

In the SA assessment of the proposed sites, Responsible Authorities must appraise the likely significant environmental effects of implementing any reasonable alternatives. For this purpose, a thorough site selection process has been carried out (see the Carter Jonas Report IAPOS, December 2015 (amended May 2016)and assessment has been applied to all potential sites using primary criteria approach to shortlist the sites for further secondary assessment.

In December 2015, initial pre-consultation assessment of the sites by Carter Jonas concluded that after considering all possible sites, apart from Hollow Road Farm, none of them passed the primary criteria assessment either due to insufficient size or access issues. Therefore, it was identified that there were no other reasonable alternative sites that could be included for a comparative assessment alongside Hollow Road Farm site to evaluate which sites presented the most sustainable solution and should have been put forward as the most suitable and viable option. Based on these findings by Carter Jonas Report, the initial SA assessment did not consider appropriate to include sites that had failed to pass primary criteria assessment as practically reasonable alternatives. Thus the initial SA document included scenario 'business as usual'. In this case, 'business as usual' included a continuation of a policy or proposal, as an alternative to preparing a new one – implementing planning permission for WTS and HWRC at Rougham Hill site and using Rougham Hill site as a reasonable realistic alternative for the SA process.

Following the public consultation held from 8 January to the 29th February 2016, public views were sought on the IAPOS Report and its accompanying SA Report. Interested parties were invited to suggest any sites which they felt might be suitable for accommodating the waste and operational facilities required but which did not feature in the Report. A number of new sites were suggested and were assessed alongside the original sites, with findings presented in the Carter Jonas IAPOS Report, December 2015 (amended May 2016). The 20 new eligible sites suggested through the consultation have been assessed in the same manner as the original sites. As a result of the assessment three new unallocated Greenfield sites passed the exclusionary criteria and were taken for further comparative analysis using qualitative criteria: McRae Estates land, Land at Rougham Hill and Land south of West Suffolk Crematorium. The two of these sites – McRae Estates land and Land at Rougham Hill both scored significantly negatively and therefore have not been considered to be reasonable, realistic and deliverable alternatives to be included in the SA assessment. Land south of West Suffolk Crematorium, on the other hand, has scored significantly higher resulting in a positive scoring and therefore has been taken forward to the SA process as a reasonable, deliverable and realistic alternative to the Hollow Road Farm site.

Land south of West Suffolk Crematorium is sufficiently distinct to highlight the different sustainability implications of each of these two sites and has enabled meaningful comparisons to be made. Land south of West Suffolk Crematorium and 'business as usual' current Rougham Hill Site have been identified as reasonable alternatives to consider alongside the Hollow Road Farm site and all three sites have been subject to the SA process outlined in this Final SA document.

SA results and statement on the likely significant effects of WSOH

Post public consultation amendment/addition: Conclusions, mitigation measures and recommendations provided in this Final SA document in respect of environmental, social and economic issues raised for the proposed WSOH will be taken into account by the applicant and reflected in the subsequent documents to emphasize the need for appropriate design and operation of new facilities at the planning application stage consultation.

Overall, the proposed option at the Hollow Road Farm site will deliver strategic overarching

objectives of the WSOH proposal. The Sustainability Appraisal process has enabled the waste partnership to consider issues when dealing with environmental, economic and social effects of waste management facilities development. Its primary concern is to address the need to provide for new waste management facilities but, in doing so, to ensure that sites identified are appropriate to the major growth locations and that the sites facilitate the enhancement of West Suffolk's biodiversity and contribute to local landscape character.

The WSOH proposal has been designed to address potential impacts on the surrounding natural environment and the community associated with traffic, noise, odours, air emissions, water quality, vectors and litter. To be fully effective the WSOH sponsors acknowledge that, with appropriate mitigation measures in place, siting the facilities at Hollow Road Farm, accompanied by proper design, operation and monitoring, will meet the needs and aspirations of the local communities and protect the environment. The WSOH proposal supports the principles of a sustainable economy in its objectives and, through proposed mitigation measures, have accounted for the protection and enhancement of the environment, surface waters and ground waters.

The compatibility analysis in Appendix 2 has shown no conflicts between SA objectives and objectives of the WSOH.

The following table presents an assessment of WSOH proposal options against the SA objectives:

Proposal Options	SA Assessment
WSOH Solutions Options	
Option 1 *Do Nothing*	This option performed the worst in terms of scoring in comparison with other options. Not implementing WTS development at all will not have positive effects on waste mileage reduction, movements of waste up the waste hierarchy and will not contribute to the enhancement of quality of waste service provision. In addition, this option will not contribute to the release of land for Phase II of the Public Service Village initiative, creation of new jobs and will not address objectives of the One Public Estate Programme.
Option 2 *Implement Rougham Hill planning permission and leave depots at Olding Road & Holborn Avenue.*	This option scored better than option one and offered a number of sustainability benefits. Overall option two is the fourth most suitable option. Option 2 scored positively against a number of environmental SA objectives including maximising tonnes per miles-carbon emission reduction, reducing waste and moving treatment of waste up the waste hierarchy. It can potentially have some short term negative effects on SA objective 14 to minimise impacts arising from the provision of waste facilities developments on where people live as construction can lead to some additional noise at the construction phase of the development. Similarly to Option 1 scoring, it will also not contribute to the release of land for Phase II of the Public Service Village initiative as Olding depot will stay and this land will not be available for regeneration. This option would lead to service disruption to the Household Waste Recycling Centre whilst it is rebuilt. However, Option 2 will have positive effects on improving existing waste infrastructure and enhancing quality of waste service provision.

Proposal Options	SA Assessment
Option 3 *Implement Rougham Hill planning permission and relocate depots.*	This option scored better than option one and two and offered a number of sustainability benefits. Overall options 3 and 5 could be the second most suitable options for the WSOH proposal. Option 3 scored positively against a number of environmental SA objectives including maximising tonnes per miles-carbon emission reduction, reducing waste and moving treatment of waste up the waste hierarchy. It can potentially have some short term negative effects on SA objective 14 to minimise impacts arising from the provision of waste facilities developments on where people live as construction can lead to some additional noise at the construction phase of the development. This option would lead to service disruption to the Household Waste Recycling Centre whilst it is rebuilt and will be presented with difficulties to find suitable site for a new West Suffolk depot. Unlike Option 1 and 2 scoring results, it will also have positive effect on SA objective 18 and will contribute to the release of land for Phase II of the Public Service Village initiative as Olding Road depot land will become available for regeneration. This option will result in service integration for the West Suffolk operations and therefore has significant financial benefits/savings annually. This option would lead to service disruption to the Household Waste Recycling Centre whilst it is rebuilt. However, Option 3 will have positive effects on improving existing waste infrastructure and enhancing quality of waste service provision.
Option 4 *Co-locate all facilities on new site.*	This option has the best score in terms of a number of positive effects and presents the best sustainable solution option for WSOH proposal. Option 4 scored positively against a number of environmental SA objectives including maximising tonnes per miles-carbon emission reduction, reducing waste and moving treatment of waste up the waste hierarchy. It can potentially have some short term negative effects on SA objective 14 to minimise impacts arising from the provision of waste facilities developments on where people live as construction can lead to some additional noise at the construction phase of the development. Post public consultation amendment/addition: This Option will also have positive effect on SA objective 18 and will contribute to the release of land for Phase II of the Public Service Village initiative as Olding depot land will become available for regeneration. Option 4 will enhance quality of service provision and operational flexibility and sustainability. Co-location will improve the resilience of business and the economy. In addition, it offers full integration of services. Relocation of the current HWRC at Rougham Hill site to a new site will release land at Rougham Hill which is estimated to release £750k capital based on industrial land values.

Proposal Options	SA Assessment
Option 5 *Co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill.*	This option scored better than option one and two and offered a number of sustainability benefits. Overall options 3 and 5 can be the second most suitable options for the WSOH proposal. Option 4 scored positively against a number of environmental SA objectives including maximising tonnes per miles-carbon emission reduction, reducing waste and moving treatment of waste up the waste hierarchy. It can potentially have some short term negative effects on SA objective 14 to minimise impacts arising from the provision of waste facilities developments on where people live as construction can lead to some additional noise at the construction phase of the development. It will also have positive effect on SA objective 18 and will contribute to the release of land for Phase II of the Public Service Village initiative as Olding depot land will become available for regeneration. Option 5 will have positive effects on improving existing waste infrastructure and enhancing quality of waste service provision. This is the cheapest option and would mean no disruption to the Household Waste Recycling Centre. However, it does not realise the improvements for HWRC customers of a split-level site and improved traffic flows. This option would not lead to partners being able to fully capitalise on the opportunity for co-location and integration.

Post public consultation amendment/addition:

~~WSOH Sites Options~~	
~~Option 1 – Hollow Road Farm~~	~~Option 2 (Business as usual) – Rougham Hill~~
~~The site will have limited effect on air quality and therefore scored as neutral. Some negative effects could be due to waste transportation by road as well as any air pollution associated with the operation of the facility. Although waste sites can affect air quality through such factors as odour, dust and bio aerosols, the majority of waste transfer operations will take place within a building. The 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.~~ ~~The site lies in a Source Protection zone 2 and on a principal major aquifer with high permeability. Applicant would need to demonstrate that development will not impact on water quality. Mitigation measures can include the use of Sustainable Urban Drainage Systems (SUDS).~~ ~~The site will cause the loss of versatile agricultural land. It is proposed the need to mitigate the loss of soil resources by re-using as much of the surplus resources 'on site' and disposing any surplus soils thereafter in a sustainable manner.~~ ~~Additional traffic movements would be accounted for by HGVs accessing the WTS to deliver or collect waste. The Waste Transfer Station will form part of the integrated waste management system and will reduce the overall number of vehicles transporting waste around the county. There are expected to be an additional 240 vehicle movements per day. However, in absolute terms, the anticipated trip generation is expected to be modest and, consequently, impacts upon sensitive receptors are expected to be minimal. The site is very well located to maximise tonnes per miles leading to carbon reduction. The proximity of the site to the strategic highway network means that there will be less waste transport on local roads.~~	~~Emissions will be within the national standards and would be monitored as a mitigation measure throughout. The site and proposed use will provide new facility for processing waste in the county and will reduce the distance waste is transported by road.~~ ~~Rougham Hill site is previously developed land and, unlike Hollow Road Farm, will not cause the loss of versatile agricultural land.~~ ~~The volumes of waste being accepted at the HWRC are not expected to alter significantly. This will result in there being little or no change to the vehicle numbers accessing the HWRC site through the proposed redevelopment. The site is very well located to maximise tonnes per miles leading to carbon emission reduction.~~ ~~It is considered unlikely that there will be significant negative effect on the conservation status of local bat populations due to the proposals. With suitable avoidance, mitigation and enhancement measures, it will be possible to ensure that residual negative impacts on ecological features due to the proposals are not significant.~~ ~~The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy.~~ ~~Construction will create short term jobs. However the size of the site will not lead to co-location of all three facilities and will not lead to release of land for regeneration at Olding Road and Mildenhall depots.~~

WSOH Sites Options	
~~Option 1 – Hollow Road Farm~~	~~Option 2 (Business as usual) – Rougham Hill~~
~~A centrally-based WTS, close to the major population centre in West Suffolk will reduce traffic impacts across West Suffolk.~~ ~~The existing sugar beet factory dominates views to the south from Fornham Road and the property at The Drift. There is currently existing screening in the form of a hedgerow on the approach to Bury St Edmunds from the east. 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.~~ ~~The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy.~~ ~~Noise is expected to be generated onsite during the site preparation and construction period which is expected to last approximately 12 months. A large site with good transport links will allow for suitable mitigation.~~ ~~The site will impact on long-term investment in waste management infrastructure. It will offer operational flexibility and sustainability. It will contribute to optimisation of the Household Waste and Recycling Centres, and enhance the quality of service provision.~~ ~~The site is big enough to accommodate three proposed facilities which will release land at Olding Road for Phase II of the Public Services Village initiative and the Holborn Road Depot. It will improve the resilience of business and the economy. It will provide further capacity for commercial services and income. It will contribute to maintaining/improving existing waste infrastructure. It will enable the facility to accommodate growth in demand and create opportunities for staff and operational flexibility. Relocation of the current HWRC at Rougham Hill site to Hollow Road Farm due to this site being of sufficient size will release land at Rougham Hill. It is estimated to release £750k capital based on industrial land values.~~	~~The site is the existing HWRC site on Rougham Hill which has no record of noise complaints. Rougham Hill currently has a well-served lorry park south east of the site and a number of commercial units to the east. The nearest residential receptors are located south of the site at a distance of more than 200m. Waste would mainly be stored within a closed building before being transferred and would be removed from site as soon as possible. Features such as misting sprays and ventilation to reduce smells will be implemented.~~ ~~The site will optimise Household Waste and Recycling Centres, and enhance quality of service provision. However, the site is unlikely to result in impacts on long-term investment in waste management infrastructure or offer operational flexibility and sustainability as much as the Hollow Road Farm site.~~ ~~Unlike the Hollow Road Farm site, it will not directly contribute to releasing land for Phase II of the Public Service Village initiative.~~ ~~Unlike the site at Hollow Road Farm, Rougham Hill, due to its size, it will not be able to co-locate all three needed facilities on a single site and will not generate capital receipts, reduce running costs and deliver integrated customer focused services.~~

WSOH Sites Options	
~~Option 1 – Hollow Road Farm~~	~~Option 2 (Business as usual) – Rougham Hill~~
~~The size of the site and its location will enable the co-location of needed facilities on a single site and will enable the generation of capital receipts, reduce running costs and deliver integrated customer focused services.~~	

WSOH Sites Options
Option 1 – Hollow Road Farm
The site will have limited effect on air quality and therefore scored as neutral. Some negative effects could be due to waste transportation by road as well as any air pollution associated with the operation of the facility. Although waste sites can affect air quality through such factors as odour, dust and bio aerosols, the majority of waste transfer operations will take place within a building. The 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. The site lies in a Source Protection zone 2 and on a principal major aquifer with high permeability. Applicant would need to demonstrate that development will not impact on water quality. Mitigation measures can include the use of Sustainable Urban Drainage Systems (SUDS). The site will cause the loss of versatile agricultural land. It is proposed the need to mitigate the loss of soil resources by re-using as much of the surplus resources on and disposing any surplus soils thereafter in a sustainable manner. Additional traffic movements would be accounted for by HGVs accessing the WTS to deliver or collect waste. The Waste Transfer Station will form part of the integrated waste management system and will reduce the overall number of vehicles transporting waste around the county. There are expected to be an additional 240 HGV movements per day. However, in absolute terms, the anticipated trip generation is expected to be modest and, consequently, impacts upon sensitive receptors are expected to be minimal. The site is very well located to maximise tonnes per miles leading to carbon reduction. The proximity of the site to the strategic highway network means that there will be less waste transport on local roads. A centrally-based WTS, close to the major population centre in West Suffolk will reduce traffic impacts across West Suffolk. In addition, the relocation of the HWRC and depot is not expected to lead to increased non-HGV traffic on West Suffolk's roads, and more specifically on Bury St Edmunds' roads. It is understood that the roads around Hollow Road Farm have sufficient capacity, subject to certain highways measures close to the site being implemented. The existing sugar beet factory dominates views to the south from Fornham Road and the property at The Drift. There is currently existing screening in the form of a hedgerow on the approach to Bury St Edmunds from the east. 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.

WSOH Sites Options
Option 1 – Hollow Road Farm
The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy. Noise is expected to be generated onsite during the site preparation and construction period which is expected to last approximately 12 months. A large site with good transport links will allow for suitable mitigation. The site will impact on long-term investment in waste management infrastructure. It will offer operational flexibility and sustainability. It will contribute to optimisation of the number and location of Household Waste and Recycling Centres, and enhance the quality of service provision. The site is big enough to accommodate three proposed facilities which will release land at Olding Road for Phase II of the Public Services Village initiative. It will improve the resilience of business and the economy. It will provide further capacity for commercial services and income. It will contribute to maintaining/improving existing waste infrastructure. It will enable the facility to accommodate growth in demand and create opportunities for staff and operational flexibility. Relocation of the current HWRC at Rougham Hill site to Hollow Road Farm due to this site being of sufficient size will release land at Rougham Hill. It is estimated to release £750k capital based on industrial land values. The size of the site and its location will enable the co-location of needed facilities on a single site and will enable the generation of capital receipts, running costs and deliver integrated customer focused services.

WSOH Sites Options
Option 2 (Business as usual) – Rougham Hill
Emissions will be within the national standards and would be monitored as a mitigation measure throughout. The site and proposed use will provide new facility for processing waste in the county and will reduce the distance waste is transported by road. Rougham Hill site is previously developed land and, unlike Hollow Road Farm, will not cause the loss of versatile agricultural land. The volumes of waste being accepted at the HWRC are not expected to alter significantly. This will result in there being little or no change to the vehicle numbers accessing the HWRC site through the proposed redevelopment. The site is very well located to maximise tonnes per miles leading to carbon emission reduction. It is considered unlikely that there will be significant negative effect on the conservation status of local bat populations due to the proposals. With suitable avoidance, mitigation and enhancement measures, it will be possible to ensure that residual negative impacts on ecological features due to the proposals are not significant. The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy. Construction will create short term jobs. However the size of the site will not lead to co-location of all three facilities and will not lead to release of land for regeneration at Olding Road and Mildenhall depots. The site is the existing HWRC site on Rougham Hill which has no record of noise complaints. Rougham Hill currently has a well-served lorry park south east of the site and a number of commercial units to the east. The nearest residential receptors are located south of the site at a distance of more than 200m. All waste would be stored within a closed building before being transferred and would be on site for less than a day. Features such as misting sprays and ventilation to reduce smells will be implemented. The site will optimise the number and location of Household Waste and Recycling Centres, and enhance quality of service provision. However, the site will unlikely result in impact s on long-term investment in waste management infrastructure or offer operational flexibility and sustainability as the Hollow Road Farm site. Unlike the Hollow Road Farm site, it will not directly contribute to releasing land for Phase II of the Public Service Village initiative. Unlike the site at Hollow Road Farm, Rougham Hill, due to its size, it will not be able to co-locate needed facilities on a single site and will not generate capital receipts, reduce running costs and deliver integrated customer focused services.

WSOH Sites Options
Option 3 – Land south of West Suffolk Crematorium
The site will have a limited effect on air quality. Some negative effects could be due to waste transportation by road as well as any air pollution associated with the operation of the facility. Although waste sites can affect air quality through such factors as odour, dust and bio aerosols, the majority of waste transfer operations will take place within a building. The 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. The proximity of the site to the strategic highway network means that there will be less waste transport on local roads. The site is at a distance of more than 400m from potential human receptors. Site lies 290 m from area reserved for relocation of West Suffolk Hospital within Bury Vision 2031 concept layout for west Bury St Edmunds strategy allocation (Policy BV5). Further, site lies 790 m from area of lower density housing shown on concept layout for Bury Vision 2031 North-West Bury St Edmunds strategy allocation (Policy BV3). The site lies in a Source Protection zone 2 and on a principal major aquifer with high permeability. The applicant would need to demonstrate that development will not impact on water quality. Mitigation measures can include the use of Sustainable Urban Drainage Systems (SUDS). Land is grades 2 and 3 thus is the best and most versatile agricultural land. The site scored negatively against this objective as it will cause the loss of versatile agricultural land. It is proposed the need to mitigate the loss of soil resources by re-using as much of the surplus resources and disposing of any surplus soils thereafter in a sustainable manner. Neutral effects of the site on this SA objective overall. Additional traffic movements would be accounted for by HGVs accessing the WTS to deliver or collect waste. There is expected to be an additional 240 HGV movements per day. However, in absolute terms the anticipated trip generation is expected to be modest and consequently, impacts on sensitive receptors are expected to be minimal. Site is well located to maximise tonnes per miles leading to carbon reduction. The proximity of the site to strategic highway network means that there will be less waste transport on local roads and will reduce the overall number of vehicles transporting waste around the county. In addition, the relocation of the HWRC and depot is not expected to lead to increased non-HGV traffic on West Suffolk's roads, and more specifically on Bury St Edmunds' roads. It is understood that the roads around the site would need significant improvement. Site is located in countryside but not far from edge of settlement. Described as 'Plateau Estate Farmlands' in SCC Landscape Character map. Not within or adjacent to national or local landscape designations and sensitivity of landscape receptor is considered medium. The impact and magnitude of effects would depend on design and mitigation measures but could be medium so net impact on landscape may be considered 'medium'. There are extensive views in and out and topography (site is on relatively high ground, much of it at 55m+) means the site is exposed, particularly from A14 but also from other viewpoints including residential.

WSOH Sites Options
Option 3 – Land south of West Suffolk Crematorium
The site allocation will contribute to diversion of waste from landfill. The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy. There is a high evidence for archaeological activity. Site is of archaeological potential. It is in a location that is topographically favourable for early occupation. There is a cropmark of a ring ditch – most likely a prehistoric burial monument – recorded within the site itself (RBY 025). A further ring ditch is recorded to the west (FAS 023). Roman finds are recorded in the County Historic Environment Record to the northwest of the site and an Anglo-Saxon find spot to the southwest (FAS 016) may be indicative of further activity in the area. There is a very positive effect against this SA objective. Construction phase will create short term jobs. The size of the site will contribute to further release of employment land. Possible negative effects. Noise is expected to be generated onsite during the site preparation and construction period which is expected to last approximately 12 months. Site potentially quite exposed from west (assuming development would be situated at eastern end of site). Existing landscaping on other boundaries has potential to reduce wind speed and limit escape of litter. Relative visibility of site means impact of any litter created likely to be higher. Proposed development would include significant boundary planting which will help to further control escape of litter. Other litter control measures also proposed. The size of the site and its location will enable to co-locate needed facilities on a single site and will enable to generate capital receipts, running costs and deliver integrated customer focused services. The site also provides an opportunity for additional space and capacity for other partners to join in the future.

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 assists in the identification of the total direct and indirect effect on receptors. Often, effects may result from the accumulation of multiple small and often indirect effects rather than few large obvious ones.

Appendices 4 and 5 analyses any synergistic effects of the SA/SEA objectives on WSOH solutions and sites options as a whole. Comments, where appropriate, have been made alongside each option.

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 Greenfield land.

Difference the process has made

The Sustainability Appraisal (SA) process is an integral part of developing the proposal and has encouraged communication between experts and partners throughout. The role of the SA is to assist with the identification of the appropriate options, by highlighting the sustainability implications of each, and by putting forward recommendations for improvement.

Post public consultation amendment/addition:
This SA Report ~~has been~~ was published alongside the WSOH proposal and ~~is~~ was available for consultation for a six week period.

Chapter 1: Background

WSOH Objectives and outline of contents

The primary reason for using a waste transfer station (WTS) is to reduce the cost of transporting waste to treatment facilities. Consolidating smaller loads from collection vehicles into larger transfer vehicles reduces hauling costs by enabling collection crews to spend less time travelling to and from distant waste treatment sites and spend more time collecting waste. This also reduces fuel consumption and vehicle maintenance costs, plus it produces less overall traffic, air emissions and road wear.

The proposal is to co-locate the functions to provide a combined service area for the waste collection and waste disposal authorities, comprising a vehicle depot, WTS and Household Waste Recycling Centre (HWRC). It provides an opportunity to bring waste transfer and waste collection vehicles together on the same site to reduce costs and increase efficiency. The proposal can become an asset to the community because it assists in achieving recycling goals, increases the public's knowledge of proper materials management, and diverts materials that would otherwise burden existing disposal capacity.

There is also a set of opportunities in Bury St Edmunds to create a coordinated 'One Public Estate' that has the potential to lead to integration and improvement of services, better public access, regeneration and greater commercial advantages.

The partner councils agree that greater long-term efficiencies could be gained through co-locating a new WTS, HWRC and vehicle and administration depot into a single new facility in or close to Bury St Edmunds. Such proposals would also create the opportunity to co-locate the current Forest Heath depot (based in Mildenhall) at this new facility, combining the activities currently undertaken on five separate sites, into one (council deliveries to Red Lodge and Thetford waste transfer stations, Rougham Hill HWRC, St Edmundsbury and Forest Heath depots). Developing a single site approach would mean that Olding Road and Mildenhall Depots would close and the land made available for development.

The project follows a proposal by Suffolk County Council to develop a waste transfer site at Rougham Hill, Bury St Edmunds, adjacent to an existing HWRC. This was part of the county council's review of waste transfer provision as waste transfer needs are changing with the development of the Energy from Waste plant at Great Blakenham near Ipswich.

Whilst planning permission has been approved for the Rougham Hill site, this alternative proposal offers the potential to be better for customers and to provide synergies and efficiencies between waste and street cleansing, grounds maintenance, parks and gardens in West Suffolk. In addition this project supports the relocation of the depot from its current location in Olding Road due to the planned development of Phase 2 of the Public Sector Village initiative.

The proposed new development will involve the construction of a new split level HWRC to replace the existing site at Rougham Hill. The throughput of materials at the HWRC is not anticipated to increase significantly over the current levels at Rougham Hill other than by virtue of population growth and is therefore in the order of 11,000 tonnes per annum (tpa).

The proposed WTS will be housed within a steel portal frame building having a footprint of circa 68m x 37m. The building will be up to 12m in height. It will accept kerbside collected residual, organic and dry recyclate waste including cardboard for baling as well as residual, green and wood waste collected at local HWRC facilities. The waste will be bulked up for onward transfer either to the Materials Recovery Facility or the Energy from Waste plant both at Great Blakenham, or for onward transport for reprocessing or composting.

Waste loading and unloading operations will mainly take place inside the building with the aim to minimise noise, odour, dust and other environmental nuisance which may be associated with waste facilities. In order to facilitate waste operations within the County it is proposed that the WTS facility will operate up to 24 hours a day every day of the year, with the exception of Christmas Day and New Year's Day.

The throughput of waste which will be accepted at the WTS is anticipated to be in the region of 94,682 tonnes and the facility will have an operational life of at least 25 years. Projected tonnages have been modelled to allow for an increase in waste arisings over this period, this reflects anticipated population growth within the County. It is anticipated that circa 800 tonnes per annum of hazardous waste will be managed at the site each year, this equates to 0.8% of the total throughput tonnage.

The proposed service area/depot building will be housed within a steel portal frame. The building will be approximately 10m in height. It will be a combination of in-building storage, offices, staff welfare facilities, fleet and plant workshops and external yards and, as such, will be of a similar construction to the transfer facility.

External bay parking for 50 heavy goods vehicles (HGVs) and 24 light goods vehicles (LGVs) will be provided on hard-standing adjacent to the depot. It is proposed that the depot site will be in operation from 6am to 8pm every day of the year, with the exception of Christmas Day and New Year's Day.

The WSOH mission statement is:

Suffolk's public sector leaders have recognised the need for integrated Whole System Leadership in the successful Transformation Challenge Award bid for 2015/16. The implementation of the West Suffolk Operational Hub will contribute to delivering the commitments made in the bid relating to:

- Joint agile working – investing in infrastructure and skills to maximise the benefits of multi-agency working
- The co-location of service providers with single points of access for service users – reducing transaction, accommodation, management and support costs.
- Multi-skilled staff working across the public sector and local communities to maximise local assets enabling people to be as self-sustaining as possible.

Two of the three underpinning principles of the approach – integration and maximising assets, are at the heart of the WSOH proposal. The delivery of the project will also enable other commitments and a whole system/no barriers approach to be realised by releasing land for Phase II of the Public Service Village initiative.

In addition to the Transformation Challenge award, this project forms part of the Norfolk and Suffolk submission to the 'One Public Estate Programme' which is a property initiative promoted by the Local Government Association and the Cabinet Office. This pioneering programme is designed to facilitate and enable local authorities to work successfully with Central Government and local agencies on public property and land issues through sharing and collaboration. Aimed at generating public sector savings, the programme objectives are to:-

- Create economic growth
- Generate capital receipts
- Reduce running costs
- Deliver more integrated customer focussed services

Key Objectives of the WSOH are:

Objective 1: To reduce the cost of running waste and cleansing services in West Suffolk by reducing the number of buildings used, sharing assets between public sector organisations and reducing staff costs.

Whilst reducing waste handling and waste miles, this also provides the future opportunity to combine staffing and management of these facilities.

Objective 2: To increase the efficiency of waste collection services by developing new trade waste arrangements and remodelling household waste services.

> *By combining the fleet and disposal points into one location the Council has the opportunity to redesign collection routes to maximise efficiency and provide further capacity for commercial services and income.*

Objective 3: To improve the customer experience for residents using the Household Waste Recycling Centre by creating a 'same level' site for customers with sunken skips which does not involve climbing stairs, and better parking arrangements.

Objective 4: To improve the customer experience for Fleet Management Services, by creating welcoming facilities, allowing for a new marketing strategy and increased revenue.

Objective 5: To increase the efficiency of the Grounds Maintenance Service by having a Transfer Facility on site which will cut out double handling of green waste and reduce waste miles. This will free-up further capacity to sell for increased revenue.

Objective 6: To manage the impact of future housing and commercial growth in West Suffolk by improving facilities and increasing efficiency and capacity.

Objective 7: To minimise the environmental impact of the provision of waste management and operation services in West Suffolk and thereby increase their sustainability.

Purpose of the SA Report

The Sustainability Appraisal is required as part of the preparation for the plan, programme or policy. Its role is to promote sustainable development by assessing the extent to which the emerging proposal, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. There is no requirement to carry out Sustainability Appraisal for project-level proposals, however, due to WSOH proposal outlining a new more integrated approach to waste management within the county, the process of selecting the right option and site for the WSOH proposal should be handled in a thorough and robust manner therefore is recommended to be a subject to the SA process. The SA provides an opportunity to consider ways by which this proposal can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the proposal might otherwise have. By doing so, it can help make sure that the aims of this proposal are the most appropriate given the reasonable alternatives.

Given that the proposal is not likely to be in line with the statutory development plan policy, the SA will consider all reasonable alternatives both in terms of solutions and sites to provide a robust basis upon which to proceed with the proposal.

Departure from the plan can be justified by reference to proven sustainability advantages of the proposed option.

The Councils are committed to sustainable development, placing the ideologies which underpin it at the centre of their activities. Sustainable development balances the needs of a growing economy with protecting the built and natural environment.

The DCLG Plan Making Manual emphasises that SA is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined. The intention is that SA is fully integrated into the plan making process from the earliest stages, both informing and being informed by it.

Collection of the baseline data for the SA has informed this Report by providing an analysis of a range of sustainability issues relevant to

WSOH Proposal and development of the SA Framework.

Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a plan, programme or policy to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives. It is the process by which the UK Government has transposed the SEA Directive into town planning legislation to incorporate economic and social objectives as well as environmental ones.

Both processes are undertaken during the preparation of a Proposal or strategy to aid the implementation of sustainable development. The main difference between them is that while SEA has more of an environmental focus, SA includes greater coverage of the social and economic aspects of sustainable development. Although SA and SEA are distinct requirements, government guidance has recommended a single appraisal process.

National Planning Policy Framework (NPPF) states:

> *'A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors' (NPPF paragraph 165).*

In 2011 the Government published its vision for sustainable development 'Mainstreaming Sustainable Development'. It commits to the transition to a green economy, tackling climate change, protecting and enhancing the natural environment, ensuring fairness and improving wellbeing, empowering communities and working on sustainability issues within both the national and international context.

Compliance with the SEA Directive/Regulations

- The Sustainability Appraisal report has been compiled in order to inform the public, Statutory Environmental Bodies (SEBs) and other interest groups of the predicted outcomes of the Proposal.

The SEA Directive and the SEA Regulations require that this appraisal will consider the following topic areas and inter-relationship between them:

- Biodiversity;
- Population;
- Human health;
- Flora and Fauna;
- Soil;
- Water;
- Air;
- Climatic Factors;
- Material assets;
- Cultural Heritage
- Landscape

This SA Report follows and sets out the requirements of the SEA and has been developed in accordance with the following:

- Directive 2001/42/EC 'on the assessment of the effects of certain plans, and programmes on the environment' (European Commission, 2001) i.e. e the Strategic Environmental Assessment Directive;
- Environmental Assessment of plans and programmes Regulations 2004 (SI 2004 No 1633);
- A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005);
- Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment. (4th April 2013 European Commission).

Table 1 demonstrates which parts of the EU SEA Directive that the SA Report complies with.

Table 1: Compliance with EU SEA Directive

Information requirement of the SEA Directive (defined by Annex I)	Section of the SA Report
An outline of the contents and main objectives of the plan or programme, and its relationship with other relevant plans and programmes	Chapter 1
The relevant aspects of the current state of the environment	Chapter 2
The environmental characteristics of areas likely to be significantly affected	Chapter 2
Any existing environmental problems which are relevant to the plan or programme, in particular, those relating to areas designated at the European level for importance to wildlife (SPAs, SACs)	Chapter 2
The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Chapter 2
The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationships between these issues.	Chapter 4
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapter 4
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack or know-how) encountered in compiling the required information.	Chapter 4
A description of the measures envisaged concerning monitoring	Chapter 5
A non-technical summary of the information provided	Non-Technical Summary

Approach adopted to the SA

The approach used in the SA is based on the process set out in the section 'Sustainability Appraisal' of the DCLG Plan Making Manual. The SA has been conducted to also meet the requirements of the SEA Regulations. The DCLG Plan Making Manual emphasises that SA is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined. The intention is that SA is fully integrated into the plan making process from the earliest stages, both informing and being informed by it. Table 2.1 sets out the SA stages, tasks and relationships with the DPD preparation, as set out in the DCLG Plan Making Manual and ODPM guidance 'A practical guide to the Strategic Environmental Assessment Directive', 2005.

An SEA need not be done in any more detail, or using any more resources, than is useful for its purpose. The Directive requires consideration of the significant environmental effects of the plan or programme, and of reasonable alternatives that take into account the objectives and the geographical scope of the plan or programme.

Table 2: The stages and tasks of the SA against the Proposal production stages

Proposal Stage	SA Stage
Pre-production	Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope Task A1 - Identifying other relevant policies, plans and programmes, and sustainability objectives Task A2 - Collecting baseline information Task A3 - Identifying sustainability issues and problems Task A4 - Developing the SA framework Task A5 - Consulting on the scope of the Sustainability Appraisal
Production	Stage B: Developing and refining options and assessing effects Task B1 - Testing the Proposal objectives against the SA framework Task B2 - Developing the Proposal options Task B3 - Predicting the effects of the Proposal Task B4 - Evaluating the effects of the Proposal Task B5 - Considering ways of mitigating adverse effects and maximising beneficial effects Task B6 - Suggesting measures to monitor the significant effects of the Proposal
	Stage C: Preparing the Sustainability Appraisal Report Task C1 - Preparing the SA Report
	Stage D: Consulting on the options of the Proposal and SA Report Task D1 - Public participation on the options of the Proposal and the SA Report Task D2(i) - Appraising significant changes
Review	Task D2(ii) - Appraising significant changes resulting from representations
Monitoring	Task D3 - Making decisions and providing information Stage E: Monitoring the significant effects of implementing the Proposal Task E1 - Finalising aims and methods for monitoring Task E2 - Responding to adverse effects

Stages *A* and *B* of the SA process are addressed in this SA Report which is available for six weeks public consultation.

Who was consulted and when

Post public consultation amendment/addition:
~~Members of the public, as well as Statutory Environmental Bodies are to be consulted together with other stakeholders and their comments are to be taken into consideration in the subsequent Final SA Report.~~

~~This SA Report is a standalone document to enable the partner councils to make an informed decision with regards to sustainability of the WSOH proposal. It, however, should be also read in conjunction with the Report on Identification and Assessment of Potential Options and Sites, December 2015 by Carter Jonas.~~

Members of the public, as well as statutory environmental bodies and other stakeholders, were consulted in January and February 2016 and their comments taken into consideration in this Final SA document. This Final SA is a standalone document to enable the partner councils to make an informed decision with regards to sustainability of the WSOH proposal. It, however, should be also read in conjunction with the report on Identification and Assessment of Potential Options and Sites, December 2015 (amended May 2016) by Carter Jonas.

Chapter 2: Sustainability Objectives, Baseline and Context

Links to other policies, plans, programmes and sustainability objectives (Task A1)

European Directive 2001/42/EC requiring Strategic Environmental Assessments (SEA) on the effects of certain plans and programmes on the environment (those which have land use implications) was incorporated into UK law in July 2004. Current government guidance for spatial plans requires a Sustainability Appraisal (SA); to incorporate a wider consideration of social and economic considerations than SEA alone.

The SEA Directive states that the SA Report should provide information on: '*The plan's relationship with other relevant plans and programmes' and "the environmental protection objectives, established at international, [European] Community or national level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex 1 (a), (e)).*

Prior to drafting the SA Objectives, a review of all relevant plans and programmes was undertaken. This review identified the relationships between the SA and plans and programmes which, in turn, enabled potential synergies to be exploited and, conversely, conflicting initiatives to be identified.

The purpose of this review was not only to list relevant plans and programmes, but to highlight the influence that the plans and programmes may have upon the SA in terms of themes set out within it. This review represented the first step in the derivation of the Sustainability Appraisal Framework for WSOH.

The WSOH proposal is influenced in various ways by other plans or programmes, or by external environmental protection objectives such as those laid down in policies. These relationships enable the Responsible Authority to take advantage of potential synergies and to deal with any inconsistencies and constraints.

No list of such plans, programmes or objectives can be definitive, but relevant plans and programmes may include:

- Land use or special plans (e.g. Local Development Frameworks and Minerals and Waste Development Plans);
- Plans dealing with aspects of the physical environment, e.g. Strategic Flood Risk Assessments, Shoreline Management Plans;
- Plans and programmes for specific sectors or types of activity, e.g. Local Economic Strategies, Local Transport and Waste Management Plans.

Task A1 requires that all relevant policies, plans, programmes and environmental objectives are analysed.

The relationship between various policies, plans, programmes and environmental protection objectives may influence the Plan. The relationships are analysed to:

- Identify any external social, environmental or economic objectives that should be reflected in the SA/SEA process;
- Identify external factors that may have influenced the preparation of the plan ; and
- Determine whether the policies in other plans and programmes might lead to cumulative or synergistic effects when combined with policies in the plan.

The results of this exercise are presented in table 3 which shows the requirements of other plans, programmes or objectives concerned, the constraints or challenges they pose, and how WSOH proposal might take account of them.

The full details of national policies and plans are provided in Appendix 5. The most relevant of these, that have required detailed consideration at the next stage of the Proposal, are summarised below:

Table 3: Summary of the most relevant plans and programmes

Document Title	Key objectives, targets and indicators relevant to WSOH and SA	Implications for SA
National Planning Policy for Waste 2014	This document sets out the detailed waste planning policies to be read in conjunction with the National Planning Policy Framework and details the requirements on Waste Planning Authorities when preparing Waste Local Plans. The National Planning Policy for Waste provides detail on: • using a proportionate evidence base, identifying need for waste management facilities, identifying suitable sites and areas, determining planning applications, and monitoring and reporting.	SA to ensure that relevant policies are reflected in the SA objectives.
The DCLG Waste Management Plan for England 2013	From 1 January 2015, local authorities will need to collect waste paper, metal, plastic or glass by way of separate collection where this is necessary to ensure that waste undergoes recovery operations in accordance with Articles 4 and 13 of the Waste Framework Directive and to facilitate or improve recovery; and where such separate collection is technically, environmentally and economically practicable…Within England, local authorities assess the need for any changes to collection arrangements that best fit their local circumstances and meet the legal obligations to collect waste set out above".	SA to include objectives relevant to the achievement of the Plan objectives.
National Planning Policy Framework (NPPF,2012)	In delivering sustainable development the key planning objectives should be: • Building a strong, competitive economy. • Supporting a prosperous rural economy. • Promoting sustainable transport. • Supporting high quality communications infrastructure. • Meeting the challenge of climate change, flooding and coastal change. • Conserving and enhancing the natural environment. • Conserving and enhancing the historic environment.	SA to include objectives relevant to the achievement of the NPPF objectives.

Document Title	Key objectives, targets and indicators relevant to WSOH and SA	Implications for SA
Waste Framework Directive	The aims of this Directive are: • To provide a comprehensive and consolidated approach to the definition and management of waste. • To shift from thinking of waste as an unwanted burden to a valued resource and make Europe a recycling society. • To ensure waste prevention is the first priority of waste management.	The SA framework to include objectives to minimise the production of waste and promotion of recycling.
Suffolk County Council Waste Core Strategy 2011	The Waste Core Strategy covers the period to 2026 and establishes the overarching principles and policy direction for determining waste planning applications within Suffolk during this period. It also identifies strategic waste management sites across the County. The Waste Core Strategy provides a vision for how waste should be managed in the county and identifies the social, economic and environmental objectives to achieve this vision. It also contains a range of Development Management Policies to provide more detailed criteria for the consideration of planning applications for waste management and other development that might potentially have an impact upon waste management facilities. Planning applications for other types of waste development are intended to be determined in accordance with the policies contained within this document and that of other relevant documents. The strategy aims by 2026 to eliminate the land filling of untreated municipal, commercial and industrial wastes and have fully operational residual waste management processes, recovering value from wastes that cannot practically be recycled or composted.	SA to include objectives relevant to the achievement of the Plan objectives. A Framework to include objectives relating to reduction of waste.
St Edmundsbury Core Strategy 2010	The St Edmundsbury Core Strategy DPD sets out the Council's vision for future growth, objectives and strategic policy framework that will manage and guide development in the borough over the next twenty years and beyond. The Core Strategy lists the policies required to implement the vision, which will be supported by the Site Specific Allocations and Development Control Policies DPDs.	SA to include objectives relevant to the achievement of the Plan objectives.

Document Title	Key objectives, targets and indicators relevant to WSOH and SA	Implications for SA
Bury St Edmunds Vision 2031	St Edmundsbury Borough Council formally adopted Bury St Edmunds, Haverhill and Rural Area Vision 2031 site allocation documents on 23 September 2014. Vision 2031 documents form part of the St Edmundsbury Local Plan. These documents identify where growth will be allowed and what local everyday services people will need to enjoy a good quality of life.	SA to include objectives relevant to the achievement of the Plan objectives.
SEBC/FHDC Joint Development Management Policies 2015	This document will replace many of the policies within each Council's existing adopted Local Plan with locally-specific development management policies covering a wide range of topics, including housing, employment, transport and the preservation of the environment, which will add to and complement national planning policy.	SA to include objectives relevant to the achievement of the Policies' objectives.
Suffolk's Local Economic Assessment 2011	The local economic assessment has provided a mechanism to bring together public sector partners and businesses to enable them to agree on the key issues facing Suffolk's economy and identify how they can work together to support the growth and development of the economy in the future.	SA to include objectives relevant to the achievement of the Suffolk's Local Economic Assessment 2011 objectives.
St Edmundsbury Economic Assessment and Action Plan 2010-2015	The council must deploy its resources to best effect and make maximum use of the levers in its control, such as procurement, to stimulate the local economy. It must work in partnership with other organisations and share resources to make them go further. Bury St Edmunds businesses responding to St Edmundsbury Borough Council's survey want the council to reduce costs of services and make provision for small and large business units.	SA to include objectives relevant to reduction of costs of council services and provision for small and large business units.

Document Title	Key objectives, targets and indicators relevant to WSOH and SA	Implications for SA
West Suffolk Environmental Statement 2013-14	A range of priority themes have been identified which the Councils wish to influence through their services at a local level and an action plan has been put in place to work towards achieving this. The issues identified include : • Creating sustainable economic growth • Energy conservation and renewable energy • Affordable warmth • Health and well-being • Housing • Natural and heritage capital • The built environment • Travel • Water resources • Procurement • Waste	SA to include objectives relevant to issues identified in the West Suffolk Environmental Statement 2013-2014.

Document Title	Key objectives, targets and indicators relevant to WSOH and SA	Implications for SA
Joint Municipal Waste Management Strategy for Suffolk – Oct 2003	The document sets out a strategy for dealing with municipal waste over the period 2003-2020. Some of the policies were updated in 2013. Suffolk's Local authorities will work together and in partnership with others to develop a Municipal Waste Management Strategy. The Strategy will seek to minimise levels of waste generated and to manage waste in ways that are environmentally, economically and socially sustainable. The Strategy will seek to influence the wider waste stream, providing waste minimisation and recycling in industry and contribute towards the preparation of a Waste Local Plan for Suffolk. In delivering the strategy, LAs will embrace the principles outlined in the National Waste Strategy and aim to recycle or compost at least 60% of municipal waste. Policy 4 - to promote and encourage waste reduction wherever possible to minimise the amount of waste that is produced. Policy 5 - to promote and encourage waste re-use wherever possible, by supporting community schemes and promoting awareness, and encouraging the re-use of waste collected through the Household Waste and Recycling Centres and bulky waste collections. Policy 11 - to increase the number of bring sites for the collection of glass throughout the county. The number of bring sites and range of materials they collect will be increased in areas where it is not planned to introduce separate kerbside collection of dry recyclables. Policy 12 - to optimise the number and location of Household Waste and Recycling Centres, and enhance quality of service provision. Increase the quantity and range of materials recycled, aiming to recycle 55% of waste taken to the sites by 2004/05.	SA to include objectives relevant to the achievement of the Plan objectives. Include waste minimisation objective in the SA. To reflect if the proposal aims to optimise the number and location of Household Waste and Recycling Centres, and enhance quality of service provision.

Document Title	Key objectives, targets and indicators relevant to WSOH and SA	Implications for SA
The One Public Estate Programme	The One Public Estate programme uses land and property released by government to boost economic growth and regeneration. Cabinet Office and the Local Government Association (LGA) run the programme to encourage sharing services, reducing running costs and generating capital receipts (money received from selling surplus property). The 20 selected councils will join 12 pilot councils that took part in the first phase of the programme in 2013. This pioneering programme is designed to facilitate and enable local authorities to work successfully with Central Government and local agencies on public property and land issues through sharing and collaboration. Aimed at generating public sector savings the programme objectives are to: • Create economic growth • Generate capital receipts • Reduce running costs • Deliver more integrated customer focussed services.	To include in the SA framework objectives relating to creation of economic growth, generation of capital receipts, running costs reduction and delivery of more integrated customer focussed services.
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007	The Strategy sets out air quality objectives and policy options to further improve air quality in the UK to deliver environmental, health and social benefits. It examines the costs and benefits of air quality improvement proposals, the impact of exceeding the strategy's air quality objectives, the effect on ecosystems and the qualitative impacts.	SA should include objectives relating to the quality of air quality and improving the environment for all communities.
Post public consultation amendment/ addition: ~~Suffolk Local Authorities – Air Quality Management and New Development 2011~~ EPUK & IAQM – Land-Use Planning & Development Control: Planning For Air Quality (2015)	Air quality is a material planning consideration with the potential to affect and influence planning processes for both proposed developments within designated Air Quality Management Areas. Aims of the guidance are: • Maintain an and where possible improve air quality; • Ensure a consistent approach to local air quality by: • Identifying circumstances where and air quality assessment would be required to accompany an application; • Providing guidance on the requirements of the air quality assessment • Providing guidance on mitigation and offsetting of impacts.	SA should include objectives relating to the quality of air quality and improving the environment for all communities.

Document Title	Key objectives, targets and indicators relevant to WSOH and SA	Implications for SA
Water Framework Directive – 2000/60/EC	This Directive aims to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater which: • Prevents further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems; • Promotes sustainable water use based on a long-term protection of available water resources; • Aims at enhanced protection and improvement of the aquatic environment, inter alia, through specific measures for the progressive reduction of discharges, emissions and losses of priority substances and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances; • Ensures the progressive reduction of pollution of groundwater and prevents its further pollution, and • Contributes to mitigating the effects of floods and droughts	Include objectives and indicators relating to water use and quality. Need to include surface water and ground water.
National Adaptation Programme, July 2013	The National Adaptation Programme was based on the findings of the Climate Change Risk Assessment, which was produced in response to the Climate Change Act, 2008. The NAP is organised around a series of objectives, together with guidance about how these will be achieved. Objective 1: To work with individuals, communities and organisations to reduce the threat of flooding and coastal erosion, including that resulting from climate change, by understanding the risks of flooding and coastal erosion, working together to put in place long-term plans to manage these risks and making sure that other plans take account of them. Objective 2: To provide a clear local planning framework to enable all participants in the planning system to deliver sustainable development, including infrastructure that minimises vulnerability and provides resilience to the impacts of climate change.	Consider objectives on mitigating and adapting to climate change.

Document Title	Key objectives, targets and indicators relevant to WSOH and SA	Implications for SA
Suffolk Climate Action Plan 2, 2012	The document does not have any binding targets but does aspire for businesses and households in Suffolk to achieve the following: • Reduce carbon emissions by 60% on 2004 levels by 2025 • Support the development of a green economy, including reducing the CO2 produced in the production and delivery of products and services • Adapt to the impacts of climate change, including extreme weather and resource scarcity	Include objectives which encourage the reduction of carbon emissions and which seek to enable mitigation and adaptation to climate change.
The Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)	The guidance references a biodiversity indicator, which was developed as a result of a Defra commissioned research project in 2003/4. The indicator developed to measure local authority performance is: • 'Progress towards achieving a local authority's potential for biodiversity', which is based on four sub-indicators relating to: • The management of local authority landholdings (e.g. % of landholdings managed to a plan which seeks to maximise the sites' biodiversity potential. • The condition of local authority managed SSSIs (e.g. % of SSSI in 'favourable' or 'unfavourable recovering' condition). The effect of development control decisions on designated sites (e.g. change in designated sites as a result of planning permissions).	SA should include objectives relating to biodiversity
Suffolk Biodiversity Action Plan, Updated October 2014	The BAP contains numerous targets for habitats and species.	SA should include objectives/indicators to ensure that BAP habitats in Suffolk are not adversely affected by the Proposal.
Suffolk Historic Landscape Characterisation Map 2008	The Map characterised the historic landscape of Suffolk through the identification and mapping of a range of defined Historic Landscape Types, each based on current land use and an assessment of its historical origin.	SA should include objectives relating to the conservation and enhancement of historic and archaeological areas and landscapes.

Document Title	Key objectives, targets and indicators relevant to WSOH and SA	Implications for SA
Suffolk's Local Transport Plan, 2011-2031	The strategy differs for urban and rural areas. Urban: • reducing the demand for car travel • more efficient use and better management of the transport network • where affordable - infrastructure improvements, particularly for sustainable transport. Rural: • Better accessibility to employment, education and services. • Encouraging planning policies to reduce the need to travel • Maintaining the transport network and improving its connectivity, resilience and reliability • Reducing the impact of transport on communities • Support the county council's ambition of improving broadband access throughout Suffolk.	SA should consider objective to promote sustainable transport.

Description of the baseline characteristics and main issues identified (Tasks A2 & A3)

Baseline information provides the basis for predicting and monitoring environmental effects and helps to identify environmental problems and alternative ways of dealing with them. Both qualitative and quantitative information can be used for this purpose. The SA Report can focus on those where significant effects are likely, provided it is made clear why other matters do not need to be addressed. The baseline and environmental effects can also include matters such as geological conditions, mineral resources, flood risk, energy consumption, noise and light pollution.

The SEA Directive says that the SA Report should provide information on: *'relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan" and the "environmental characteristics of the areas likely to be significantly affected' (Annex I (b) (c)); and 'any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC' (Annex I (c))*

In addition to the requirements of the SEA Directive, the statutory SA process requires the collection of additional information on social and economic characteristics of the plan area.

Sufficient information about the current and likely future state of the study area is required to allow the proposal's effects to be adequately predicted. Collection of the baseline data was carried out using desktop study followed by sites visit on 4th August 2015.

Baseline data were collected about St Edmundsbury for a range of economic, social and environmental matters, looking at the Borough as it is today and identifying current trends. Wherever possible, these data have been updated and relevant additional information added as part of the preparation

of this Sustainability Appraisal Report. The baseline data collected to date are summarised below. This data has allowed the identification of key issues for the Borough.

Geographical Scope

The Borough of St Edmundsbury is located in western Suffolk. It has borders with Norfolk to the north, Mid Suffolk and Babergh Districts to the east, Essex to the south and Cambridgeshire and Forest Heath District to the west.

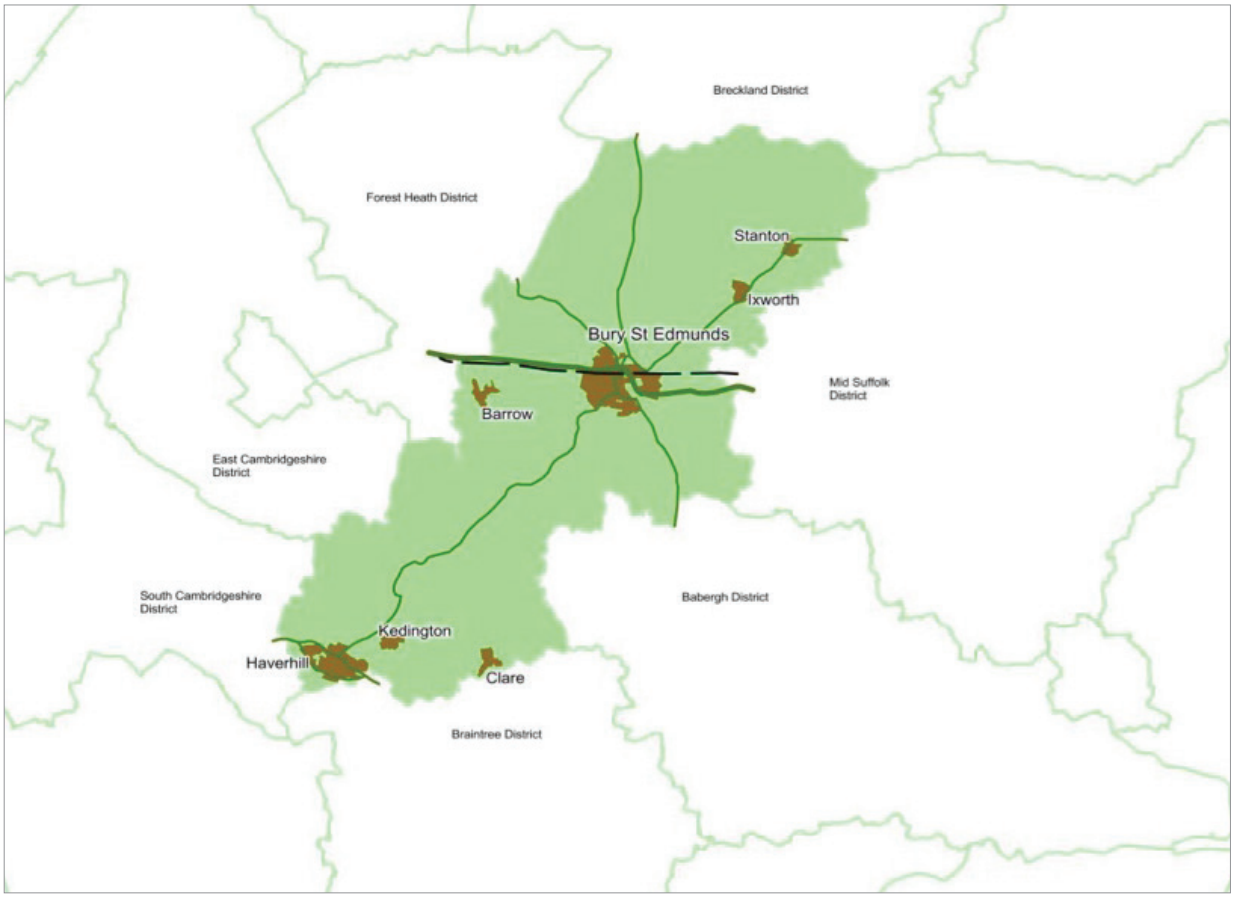
The borough has two main towns: Bury St Edmunds in the centre and Haverhill to the south. The remainder of the borough is rural with some large villages such as Stanton, Ixworth, Barrow, Clare and Kedington and many small villages and settlements. The geographical boundary of the borough is presented in Figure 1.

Figure 1. St Edmundsbury Borough

Population

The total population of St. Edmundsbury was 112,073 in 2014. The population of Bury St Edmunds incorporating the 10 wards of the town totals 35,473 which represents a third of the population of St Edmundsbury Borough Council. There is a high proportion of people (48%) aged 65 and over in the Borough with the younger population of 16 – 24 year olds reducing. The main ethnic group of the Borough is White British with 6% made up of other minority ethnic groups.

The National Index of Multiple Deprivation in 2010 ranked St Edmundsbury Borough Council as 240 out of 354 with 1 being the most deprived and therefore is considered good. In 2004 the rank score for the Haverhill South Ward (formerly Clements) 1,132 out of 8414 with Eastgate Ward in Bury St Edmunds scoring 7,805. This indicates that there are disparities between the two towns and with a higher deprivation in Haverhill in comparison with Bury St Edmunds skew the overall results for St Edmundsbury.



Health

The general health of the residents of Bury St Edmunds is good. However there are disparities between wards within Bury St Edmunds and in the Moreton Hall ward life expectancy on average is 85.72 years old whereas in the St Olaves Ward this reduces to 78.7 years old.

Bury St Edmunds is considered to be an affluent area with a lower than average unemployment. There are two main health problems: 20% of residents smoke and 15% are obese. Bury St Edmunds is fortunate to have a number of voluntary and community sector groups who are working to reduce these particular health issues.

Table 4: Complaints trends for odour, noise and light pollution in St. Edmundsbury

	2014/15	2013/14	2012/13	2011/12	2010/11
Odour					
Commercial Bonfires	5	12	11	10	10
Commercial Smoke	4	2	4	8	2
British Sugar	3	0	0	0	0
Smell Commercial	9	18	17	24	24
Smell Industrial	2	6	9	14	12
Total Odour	**23**	**38**	**41**	**56**	**48**
Noise					
Heavy Industrial	3	3	2	0	1
Light Industrial	3	4	3	2	6
Commercial	59	73	91	114	132
Total Noise	**65**	**80**	**96**	**116**	**139**
Light Pollution	**2**	**2**	**2**	**2**	**2**

Source: SEBC

The trend demonstrates that there is an over 50 per cent reduction in the number of complaints in respect of odour, noise and light pollution in St. Edmundsbury.

Economy and employment

St Edmundsbury is an economically prosperous Borough with around 3,955 VAT registered businesses at the end of 2007. The town centre is home to a large number of offices concentrated along the edges of the shopping area, with a number of smaller premises above shops. It is important to take a long-term perspective when considering the future role of the town centre as a location for employment.

The economy is in transition and structural changes have occurred which mean that the recovery will not see a return to business as usual. Instead businesses – and the public sector - will have to be innovative and seek new markets and new ways of doing things. The council's economic strategy has to be flexible enough to cope with further shocks and respond quickly to opportunities. The council can encourage local businesses to raise their aspirations and improve their performance, it can create the conditions that will help them and it can enlist help from economic agencies.

The recovery in the UK economy is likely to be held back by the need to control public

finances and reduce the budget deficit, and public spending will have to be tightly constrained as part of a programme of fiscal austerity. Moreover, nearly a third of employment in St Edmundsbury is in the public sector and redundancies would mean less money circulating in the local economy.

The council must deploy its resources to best effect and make maximum use of the levers in its control, such as procurement, to stimulate the local economy. It must work in partnership with other organisations and share resources to make them go further.

Bury St Edmunds (Suffolk's Local Economic Assessment 2011)

Swot Analysis Strengths	Weaknesses
Sub-regional centre	High dependency upon public sector employment
Central position in the region	Lack of appropriate infrastructure
A14 and railway station	Poor train links to Cambridge and London
Good retail offer	Lack of premises for business incubation
Strong image as heritage town	Lack of premises for large businesses
Very good amenities	
Self-contained labour market	
Opportunities	Threats
Development of Suffolk Business Park	Capacity and condition of the A14
Development of A14 corridor	Risk of development spoiling town
Development of University Campus Suffolk	

Economic Linkages

The historic market town of Bury St Edmunds is centrally placed in the region. It has a large rural hinterland and a wide range of shops and services. It is well-served by the A14 and it has the only railway station in St Edmundsbury which links it with Ipswich to the east and Cambridge and Peterborough to the west, although there is no direct link to London. Within the economic sub-region of West Suffolk, the Bury St Edmunds area forms a distinct, relatively self-contained market.

Structure of Local Economy

The largest employment sectors in Bury St Edmunds are the public sector (34.3%), distribution, hotels and restaurants (28.1%) and financial services (14.4%) (ABI 2008). Manufacturing (11.6%) is also significant. The public sector accounts for over a third of all employment, largely because the town is the site of some sub-regional public sector employers, such as West Suffolk Hospital and West Suffolk College.

Many of the biggest commercial employers are food and drink related, reflecting the town's position at the centre of a large agricultural area. This includes Greene King, Premier Foods, Dalehead Foods and British Sugar. There are some large technological companies, including Sealeys, Vintens, Roper Industries and STL Technologies. The supermarkets Tesco, Asda, Sainsbury's and Waitrose are also large employers.

Bury St Edmunds has a proud tradition of local independent businesses starting in the town, such as Greene King, Denny Brothers, Glasswells and Sealeys. The majority of businesses in Bury St Edmunds remain small and there is a huge variety. Traditional agriculture-related businesses sit side by side with hi-tech enterprises.

Enterprise and Innovation

There are 12 business parks and industrial estates in the town. The newest is Suffolk Business Park, close to the A14, and home to several important local businesses such as Denny Bros and Sealey Power Products. A proposed 68 hectare extension to the business park along the A14 has recently been approved so that eventually it will stretch out to the Rookery Crossroads at Rougham and provide enough space for business expansion for the foreseeable future. The Employment Land Review recommends carrying out an assessment of the other employment areas in the town to look at the possibility of regenerating or reusing them for other purposes and concentrating future business development at Suffolk Business Park. MENTA (Mid-Anglian Enterprise Agency) offers advice and support to small and medium-sized enterprises and people wanting to start new businesses. It also has 21 units available for new and small businesses to rent, but these are usually all occupied and more units are needed in the town.

Business Needs

Bury St Edmunds businesses, responding to St Edmundsbury Borough Council's survey, want the council to reduce the costs of services, help with rates and improve transport and parking. According to the Employment Land Review, agents consider that the current lack of large new stock is a hindrance to Bury St Edmunds's offer, and that there is also a high level of demand for smaller workspace units. The development of Suffolk Business Park is intended to meet the need for larger units and the borough council plans to establish a new incubation centre at Suffolk Business Park to help meet the need for smaller units.

Household and Business Growth

Household and business growth is, and will continue, to increase demand for waste services and create new commercial opportunities. The growth is based on the average increase in housing numbers as outlined in current development plans, equating to 954 households per year in West Suffolk. This growth is significant in terms of the number of additional households requiring waste collection services and also the quantity of waste generated and requiring transfer for treatment.

Housing needs

The Core Strategy confirms how new homes will be distributed across St Edmundsbury, following consultation on options for this growth in 2008. Policy CS1 of the Core Strategy identifies that 52% of the 2001-2031 growth will be in Bury St Edmunds, 34% in Haverhill and the remaining 14% across the rural area. However, taking account of the higher rates of house-building since 2001, the number of new homes to be constructed in Bury St Edmunds during the period 2012 to 2031 will be reduced to 50% of the borough total, or 5740 homes, in order to conform with the Core Strategy. The Vision 2031 documents provide the opportunity to turn a high level strategy into more detailed and site specific proposals using up-to-date information on site availability and deliverability. As at 1 April 2012 there was planning permission for 390 new homes in the town where development had either not commenced or were under construction and not complete. This leaves a need to find sites for a further 5350 homes that can be built by 2031. Vision 2031 allocates sites that are estimated to have the ability to deliver at least 4985 homes. The shortfall of 365 is expected to be made up of new homes that will be built on mixed use developments allocated in the Vision document, where it is too early in the planning stage to estimate precisely how many might be built. In addition, it is expected that new homes will continue to come forward on small "windfall" and infill sites across the town that occur through conversions and redevelopment opportunities.

Waste and waste management

Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion

of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. In 2013/14 St Edmundsbury's recycling rate was at 52.61% compared with an average county figure of 52.97%, however it still remains considerably higher than the national average of 41.2%.

St Edmundsbury was awarded Beacon Council status in 2001 and 2006 by the Government. This award recognised that St Edmundsbury was a national leader in the field of waste management and recycling. Since then the council has been involved in helping other councils across the country to improve their recycling rates. St Edmundsbury works in partnership with the six other district and borough councils in Suffolk together with the County Council through the Suffolk Waste Partnership to improve waste management in Suffolk. In November 2014 the Suffolk Waste Partnership started a contract with Viridor Waste Management to sort and recycle material collected from households. Through the work of the Suffolk Waste Partnership the total amount of waste material recycled in 2014/2015 was 53,056 tonnes per year – representing a recycling rate across Suffolk of approximately 20% from household collections alone. By working together with all Suffolk councils, St Edmundsbury has helped achieve significant improvements in recycling rates across the county.

Household waste is collected from domestic properties & premises classified as domestic by the Controlled Waste Regulations 2012 (e.g. residential homes, schools, prisons). Municipal waste is all local authority collected waste including domestic and commercial customers, this includes residual waste & waste collected for recycling and composting from both domestic and commercial customers.

Table 5: Percentage of Household Waste Sent for Re-use, Recycling or Composting (Financial Year 13-14)

District	Percentage of Household Waste Sent for Re-use, Recycling or Composting (Financial Year 13-14)
Babergh	41.73
Forest Heath	46.10
Ipswich	41.28
Mid Suffolk	41.73
St Edmundsbury	52.61
Suffolk Coastal	57.44
Waveney	50.94
Suffolk County	52.97

Source: Suffolk Observatory

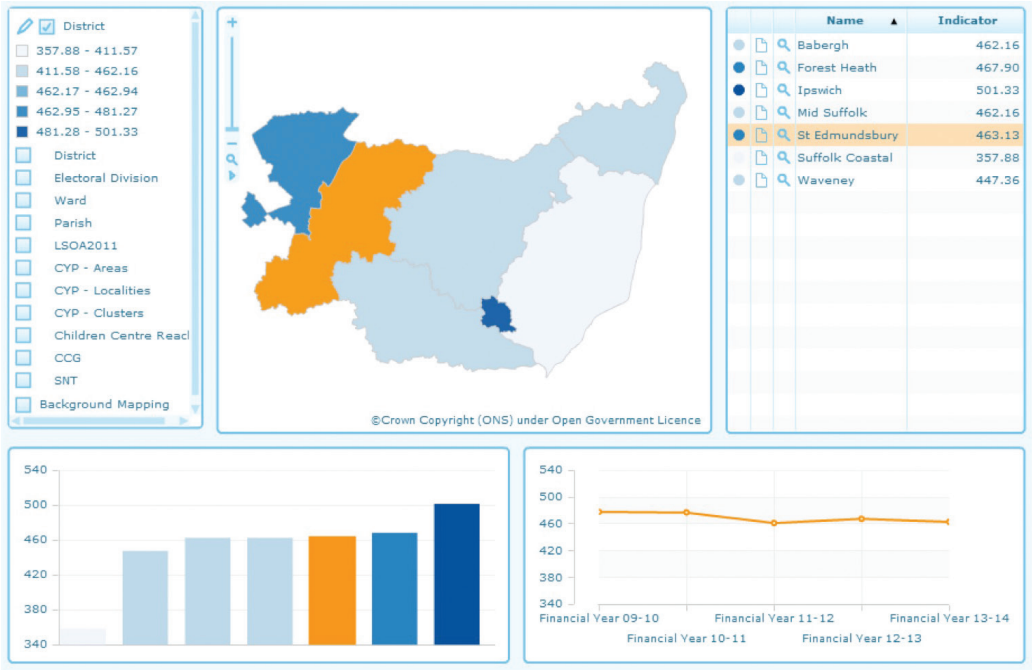
Table 6: Waste arisings in St Edmundsbury 2013

	2011/12	2012/13
Reported Domestic residual waste arising	21,063.72 T	21,531.23 T
Reported Municipal residual waste arising	25,576.85 T	26,400.60 T

Source: St Edmundsbury BC 2013

The table shows in St Edmundsbury there has been an increase in total waste arising in the Borough since the previous monitoring year.

Figure 2. Residual household waste per household (kg/household) St Edmundsbury 2013-2014



Source: Suffolk Observatory

Waste Transfer stations

a) Current private sector transfer stations are distant from the major population centre of Bury St Edmunds, with poor road access. They are located on the western fringe of Suffolk, whereas materials are destined for facilities in central Suffolk (energy from waste facility and materials recycling facility), increasing waste miles and costs.

b) All three existing waste transfer stations currently used by the councils in West Suffolk are in private ownership. Private ownership of waste transfer stations means that changing waste transfer service providers (eg at the end of a contract) requires a change of facility locations. Changing facility locations has the potential to cause an upheaval in waste collection services because of the re-routing and other logistical complications it presents. This is seen as a barrier to changing waste transfer service providers and therefore to flexibility and competition. With publicly owned facilities these problems do not occur – a change of service provider can take place with

the location from which the services are provided being kept the same. As a result the upheaval associated with a change of location is avoided.

Trends/Future needs

Currently waste generation is increasing at around 2% pa, reflecting improvements in the economy and increases in population. Long term waste forecasting is notoriously difficult.

Accessibility

Bury St Edmunds provides the main focus for public transport within the Borough having both a railway station and bus station. The railway station is located away from the town centre but within walking distance. The bus station is within the town centre and has links to the surrounding towns within St Edmundsbury and beyond. The railway station has links to Cambridge and Ipswich. However, services from the towns remain relatively poor with the former ward of Chevington being the least accessible ward in Suffolk and Stanton and Barrow are amongst the 15% of least accessible wards in the county.

The major road network within the Borough comprises the A14 Felixstowe to Birmingham, the A143 Haverhill to Great Yarmouth and A134 Bury St Edmunds to the A10 outside of King's Lynn.

The borough has an extremely high level of car ownership and use. Approximately 16% of the local population do not have access to a car which is well below the national average of 27%. In addition the number of people employed using their car for getting work is higher than in Suffolk and the East of England as a whole. Combined with low levels of public transport use, this represents a significant sustainability challenge to the Borough.

Government policy seeks to reduce car parking provision where this can improve the sustainability of centres and access to them. However, this must not be at the expense of harming the attraction of Bury St Edmunds as a retail and employment centre and any reductions should be accompanied by improvements to public transport provision.

Cultural Heritage

In St Edmundsbury there are 35 conservation areas, over 3,000 Listed Buildings, 1015 buildings are also restricted by an Article 4 Direction. There are 69 Ancient Monuments and 4 listed parks and gardens.

One thousand of the Listed Buildings are within Bury St Edmunds and are seen as a valuable and essential part of Suffolk's identity. Much of Bury St Edmunds' medieval history is seen within the town centre although some is hidden behind elegant 17th and 18th century facades.

Contaminated land

There are no sites determined as Contaminated Land as defined under Part IIA of the Environmental Protection Act 1990 within St Edmundsbury and this has been the case since Part IIA came into force in April 2000.

Flooding

Although parts of the Borough fall within areas at risk from flooding, a very low proportion of property within St Edmundsbury are actually at risk of flooding. In recent years, very few planning applications for development in flood risk areas in St Edmundsbury have been approved against Environmental Agency advice.

Air quality

The air quality throughout the borough, and in Bury St Edmunds, is generally good with no Air Quality Management Areas (AQMAs). However, a small area in the centre of Great Barton adjacent to the A143 was previously declared as an AQMA. The AQMA incorporated Gatehouse Cottage and 1-8 The Street, Great Barton, Suffolk, was in force between 1 June 2010 and 1 January 2013 and was designated in relation to a likely breach of the Nitrogen Dioxide (annual mean) objective. The revocation of the AQMA was undertaken on a technical basis and not due to compliance with the NO2

objective. Monitoring continues within the former AQMA and levels of NO2 have fallen steadily from 48.5mg/m3 in 2010 to 43.7mg/m3 in 2014. The objective is 40mg/m3.

Trends: Levels of NO2 are measured throughout the borough and are generally shown to have fallen or remained relatively steady throughout the past 5 years.

Landscape and biodiversity

The landscape of St Edmundsbury is predominantly rural, with every village having a population of fewer than 3,000 and two major towns of Haverhill and Bury St Edmunds. The borough is an area of unspoiled natural beauty with a keen sense of its rural heritage. Many villages have an important historic character, with thatched and timber framed cottages common; Clare and Cavendish are perhaps the two best known.

The borough includes one Special Protection Area (SPA) (Breckland), two Special Areas of Conservation (SAC) (Breckland and Waveney & Little Ouse Valley Fens), 22 Sites of Special Scientific Interest (SSSI), 144 County Wildlife Sites, two Local Nature Reserves (LNR) and three Country Parks.

The majority of the SSSIs in the borough are partly in an unfavourable or mixed condition. However, 19 of the 23 SSSIs are meeting their Public Service Agreement (PSA) targets (i.e. are in favourable or unfavourable but recovering condition) in over half of their areas.

A Landscape Characterisation Study undertaken by Suffolk County Council identified 14 landscape types within St Edmundsbury, the characters of which are distinct and individually important to the character of the borough.

These landscape types are:

- Ancient plateau claylands
- Estate sandlands
- Plateau estate farmlands
- Rolling estate farmlands
- Rolling estate sandlands
- Rolling valley farmlands
- Rolling valley farmlands & furze
- Undulating ancient farmlands
- Undulating estate farmlands
- Urban
- Valley meadowlands
- Valley meadows & fens
- Wooded chalk slopes
- Wooded valley meadowlands & fens

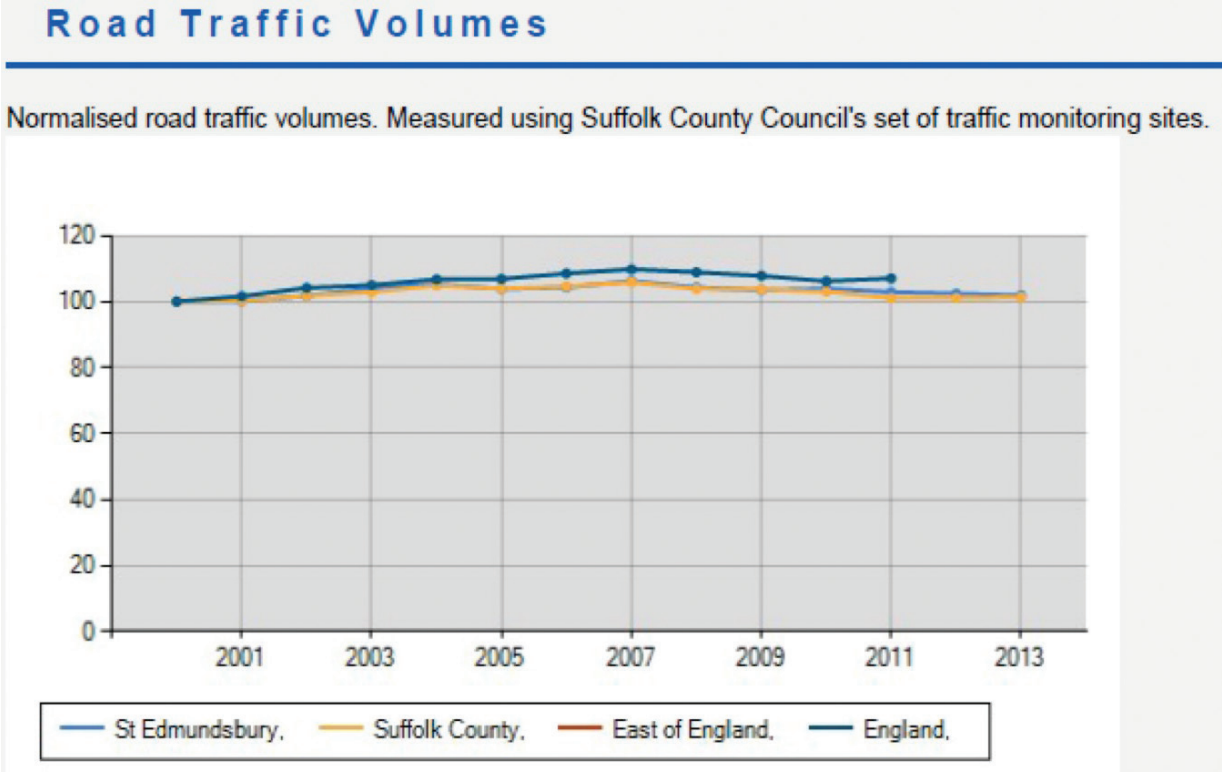
Soils

The majority of farmland in the borough is either Grade 2 or 3 which are generally considered to be the best and most versatile types of agricultural land. This agricultural land is therefore a valuable resource within St Edmundsbury.

Traffic

Traffic volumes have decreased by 1.2% on the A14 through Bury St Edmunds from 2007. This could be due to the economic downturn. It is considered that the majority of traffic is caused by an increase in car use, particularly for journeys to work, however the number of lorries using the roads has dropped, possibly for the reason mentioned above.

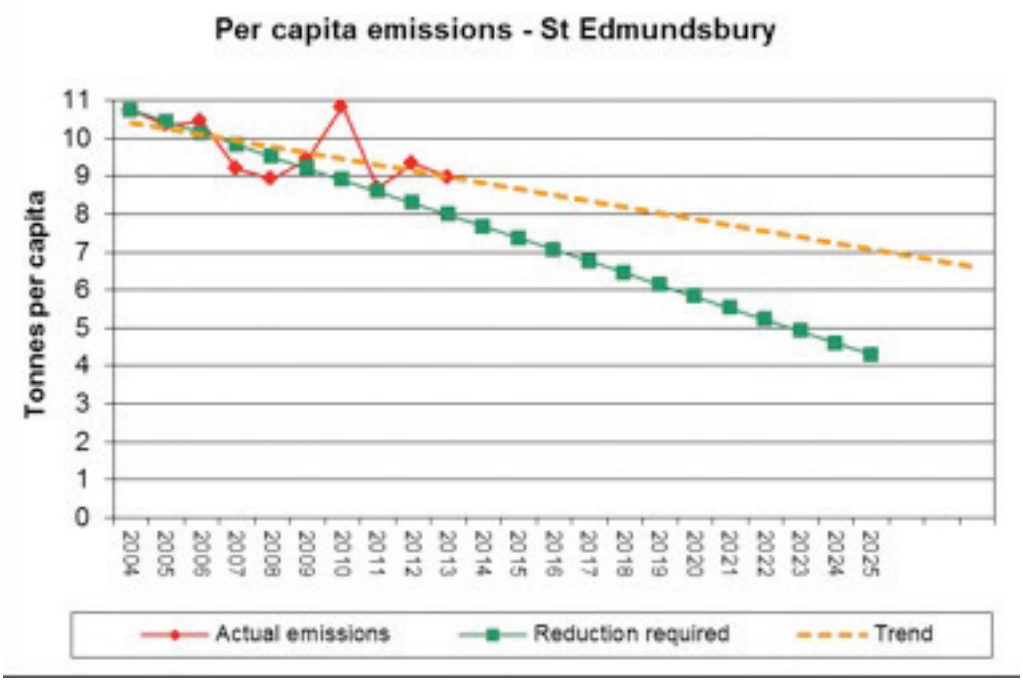
Figure 3. Road Traffic Volumes



Source: Suffolk Observatory

Across Suffolk there has been a slight fall in use of sustainability modes of transport to work in 2012 and a 10% decline in St Edmundsbury over the period 2009 to 2012.

Figure 4: Emissions



Source: SEBC

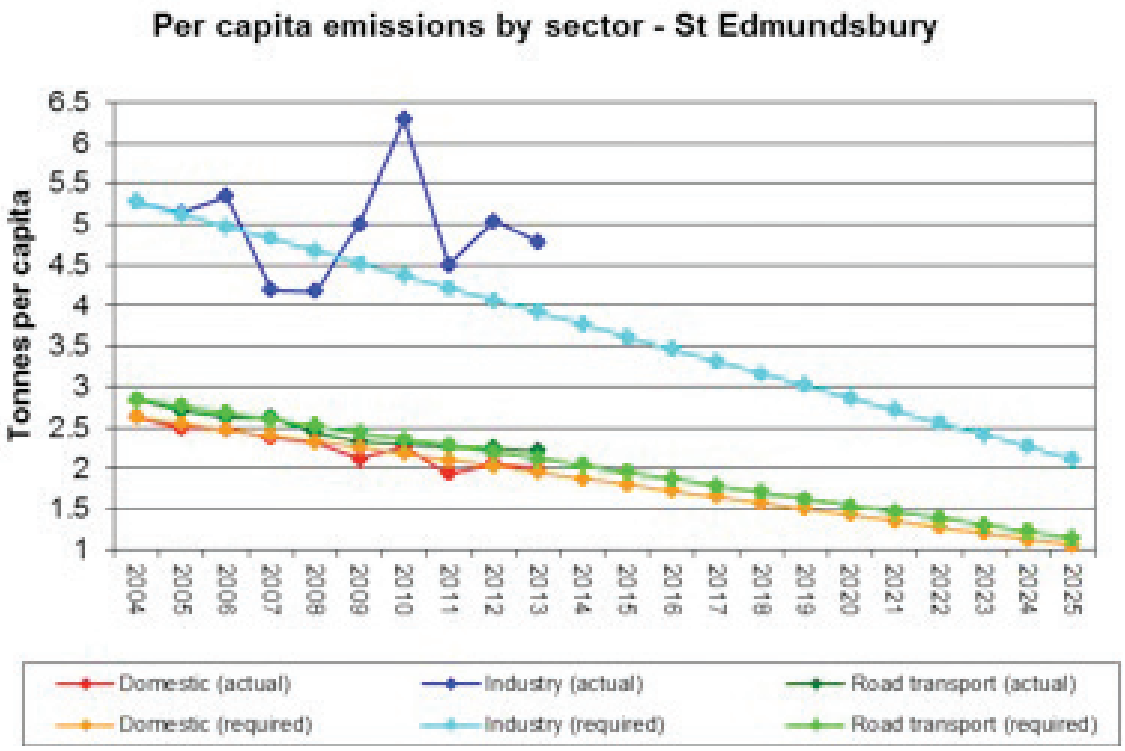
Table 7: Emissions by sector St Edmundsbury

Year	Industry and Commercial	Domestic	Road Transport	Grand Total	Population ('000s, mid-year estimate)	Per Capita Emissions (t)	Required (total)	Per capita (industry)	Required (industry)	Per capita (domestic)	Required (domestic)	Per capita (road transport)	Required (transport)
2004	529.0	263.4	285.5	1,077.9	100.3	10.7	10.7	5.3	5.3	2.6	2.6	2.8	2.8
2005	531.3	257.7	280.0	1,069.0	103.3	10.3	10.4	5.1	5.1	2.5	2.6	2.7	2.8
2006	560.4	260.5	275.6	1,096.6	104.9	10.5	10.1	5.3	5.0	2.5	2.5	2.6	2.7
2007	445.3	252.4	279.0	976.7	106.1	9.2	9.8	4.2	4.8	2.4	2.4	2.6	2.6
2008	449.2	249.1	262.5	960.8	107.5	8.9	9.5	4.2	4.7	2.3	2.3	2.4	2.5
2009	542.9	229.3	252.2	1,024.5	108.4	9.5	9.2	5.0	4.5	2.1	2.3	2.3	2.4
2010	692.2	248.5	252.9	1,193.6	110.0	10.9	8.9	6.3	4.4	2.3	2.2	2.3	2.4
2011	501.1	215.4	252.3	968.9	111.4	8.7	8.6	4.5	4.2	1.9	2.1	2.3	2.3
2012	562.3	229.5	251.1	1,042.9	111.6	9.3	8.3	5.0	4.1	2.1	2.0	2.2	2.2
2013	532.3	222.0	246.6	1,000.9	111.3	9.0	8.0	4.8	3.9	2.0	2.0	2.2	2.1
2014							7.7		3.8		1.9		2.0
2015							7.4		3.6		1.8		2.0
2016							7.1		3.5		1.7		1.9
2017							6.8		3.3		1.7		1.8
2018							6.4		3.2		1.6		1.7
2019							6.1		3.0		1.5		1.6
2020							5.8		2.9		1.4		1.5
2021							5.5		2.7		1.4		1.5
2022							5.2		2.6		1.3		1.4
2023							4.9		2.4		1.2		1.3
2024							4.6		2.3		1.1		1.2
2025							4.3		2.1		1.1		1.1

Source: SEBC

Figure 5. Emissions by sector

St Edmundsbury has the highest carbon emissions of any district in Suffolk.



Source: SEBC

Energy Consumption

Average annual electricity consumption figures for St Edmundsbury show a decrease in domestic electricity consumption and an increase in industrial energy consumption since 2003. Figures also indicate that average domestic and industrial energy consumption in the borough is above both that for the East of England.

Table 8: Energy Consumption in St Edmundsbury

	Domestic consumers		Commercial and industrial consumers		Sales per consumer	
	Sales - GWh	Number of MPANs (thousands)	Sales - GWh	Number of MPANs (thousands)	Average domestic consumption kWh	Average commercial and industrial consumption kWh
2010	212.2	46.6	332.3	4.5	4,557	74,306
2011	208.4	46.6	290.7	4.5	4,468	64,974
2012	205.5	46.8	328.1	4.5	4,387	72,491

Source: www.gov.uk/government/collections/sub-national-electricity-consumption-data

The table shows average electricity consumption per domestic consumer has decreased over the period 2010 to 2012. Average commercial and industrial consumption has decreased from 2010 to 2012, although there was a drop in consumption in 2011.

Table 9: Electricity consumption statistics 2013

	All domestic		*Non-domestic*		*All*		
Local Authority	Mean consumption	Median consumption	Mean consumption	Median consumption	Mean consumption	Median consumption	Average domestic consumption per household (kWh) (2)
Babergh	4,697	3,606	61,611	9,081	9,650	3,717	4,840
Forest Heath	4,667	3,432	95,882	9,731	13,086	3,554	5,007
Ipswich	3,700	3,086	63,652	10,203	8,136	3,165	3,766
Mid Suffolk	4,910	3,806	66,996	9,083	10,317	3,918	5,014
St Edmundsbury	4,297	3,413	76,859	10,531	10,697	3,520	4,323
Suffolk Coastal	4,505	3,473	62,235	8,573	9,395	3,572	4,823
Waveney	3,889	3,122	74,870	8,207	9,245	3,201	4,167
EAST ENGLAND	**4,257**	**3,416**	**72,864**	**9,250**	**9,587**	**3,499**	**4,410**

Source: DECC

Table 10: Gas consumption in St Edmundsbury

	Domestic consumers		Commercial and industrial consumers		Sales per consumer	
	Sales - GWh	Number of MPANs (thousands)	Sales - GWh	Number of MPANs (thousands)	Average domestic consumption kWh	Average commercial and industrial consumption kWh
2010	458.9	32.4	2,212.9	0.5	14,166.2	4,895,729.8
2011	430.4	32.6	1,684.5	0.4	12,209.9	3,751,668.2

Source: www.gov.uk/government/collections/sub-national-gas-consumption-data

Average gas consumption per domestic consumer decreased in St Edmundsbury over the period 2010 to 2011. There was also a decrease in commercial and industrial gas consumption from 2010 to 2011.

Topography and land use

The topography of the Borough is typified by gently rolling lowland cut by small rivers and their tributaries. The landscape contains considerable variety, ranging from heaths and afforested areas of the Brecks in the north, to the river valley of the Upper Stour in the south. The Borough divides into north and south with a central plateau in the area of Chedburgh at 125m above Ordnance Datum.

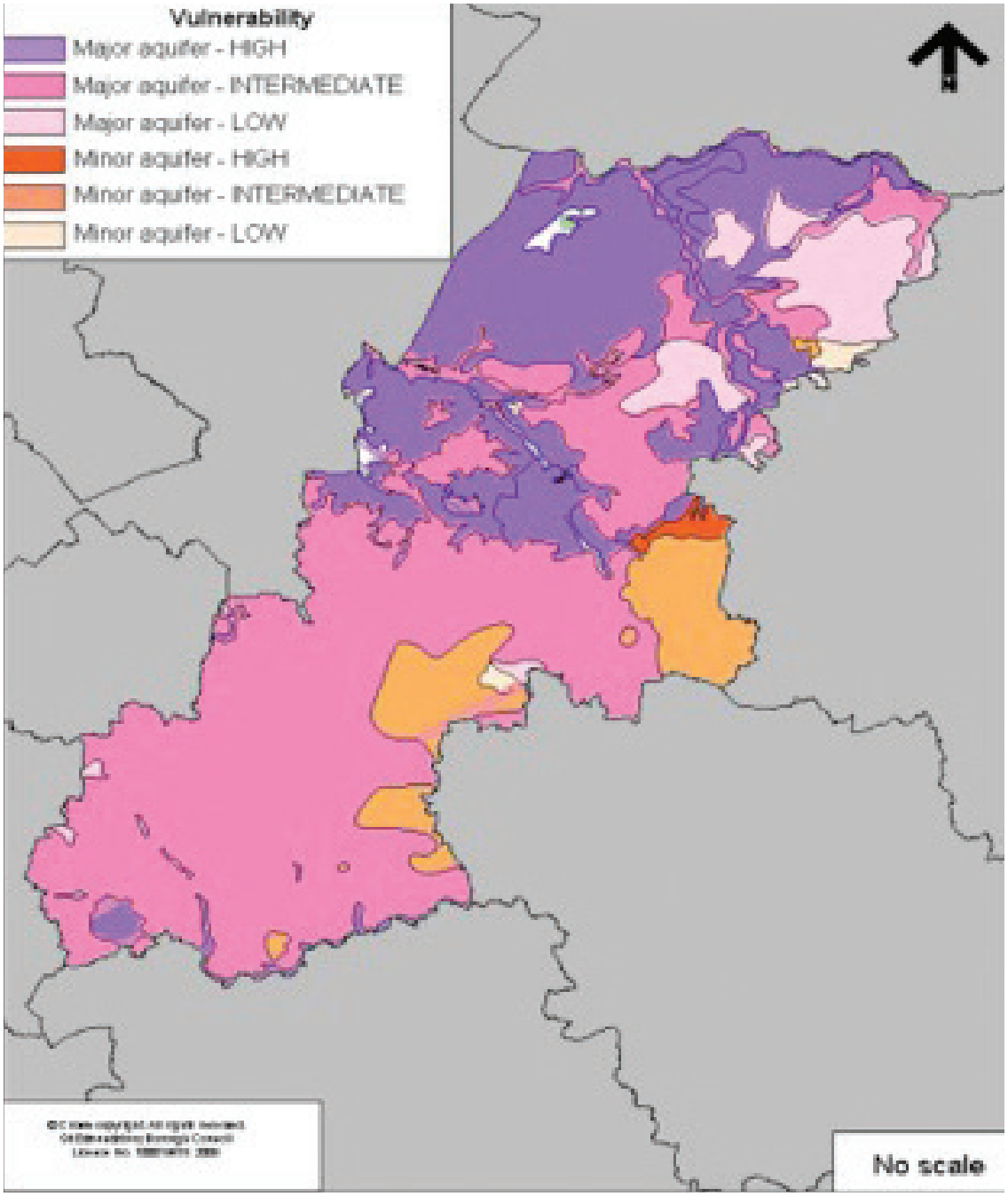
Arable farming is the principal land use with the commonest crops being wheat, barley, rape and sugar beet. However, the rural landscape is varied with water meadows along main streams and woodland. Industries, like woollens, have been superseded by light engineering and service industries principally in Bury St Edmunds and Haverhill. Food processing is strong in the local economy, including sugar beet, pig and poultry processing.

Water resources

The Cretaceous Chalk forms the main aquifer in the area. It comprises a pure, fine-grained, high porosity limestone with the presence of fissures giving high secondary porosity. Beneath the Chalk, groundwater is also present in the Lower Greensand of the Lower Cretaceous, comprising a highly permeable loosely cemented sandstone with local clay beds.

The Crag Sands and unconsolidated chalky clay, sand silt and gravel deposits overlying the Chalk are generally considered to be in hydraulic continuity with the Chalk. These can act as local sources of water supply although they are prone to drop in yield during drought. Since they are in continuity with the Chalk, they act as a means for surface water to percolate into deep storage in the Chalk. The Chalk is identified as being of high vulnerability from contamination because of the importance of the groundwater resources and relative lack of protection from superficial deposits (Figure 6).

Figure 6. Groundwater vulnerability in St Edmundsbury



Water quality

The quality of water within the borough's rivers is generally fair to good, in terms of chemical and biological quality. However the chemical quality of the rivers is worse than the average quality of rivers in the East of England. There are two rivers which flow through Bury St Edmunds: the River Linnet and River Lark.

The Environment Agency monitors three water quality indicators in rivers for biological, chemical and nutrient status. The biological quality is an indication of overall health of rivers, the chemical quality is an indicator of organic pollution in general and nutrients status indicates the phosphate and nitrates in rivers. This is monitored on an annual basis. The Environment Agency data indicates the ecological status of the many river bodies in St Edmundsbury has shown either no class improvement or a decline from 2009 to 2013 but this may be due to a change in the 2013 classification including additional (failing) elements which weren't considered in 2009. The chemical and nutrient status showed a mixed picture with some improvement and some decline in some of the water bodies between 2009 and 2013.

A summary of the main issues identified is presented in the Table 11 below:

Key Sustainability Issues (Task A3)

Table 11: Sustainability Issues identified

SEA Themes/SA Objectives	Implications for the WSOH proposal	Plans and Programmes	Evolution without WSOH
Environmental			
Water quality and resources 1. To maintain/ improve air and water quality (including HGV movements) in line with national standards limits 3. To use water and mineral resources efficiently, and re-use and recycle where possible	The quality of water within the borough's rivers is generally fair to good in terms of chemical and biological quality. However the chemical quality of the rivers is worse than the average quality of rivers in the East of England. The study area lies within groundwater source protection zones and major aquifer areas. For WSOH to maintain water quality of surface and groundwater.	SCC Preliminary Flood Risk Assessment Report 2011 Water Framework Directive (England and Wales) Regulations 2000/60/EC. Groundwater Regulations 1998	This issue would be addressed in the absence of the proposal through the Development Management Policies.

SEA Themes/SA Objectives	Implications for the WSOH proposal	Plans and Programmes	Evolution without WSOH
Soil 2. To conserve soil resources and quality	The majority of farmland in the borough is either Grade 2 or 3 which are generally considered to be the best and most versatile types of agricultural land. The high level of growth in St Edmundsbury required by the East of England Plan is likely to result in the loss of some of this valuable land. Opportunity for WSOH to reduce the loss of valuable agricultural land through the promotion of the efficient use of land through well designed developments.	Defra Safeguarding our Soils, A Strategy for England, 2009	This issue would be addressed in the absence of the proposal through the Development Management Policies.
Landscapes and townscapes 7. To maintain/ improve the quality and local distinctiveness of landscapes/ townscapes	There are 14 landscape types within the borough and the need to develop will continue to put pressure upon them. The quality of the wider settings of the landscape types should be preserved and enhanced with sympathetic development adjacent to designated sites which blends with the environment.	Suffolk Historic Landscape Characterisation Map 2008	The quality of the landscape would be protected through the Core Strategy and Development Management Policies.
Contributions to climate change and vulnerability to climatic events 8. To reduce contributions to climate change 10. To reduce vulnerability to flooding	Historic evidence has demonstrated that extreme weather conditions have the potential to cause damage through flooding. Opportunity for WSOH to promote development in locations that reduce the susceptibility of flooding through the location of proposed new development on land outside of Flood Zones 2 and 3.	Defra Flood and Coastal Erosion Risk Management Appraisal Guidance (FCERMAG) SCC Preliminary Flood Risk Assessment Report 2011	This issue of flood risk would be controlled in the absence of the proposal through the Core Strategy and Development Management Policies.

SEA Themes/SA Objectives	Implications for the WSOH proposal	Plans and Programmes	Evolution without WSOH
Biodiversity and geodiversity 6. To maintain/ improve biodiversity and geodiversity	There is pressure on rich biodiversity. There a number of designations within the borough and these should not be detrimentally affected by development. Within Bury St Edmunds there are a number of parks and rivers which could be rich in biodiversity and these should be respected. Opportunity for the Bury St Edmunds Vision 2031 to ensure that development limits the effect on the habitats and species of the large number of designated sites within the borough and are protected from destruction and loss and, where possible, are enhanced. The settings of the sites should be safeguarded and nearby developments should be screened to reduce the visual impact.	Suffolk Biodiversity Action Plan, Updated October 2014	The issue would still be addressed though through the Core Strategy.
Historical and archaeological importance 11. To conserve and where appropriate enhance areas of historical and archaeological importance	The Suffolk Historic Environment Record within the Borough. The majority relate to undesignated heritage assets of local and regional significance. Of these, over 500 are in Bury St Edmunds and 100 in Haverhill. Designated and non-designated heritage assets should be protected, enhanced and promoted through the site allocation process.	Heritage in Local Plans: How to create a sound plan under the NPPF (2012) Planning (Listed Buildings and Conservation Areas) Act 1990	Heritage assets would be protected through the Core Strategy and Development Management Policies.

SEA Themes/SA Objectives	Implications for the WSOH proposal	Plans and Programmes	Evolution without WSOH
Energy Consumption 8. To reduce contributions to climate change	Average annual electricity consumption figures for St Edmundsbury show a decrease in domestic electricity consumption and an increase in industrial energy consumption since 2003. Figures also indicate that average domestic and industrial energy consumption in the borough is above for that for the East of England. Opportunity for WSOH to encourage new development to use renewable energy or low CO2 energy sources.	SCC Traffic monitoring Energy data from District Councils' Home Energy survey and DTi	This issue would be addressed through the Development Management Policies.
High CO2 Emissions per Capita 8. To reduce contributions to climate change	Opportunity for WSOH to promote renewable, low carbon energy technologies and energy efficiency measures within the borough. The location of new development with respect to existing and proposed sustainable transport networks can assist with the reduction of CO2 emissions.	SCC Traffic monitoring Energy data from District Councils' Home Energy survey and DTi	The issue will be addressed through the Development Management Policies.
Waste Mileage 5. To reduce the effects of traffic on the environment	Opportunity for WSOH to reduce waste mileage.	Suffolk County Council Waste Core Strategy 2011	Without WSOH future waste mileage may not be appropriately supported.
Air Quality 5. To reduce the effects of traffic on the environment	The air quality throughout the borough, and in Bury St Edmunds, is generally good with no Air Quality Management Areas. Opportunity for WSOH to maintain air quality.	The Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007 Suffolk Local Authorities – Air Quality Management and New Development 2011	This issue would be addressed through the Development Management Policies.

SEA Themes/SA Objectives	Implications for the WSOH proposal	Plans and Programmes	Evolution without WSOH
Social Issues			
Health 13. To maintain/ improve health of the population overall 14. To minimise the impacts arising from the provision of waste facilities developments on where people live	The trend demonstrates that there is an over 50 per cent reduction in the number of complaints in respect of odour, noise and light pollution in St. Edmundsbury in the past five years. Opportunity for WSOH to ensure that noisy land uses are located away from residential areas. Opportunity to promote the use of landscaping and attenuation bunds to reduce the impact of noise-creating activities.	SEBC Monitoring Report 2013	This issue would be addressed through the Development Management Policies.
Population growth 4. To reduce waste 9. To move treatment of waste up the waste hierarchy	The population of St Edmundsbury has grown significantly over the past two decades (by 16.9%) and continues to show increase. Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/ composting increased, absolute volumes have grown for both categories.	Suffolk Observatory	Without WSOH future population growth pressure on waste services may not be appropriately supported by the right type of development.

SEA Themes/SA Objectives	Implications for the WSOH proposal	Plans and Programmes	Evolution without WSOH
Economic Issues			
15. To achieve sustainable levels of prosperity and economic growth 16. To encourage and accommodate both indigenous and inward investment 17. To encourage efficient patterns of movement in support of economic growth 18. To facilitate delivery of the One Public Estate Programme	Bury St Edmunds businesses want the council to reduce costs of services, help with rates and improve transport and parking. There is also a high level of demand for smaller workspace units. There is high dependency upon public sector employment. Household and business growth is, and will continue to, increase demand for waste services and create new commercial opportunities. Some of the existing buildings and arrangements for operational services are not sustainable in the long term, being unable to accommodate growth in demand, are inefficient with high running costs and their location reduces opportunities for staff and operational flexibility. There is a need for reduction of costs of council services and provision for small and large business units. • Opportunities for WSOH: • A reduction in the costs to the public purse of waste and depot operations in West Suffolk. • Facilities, which offer operational flexibility and sustainability – which can meet future household and business growth and an increasingly stringent legislative environment. • Improved facilities for the public and commercial customers that also enable organisations to fully capitalise on commercial opportunities.	The One Public Estate Programme St Edmundsbury Economic Assessment and Action Plan 2010-2015 Suffolk's Local Economic Assessment 2011 Suffolk's Local Transport Plan, 2011-2031	Without WSOH identified economic issues may not be appropriately addressed by the right type of development.

Limitations on information

Some uncertainties exist around the precise impacts of climate change on Suffolk and that evidence base is incomplete.

The SA Framework, including objectives, leading questions and indicators

The SA framework is a key element in conducting the SA; it incorporates the baseline data and identifies key sustainability issues into a clear structure which can be used to assess the effects resulting from the implementation of the proposals. The use of objectives is not a formal requirement, but it is recognised as a helpful tool in which social, environmental and economic effects can be predicted and evaluated at the key stages in the production of the document.

The proposed SA Objectives address the full cross-section of sustainability issues, including social, economic and environmental factors and have been developed from:

- A review of relevant plans, policies and programmes; including international, European, national, regional and local guidance (Task A1);
- A thorough analysis of the environmental, economic and social baseline information for Northumberland (Task A2);
- An identification of key sustainability issues (Task A3).

SA objectives are also derived from external objectives to which Responsible Authorities need to have regard independently from the SEA process and include economic and social objectives. This SA process has adapted SA objectives to take account of local circumstances and concerns.

The Framework consists of 18 objectives, of which progress towards will be measured using related indicators as listed in Table 12. The indicators also serve to clarify the intended interpretation of each objective.

The SA framework objectives were used consistently to appraise the proposal and were developed from the work undertaken to review the list of relevant plans and programmes and the identified baseline position, including the key sustainability issues.

Table 12: SA Objectives, associated questions & indicators

SA objective	Questions	Related Data/ Indicators
Environmental		
1. To maintain/ improve air and water quality (including HGV movements) in line with national standards limits	• Will it improve the quality of inland waters? • Is the site proposed within a groundwater source protection zone and/ or within an area designated as major aquifer? Is the site proposed within water abstraction management area? • Is the site proposed within the area with good access to mains water and waste networks with existing capacity? Will it improve air quality? • Will it affect levels of the 7 National Objective pollutants for local air quality (SO2, NO2, PM10, benzene, 1,3-butadene, CO, Pb).	• Concentration of air pollutants • AQMAs • Water quality in rivers. • Groundwater quality.
2. To conserve soil resources and quality	• Will it minimise the loss of greenfield land to development? • Will it minimise loss of the best and most versatile agricultural? • Will it affect the amount of contaminated land? • Will it affect quality of soils? • Is the site proposed on greenfield land? • Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3)? • Will it lead to remediation of contaminated land?	• Number and percentage of new development completed on greenfield land. • Allocations on best and most versatile agricultural land (grades 1, 2, and 3a) • No. of waste management sites on greenfield land. • Waste management sites/ development on best agricultural land. • Map/data showing soil quality. • Number of potential and declared contaminated sites returned to beneficial use. • Number / area of organic farms (ha).

SA objective	Questions	Related Data/ Indicators
3. To use water and mineral resources efficiently, and re-use and recycle where possible	• Will it promote sustainable use of minerals? • Will it promote sustainable use of water? • Will it maintain water availability for water dependant habitats? • Will it affect rates of abstraction/ water use? • Will it affect grey water recycling?	• Recycled aggregate production. • Daily domestic water use (per capita consumption, litres) for St Edmundsbury. • Will it promote the wise use of water, taking account of climate change? • Water availability for water dependent habitats. • Use of recycled water on waste sites.
4. To reduce waste	• Will it reduce household waste? • Will it increase waste recovery and recycling?	• Household and municipal waste produced. • Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled.
5. To reduce the effects of traffic on the environment	• To minimise effects of HGV traffic on the environment • Will it affect movements on Strategic Lorry Route Network? • Will it increase the proportion of journeys made using modes other than the private car? • Will it reduce waste mileage?	• Traffic volumes in key locations Location to maximize tonnes per miles • Location of Strategic Lorry Routes • Percentage of journeys to work undertaken by sustainable modes

SA objective	Questions	Related Data/ Indicators
6. To maintain/ improve biodiversity and geodiversity	• Will it maintain and enhance sites designated for their nature conservation interest statutory: SSSIs, SPA, SAC, LNRs and non-statutory: County Wildlife Sites (CWS)? • Will it avoid disturbance or damage to protected species and their habitats? • Will it help deliver targets and action for habitats and species within the Suffolk Biodiversity Action Plan (BAP)? • Will it help to reverse the national decline in farmland birds? • Will it protect and enhance sites, features and areas of geological value in both urban and rural areas? • Will there be enhancement opportunities as a result of development? • Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 2km of a SSSI. • Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 500m of a site. • Are BAP habitats known to be on the site? • Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS Regionally Important Geological/Geomorphological Sites)?	• Change in number and area of designated ecological sites. Condition of CWS (National Indicator 197). • Development proposals affecting protected species outside protected areas. • Achievement of Habitat Action Plan targets. • Achievement of Species Action Plan targets. • Development proposals affecting BAP habitats outside protected areas. • Bird survey results. • Reported condition of ecological SSSIs.

SA objective	Questions	Related Data/ Indicators
7. To maintain/ improve the quality and local distinctiveness of landscapes/ townscapes	• Will it reduce the amount of derelict, degraded and underused land? • Will it improve the landscape and/or townscape?	• Changes in landscape (Landscape Character Assessment) • Area of designated landscape (SLAs & AONBs and The Broads) • Number of TPOs affected • Number of field boundaries affected • Light pollution • Number of planning applications refused for reasons due to poor design
8. To reduce contributions to climate change	• Will it reduce emissions of greenhouse gases by reducing energy consumption? • Will the site proposal promote the incorporation of small-scale renewable in developments?	• Consumption of electricity - Domestic use per consumer and total commercial and industrial use. • Consumption of energy. • Use of low carbon technologies. • Location to maximize tonnes per miles. • Opportunities for utilizing renewable or low-carbon energy supply systems.
9. To move treatment of waste up the waste hierarchy	• Will it affect recycling/reuse measures? • Will it affect amount of waste to landfill? • Will it affect energy recovery from waste?	• Tonnage recycled, composted and landfilled.
10. To reduce vulnerability to flooding	• Will it minimise the risk of flooding to people and property from rivers and watercourses? • Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?	• Flood Risk – Planning applications approved against Environment Agency advice. • Properties at risk of flooding from rivers. • Incidence of fluvial flooding (properties affected). • SFRA results.

SA objective	Questions	Related Data/ Indicators
11. To conserve and where appropriate enhance areas of historical and archaeological importance	• Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas? • Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	• Number of listed buildings and buildings at risk. • Area of historic parks and gardens. • Number and area of Conservation Areas (CAs) and Article 4 directions. • Number of Conservation Area Appraisals (CAAs) completed and enhancement. schemes (in conservation areas) implemented. • Number of Scheduled Monuments (SMs) damaged as a result of development. • Number of applications affecting known or unknown archaeological site but judged of high potential and approved with conditions requiring prior excavation or recording during development.
Social		
12. To maximise opportunities for new/ additional employment	• Will it to affect direct employment/ ancillary employment in/to the waste industry?	• Average earnings in waste industry • Employment figures for waste industry
13. To maintain/ improve health of the population overall	• Will it impact on the quality and quantity of footpaths? • Will it affect human health? • Will any WTS facilities be sited within 250m of residential properties? • Does it promote the use of landscaping and attenuation bunds to reduce the impact of noise-creating activities?	• Percentage of footpaths open to public • HPA position statement on Municipal Solid Waste Incineration • Enviros Report: Review of Environmental and Health Effects of Waste Management: Municipal Solid Waste and Similar Wastes • Healthy Sustainable Communities- what works?

SA objective	Questions	Related Data/ Indicators
14. To minimise the impacts arising from the provision of waste facilities developments on where people live	• Will it cause a statutory nuisance, in terms of odour? • Have noise control planning conditions been set? • Will it affect the EPA1990 in terms of noise? • Have dust control planning conditions been set? • Will it affect the EPA1990, in terms of dust? • Will it affect fly tipping in the County?	• Number of human receptors. • Compliance with noise/dust control conditions. • Complaints relating to noise, dust and odour (Districts Environmental Health officers and SCC.) • Fly tipping statistics (SCC). • Light pollution maps.
Economic		
15. To achieve sustainable levels of prosperity and economic growth	• Will it impact on long-term investment in waste management infrastructure? • Will it impact on an appropriate/ adequate supply of land? • Will it offer operational flexibility and sustainability? • Does it aim to optimise the number and location of Household Waste and Recycling Centres, and enhance quality of service provision?	• Employment land availability. • Amount of waste exported. • Amount of waste treated within county.
16. To encourage and accommodate both indigenous and inward investment	• Does it provide further capacity for commercial services and income? • Does it contribute to maintaining/ improving existing waste infrastructure? • Will it unable to accommodate growth in demand and create opportunities for staff and operational flexibility?	• Amount of savings achieved. Efficiency and income generated. Opportunities for staff created in waste industry.

SA objective	Questions	Related Data/ Indicators
17. To encourage efficient patterns of movement in support of economic growth	• Will it impact on road dependency? • Will it affect alternative modes of transport of waste? • Will it reduce commuting? • Will it impact on road dependency? • Will it affect alternative modes of transport of waste? • Will it improve accessibility to work by public transport, walking and cycling?	• No of developments where a green travel plan is submitted/ condition of development. • Distances travelled to work for the resident population. • Number / percentage of people working from home as main place of work. • Number of developments where a travel plan is submitted or is a condition of development. Percentage of journeys to work undertaken by sustainable modes.
18. The One Public Estate Programme	• Does it generate capital receipts? • Does it reduce running costs? • Does it deliver more integrated customer focussed services? • Does it contribute to reduction of costs of council services and provision for small and large business units? • Does it contribute to releasing land for Phase II of the Public Service Village initiative? • Will it improve the resilience of business and the economy?	• Capital receipts. • Costs reduction.

Chapter 3: Appraisal Methodology

Compatibility testing of the WSOH objectives against the SA objectives

The objectives of the WSOH proposal need to be tested against the SA objectives to identify both potential synergies and inconsistencies. This information may help in developing alternatives during further development of the proposal and may, in some cases, help to refine its objectives. Appendix 1 of this report shows a test of WSOH objectives against the SA objectives. The assessments in Appendix 1 are based on a symbol based system which indicates the degree of compatibility between SA objectives and WSOH objectives.

Key

- Compatible
- Neutral
- Incompatible

The suggested objectives are all likely to be compatible (implementation of the objective will also help achieve the SA objective) or neutral (the objective of the WSOH can be implemented simultaneously with the SA objective without them hindering each other).

Predicting the effects of WSOH solutions options and sites options against the SA Objectives

Testing solutions options against the 18 SA objectives is presented in Appendix 2. It uses symbol based scoring system and provides a brief commentary explaining and expanding on the scoring. The assessments are based on a symbol based system which indicates the degree of compatibility of the SA objectives. The WSOH options were derived from the draft options considered by authorities as a result of ongoing meetings with stakeholders. 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 EIA or a project, the WSOH solutions options were kept at the strategic level.

Key

++	Very positive effect
+	Positive effect
0	Neutral effect
–	Negative effect
––	Very negative effect
?	Uncertain

Who carried out the SA

An independent and suitably qualified SA consultant was working together with the councils during the initial stages of the SA process, identifying and scoping strategies and plans and collecting baseline data. A common SA framework was developed by the consultant who carried out the SA assessments on the WSOH proposal and findings were presented in this report. This SA Report will be subject for public consultation following which the Final SA Report will be prepared in light of the consultation responses received.

Difficulties encountered

There were some difficulties in carrying out the appraisal, mostly relating to the choice of the appropriate assessment methodology for this type of proposal.

Another issue was the precise determination of the strategic nature and the level of details that this SA assessment should go into to assess the sustainability of WSOH proposal.

Chapter 4: WSOH Assessment Results

Sustainability Appraisal of WSOH objectives

The compatibility analysis in Appendix 1 shows no conflicts between SA objectives and objectives of WSOH. The suggested objectives are all likely to be compatible (implementation of the proposal objective will facilitate implementation of the SA objective) or neutral (the proposal objective can be implemented simultaneously with the SA objective without them hindering each other). Due to no conflict between the two sets of objectives, there is no particular need to refine the WSOH objectives on this basis. Economic SA objectives are particularly compatible with the WSOH objectives. However, views on this will be welcomed, and there may, of course, be other reasons as to why some of the WSOH objectives should be changed.

Developing and refining alternatives and assessing effects

In conducting SA, Responsible Authorities must appraise the likely significant environmental effects of implementing the policy and any reasonable alternatives. Each alternative can be tested against the SA objectives, with positive as well as negative effects being considered, and uncertainties about the nature and significance of effects noted.

Alternatives considered often include scenarios termed 'do nothing' and 'business as usual'. 'Do nothing' means not introducing a policy or proposal where none already exists. 'Business as usual' means a continuation of a policy or proposal, as an alternative to preparing a new one.

What the Directive says:

> *'… an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated" (Article 5.1). Information to be provided in the Environmental Report includes "an outline of the reasons for selecting the alternatives dealt with" (Annex I (h)).*

It is desirable for the Responsible Authority to predict and evaluate the effects of elements of the evolving plan or programme, including alternatives, while they are working on them. Where adverse effects are seen to be likely, possibilities for mitigation must be considered.

It is not the purpose of the SA to decide the alternative to be chosen for the plan or programme. This is the role of the decision-makers who have to make choices on the plan or programme to be adopted. The SA simply provides information on the relative environmental performance of alternatives, and can make the decision-making process more transparent.

Developing solutions options and alternatives for WSOH proposal

The following options were considered in terms of solutions options for WSOH proposal for the SA assessment:

Option 1	do nothing
Option 2	implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue
Option 3	implement Rougham Hill planning permission and relocate depots
Option 4	co-locate all facilities on new site
Option 5	co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill

	Option1	Option 2	Option 3	Option 4	Option 5
Waste transfer facility	As existing: Red Lodge, Haverhill & Thetford	Rougham Hill	Rougham Hill	New site	New site
BSE depot	As existing: Olding Road	As existing: Olding Road	New site	New site	New site
Mildenhall depot	As existing: Holborn Avenue	As existing: Holborn Avenue	Closed	Closed	Closed
Household waste recycling centre	As existing: Rougham Hill	Redeveloped at Rougham Hill	Redeveloped at Rougham Hill	New site	As existing: Rougham Hill

Developing sites selection options and alternatives for WSOH proposal

Identifying a suitable site for a depot, WTS and HWRC is a challenging process. Site suitability depends on numerous technical, environmental, economic, social and political criteria. When selecting a site, a balance needs to be achieved amongst the multiple criteria that might have competing objectives. Less than ideal sites may still present the best option due to transportation, environmental, and economic considerations. Yet another set of issues that must be addressed relates to public concern or opposition, particularly from people living or working near the proposed site.

Suffolk County Council has been working to establish a new network of waste transfer stations, close to major centres of population (and therefore close to waste generation) since 2011. In 2012, work to establish the most appropriate location for a waste transfer facility to serve West Suffolk identified that Bury St Edmunds would be the right location for such a facility.

After an assessment of the potential sites by Suffolk County Council, the existing Rougham Hill household waste recycling centre (HWRC) site was identified as the most appropriate place to locate the WTS facility. A full planning application for the Rougham Hill site was submitted and approved in 2013.

Whilst planning permission has been approved for the Rougham Hill site, this alternative proposal offers the potential to be better for customers and to provide synergies and efficiencies between waste operations in the town. SEBC had a desire to relocate its outdated vehicle depot, which provided a timely opportunity to consider the option to co-locate the WTS and HWRC elements which are also required in the Bury St Edmunds area. By considering a co-located solution there is an opportunity to increase efficiency of waste services in West Suffolk. In addition, this project supports the relocation of the depot from its current location in Olding Road due to the planned development of Phase 2 of the Public Sector Village initiative.

The search for a suitable site for WSOH has been a challenging process. A critical factor like timing does not work in favour of the proposed WSOH as no specific allocation was made in the recent Bury St Edmunds Vision 2031 planning document for a new HWRC facility, nor a new WTS, although a new depot facility would have fallen within a general employment allocated area. The actual need for this facility was determined post adoption of the SCC Waste Core Strategy (WCS) 2011 and the Bury St Edmunds Vision 2031, therefore specific site allocations are not available.

A policy-led staged sequential approach has been adopted in identifying and analysing potential alternative locations for the sitting of the WSOH.

Firstly, the search area was defined. This was based upon Suffolk's waste contractual considerations and existing waste transfer and treatment provisions. The search area therefore comprises an area that is not already well served by existing or proposed facilities. Sites should be located near to junctions 42, 43 or 44 in order to ensure operational and cost efficiencies are achieved and sustainability objectives are met.

Post public consultation amendment/addition: Stage 1 of the analysis identified a list of potential sites in Bury St Edmunds, currently allocated for employment uses within the Bury St Edmunds Vision 2031, to be considered for the siting of the WSOH (see Report on Identification and Assessment of Potential Options and Sites, December 2015 Amended May 2016 by Carter Jonas). The information below pertains to both the sites identified in December 2015 and, following consultation, those sites included in the IAPOS May 2016 Report.

The following sites were identified and assessed against exclusionary criteria to test their suitability. After assessing these sites using exclusionary criteria[1] to test their suitability, none of them have passed to the next stage of the site selection process either on the grounds of size, location proximity or issue of being fully occupied. This fact has presented a significant challenge to the stakeholders that, although being consistent with the development plans' policies, none of these sites considered were big enough to accommodate required proposal.

Rougham Industrial Estate, BSE	Nothing of sufficient size vacant	Excluded
Saxham Business Park	Nothing of sufficient size vacant	Excluded
Eastern Way, BSE	Nothing of sufficient size vacant	Excluded
Mildenhall Road, BSE	Nothing of sufficient size vacant	Excluded
Western Way, BSE	Nothing of sufficient size vacant	Excluded
Moreton Hall/Suffolk Business Park, BSE	Nothing of sufficient size vacant	Excluded
British Sugar, Hollow Road, BSE	Nothing of sufficient size vacant	Excluded
Anglian Lane, BSE	Nothing of sufficient size vacant	Excluded
Barton Road, BSE	Nothing of sufficient size vacant	Excluded
Blenheim Road, BSE	Nothing of sufficient size vacant	Excluded
Chapel Pond Hill, BSE	Nothing of sufficient size vacant	Excluded
Enterprise Park, BSE	Nothing of sufficient size vacant	Excluded
Northern Way, BSE	Nothing of sufficient size vacant	Excluded
Greene King, BSE	Nothing of sufficient size vacant	Excluded
Extension to Suffolk Business Park, BSE	Not suitably located – would use junction 45 of A14	Excluded
Existing HWRC site and land to north and DEFRA land, Rougham Hill, BSE	Total area of two sites is not sufficient	Excluded

[1] Post public consultation amendment/addition: More details on site selection criteria can be found in the Report on Identification ad Assessment of Potential Options and Sites, December 2015 Amended May 2016 by Carter Jonas which accompanies this SA Report ~~and is available for public consultation~~.

New Sites (post IAPOS consultation)

RAF Mildenhall	Not suitably located.	Excluded
FHDC Depot, Holborn Avenue, Mildenhall	Area of site is not sufficient and not suitably located.	Excluded
NHS/DHL logistics site, Olding Road, BSE	Area of site is not sufficient.	Excluded
Old Saxham Railway Station Site	Not suitably located.	Excluded
Former Padley poultry site, Northern Way, BSE	Area of site is not sufficient.	Excluded
AJN Steelstock site (and/or adjoining land), Icknield Way, Kentford, Newmarket	Not suitably located.	Excluded
Lorry park and adjacent unused brownfield land, Rougham Hill, BSE	Area if site is not sufficient.	Excluded
Rougham airfield, Rougham	Not suitably located.	Excluded
Former Little Chef site and surrounding land, north of the A14, nr Kentford	Not suitably located.	Excluded
Former Little Chef site and adjoining land, south of the A14, nr Kentford	Not suitably located	Excluded
SCC Highways/Kier depot site, Rougham Industrial Estate, Rougham	Area of site is not sufficient and not suitably located.	Excluded
Vacant land at Chapel Pond Hill, Bury St Edmunds	Area of site is not sufficient.	Excluded

Post public consultation amendment/addition:
The tables above illustrate that none of the sites, currently allocated for employment uses within the Bury St Edmunds Vision 2031, were shortlisted for the second stage of the site selection process. Given that none of the sites could pass the exclusionary criteria, the Councils struggled to identify sites of adequate size and proximity to the A14. After carefully considering all possible site alternatives in conformity with the development plan policies, the Councils had to start looking for alternative solutions to accommodate the WSOH – including Greenfield sites.

Post public consultation amendment/addition:
The following locations were considered appropriate for inclusion within the sequential test, based upon their favourable proximity to the A14 and adequate sizes:

- Hollow Road Farm
- Symonds Farm
- Tut Hill

Site	Suitability & Comments	Decision
Hollow Road Farm	6.13ha – site fits specified size requirements and is available for acquisition to deliver the facilities/development sought. The site is suitably located to the SLRN, well located in relation to West Suffolk's largest population centre (important for minimising fleet mileage, accessibility of HWRC and for sustainable transport purposes) and is over 300m from nearest residential property.	Included
Symonds Farm	6.52ha – site theoretically large enough but its distance from West Suffolk's largest population centre is such that fleet mileage will be higher, the HWRC will be less accessible and sustainable transport options will be minimised. Furthermore, significant junction improvements (£cost) would be required to deliver the facilities/development sought at this location	Excluded
Tut Hill	11.04ha – site theoretically large enough but while landowner is prepared to dispose of site for development of a depot and HWRC they are not prepared to dispose of site for development of (or including) a waste transfer station	Included

New sites were identified during consultation on the IAPOS (see report December 2015 Amended May 2016).

- Vicinity of A14 J40 (Higham)
- Land south east of Tuddenham
- Thetford Road, Ingham
- McRae Estates land between River Lark and A14, BSE
- Land west of Symonds Farm, Saxham
- Field between Westley roundabout and Saxham Business Park, Westley
- Land between Rougham Hill, A14 and Rushbrooke Lane, BSE
- Land south of West Suffolk Crematorium, nr Risby

Vicinity of A14 J40 (Higham)	97.7 ha – site theoretically large enough but its distance from West Suffolk's largest population centre is such that fleet mileage will be higher, the HWRC will not be accessible and sustainable transport options will be minimised.	Excluded
Land south east of Tuddenham	Site not defined in response thus area cannot be calculated. Tuddenham's distance from West Suffolk's largest population centre is such that fleet mileage will be higher, the HWRC will not be accessible and sustainable transport options will be minimised. In addition the site aso fails the impact on sites of international or national biodiversity criterion as most of the area lies within the Breckland Farmland SSSi.	Excluded
Thetford Road, Ingham	Site not defined in response thus area cannot be calculated. Ingham's distance from distance from West Suffolk's largest population centre is such that fleet mileage will be higher, the HWRC will not be accessible and sustainable transport options will be minimised.	Excluded
McRae Estates land between River Lark and A14, BSE	15.4 ha – site theoretically large enough and suitably located. However, development of the site is not favoured on historic landscape grounds and it is of high archaeological importance. The site abuts St James Middle School and Bury St Edmunds Rugby Club's fields. The nearest dwelling lies only 160m from site and there are two hotels within 175m. The site lies close to an area zoned as housing within the Bury Vision 2031 concept layout (110m). A desktop technical assessment indicates that it could be at risk of ground instability. Significant alterations and improvements to the local highway network would be likely to be needed.	Included
Land west of Symonds Farm, Saxham	47.3 ha – site theoretically large enough but its distance from West Suffolk's largest population centre is such that fleet mileage will be higher, the HWRC will not be accessible and sustainable transport options will be minimised.	Excluded
Field between Westley roundabout and Saxham Business Park, Westley	30.8 ha – site theoretically large enough but fails the access to/ from primary highway network criterion due to its limited highway frontage and curtailed sightlines (which mean that suitable access arrangements can not be delivered).	Excluded
Land between Rougham Hill, A14 and Rushbrooke Lane, BSE	39.5 ha – site theoretically large enough and suitably located, However, site includes part of area identified for housing within Vision 2031. Site also of high archaeological potential.	Included
Land south of West Suffolk Crematorium, BSE / Risby	22.9 ha – site theoretically large enough and suitably located. The nearest existing sensitive receptor (residential) is 400m away. However, the site is only 290m from the area reserved for the relocation of the West Suffolk Hospital within the Bury Vision 2031 concept layout. The site is exposed particularly from the A14 and development could lead to visual impact, and light. Significant alterations and improvements to the local highway network would be likely to be needed.	Included

Post public consultation amendment/addition:
~~Similarly to the previous exercise, the first stage of the site selection process was carried out again in respect of the three Greenfield sites using exclusionary criteria to test their suitability. Following assessment of these sites, it has become apparent that Symonds Farm does not have an adequate access to the site and is too far from Bury St Edmunds to co-locate all three facilities.~~

~~Thus the assessment of the unallocated Greenfield sites against the exclusionary criteria in this exercise has identified two sites which might be suitable for accommodating the proposed development and be taken to Stage 2 of the site selection process – Tut Hill and Hollow Road Farm.~~

~~Stage 2 involved a comparative analysis using assessment criteria of the two shortlisted sites and was carried out through a combination of information gained through the site visits, desk based assessments and GIS review.~~

~~The assessment has concluded that, of the two sites shortlisted, the Hollow Road Farm site scored much more favourably in comparison with the site at Tut Hill. In addition, Hollow Road Farm is unconditionally available for acquisition, thus making this site the only current viable solution (see Report on Identification and Assessment of Potential Options and Sites, December 2015 by Carter Jonas).~~

Similarly to the previous exercise, the first stage of the site selection process was carried out again in respect of the initial three Greenfield sites and additional post-consultation sites using exclusionary criteria to test their suitability. Following assessment of all these sites, the three new Greenfield sites passed the exclusionary criteria alongside previously assessed Tut Hill and Hollow Road Farm: McRae Estates land between River Lark and A14, BSE; Land between Rougham Hill, A14 and Rushbrooke Lane, BSE; and Land south of West Suffolk Crematorium, BSE / Risby.

Thus the assessment of the unallocated Greenfield sites against the exclusionary criteria in this exercise has identified five sites which might be suitable for accommodating the proposed development and be taken to Stage 2 of the site selection process.

Stage 2 involved a comparative analysis using assessment criteria of the five shortlisted sites and was carried out through a combination of information gained through the site visits, desk based assessments and GIS review.

The assessment has concluded that, of the five sites shortlisted, the Hollow Road Farm site scored much more favourably in comparison with the other sites.

Sites not included within the Sustainability Appraisal process

Planning practice Guidance states that reasonable alternatives are the different realistic options to be considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

As part of the plan-making process, an independent assessment of the suitability of sites was carried out to test their suitability. As part of this process, initial exclusionary criteria were applied. Those sites that failed the first stage (Stage 1) of this site assessment process have not be included in the Sustainability Appraisal process where they can be considered unviable and therefore for the purposes of the Sustainability Appraisal process, 'unreasonable alternatives.' This approach is in line with PAS Guidance on the filtering of options.

Post public consultation amendment/addition:
~~Following Stage 1, two sites were shortlisted for the second stage (Stage 2) of the site assessment process, with Tut Hill being subsequently excluded from being a viable option suitable for the WSOH proposal due to issues of deliverability and availability. A site where the owners are unable or unwilling to make a site available for a suitable waste use will be excluded and cannot constitute a reasonable alternative for the SA process. Sites that do not satisfy these criteria are not 'reasonable'~~

~~alternatives and should be discounted. On this basis, Tut Hill was excluded from the SA process, with Hollow Road Farm suitable for inclusion in the SA process.~~

~~For the purpose of this SA process it is not considered appropriate to include sites that have failed to pass exclusionary criteria assessment and availability criteria as practically reasonable alternatives. Thus this SA document will include the scenario 'business as usual'. In this case, 'business as usual' will include a continuation of a policy or proposal, as an alternative to preparing a new one – implementing planning permission for the WTS and HWRC at the Rougham Hill site and using the Rougham Hill site as a reasonable realistic alternative for the SA process.~~

Following Stage 1, five sites were shortlisted for the second stage (Stage 2) of the site assessment process, with Tut Hill being subsequently excluded from being a viable option suitable for the WSOH proposal due to issues of deliverability and availability. A site where the owners are unable or unwilling to make a site available for a suitable waste use will be excluded and cannot constitute a reasonable alternative for the SA process. Sites that do not satisfy these criteria are not 'reasonable' alternatives and should be discounted.

As a result of the assessment the three new unallocated Greenfield sites passed the exclusionary criteria and were taken for further comparative analysis using qualitative criteria: McRae Estates land, Land at Rougham Hill and Land south of West Suffolk Crematorium. The two of these sites – McRae Estates land and Land at Rougham Hill both scored significantly negatively and therefore have not been considered to be reasonable, realistic and deliverable alternatives to be included in the SA assessment. Land south of West Suffolk Crematorium, on the other hand, has scored significantly higher resulting in a positive scoring and therefore has been taken forward to the SA process as a reasonable, deliverable and realistic alternative to the Hollow Road Farm site.

For the purpose of this SA process it is not considered appropriate to include sites that have failed to pass exclusionary criteria assessment and availability criteria as practically reasonable alternatives. Thus this SA document has also included the scenario 'business as usual'. In this case, 'business as usual' included a continuation of a policy or proposal, as an alternative to preparing a new one – implementing planning permission for the WTS and HWRC at the Rougham Hill site and using the Rougham Hill site as a reasonable realistic alternative for the SA process.

Land south of West Suffolk Crematorium is sufficiently distinct to highlight the different sustainability implications of each of these two sites and has enabled meaningful comparisons to be made. Land south of West Suffolk Crematorium and 'business as usual' current Rougham Hill Site have been identified as reasonable alternatives to consider alongside the Hollow Road Farm site and all have been subject to the SA process outlined in this Final SA document.

Sustainability Appraisal of WSOH solutions options

The full sustainability appraisal of WSOH solution options can be found in Appendix 2 of this document. Table 13 overleaf presents the SA summary:

Five solutions options were suggested to provide a comparative analysis between them in terms of their sustainability which enables an informed decision to be made about which solution presents the most sustainable option to take forward for the WSOH.

Each option has been assessed against the 18 SA objectives. This helped to ensure that the final option chosen was the one that led to the greatest sustainability 'gains' (i.e. the biggest net improvements from the current situation)

Table 13: SA summary of the WSOH solutions options

Solutions Options	Overall Impact		Short term		Medium term		Long term		Comments
Option 1	0	++	0	++	0	++	0	++	This option performed the worst in terms of scoring in comparison with other options.
	0	+	1	+	0	+	0	+	
	10	0	9	0	10	0	10	0	
	8	–	8	–	8	–	8	–	
	0	––	0	––	0	––	0	––	
	0	?	0	?	0	?	0	?	
Option 2	1	++	1	++	1	++	1	++	This option scored better than option one and offered a number of sustainability benefits. Overall option 2 is the fourth best option.
	7	+	7	+	7	+	7	+	
	10	0	9	0	11	0	11	0	
	0	–	1	–	0	–	0	–	
	0	––	0	––	0	––	0	––	
	0	?	0	?	0	?	0	?	
Option 3	2	++	2	++	2	++	2	++	This option scored better than option one and two and offered a number of sustainability benefits. Overall options 3 and 5 could be the second most suitable option for WSOH proposal.
	7	+	7	+	7	+	7	+	
	9	0	8	0	9	0	9	0	
	0	–	1	–	0	–	0	–	
	0	––	0	––	0	––	0	––	
	0	?	0	?	0	?	0	?	
Option 4	6	++	6	++	6	++	6	++	This option has the best score in terms of a number of positive effects and presents the best sustainable solution option for WSOH proposal.
	3	+	3	+	3	+	3	+	
	9	0	8	0	9	0	9	0	
	0	–	1	–	0	–	0	–	
	0	––	0	––	0	––	0	––	
	0	?	0	?	0	?	0	?	
Option 5	2	++	2	++	2	++	2	++	This option scored better than option one and two and offered a number of sustainability benefits. Overall options 3 and 5 can be the second most suitable option for WSOH proposal.
	7	+	7	+	7	+	7	+	
	9	0	8	0	9	0	9	0	
	0	–	1	–	0	–	0	–	
	0	––	0	––	0	––	0	––	
	0	?	0	?	0	?	0	?	

Assessment summary:

Option 1 – do nothing

This option scored the worst in comparison with other options.

This option scored neutral or negatively on the majority of the SA objectives. Not implementing WTS development at all will not have positive effects on waste mileage reduction nor movements of waste up the waste hierarchy and will not contribute to the enhancement of quality of waste service provision.

In addition, this option will not contribute to the release of land for Phase II of the Public Service Village initiative, creation of new jobs and will not address objectives of the One Public Estate Programme.

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

This option scored better than option one and offered a number of sustainability benefits. Overall option 2 is the fourth best option.

Option 2 scored positively against a number of environmental SA objectives including maximising tonnes per miles-carbon emission reduction, reducing waste and moving treatment of waste up the waste hierarchy. It can potentially have some short term negative effects on SA objective 14 to minimise impacts arising from the provision of waste facilities developments on where people live as construction facilities can lead to some additional noise at the construction phase of the development. Similarly to Option 1 scoring, it will also not contribute to the release of land for Phase II of the Public Service Village initiative as Olding Road depot will stay and this land will not be available for regeneration. This option would lead to service disruption to the Household Waste Recycling Centre whilst it is rebuilt.

However, Option 2 will have positive effects on improving existing waste infrastructure and enhancing quality of waste service provision.

Option 3 – implement Rougham Hill planning permission and relocate depots

This option scored better than option one and two and offered a number of sustainability benefits. Overall options 3 and 5 could be the second most suitable options for WSOH proposal.

Option 3 scored positively against a number of environmental SA objectives including maximising tonnes per miles-carbon emission reduction, reducing waste and moving treatment of waste up the waste hierarchy. It can potentially have some short term negative effects on SA objective 14 to minimise impacts arising from the provision of waste facilities developments on where people live as construction of facilities can lead to some additional noise at the construction phase of the development. This option would lead to service disruption to the Household Waste Recycling Centre whilst it is rebuilt and will be presented with difficulties to find suitable site for a new West Suffolk depot.

Unlike Option 1 and 2 scoring results, it will also have positive effect on SA objective 18 and will contribute to the release of land for Phase II of the Public Service Village initiative as the land at Olding Road depot will become available for regeneration. This option will result in service integration for the West Suffolk operations and therefore has significant financial benefits/ savings annually. This option would lead to service disruption to the Household Waste Recycling Centre whilst it is rebuilt.

However, Option 3 will have positive effects on improving existing waste infrastructure and enhancing quality of waste service provision.

Option 4 – co-locate all facilities on new site

This option has the best score in terms of a number of positive effects and presents the best sustainable solution option for the WSOH proposal.

Option 4 scored positively against a number of environmental SA objectives including maximising tonnes per miles-carbon emission reduction, reducing waste and moving treatment of waste up the waste hierarchy. It can potentially have some short term negative effects on SA objective 14 to minimise impacts arising from the provision of waste facilities developments on where people live as construction of facilities can lead to some additional noise at the construction phase of the development.

Post public consultation amendment/addition: This Option will also have positive effect on SA objective 18 and will contribute to the release of land for Phase II of the Public Service Village initiative as the land at Olding Road depot will become available for regeneration. Option 4 will enhance quality of service provision and operational flexibility and sustainability. Co-location will improve the resilience of business and the economy. In addition, it offers full integration of services. Relocation of the current HWRC at Rougham Hill site to a new site will release land at Rougham Hill which is estimated to release £750k capital based on industrial land values.

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

This option scored better than option one and two and offered a number of sustainability benefits. Overall options 3 and 5 can be the second most suitable options for WSOH proposal.

Option 4 scored positively against a number of environmental SA objectives including maximising tonnes per miles-carbon emission reduction, reducing waste and moving treatment of waste up the waste hierarchy. It can potentially have some short term negative effects on SA objective 14 to minimise impacts arising from the provision of waste facilities developments on where people live as construction of facilities can lead to some additional noise at the construction phase of the development.

It will also have positive effect on SA objective 18 and will contribute to the release of land for Phase II of the Public Service Village initiative as Olding depot land will become available for regeneration. Option 3 will have positive effects on improving existing waste infrastructure and enhancing quality of waste service provision.

This is the cheapest option and would mean no disruption to the Household Waste Recycling Centre. However, it does not realise the improvements for HWRC customers of a split-level site and improved traffic flows. This option would not lead to partners being able to fully capitalise on the opportunity for co-location and integration.

WSOH solution options and explanation of choice

Following the SA assessment of the WSOH solution options against the 18 SA objectives,(full appraisal of which can be found in Appendix 2) it has been established that the wider sustainability benefits and efficiencies could be gained through **Option 4 - co-locate all facilities on new site** in or close to Bury St Edmunds. This option received the highest score in terms of economic SA objectives and would create the opportunity to bring greater long-term flexibility, further opportunities for integration and potential to bring more partners on board to improve asset utilization, improve efficiency, increase capacity and reduce costs.

This option also scored better than other options on SA objective 18 and facilitates the potential development of the Western Way site for phase II of a Public Sector Village meeting the objectives of the One Public Estate Programme.

Recommendation: Based on the SA scoring results, the total positive effects are greater for the proposed WSOH **Option 4 – co-locate all facilities on new site** which offers greater sustainability benefits for the delivery of the WSOH proposal, and thus it is recommended through the sustainability appraisal process to be the most suitable option.

Sustainability Appraisal of sites selection options

The SA process considers the physical characteristics of the sites together with judgements and broad assumptions about the potential effects of the proposed waste facilities likely to be developed on that site and informed by site information collected by the Councils, existing knowledge and expertise of qualified officers, and supplemented by ongoing consultation with stakeholders for individual sites.

The full sustainability appraisal of site selection options can be found in Appendix 3 of this document. Table 14 presents the summary of the SA results for each site option.

Table 14: SA summary of sites selection options

Post public consultation amendment/addition:

Site Options	Overall Impact		Short term		Medium term		Long term		Comment/Mitigation
Hollow Road Farm	6	++	6	++	6	++	6	++	Applicant would need to demonstrate that development will not impact on water quality. Use of Sustainable Urban Drainage Systems (SUDS) recommended as mitigation. Appropriate design and screening should be applied. The efficient use of water could be maximised by the design of the facility. Further archaeological evaluation will be required. Appropriate protection measures should be incorporated into the design of the facility to minimise the impacts arising from the provision of waste facilities developments on where people live.
	4	+	4	+	4	+	4	+	
	7	0	6	0	7	0	7	0	
	1	–	2	–	1	–	1	–	
	0	––	0	––	0	––	0	––	
	0	?	0	?	0	?	0	?	

Site Options	Overall Impact		Short term		Medium term		Long term		Comment/Mitigation
'Business as usual' Rougham Hill	2	++	2	++	2	++	2	++	The design of the proposed facility must safeguard designated areas. Applicant would need to demonstrate that the development will not impact on water quality. Use of Sustainable Urban Drainage Systems (SUDS) as mitigation. Appropriate protection measures should be incorporated into the design of the facility to minimise the impacts arising from the provision of waste facilities developments on where people live.
	6	+	7	+	6	+	6	+	
	10	0	8	0	10	0	10	0	
	0	–	1	–	0	–	0	–	
	0	––	0	––	0	––	0	––	
	0	?	0	?	0	?	0	?	
Land south of West Suffolk Crematorium	6	++	6	++	6	++	6	++	Applicant would need to demonstrate that development will not impact on water quality. Use of Sustainable Urban Drainage Systems (SUDS) recommended as mitigation. Appropriate design and screening should be applied. The efficient use of water could be maximised by the design of the facility. There is a high evidence for archaeological activity. Further archaeological evaluation will be required. Appropriate protection measures should be incorporated into the design of the facility to minimise the impacts arising from the provision of waste facilities developments on where people live.
	4	+	4	+	4	+	4	+	
	3	0	3	0	3	0	3	0	
	5	–	5	–	5	–	5	–	
	0	––	0	––	0	––	0	––	
	0	?	0	?	0	?	0	?	

Option 1: Hollow Road Farm

Site Location

The site at Fornham St Martin, Bury St Edmunds, is an undeveloped area of agricultural land located off the A134 on the road to Great Barton. The site is approximately 7 hectares in size with the northern site area raised slightly above the southern site area. There is also a general uphill slope on the site from east to west.

To the west of the site is the A134 and a planted tree belt lines this boundary. Directly to the north of the site lies the road to Great Barton, beyond which the area is predominantly agricultural in nature, as is the land to the east. Immediately to the south of the site is a variety of industrial works, with a reservoir and an area of woodland beyond that. An industrial sugar factory is located 100m to the south-west, while the nearest residential receptor is 315m from the site boundary to the north-west.

Summary of the SA results:

Environmental SA objectives

SA objective 1: To maintain/improve air and water quality (including HGV movements) in line with national standards limits

The site will have a limited effect on this objective and therefore is scored as neutral. Some negative effects could be due to waste transportation by road as well as any air pollution associated with the operation of the facility. Although waste sites can affect air quality through such factors as odour, dust and bio aerosols, the majority of waste transfer operations will take place within a building. The 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.

Consolidating smaller loads from collection vehicles into larger transfer vehicles reduces hauling costs 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, air 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 site is at a distance of more than 250m from potential human receptors. The nearest residential receptor is located 315m to the west of the site along Barton Hill, with the nearest residential receptor to the south east is at a distance of 600m.

The site lies in a Source Protection zone 2 and on a principal major aquifer with high permeability. The applicant would need to demonstrate that development will not impact on water quality. Mitigation measures can include the use of Sustainable Urban Drainage Systems (SUDS).

All drainage from roads and hard-standing will be diverted through petrol and oil interceptors prior to discharge to prevent pollution under a discharge consent. Drainage at the site will be provided by a separate sealed drainage system for contaminated water. The peak surface water drainage rate is assumed to be equivalent to Greenfield runoff, but will be subject to EA/ Local Authority approval.

A detailed drainage plan for foul water, with details of any proposed drainage infrastructure will be included with the planning application.

SA objective 2: To conserve soil resources and quality

The site scored negatively against this objective as it will cause the loss of versatile agricultural land. It is proposed the need to mitigate the loss of soil resources by re-using as much of the surplus resources and disposing of any surplus soils thereafter in a sustainable manner.

SA objective 3: To use water and mineral resources efficiently, and re-use and recycle where possible

The site has scored positively as the design of the facility could maximise the efficient use of water.

SA objective 4: To reduce waste

The allocation of the site facilitates waste minimisation therefore scored very positively against this SA objective.

SA objective 5: To reduce the effects of traffic on the environment

Neutral effects of the site on this SA objective overall. Additional traffic movements would be accounted for by HGVs accessing the WTS to deliver or collect waste. There is expected to be an additional 240 vehicle movements per day. However, in absolute terms the anticipated trip generation is expected to be modest and consequently, impacts on sensitive receptors are expected to be minimal. Site is very well located to maximise tonnes per miles leading to carbon reduction. The proximity of the site to strategic highway network means that there will be less waste transport on local roads and will reduce the overall number of vehicles transporting waste around the county.

By having a centrally-based WTS, close to the major population centre in West Suffolk, will reduce traffic impact across West Suffolk.

SA objective 6: To maintain/improve biodiversity and geodiversity

The site scored neutrally against this SA objective. The site does not lie within any statutory designated sites. The closest designation is the Glen Chalk Caves SSSI which is approximately 1.6km south of the application boundary. The Preliminary Ecological Assessment identified one potential roosting habitat was identified, however this was identified as being very young and has a low likelihood of being a bat roost. Bats may use the western boundary of the site for foraging and community, therefore light spillage should be kept to a minimum in this area.

It is acknowledged that the trees or shrubs onsite could also provide a potential habitat for nesting birds and so any vegetation clearance will take place outside of the nesting season.

There will be lighting plans in place which will minimise any impact on the surrounding area, including wildlife.

Sensitive planting and other landscape works may improve the site's biodiversity interest and potential.

SA objective 7: To maintain/improve the quality and local distinctiveness of landscapes/townscapes

Neutral impact against this SA objective. The existing sugar beet factory dominates views to the south from Fornham Road and is a significant feature in the skyline viewed from properties at The Drift. There is currently existing screening in the form of a hedgerow on the approach to Bury St Edmunds from the east. The proposed design seeks to retain the vast majority of perimeter vegetation screening which already exists and it is also proposed to construct a 15m wide strip along the northern boundary for landscape planting and hedgerow growth. Appropriate design and screening as mitigation. 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.

The Hollow Road Farm site has a gently sloping topography: Transfer stations often are multilevel buildings that need to have vehicle access at several levels. Sites with moderately sloping terrain can use topography to their advantage, allowing access to the upper levels from the higher parts of the natural terrain and access to lower levels from the lower parts.

The prevailing natural topography of the site should be utilised wherever possible to take advantage of existing wind barriers and visual screens. Existing slopes can be used to provide benches and to divert water flows from operational areas.

SA objective 8: To reduce contributions to climate change

The site scored positively against this SA objective. The design of the facility can incorporate energy efficient measures. This site is very well located to maximise tonnes per miles – carbon reduction. Opportunity for the WSOH to encourage new development to use renewable energy or low CO2 energy sources. Greater waste miles efficiencies.

SA objective 9: To move treatment of waste up the waste hierarchy

The site has a very positive effect on this SA objective. The site allocation will contribute to diversion of waste from landfill. The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy.

SA objective 10: To reduce vulnerability to flooding

Positive effect as the site is not within a floodplain.

SA objective 11: To conserve and where appropriate enhance areas of historical and archaeological importance

The site scored neutrally overall against this SA objective. There is a relatively low evidence for archaeological activity, with only four anomalies that appear to be of an archaeological derivation.

Social SA objectives

SA objective 12: To maximise opportunities for new/additional employment

There is a very positive effect against this SA objective. Construction phase will create short term jobs. The size of the site will contribute to further release of employment land.

SA objective 13: To maintain/improve health of the population overall

There will be neutral effect overall. There will be low noise sensitivity. The dominant background noise source is likely to be the A134, given this and the distance of 315m to the nearest sensitive receptors, it is not considered likely that noise will give rise to any potential adverse impacts. Waste would mainly be stored within a closed building before being transferred and would be removed from site as soon as possible. Features such as misting sprays and ventilation to reduce smells will be implemented.

SA objective 14: To minimise the impacts arising from the provision of waste facilities developments on where people live

Short term possible negative effects. Noise is expected to be generated onsite during the site preparation and construction period which is expected to last approximately 12 months.

Medium and long term neutral effects overall. Large site with good transport links will allow for suitable mitigation. Appropriate protection measures should be incorporated into the design. The design will include features which reduce the need for reversing (and the associated bleeping noise) and this will be considered again in the next design stage. Waste transfer operations happen mainly within the building and having the doors closed would minimise the amount of noise that could be heard off site.

During operations, noise may be generated on the site, primarily from on-site plant equipment, such as the loading shovel. There is the potential that noise may be generated by RCVs and HGVs accessing the site. In addition, the public vehicles and HGVs using the site will generate a significant amount of noise due to the relative increase in visitor numbers using the site or the amount of waste that will require transportation off site for treatment.

That said, the dominant background noise source is likely to be the A134, given this and the distance to the nearest sensitive receptors,

it is not considered likely that noise will give rise to any potential adverse impacts.

Waste would mainly be stored within a closed building before being transferred and would be removed from site as soon as possible which will not give rise to major smells or vermin. Additional mitigation measures will include features such as misting sprays and ventilation to reduce smells.

Good management processes will enable prevention of litter and fly tipping on the site. Measures will include netting off lorries taking rubbish away from the site and ensuring that vehicles are cleaned down effectively.

Economic SA objectives

SA objective 15: To achieve sustainable levels of prosperity and economic growth

Very positive effect against this SA objective. Site will impact on long-term investment in waste management infrastructure. It will offer operational flexibility and sustainability. It will contribute to optimisation of the number and location of Household Waste and Recycling Centres, and enhance quality of service provision. Waste transfer stations play an important role in a community's total waste management system, serving as the link between a community's solid waste collection programme and final waste treatment facilities. They consolidate waste from multiple collection vehicles into larger, high-volume transfer vehicles for more economical shipment to distant treatment sites. The site is big enough to accommodate three proposed facilities which will release land at Olding Road for Phase II of the Public Services Village initiative, and also land at Holborn Road and Rougham Hill. It will improve the resilience of business and the economy.

SA objective 16: To encourage and accommodate both indigenous and inward investment

Very positive effect against this SA objective. It will provide further capacity for commercial services and income. It will contribute to maintaining/improving existing waste infrastructure. It will enable to accommodate growth in demand and create opportunities for staff and operational flexibility. Relocation of the current HWRC at Rougham Hill site to Hollow Road Farm due to this site being of sufficient size will release land at Rougham Hill. It is estimated to release £750k capital based on industrial land values.

SA objective 17: To encourage efficient patterns of movement in support of economic growth

The site scored positively against this SA objective. The site is well located next to strategic highways network. It will improve accessibility to work by public transport, walking and cycling.

SA objective 18: Facilitate delivery of the One Public Estate Programme

The size of the site and its location will enable the councils to co-locate needed facilities on a single site and will enable them to generate capital receipts, reduce running costs and deliver integrated customer focused services. The site also provides an opportunity for additional space and capacity for other partners to join in the future.

Option 2 – 'Business as usual': Rougham Hill Site

Site Location

The site is located approximately 2km to the south east from Bury St Edmunds on Rougham Hill near the A14, a major road corridor traversing through the city centre. The Rougham Hill site is 1.2 hectares. The existing HWRC occupies the southern portion of the development site with the remaining northern section being vacant land. The land immediately to the east contains an area of commercial development.

Immediately to the west of the site is an area of vacant land which is currently utilised as a surface water balancing pond, beyond which lies a roundabout and the A134 which connects

Rougham Hill with the A14(T) roundabout and slip road. The land to the south of the application site is mainly arable agricultural land with housing beyond the southern side of the fields. To the south east there is a lorry park and transport cafe, beyond which lies a golf driving range.

Currently half of the site adjoining Rougham Hill is used as the HWRC and comprises of separated entrance and exit with a number of waste containers and site office. The existing HWRC is surrounded by timber close board fencing and grassed embankments to the west, north and east. To the west of the site an existing woodland belt adjoins embankments along the site boundary. The other half of the site to the north of the existing HWRC is undeveloped and overgrown in scrub. A distinctive landscape framework is created by the presence of existing mature woodland belt along the western and northern boundary.

Summary of the SA results:

Environmental SA objectives

SA objective 1: To maintain/improve air and water quality (including HGV movements) in line with national standards limits

The site scored neutrally against this SA objective. Emissions will be within the national standards and would be monitored as a mitigation measure throughout. The site and proposed use will provide new facility for processing waste in the county and will reduce the distance waste is transported by road. Subject to stringent pollution control & monitoring. Mitigation measures include the use of Sustainable Urban Drainage Systems (SUDS).

SA objective 2: To conserve soil resources and quality

The site scored neutrally against this SA objective. Rougham Hill site is a previously developed land therefore scored better than Hollow Road Farm against this SA objective.

SA objective 3: To use water and mineral resources efficiently, and re-use and recycle where possible

The site has a positive effect against this SA objective. The design of the facility could maximise the efficient use of water.

SA objective 4: To reduce waste

The site scored very positively against this SA objective. It will facilitate waste minimisation.

SA objective 5: To reduce the effects of traffic on the environment

Neutral effects overall against this SA objective. As stated the volumes of waste being accepted at the HWRC are not expected to alter significantly. This will result in there being little or no change to the vehicle numbers accessing the HWRC site through the proposed redevelopment of the site. Site is very well located to maximise tonnes per miles leading to carbon reduction.

SA objective 6: To maintain/improve biodiversity and geodiversity

Neutral effects overall against this SA objective. It is considered unlikely that there will be significant negative effect on the conservation status of local bat populations due to the proposals. With suitable avoidance, mitigation and enhancement measures, it will be possible to ensure that residual negative impacts on ecological features due to the proposals are not significant.

SA objective 7: To maintain/improve the quality and local distinctiveness of landscapes/townscapes

Neutral effects overall against this SA objective. The effect of the proposed scheme on landscape character will be limited to the local level and will not result in significant adverse effects.

SA objective 8: To reduce contributions to climate change

The site scored positively against this SA objective. The design of the facility can incorporate energy efficient measures. The site is very well located to maximise tonnes per miles leading to carbon reduction.

SA objective 9: To move treatment of waste up the waste hierarchy

Very positive effect on this SA objective. The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy.

SA objective 10: To reduce vulnerability to flooding

Positive effect against this objective. The site is not within a floodplain.

SA objective 11: To conserve and where appropriate enhance areas of historical and archaeological importance

Neutral effects overall against this SA objective. Land already disturbed and hence potential archaeological value could be diminished. An initial search was carried out to look for statutory designated sites or buildings within 300m of the application site. This search returned no results and it is therefore not anticipated that the development will result in any adverse effects on the built heritage, the historic landscape or archaeological remains.

Social SA objectives

SA objective 12: To maximise opportunities for new/additional employment

In short term the site will have positive effects. Construction will create short term jobs. However the size of the site will not lead to co-location of all three facilities and will not lead to release of employment land.

SA objective 13: To maintain/improve health of the population overall

The site is the existing HWRC site on Rougham Hill which has no record of noise complaints. Rougham Hill currently has a well-served lorry park south east of the site and a number of commercial units to the east. The nearest residential receptors are located south of the site at a distance of more than 200m. Waste would mainly be stored within a closed building before being transferred and would be removed from site as soon as possible. Features such as misting sprays and ventilation to reduce smells will be implemented.

SA objective 14: To minimise the impacts arising from the provision of waste facilities developments on where people live

Short term possible negative effects. Noise is expected to be generated onsite during the site preparation and construction period which is expected to last approximately 12 months.

Medium and long term neutral effects overall. Waste transfer operations happen mainly within the building and having the doors closed would minimise the amount of noise that could be heard off site.

The site scores neutrally against this in relation to the volume and distance of potential human receptors for air quality.

Economic SA objectives

SA objective 15: To achieve sustainable levels of prosperity and economic growth

The site scored positively against this SA objective. It will optimise the number and location of Household Waste and Recycling Centres, and enhance quality of service provision. However, the site is unlikely to impact on long-term investment in waste management infrastructure or offer as much operational flexibility and sustainability as the Hollow Road Farm site. The site is not big enough to co-locate the three needed facilities on one site to facilitate delivery of this objective. Unlike the Hollow Road Farm site, it will not directly

contribute to releasing land for Phase II of the Public Service Village initiative.

SA objective 16: To encourage and accommodate both indigenous and inward investment

Positive effects on this SA objective. It will contribute to maintaining/improving existing waste infrastructure.

SA objective 17: To encourage efficient patterns of movement in support of economic growth

Positive effects on this SA objective. The site is well located next to strategic highways network. It will improve accessibility to work by public transport, walking and cycling.

SA objective 18: Facilitate delivery of the One Public Estate Programme

The site scored neutrally on this SA objective. It does not directly contribute to this objective.

Post public consultation amendment/addition:

Option 3: Land south of West Suffolk Crematorium

Site Location

Land south of West Suffolk Crematorium, is an undeveloped area of agricultural land located adjacent to A14. The site is approximately 22.9 hectares with nearest sensitive receptor (residential) is 400m away.

Summary of the SA results:

Environmental SA objectives

SA objective 1: To maintain/ improve air and water quality (including HGV movements) in line with national standards limits

The site will have a limited effect on this objective and therefore is scored as neutral. Some negative effects could be due to waste transportation by road as well as any air pollution associated with the operation of the facility. Although waste sites can affect air quality through such factors as odour, dust and bio aerosols, the majority of waste transfer operations will take place within a building. The 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.

Consolidating smaller loads from collection vehicles into larger transfer vehicles reduces hauling costs 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, air 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 site is at a distance of more than 400m from potential human receptors. Site lies 290 m from area reserved for relocation of West Suffolk Hospital within Bury Vision 2031 concept layout for west Bury ST Edmunds strategy allocation (Policy BV5). Further, site lies 790 m from area of lower density housing shown on concept layout for Bury Vision 2031 North-West Bury St Edmunds strategy allocation (Policy BV3).

The site lies in a Source Protection zone 2 and on a principal major aquifer with high permeability. The applicant would need to demonstrate that development will not impact on water quality. Mitigation measures can include the use of Sustainable Urban Drainage Systems (SUDS).

All drainage from roads and hard-standing will be diverted through petrol and oil interceptors prior to discharge to prevent pollution under a discharge consent. Drainage at the site will be provided by a separate sealed drainage system for contaminated water. The peak surface water drainage rate is assumed to be equivalent to Greenfield runoff, but will be subject to EA/ Local Authority approval.

A detailed drainage plan for foul water, with details of any proposed drainage infrastructure will be included with the planning application.

SA objective 2: To conserve soil resources and quality

Land is grades 2 and 3 thus is the best and most versatile agricultural land. The site scored negatively against this objective as it will cause the loss of versatile agricultural land. It is proposed the need to mitigate the loss of soil resources by re-using as much of the surplus resources and disposing of any surplus soils thereafter in a sustainable manner.

SA objective 3: To use water and mineral resources efficiently, and re-use and recycle where possible

The site has scored positively as the design of the facility could maximise the efficient use of water.

SA objective 4: To reduce waste

The allocation of the site facilitates waste minimisation therefore scored very positively against this SA objective.

SA objective 5: To reduce the effects of traffic on the environment

Neutral effects of the site on this SA objective overall. Additional traffic movements would be accounted for by HGVs accessing the WTS to deliver or collect waste. There is expected to be an additional 240 vehicle movements per day. However, in absolute terms the anticipated trip generation is expected to be modest and consequently, impacts on sensitive receptors are expected to be minimal. Site is well located to maximise tonnes per miles leading to carbon reduction. The proximity of the site to strategic highway network means that there will be less waste transport on local roads and will reduce the overall number of vehicles transporting waste around the county.

By having a centrally-based WTS, close to the major population centre in West Suffolk, will reduce traffic impact across West Suffolk.

SA objective 6: To maintain/improve biodiversity and geodiversity

The site scored neutrally against this SA objective. Site is within the SSSI impact risk zone relating to Breckland Farmland SSSI and Breckland SPA (its lies approx. 2.9km away). Natural England would need to be consulted on any proposals through the planning process.

Hyde Wood ancient woodland is located to the north - the site falls just outside its 500m buffer zone.

There are records of a number of protected and notable species associated with the A14 junction and adjacent railway corridor.

A14 corridor east of the junction is designated local wildlife site. The site comprises arable land. Existing landscape features include hedgerows which in this context are important for habitat connectivity. There will be lighting plans in place which will minimise any impact on the surrounding area, including wildlife.

Sensitive planting and other landscape works may improve the site's biodiversity interest and potential.

SA objective 7: To maintain/ improve the quality and local distinctiveness of landscapes/ townscapes

Negative impact against this SA objective. Site is located in countryside but not far from edge of settlement. Described as 'Plateau Estate Farmlands' in SCC Landscape Character map. Not within or adjacent to national or local landscape designations and sensitivity of landscape receptor is considered medium. The impact and magnitude of effects would depend on design and mitigation measures but could be medium so net impact on landscape may be considered 'medium'. There are extensive views in and out and topography (site is on relatively high ground, much of it at 55m+) means the site is exposed, particularly from A14 but also from other viewpoints including residential.

SA objective 8: To reduce contributions to climate change

The site scored positively against this SA objective. The design of the facility can incorporate energy efficient measures. This site is well located to maximise tonnes per miles – carbon reduction. Opportunity for the WSOH to encourage new development to use renewable energy or low CO2 energy sources. Greater waste miles efficiencies.

SA objective 9: To move treatment of waste up the waste hierarchy

The site has a very positive effect on this SA objective. The site allocation will contribute to diversion of waste from landfill. The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy.

SA objective 10: To reduce vulnerability to flooding

Positive effect as the site is not within a floodplain.

SA objective 11: To conserve and where appropriate enhance areas of historical and archaeological importance

The site scored negatively overall against this SA objective. There is a high evidence for archaeological activity. Site is of archaeological potential. It is in a location that is topographically favourable for early occupation. There is a cropmark of a ring ditch – most likely a prehistoric burial monument – recorded within the site itself (RBY 025). A further ring ditch is recorded to the west (FAS 023). Roman finds are recorded in the County Historic Environment Record to the northwest of the site and an Anglo-Saxon find spot to the southwest (FAS 016) may be indicative of further activity in the area.

High potential for important archaeological remains to be defined at this location.

Social SA objectives

SA objective 12: To maximise opportunities for new/ additional employment

There is a very positive effect against this SA objective. Construction phase will create short term jobs. The size of the site will contribute to further release of employment land.

SA objective 13: To maintain/ improve health of the population overall

All waste would be stored within a closed building before being transferred and would be on site for less than a day. Features such as misting sprays and ventilation to reduce smells will be implemented.

SA objective 14: To minimise the impacts arising from the provision of waste facilities developments on where people live

Possible negative effects. Noise is expected to be generated onsite during the site preparation and construction period which is expected to last approximately 12 months.

Large site with good transport links will allow for suitable mitigation. Appropriate protection measures should be incorporated into the design. The design will include features which reduce the need for reversing (and the associated bleeping noise) and this will be considered again in the next design stage. Waste transfer operations happen mainly within the building and having the doors closed would minimise the amount of noise that could be heard off site.

During operations, noise may be generated on the site, primarily from on-site plant equipment, such as the loading shovel. There is the potential that noise may be generated by RCVs and HGVs accessing the site. In addition, the public vehicles and HGVs using the site will generate a significant amount of noise due to the relative increase in visitor numbers using the site or the amount of waste that will require transportation off site for treatment.

That said, the dominant background noise source is likely to be the A14, given this and the distance to the nearest sensitive receptors, it is not considered likely that noise will give rise to any potential adverse impacts.

All waste would be stored within a closed building before being transferred and would usually be on site for less than a day which will not give rise to major smells or vermin. Additional mitigation measures will include features such as misting sprays and ventilation to reduce smells.

Waste would be kept inside the building with doors closed when not in use to keep smell or noise inside as much as possible.

Site potentially quite exposed from west (assuming development would be situated at eastern end of site). Existing landscaping on other boundaries has potential to reduce wind speed and limit escape of litter.

Relative visibility of site means impact of any litter created likely to be higher.

Proposed development would include significant boundary planting which will help to further control escape of litter. Other litter control measures also proposed.

Good management processes will enable prevention of litter and fly tipping on the site. Measures will include netting off lorries taking rubbish away from the site and ensuring that vehicles are cleaned down effectively.

Economic SA objectives

SA objective 15: To achieve sustainable levels of prosperity and economic growth

Very positive effect against this SA objective. Site will impact on long-term investment in waste management infrastructure. It will offer operational flexibility and sustainability. It will contribute to optimisation of the number and location of Household Waste and Recycling Centres, and enhance quality of service provision. Waste transfer stations play an important role in a community's total waste management system, serving as the link between a community's solid waste collection programme and a final waste treatment facilities. They consolidate waste from multiple collection vehicles into larger, high-volume transfer vehicles for more economical shipment to distant treatment sites. The site is big enough to accommodate three proposed facilities which will release land at Olding Road for Phase II of the Public Services Village initiative. It will improve the resilience of business and the economy.

SA objective 16: To encourage and accommodate both indigenous and inward investment

Very positive effect against this SA objective. It will provide further capacity for commercial services and income. It will contribute to maintaining/improving existing waste infrastructure. It will enable to accommodate growth in demand and create opportunities for staff and operational flexibility. Relocation of the current HWRC at Rougham Hill site to Hollow Road Farm due to this site being of sufficient size will release land at Rougham Hill. It is estimated to release £750k capital based on industrial land values.

SA objective 17. To encourage efficient patterns of movement in support of economic growth

The site scored positively against this SA objective. The site is well located next to strategic highways network. It will improve accessibility to work by public transport, walking and cycling.

SA objective 18: Facilitate delivery of the One Public Estate Programme

The size of the site and its location will enable to co-locate needed facilities on a single site and will enable to generate capital receipts, running costs and deliver integrated customer focused services. The site also provides an opportunity for additional space and capacity for other partners to join in the future.

Sites selection options and explanation of choice

Post public consultation amendment/addition:
~~Two options were suggested to provide a comparative analysis between them in terms of their sustainability which enables the partner councils to make an informed decision about which solution presents the most sustainable option to take forward as the most suitable and sustainable option for WSOH.~~

~~Each option has been assessed against the 18 SA objectives. This helped to ensure that the final option chosen was the one that led to the greatest sustainability 'gains' (i.e. the biggest net improvements from the current situation). Overall, both sites options have demonstrated that they are in conformity with the SA objectives and have mainly positive or neutral effects overall. Appropriate protection measures would be incorporated into the design of the facility to minimise the impacts arising from the provision of waste facilities developments on where people live. That said, it is noteworthy that Hollow Road Farm site scored better on four out of five economic SA objectives than the site at Rougham Hill. By having a centrally-based WTS, close to the major population centre in West Suffolk this will reduce traffic impact across West Suffolk.~~

Three options were suggested to provide a comparative analysis between them in terms of their sustainability which enables to make an informed decision about which solution presents the most sustainable option to take forward as the most suitable and sustainable option for WSOH.

Each option has been assessed against the 18 SA objectives. This helped to ensure that the final option chosen was the one that led to the greatest sustainability 'gains' (i.e. the biggest net improvements from the current situation). Overall, the sites options have demonstrated that they are in conformity with the SA objectives and have mainly positive or neutral effects overall. Appropriate protection measures would be incorporated into the design of the facility to minimise the impacts arising from the provision of waste facilities developments on where people live. That said, it is noteworthy that Hollow Road Farm site scored better on four out of five economic SA objectives than the site at Rougham Hill. By having a centrally-based WTS, close to the major population centre in West Suffolk this will reduce traffic impact across West Suffolk.

The Hollow Road Farm site is large enough to allow recycling, transfer and vehicle parking, and is located centrally within the District/borough making collections more efficient and reducing vehicle mileage on local roads. It also minimises the distance waste has to travel once collected, thus providing economic and sustainability benefits.

Furthermore, the site has adaptable site access/egress points and can therefore be modified as required by the Highway Authority for use by Bulk Transfer vehicle HGVs and Refuse Collection Vehicles, as well as for public access. Further support of this site sees it located in Flood Zone 1 (lowest risk) and away from AONB, SAC, SPA and SSSI designations.

Although the WSOH proposal at the Hollow Road Farm Greenfield site would invariably result in the loss of Grade 2 agricultural land, it currently provides the only option to support the SEBC wider ambitions for the development of Phase II of the Public Sector Village initiative.

Similarly, this site offers the greatest capacity and flexibility to incorporate other public sector occupiers. The One Public Sector Estate approach is leading to high levels of demand for shared accommodation and it is believed that, once built, there will be high levels of demand for further sharing of the facilities, similar to the experience with West Suffolk House at Western Way.

Recommendation: Providing that the proposed mitigation measures are in place, the SA scoring results demonstrate that the overall positive effects are greater for the site at Hollow Road Farm which offers greater sustainability benefits, and thus it is recommended through sustainability appraisal process to be the most suitable site for the proposed WSOH development.

How environmental issues raised were taken into account when choosing options

Conclusions, mitigation measures and recommendations provided in this SA document in respect of environmental, social and economic issues raised for the proposed WSOH will be taken into account by the applicant and reflected in the subsequent documents to emphasize the need for appropriate design and operation of new facilities at the planning application stage consultation.

Overall, site options for the WSOH proposal have demonstrated conformity with the SA objectives, and with appropriate mitigation measures in place the facilities siting at Hollow Road Farm accompanied by proper design, operation and monitoring can address and mitigate potential impacts on the surrounding natural environment and the community associated with traffic, noise, odours, air emissions, water quality, vectors and litter.

Other options considered and why they were rejected

Initial testing of WSOH solutions options and sites options against the 18 SA objectives has been undertaken using the SA Framework set out in this document.

The proposed WSOH five solution alternatives were derived from the draft options presented by the Councils as a result of ongoing meetings with stakeholders. A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005) was used to select practically reasonable alternatives in terms of sites for WSOH siting. 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 EIA or a project, both WSOH solutions options and sites options appraisal were kept at the strategic level. Following the appraisal the most sustainable solutions were identified and put forward as the most suitable options.

Cumulative and Synergistic Effects of WSOH proposal versus SA objectives

The SEA Directive requires that the assessment of effects include secondary, cumulative and synergistic effects. Cumulative effects arise where several proposals individually may or may not have a significant effect, but in-combination have a significant effect due to spatial crowding or temporal overlap between plans, proposals and actions and repeated removal or addition of resources due to proposals and actions. Many environmental problems result from cumulative effects. These effects are very hard to deal with on a project by project basis through Environmental Impact Assessment. It is at the SA level that they are most effectively identified and addressed.

Cumulative effects assessment is a systematic procedure for identifying and evaluating the significance of effects from multiple activities. The analysis of the causes, pathways and consequences of these effects is an essential part of the 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 assists in the identification of the total direct and indirect effect on receptors. Often, effects may result from the accumulation of multiple small and often indirect effects rather than few large obvious ones.

Appendices 4 and 5 analyses any synergistic effects of the SA/SEA objectives on WSOH solutions and sites options as a whole. Comments, where appropriate, have been made alongside each option. Table 15 below outlines those receptors that could potentially experience significant cumulative effects, based on current knowledge and methods of assessment.

Table 15: Summary of Cumulative Effects

Effects	Causes	Significance
Cumulative effect of improving the health of Bury St Edmunds' resident population.	The proposals within the document taken together with the Core Strategy policies seek to address aspects that contribute to maintaining and improving health. The Hollow Road Farm site is very well located to maximise tonnes per miles leading to carbon reduction. The proximity of the site to strategic highway network means that there will be less waste transport on local roads and will reduce the overall number of vehicles transporting waste around the county. By having a centrally-based WTS, close to the major population centre in West Suffolk, will reduce traffic impact across West Suffolk. It can improve air quality and a sense of wellbeing.	Significant positive effects increasingly apparent over the medium to longer term.
Cumulative effect on the loss of greenfield land to development.	Core Strategy policies CS1 and CS14 interpret national policy and provide the local approach to sequential development. As a result, the proposed Bury St Edmunds Vision 2031 Submission Draft document favours development on previously developed land. However, in order to meet housing delivery requirements it will be necessary to develop greenfield land in a number of large strategic sites. The proposed site at Hollow Road Farm is a greenfield site and result in the loss of versatile agricultural land. It is proposed the need to mitigate the loss of soil resources by re-using as much of the surplus resources and disposing of any surplus soils thereafter in a sustainable manner.	Significant negative effects developing over the medium to longer term as more greenfield development is completed.
Cumulative effects of Bury St Edmunds economic growth and diversification.	Post public consultation amendment/addition: The provisions for strategic economic growth within the Core Strategy and the proposal of employment sites across the Bury St Edmunds area should help to encourage business and investment within the Bury St Edmunds economy. The site at Hollow Road Farm will impact on long-term investment in waste management infrastructure. It will offer operational flexibility and sustainability. It will contribute to optimisation of the number and location of Household Waste and Recycling Centres, and enhance quality of service provision. It will provide further capacity for commercial services and income. Relocation of the current HWRC at Rougham Hill site to Hollow Road Farm due to this site being of sufficient size will release land at Rougham Hill. It is estimated to release £750k capital based on industrial land values.	Significant positive effects likely over the longer term.

How problems were considered and proposed mitigation measures

Overall, the proposed option will deliver the strategic overarching objectives of the WSOH proposal. The Sustainability Appraisal process has enabled the WSOH proposal to consider the issues faced by the waste partnership when dealing with flood risk, environmental, economic and social aspects of the proposed development.

Waste Management Facilities could have certain impacts including dust, light pollution and HGV movement on the public highway.

Mitigation measures, where negative impacts occur against each SA objective, are outlined in the SA assessment tables which can be found in Appendices of this document. The SA process has enabled the Councils to consider the issues faced when dealing with waste development proposals in West Suffolk. Its primary concern is to address the need to provide for new waste management facilities, but in doing so, to ensure that sites identified are appropriate to the major growth locations and that the sites facilitate the enhancement of West Suffolk's biodiversity and contribute to local landscape character.

Proposed mitigation measures:

Landscape

The Hollow Road Farm site has a gently sloping topography: Transfer stations often are multilevel buildings that need to have vehicle access at several levels. Sites with moderately sloping terrain can use topography to their advantage, allowing access to the upper levels from the higher parts of the natural terrain and access to lower levels from the lower parts.

The prevailing natural topography of the site should be utilised wherever possible to take advantage of existing wind barriers and visual screens. Existing slopes can be used to provide benches and to divert water flows from operational areas.

Traffic

Traffic causes the most significant offsite environmental impacts associated with larger waste transfer stations and vehicle depots. By consolidating shipments to the treatment sites, a waste transfer system will have net positive impacts in terms of reducing community-wide HGV traffic, air emissions, noise, and highway wear. Some of these negative impacts, however, might be concentrated in the immediate vicinity of the transfer station as a result of increased local traffic generated by a transfer station, even though overall impacts are reduced. Evaluating travel routes and the resulting traffic impacts should receive significant attention during facility siting and design to minimize the traffic's offsite environmental impacts.

Any queuing should occur within the operational facility so as not to inhibit the traffic flow on public streets. This should be considered in the site selection phase of development in terms of impact on the local traffic flows, but further detailed consideration is necessary in the design stage as to reduce the impact of traffic on congestion both outside the immediate area of the facility and within the facility itself.

The facility itself should incorporate, as much is as possible, one-way traffic flow, particularly in areas used by the public. Consideration should also be given to minimising intersections, separation of public and transfer operational vehicles, and development of a one-way weighbridge if dual weighbridges are not a feasible cost effective addition.

The site layout should take into consideration the types of vehicles that are likely to frequent the site including both customer and operational vehicles. Particular attention should be given to accommodating residents needing to reverse trailers. Directing traffic flow through or along a tipping area where there are a number of drop off points for the same type of material can assist reduce the need for customers to reverse up to bins, hence reducing potential queuing time.

Noise

Transfer stations and vehicle depots can be a significant source of noise, which might be a nuisance to neighbours. Heavy truck traffic and the operation of heavy-duty facility equipment are the primary sources of noise from developments of this type. Good facility design and operations can help reduce noise emanating from the facility.

Orienting buildings so the site topography and the structure's walls buffer adjacent noise-sensitive properties from direct exposure to noise sources:

- Providing sound-absorbent materials on building walls and ceilings.
- Facing building openings such as entrances away from noise-sensitive adjoining property.
- Confining noisy activities within specified buildings or other enclosures. In particular, enclose hydraulic power units associated with compactors and rams in areas with acoustic silencing materials. Quieter equipment options can also be selected during design.

Air Emissions

Waste sites can affect air quality through such factors as odour, dust and bio aerosols. Air emissions at transfer stations result from dusty wastes delivered to the transfer station, exhaust from mobile equipment such as trucks and loaders, driving on unpaved or dusty surfaces, and clean-up operations such as street sweeping. As with odour control, proper design and operating procedures help minimise air emissions, including:

- Paving all traffic carrying surfaces.
- Installing misting systems to suppress dust inside the building or using a hose to spray dusty wastes as they are unloaded and moved to the receiving vehicles.
- Keeping doors closed when not in use.

Surface water

Keeping surface water free of runoff contamination from waste, mud, and fuel and oil that drips from vehicles is important in maintaining the quality of both the surface and ground water systems. Waste transfer station development typically results in the addition of new impervious surfaces (i.e., paved surfaces) that increase the total quantity of runoff and can contribute to flooding potential. The site layout should seek to minimise impervious areas and maximise landscape and vegetative cover areas to reduce total runoff.

It has been identified that the Hollow Road Farm site lies in a Source Protection Zone 2 and on a principal major aquifer with high permeability. All drainage from roads and hard-standing should be diverted through petrol and oil interceptors prior to discharge under a discharge consent.

Litter

In the normal course of facility operations, stray pieces of waste are likely to become litter in and around the facility. Design and operation considerations that can reduce the litter problem include:

- Conducting all waste handling and processing activities in enclosed areas, if possible.
- Orienting the main transfer building with respect to the predominant wind direction so it is less likely to blow through the building (or tunnel) and carry litter out. Generally the "blank" side of the building should face into the prevailing wind.
- Locating doors in areas that are less likely to have potentially litter-producing materials stored near them, regardless of building orientation.
- Covering of loads to prevent the spillage of any material.
- Install litter screens or fences around the site perimeter.

Chapter 5: Proposals for Monitoring

The Directive's provisions on monitoring apply when the policy is being put into effect, rather than during its preparation and adoption. However, preparations for monitoring will need to be considered in the course of preparing the policy.

Monitoring allows the actual significant environmental effects of implementing the plan or programme to be tested against those predicted. It thus helps to ensure that any problems which arise during implementation, whether or not they were foreseen, can be identified and future predictions made more accurately.

Table 16: The SA Monitoring Framework

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
1. To maintain/ improve air and water quality (including HGV movements) in line with national standards limits	Will it improve the quality of inland waters? Is the site proposed within a groundwater source protection zone and/ or within an area designated as major aquifer? Is the site proposed within the area with good access to mains water and waste networks with existing capacity? Will it improve air quality? Will it affect levels of the 7 National Objective pollutants for local air quality (SO2, NO2, PM10, benzene, 1,3-butadene, CO, Pb).	Concentration of air pollutants AQMAs Water quality in rivers. Groundwater quality.	Post public consultation amendment/ addition: • ~~Air quality results from districts (annual)~~ • ~~Districts' Monitoring of AQMAs declared in their area (annual)~~ • Air quality results from specific baseline monitoring at key locations	Districts' AMRs	Not exceed set levels

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
2. To conserve soil resources and quality	Will it minimise the loss of greenfield land to development? Will it minimise loss of the best and most versatile agricultural land? Will it affect the amount of contaminated land? Will it affect quality of soils? Is the site proposed on greenfield land? Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3)? Will it lead to remediation of contaminated land?	Number and percentage of new development completed on greenfield land. Allocations on best and most versatile agricultural land (grades 1, 2, and 3a) No. of waste management sites on greenfield land. Waste management sites/ development on best agricultural land. Map/data showing soil quality. Number of potential and declared contaminated sites returned to beneficial use. Number / area of organic farms (ha).	• Environment Agency (EA) unresolved objections against planning applications (annual) • Development Control (annual)	Districts' AMRs	Goal to minimize the loss.

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
3. To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals? Will it promote sustainable use of water? Will it maintain water availability for water dependant habitats? Will it affect rates of abstraction/water use? Will it affect grey water recycling?	Recycled aggregate production. Daily domestic water use (per capita consumption, litres) for St Edmundsbury. Will it promote the wise use of water, taking account of climate change? Water availability for water dependent habitats. Use of recycled water on waste sites.	• Suffolk Biological Records Centre • DC/ Enforcement monitoring reports (annual)	Districts' AMRs	Increase in percentage
4. To reduce waste	Will it reduce household waste? Will it increase waste recovery and recycling?	Household and municipal waste produced. Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled.	• AONB boundary review (3 yearly) • DC Monitoring (annual)	Districts' AMRs	Increase in percentage reduction
5. To reduce the effects of traffic on the environment	To minimise effects of HGV traffic on the environment Will it affect movements on Strategic Lorry Route Network? Will it increase the proportion of journeys made using modes other than the private car? Will it reduce waste mileage?	Traffic volumes in key locations Location to maximize tonnes per miles Location of Strategic Lorry Routes Percentage of journeys to work undertaken by sustainable modes	SCC Planning Permissions refused on such grounds (annual)	Districts' AMRs	Decrease in traffic volumes

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
6. To maintain/ improve biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation interest statutory: SSSIs, SPA, SAC, LNRs and non-statutory: County Wildlife Sites (CWS)? Will it avoid disturbance or damage to protected species and their habitats? Will it help deliver targets and action for habitats and species within the Suffolk Biodiversity Action Plan (BAP)? Will it help to reverse the national decline in farmland birds? Will it protect and enhance sites, features and areas of geological value in both urban and rural areas? Will there be enhancement opportunities as a result of development? Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 2km of a SSSI. Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 500m of a site. Are BAP habitats known to be on the site? Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS Regionally Important Geological/Geomorphological Sites)?	Change in number and area of designated ecological sites. Condition of CWS (National Indicator 197). Development proposals affecting protected species outside protected areas. Achievement of Habitat Action Plan targets. Achievement of Species Action Plan targets. Development proposals affecting BAP habitats outside protected areas. Bird survey results. Reported condition of ecological SSSIs.	• Environment Agency (CAMS) • Development Control (annual)	Districts' AMRs	100%

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
7. To maintain/ improve the quality and local distinctiveness of landscapes/ townscapes	Will it reduce the amount of derelict, degraded and underused land? Will it improve the landscape and/or townscape?	Changes in landscape (Landscape Character Assessment) Area of designated landscape (SLAs & AONBs and The Broads) Number of TPOs affected Number of field boundaries affected Light pollution Number of planning applications refused for reasons due to poor design	• Environment Agency objections sustained (annual) • Planning applications refused (annual)	Districts' AMRs	100%
8. To reduce contributions to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption? Will the site proposal promote the incorporation of small-scale renewable in developments?	Consumption of electricity - Domestic use per consumer and total commercial and industrial use. Consumption of energy. Use of low carbon technologies. Location to maximize tonnes per miles. Opportunities for utilizing renewable or low-carbon energy supply systems.	• SCC traffic monitoring surveys • Highways Agency traffic monitoring (annual)	• Local Transport Plan; Highways Agency website • Districts' AMRs	Percentage increase

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
9. To move treatment of waste up the waste hierarchy	Will it affect recycling/reuse measures? Will it affect amount of waste to landfill? Will it affect energy recovery from waste?	Tonnage recycled, composted and landfilled.	SSAG Monitoring/ Development Control/ SCC Archaeology Service	Districts' AMRs	Percentage increase
10. To reduce vulnerability to flooding	Will it minimise the risk of flooding to people and property from rivers and watercourses? Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?	• Flood Risk – Planning applications approved against Environment Agency advice. • Properties at risk of flooding from rivers. • Incidence of fluvial flooding (properties affected). • SFRA results.	Development Control (DC) (annual)	Districts' AMRs	100%

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
11. To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas? Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	Number of listed buildings and buildings at risk Area of historic parks and gardens. Number and area of Conservation Areas (CAs) and Article 4 directions. Number of Conservation Area Appraisals (CAAs) completed and enhancement. schemes (in conservation areas) implemented. Number of Scheduled Monuments (SMs) damaged as a result of development. Number of applications affecting known or unknown archaeological site but judged of high potential and approved with conditions requiring prior excavation or recording during development.	• SCC Waste survey to industry • Planning Permissions conditions monitoring (annual)	Districts' AMRs	100%

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
12. To maximise opportunities for new/ additional employment	Will it to affect direct employment/ancillary employment in/to the waste industry?	Average earnings in waste industry Employment figures for waste industry	ONS (annual)	ONS website	
13. To maintain/ improve health of the population overall	Will it impact on the quality and quantity of footpaths? Will it affect human health? Will any WTS facilities be sited within 250m of residential properties? Does it promote the use of landscaping and attenuation bunds to reduce the impact of noise-creating activities?	Percentage of footpaths open to public HPA position statement on Municipal Solid Waste Incineration Enviros Report: Review of Environmental and Health Effects of Waste Management: Municipal Solid Waste and Similar Wastes Healthy Sustainable Communities - what works?	• SCC Rights of Way work plans • Community Strategies (annual)	Ease of Use of the Public Rights of Way Network.	100%

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
14. To minimise the impacts arising from the provision of waste facilities developments on where people live	Will it cause a statutory nuisance, in terms of odour? Have noise control planning conditions been set? Will it affect the EPA1990 in terms of noise? Have dust control planning conditions been set? Will it affect the EPA1990, in terms of dust? Will it affect fly tipping in the County?	Number of human receptors. Compliance with noise/dust control conditions. Complaints relating to noise, dust and odour (Districts Environmental Health officers and SCC.) Fly tipping statistics (SCC). Light pollution maps.	DC Planning permissions (annual)	Districts' AMRs	Decrease in numbers of complaints
15. To achieve sustainable levels of prosperity and economic growth	Will it impact on long-term investment in waste management infrastructure? Will it impact on an appropriate/adequate supply of land? Will it offer operational flexibility and sustainability? Does it aim to optimise the number and location of Household Waste and Recycling Centres, and enhance quality of service provision?	Employment land availability. Amount of waste exported. Amount of waste treated within county.	ONS and Suffolk Observatory	ONS website; Suffolk Observatory website	Percentage increase
16. To contribute to releasing land for Phase II of the Public Service Village initiative	Will it impact on an appropriate/adequate supply of land? Will it improve the resilience of business and the economy?	Employment land availability.	ONS and Suffolk Observatory	Districts' AMRs	Percentage increase

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
17. To encourage and accommodate both indigenous and inward investment	Does it provide further capacity for commercial services and income? Does it contribute to maintaining/improving existing waste infrastructure? Will it unable to accommodate growth in demand and create opportunities for staff and operational flexibility?	Amount of savings achieved. Efficiency and income generated. Opportunities for staff created in waste industry.	ONS and Suffolk Observatory	Districts' AMRs	Percentage increase
18. To encourage efficient patterns of movement in support of economic growth	Will it impact on road dependency? Will it affect alternative modes of transport of waste? Will it reduce commuting? Will it impact on road dependency? Will it affect alternative modes of transport of waste? Will it improve accessibility to work by public transport, walking and cycling?	No of developments where a green travel plan is submitted/condition of development. Distances travelled to work for the resident population. Number / percentage of people working from home as main place of work. Number of developments where a travel plan is submitted or is a condition of development. Percentage of journeys to work undertaken by sustainable modes.	ONS and Suffolk Observatory	Districts' AMRs	Percentage increase

SA Objectives	SA Questions	Performance Indicator	Source of data/ frequency of monitoring	Where to be reported	Targets
19. The One Public Estate Programme	Does it generate capital receipts? Does it reduce running costs? Does it deliver more integrated customer focussed services? Does it contribute to reduction of costs of council services and provision for small and large business units?	Capital receipts. Costs reduction.	ONS and Suffolk Observatory	Districts' AMRs	Percentage increase

Chapter 6: Post-Consultation Changes

Post public consultation amendment/addition:
~~As a result of the consultation with various stakeholders of the SA Report December 2015, changes will be made to the SA Report to reflect consultation responses. This consultation will be carried out to enable the findings and recommendations of the SA assessment to be reflected whilst developing reasonable alternatives for the WSOH proposal and identifying the likely significant effects of available options before choosing preferred options to proceed with the WSOH proposal.~~

~~The development and appraisal of options is an iterative process, with options being revised to take account of the appraisal findings which are documented in this SA Report. The SA Report has enabled forecasting and evaluation of the significant effects to assist in developing and refining options for the WSOH proposal, their selection and publication for consultation and provided justification for the single site approach at Hollow Road Farm as its only viable and best suited option.~~

The development and appraisal of options is an iterative process, with options being revised to take account of the appraisal findings which are documented in this SA Report. The SA Report has enabled forecasting and evaluation of the significant effects to assist in developing and refining options for the WSOH proposal, their selection and publication for consultation.

The consultation on the SA ran from the 8 January to the 19th February 2016. This document was available on the West Suffolk Councils' website at: www.westsuffolk.gov.uk/wsoh.

As a result of the consultation with various stakeholders of the SA Report December 2015, changes have been made to the SA Report to reflect consultation responses. The consultation was carried out to enable the findings and recommendations of the SA assessment to be reflected whilst developing reasonable alternatives for the WSOH proposal and identifying the likely significant effects of available options before choosing preferred options to proceed with the WSOH proposal.

A number of comments were received with regards to the SA process and the SA Report. The main concerns were associated with finding the right balance between environmental and economic considerations of the proposed WSOH; noise impacts during the 12 months construction phase of the project; impact on air quality and odour; and potential impacts as a result of the increase in traffic movements.

Following the consultation exercise, amendments have been carried out throughout the Final SA Report document for further clarification, and full responses to the issues raised in respect of the SA process have been included in Appendix 8 of this document.

The consultation responses prompted the need to revisit some scores given during the initial SA assessment, however, this did not lead to any changes to scores and conclusions in the Final version of the SA document.

Following the public consultation held from 8 January to the 29th February 2016, people's views were sought on the IAPOS Report and its accompanying SA Report. Interested parties were invited to suggest any sites which they felt might be suitable for accommodating the waste and operational facilities required but which did not feature in the Report. A number of new sites were suggested and were assessed alongside the original sites, with findings presented in the Carter Jonas IAPOS Report, December 2015 (amended May 2016). The 20 new eligible sites suggested through the consultation have been assessed in the same manner as the original sites. As a result of the assessment three new unallocated Greenfield sites passed the exclusionary criteria and were taken for further comparative analysis using qualitative criteria: McRae Estates land, Land at Rougham Hill and Land south of West Suffolk Crematorium. The two of these sites – McRae

Estates land and Land at Rougham Hill both scored significantly negatively and therefore have not been considered to be reasonable, realistic and deliverable alternatives to be included in the SA assessment. Land south of West Suffolk Crematorium, on the other hand, has scored significantly higher resulting in a positive scoring and therefore has been taken forward to the SA process as a reasonable, deliverable and realistic alternative to the Hollow Road Farm site.

Chapter 7: Conclusions

Post public consultation amendment/addition:

This document provides the sustainability appraisal in terms of social, economic and environmental factors which accompanies WSOH proposal on consultation. It summarises the baseline conditions and key issues in the wider Borough and the town of Bury St Edmunds. A comprehensive review of the key plans, programmes and strategies was undertaken to consider the wider context within which WSOH and other Local Plan documents will function.

After developing an understanding of the proposal geographical scope, the WSOH proposal was appraised against a set of sustainability objectives. The 18 SA framework objectives were used consistently to appraise the proposal and were developed from the work undertaken to review the list of relevant plans and programmes and the identified baseline position, including the key sustainability issues.

The proposal is to co-locate the functions to provide a combined service area for the waste collection and waste disposal authorities comprising depot, WTS and HWRC. It provides an opportunity to bring waste transfer and waste collection together on the same site to reduce costs and increase efficiency.

To test the overall sustainability of this approach, four other options, including 'do nothing' were considered and assessed against 18 SA objectives. The appraisal demonstrated that co-location of three facilities on one site option has the highest score in terms of a number of positive effects and presents the most sustainable solution option for the WSOH proposal.

Following this exercise, alternatives were sought for the best suited site to accommodate the above option for WSOH. Results of the search revealed that none of the sites, apart from Hollow Road Farm and Tut Hill have met the essential exclusionary criteria. A comparative analysis using assessment criteria of the two shortlisted sites was carried out through a combination of information gained through the site visits, desk based assessments and GIS review.

The assessment has concluded that, of the two sites shortlisted, the Hollow Road Farm site scored much more favourably in comparison with the site at Tut Hill. In addition, Hollow Road Farm is unconditionally available for acquisition, thus making this site the only current viable solution for the WSOH proposal. With Tut Hill being subsequently excluded from being a viable option suitable for the WSOH proposal due to issues of deliverability and availability, the site was excluded from the SA process. Thus the scenario of 'business as usual' was applied as a reasonable alternative to the shortlisted site at Hollow Road Farm for the purpose of this SA process. In this case, 'business as usual' was a continuation of a policy or proposal, as an alternative to preparing a new one – implementing planning permission for WTS and HWRC at Rougham Hill site and using Rougham Hill site as a reasonable realistic alternative for the SA process.

The SA assessment of the two sites demonstrated that that they are both in conformity with the SA objectives and have mainly positive or neutral effects overall. The sites lie within groundwater source protection zones and major aquifer areas. The results of the SA identified the need for the mitigation measures to ensure that the impact of the development is minimal. However, Hollow Road Farm site scored better on four out of five economic SA objectives than the site at Rougham Hill. By having a centrally-based WTS, close to the major population centre in West Suffolk this will reduce traffic impact across West Suffolk. Furthermore, the SA assessment concluded that the site was adaptable for site access/egress points and can, therefore, be modified as required by the Highway Authority for use by Bulk Transfer Vehicle HGVs and Refuse Collection Vehicles, as well as for public access. Further support of this site sees it located in Flood Zone 1 (lowest risk) and away

~~from AONB, SAC, SPA and SSSI designations.~~

~~Although the WSOH proposal at the Hollow Road Farm Greenfield site would invariably result in the loss of Grade 2 agricultural land, the SA recommends that the loss of soil resources is mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing of any surplus soils thereafter in a sustainable manner.~~

~~Hollow Road Farm currently provides the only viable option to support the authority's wider ambitions for the development of Phase II of the Public Sector Village initiative. Similarly, this site offers the greatest capacity and flexibility to incorporate other public sector occupiers. The One Public Sector Estate approach is leading to high levels of demand for shared accommodation and it is believed that, once built, there will be high levels of demand for further sharing of the facilities, similar to the experience with West Suffolk House at Western Way.~~

~~The SA has concluded that, providing that the proposed mitigation measures are in place, the overall positive effects are greater for the site at Hollow Road Farm which offers greater sustainability benefits, and thus it is recommended through sustainability appraisal process to be the most suitable site for the proposed WSOH development.~~

This document provides the sustainability appraisal in terms of social, economic and environmental factors which accompanies WSOH proposal on consultation. It summarises the baseline conditions and key issues in the wider Borough and the town of Bury St Edmunds. A comprehensive review of the key plans, programmes and strategies was undertaken to consider the wider context within which WSOH and other Local Plan documents will function.

After developing an understanding of the proposal geographical scope, the WSOH proposal was appraised against a set of sustainability objectives. The 18 SA framework objectives were used consistently to appraise the proposal and were developed from the work undertaken to review the list of relevant plans and programmes and the identified baseline position, including the key sustainability issues.

The proposal is to co-locate the functions to provide a combined service area for the waste collection and waste disposal authorities comprising depot, WTS and HWRC. It provides an opportunity to bring waste transfer and waste collection together on the same site to reduce costs and increase efficiency.

To test the overall sustainability of this approach, four other options, including 'do nothing' were considered and assessed against 18 SA objectives. The appraisal demonstrated that co-location of three facilities on one site option has the highest score in terms of a number of positive effects and presents the most sustainable solution option for the WSOH proposal.

Following this exercise, alternatives were sought for the best suited site to accommodate the above option for WSOH.

The assessment has concluded that, of the five sites shortlisted, the Hollow Road Farm site scored much more favourably in comparison with other sites. With Tut Hill being subsequently excluded from being a viable option suitable for the WSOH proposal due to issues of deliverability and availability, the site was excluded from the SA process. Thus the scenario of 'business as usual' was applied as a reasonable alternative to the shortlisted site at Hollow Road Farm for the purpose of this SA process. In this case, 'business as usual' was a continuation of a policy or proposal, as an alternative to preparing a new one – implementing planning permission for WTS and HWRC at Rougham Hill site and using Rougham Hill site as a reasonable realistic alternative for the SA process.

As a result of the assessment three new unallocated Greenfield sites passed the exclusionary criteria and were taken for further comparative analysis using qualitative criteria: McRae Estates land, Land at Rougham Hill and Land south of West Suffolk Crematorium.

The two of these sites – McRae Estates land and Land at Rougham Hill both scored significantly negatively and therefore have not been considered to be reasonable, realistic and deliverable alternatives to be included in the SA assessment. Land south of West Suffolk Crematorium, on the other hand, has scored significantly higher resulting in a positive scoring and therefore has been taken forward to the SA process as a reasonable, deliverable and realistic alternative to the Hollow Road Farm site.

Land south of West Suffolk Crematorium is sufficiently distinct to highlight the different sustainability implications of each of these two sites and has enabled meaningful comparisons to be made. Land south of West Suffolk Crematorium and 'business as usual' current Rougham Hill Site have been identified as reasonable alternatives to consider alongside the Hollow Road Farm site and all have been subject to the SA process outlined in this Final SA document.

The SA assessment of the three sites demonstrated that that they are all in general conformity with the SA objectives and have mainly positive or neutral effects overall. The sites lie within groundwater source protection zones and major aquifer areas. The results of the SA identified the need for the mitigation measures to ensure that the impact of the development is minimal. However, the Hollow Road Farm site scored better on four out of five economic SA objectives than the site at Rougham Hill. By having a centrally-based WTS, close to the major population centre in West Suffolk this will reduce traffic impact across West Suffolk. Furthermore, the SA assessment concluded that the site was adaptable for site access/egress points and can, therefore, be modified as required by the Highway Authority for use by Bulk Transfer Vehicle HGVs and Refuse Collection Vehicles, as well as for public access. Further support of this site sees it located in Flood Zone 1 (lowest risk) and away from AONB, SAC, SPA and SSSI designations.

In addition, Hollow Road Farm scored higher than the site at Land south of West Suffolk Crematorium on the a number of SA objectives: landscape impacts, archaeology and impacts arising from the provision of waste facilities developments on where people live.

The two sites' differing scores against these criteria reflect material differences in their suitability for accommodating the optimal solution proposals. Further, the necessarily utilitarian nature of the optimum solution proposals means that the greater visual and light sensitivity of Land south of West Suffolk Crematorium will make it less suitable than Hollow Road Farm for accommodating them. Finally, even though litter would be carefully controlled at any site, it is likely to be harder to control litter at land south of West Suffolk Crematorium than at Hollow Road Farm. The impact of the litter at land south of West Suffolk Crematorium, should it occur, may also be higher.

Although the WSOH proposal at the Hollow Road Farm Greenfield site would invariably result in the loss of Grade 2 agricultural land, the SA recommends that the loss of soil resources is mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing of any surplus soils thereafter in a sustainable manner.

The sites SA has therefore shown Hollow Road Farm to be the most suitable, available and deliverable of the three sites options assessed.

The SA has concluded that, providing that the proposed mitigation measures are in place, the overall positive effects are greater for the site at Hollow Road Farm which offers greater sustainability benefits, and thus it is recommended through sustainability appraisal process to be the most suitable site for the proposed WSOH development.

Appendices

Appendix 1: Compatibility testing of WSOH Objectives against the SA Objectives

SA Objectives	WSOH Objectives						
Key Compatible Neutral Incompatible	To reduce the cost of running waste and cleansing services in West Suffolk by reducing the number of buildings used, sharing assets between public sector organisations and reducing staff costs.	To increase the efficiency of waste collection services by developing new trade waste arrangements and remodelling household waste services.	To improve the customer experience for residents using the Household Waste Recycling Centre by creating a 'same level' site for customers with sunken skips...	To improve the customer experience for Fleet Management Services, by creating welcoming facilities, allowing for a new marketing strategy and increased revenue.	To increase the efficiency of the Grounds Maintenance Service by having a Transfer Facility on site which will cut out double handling of green waste and reduce waste miles. This will free-up further capacity to sell for increased revenue.	To manage the impact of future housing and commercial growth in West Suffolk by improving facilities and increasing efficiency and capacity.	To minimise the environmental impact of the provision of waste management and operation services in West Suffolk and thereby increase their sustainability
Environmental							
1. To maintain/ improve air and water quality (including HGV movements) in line with national standards limits		Promotes sustainable transportation			Minimised traffic movements		Directly promotes this objective
2. To conserve soil resources and quality							Directly promotes this objective
3. To use water and mineral resources efficiently, and re-use and recycle where possible							
4. To reduce waste		Directly promotes this objective				Directly promotes this objective	

SA Objectives	WSOH Objectives						
	To reduce the cost of running waste and cleansing services in West Suffolk by reducing the number of buildings used, sharing assets between public sector organisations and reducing staff costs.	To increase the efficiency of waste collection services by developing new trade waste arrangements and remodelling household waste services.	To improve the customer experience for residents using the Household Waste Recycling Centre by creating a 'same level' site for customers with sunken skips...	To improve the customer experience for Fleet Management Services, by creating welcoming facilities, allowing for a new marketing strategy and increased revenue.	To increase the efficiency of the Grounds Maintenance Service by having a Transfer Facility on site which will cut out double handling of green waste and reduce waste miles. This will free-up further capacity to sell for increased revenue.	To manage the impact of future housing and commercial growth in West Suffolk by improving facilities and increasing efficiency and capacity.	To minimise the environmental impact of the provision of waste management and operation services in West Suffolk and thereby increase their sustainability
5. To reduce the effects of traffic on the environment					Directly promotes this objective		Directly promotes this objective
6. To maintain/ improve biodiversity and geodiversity							Directly promotes this objective
7. To maintain/ improve the quality and local distinctiveness of landscapes/ townscape							Directly promotes this objective
8. To reduce contributions to climate change					Promotes sustainable transportation Reduce waste mileage		
9. To move treatment of waste up the waste hierarchy		Directly promotes this objective				Directly promotes this objective	Directly promotes this objective

SA Objectives	WSOH Objectives						
	To reduce the cost of running waste and cleansing services in West Suffolk by reducing the number of buildings used, sharing assets between public sector organisations and reducing staff costs.	To increase the efficiency of waste collection services by developing new trade waste arrangements and remodelling household waste services.	To improve the customer experience for residents using the Household Waste Recycling Centre by creating a 'same level' site for customers with sunken skips...	To improve the customer experience for Fleet Management Services, by creating welcoming facilities, allowing for a new marketing strategy and increased revenue.	To increase the efficiency of the Grounds Maintenance Service by having a Transfer Facility on site which will cut out double handling of green waste and reduce waste miles. This will free-up further capacity to sell for increased revenue.	To manage the impact of future housing and commercial growth in West Suffolk by improving facilities and increasing efficiency and capacity.	To minimise the environmental impact of the provision of waste management and operation services in West Suffolk and thereby increase their sustainability
10. To reduce vulnerability to flooding							
11. To conserve and where appropriate enhance areas of historical and archaeological importance							
Social							
12. To maximise opportunities for new/ additional employment				Contributes to this objective		Contributes to this objective	
13. To maintain/ improve health of the population overall							
14. To minimise the impacts arising from the provision of waste facilities developments on where people live							Directly promotes this objective

SA Objectives	WSOH Objectives						
	To reduce the cost of running waste and cleansing services in West Suffolk by reducing the number of buildings used, sharing assets between public sector organisations and reducing staff costs.	To increase the efficiency of waste collection services by developing new trade waste arrangements and remodelling household waste services.	To improve the customer experience for residents using the Household Waste Recycling Centre by creating a 'same level' site for customers with sunken skips...	To improve the customer experience for Fleet Management Services, by creating welcoming facilities, allowing for a new marketing strategy and increased revenue.	To increase the efficiency of the Grounds Maintenance Service by having a Transfer Facility on site which will cut out double handling of green waste and reduce waste miles. This will free-up further capacity to sell for increased revenue.	To manage the impact of future housing and commercial growth in West Suffolk by improving facilities and increasing efficiency and capacity.	To minimise the environmental impact of the provision of waste management and operation services in West Suffolk and thereby increase their sustainability
Economic							
15. To achieve sustainable levels of prosperity and economic growth	Directly promotes this objective			Directly promotes this objective			
16. To encourage and accommodate both indigenous and inward investment		Contributes to this objective		Directly promotes this objective			
17. To encourage efficient patterns of movement in support of economic growth					Directly promotes this objective	Directly promotes this objective	
18. The One Public Estate Programme	Contributes to this objective	Contributes to this objective			Contributes to this objective		

Appendix 2: Compatibility testing of WSOH solution options against the SA objectives

Action	Option 1 do nothing				Option 2 implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue				Option 3 implement Rougham Hill planning permission and relocate depots				Option 4 co-locate all facilities on new site				Option 5 co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
Environmental																				
1. To maintain/ improve air and water quality (including HGV movements) in line with national standards limits	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects
2. To conserve soil resources and quality	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects
3. To use water and mineral resources efficiently, and re-use and recycle where possible	0	0	0	Neutral effects	+	+	+	Positive effects Design of the proposed facility could maximise efficient use of water	+	+	+	Positive effects Design of the proposed facility could maximise efficient use of water	+	+	+	Positive effects Design of the proposed facility could maximise efficient use of water	+	+	+	Positive effects Design of the proposed facility could maximise efficient use of water

Action	Option 1 do nothing				Option 2 implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue				Option 3 implement Rougham Hill planning permission and relocate depots				Option 4 co-locate all facilities on new site				Option 5 co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
4. To reduce waste	–	–	–	No proposal means no waste reduction	+	+	+	Positive effects	+	+	+	Positive effects	+	+	+	Positive effects	+	+	+	Positive effects
5. To reduce the effects of traffic on the environment	–	–	–	No waste mileage reduction	0	0	0	Neutral effects Waste mileage reduction	0	0	0	Neutral effects Waste mileage reduction	0	0	0	Neutral effects Waste mileage reduction	0	0	0	Neutral effects Waste mileage reduction
6. To maintain/ improve biodiversity and geodiversity	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects
7. To maintain/ improve the quality and local distinctiveness of landscapes/ townscapes	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects

Action	Option 1 do nothing				Option 2 implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue				Option 3 implement Rougham Hill planning permission and relocate depots				Option 4 co-locate all facilities on new site				Option 5 co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
8. To reduce contributions to climate change	–	–	–	No waste mileage reduction	+	+	+	Maximises tonnes per miles – carbon emissions reduction	+	+	+	Maximises tonnes per miles – carbon emissions reduction	++	++	++	Co-location leads to greater waste mileage savings – carbon emissions reductions	+	+	+	Maximises tonnes per miles – carbon emissions reduction
9. To move treatment of waste up the waste hierarchy	–	–	–	Does not contribute to this objective in the absence of proposal	++	++	++	Directly contributes to this objective	++	++	++	Directly contributes to this objective	++	++	++	Directly contributes to this objective	++	++	++	Directly contributes to this objective
10. To reduce vulnerability to flooding	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects
11. To conserve and where appropriate enhance areas of historical and archaeological importance	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects

Action	Option 1 do nothing				Option 2 implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue				Option 3 implement Rougham Hill planning permission and relocate depots				Option 4 co-locate all facilities on new site				Option 5 co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
Social																				
12. To maximise opportunities for new/ additional employment	–	–	–	No construction jobs, no employment land released	+	0	0	Short term construction jobs	++	++	++	Short term construction jobs Release employment land	++	++	++	Short term construction jobs Release employment land	++	++	++	Short term construction jobs Release employment land
13. To maintain/ improve health of the population overall	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects	0	0	0	Neutral effects
14. To minimise the impacts arising from the provision of waste facilities developments on where people live	+	0	0	Noise will be avoided as no construction will take place	–	0	0	Noise during construction phase	–	0	0	Noise during construction phase	–	0	0	Noise during construction phase	–	0	0	Noise during construction phase

Action	Option 1 do nothing				Option 2 implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue				Option 3 implement Rougham Hill planning permission and relocate depots				Option 4 co-locate all facilities on new site				Option 5 co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
Economic																				
15. To achieve sustainable levels of prosperity and economic growth	–	–	–	Will not enhance quality of service provision	+	+	+	Will enhance quality of service provision	+	+	+	Will enhance quality of service provision	++	++	++	Will enhance quality of service provision Operational flexibility and sustainability	+	+	+	Will enhance quality of service provision
16. To encourage and accommodate both indigenous and inward investment	–	–	–	Will not improve existing waste infrastructure	+	+	+	Will contribute to improving existing waste infrastructure	+	+	+	Will contribute to improving existing waste infrastructure	++	++	++	Will provide further capacity for commercial series and income Will contribute to improving existing waste infrastructure	+	+	+	Will contribute to improving existing waste infrastructure

Action	Option 1 do nothing				Option 2 implement Rougham Hill planning permission and leave depots at Olding Road and Holborn Avenue				Option 3 implement Rougham Hill planning permission and relocate depots				Option 4 co-locate all facilities on new site				Option 5 co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
17. To encourage efficient patterns of movement in support of economic growth	0	0	0	Neutral effects	+	+	+	Positive effects	+	+	+	Positive effects	+	+	+	Positive effects	+	+	+	Positive effects
18. The One Public Estate Programme	–	–	–	Will not be achieved	0	0	0	Neutral effects	+	+	+	Positive effects Partly contributes to this objective	++	++	++	Offers full integration of services Will release land for Phase II Co-location will improve the resilience of business and the economy	+	+	+	Positive effects Partly contributes to this objective

Appendix 3: Compatibility testing of sites options against the SA objectives

Post public consultation amendment/addition:

Sites	Option 1 Hollow Road Farm				Option 2 (Business as usual) Rougham Hill				Option 3 Land south of West Suffolk Crematorium			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
Environmental												
1. To maintain/ improve air and water quality (including HGV movements) in line with national standards limits	0	0	0	Some negative effects could be due to waste transportation by road as well as any air pollution associated with the operation of the facility. Although waste sites can affect air quality through such factors as odour, dust and bio aerosols, the majority of waste transfer operations will take place within a building. Emissions would be within the national standards and would be monitored as a mitigation measure throughout through development control requirements. Consolidating smaller loads from collection vehicles into larger transfer vehicles reduces hauling costs 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, air emissions, and road wear.	0	0	0	Limited effect. The site and proposed use will provide new facility for processing waste in the county and will reduce the distance waste is transported by road. Emissions would be within the national standards and would be monitored as a mitigation measure throughout through development control requirements. Consolidating smaller loads from collection vehicles into larger transfer vehicles reduces hauling costs 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, air emissions, and road wear. Limited effect. Mitigation measures include the use of Sustainable Urban Drainage Systems (SUDS).	–	–	–	Some negative effects could be due to waste transportation by road as well as any air pollution associated with the operation of the facility. Although waste sites can affect air quality through such factors as odour, dust and bio aerosols, the majority of waste transfer operations will take place within a building. Emissions would be within the national standards and would be monitored as a mitigation measure throughout through development control requirements. The significant highway improvements required to deliver satisfactory access arrangements at Land south of WSC make it less suitable than Hollow Road Farm where the access arrangements are already considered acceptable in principle.

Sites	Option 1 Hollow Road Farm				Option 2 (Business as usual) Rougham Hill				Option 3 Land south of West Suffolk Crematorium			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
1. To maintain/ improve air and water quality (including HGV movements) in line with national standards limits				The proximity of the site to strategic highway network means that there will be less waste transport on local roads. The site is at a distance of more than 250 m from potential human receptors. The nearest residential receptor is located 315m to the west of the site along Barton Hill, with the nearest residential receptor to the south east at a distance of 600m. The site lies in a Source Protection zone 2 and on a principal major aquifer with high permeability. Applicant would need to demonstrate that development will not impact on water quality. Mitigation measures can include the use of Sustainable Urban Drainage Systems (SUDS). Drainage from all hard standing areas will be through oil and petrol interceptors to prevent pollution. A detailed drainage plan for foul water, with details of any proposed drainage infrastructure will be included with the planning application.					–	–	–	The site lies in a Source Protection zone 2 and on a principal major aquifer with high permeability. Applicant would need to demonstrate that development will not impact on water quality. Mitigation measures can include the use of Sustainable Urban Drainage Systems (SUDS). Drainage from all hard standing areas will be through oil and petrol interceptors to prevent pollution. A detailed drainage plan for foul water, with details of any proposed drainage infrastructure will be included with the planning application.

Sites	Option 1 Hollow Road Farm				Option 2 (Business as usual) Rougham Hill				Option 3 Land south of West Suffolk Crematorium			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
2. To conserve soil resources and quality	–	–	–	Loss of versatile agricultural land. It is proposed the need to mitigate the loss of soil resources by re-using as much of the surplus resources on and disposing any surplus soils thereafter in a sustainable manner.	0	0	0	Previously developed land.	–	–	–	Loss of versatile agricultural land. It is proposed the need to mitigate the loss of soil resources by re-using as much of the surplus resources on and disposing any surplus soils thereafter in a sustainable manner.
3. To use water and mineral resources efficiently, and re-use and recycle where possible	+	+	+	The design of the facility could maximise the efficient use of water.	+	+	+	The design of the facility could maximise the efficient use of water.	+	+	+	The design of the facility could maximise the efficient use of water. It is proposed the need to mitigate the loss of soil resources by re-using as much of the surplus resources on and disposing any surplus soils thereafter in a sustainable manner.

Sites	Option 1 Hollow Road Farm				Option 2 (Business as usual) Rougham Hill				Option 3 Land south of West Suffolk Crematorium			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
4. To reduce waste	++	++	++	Facilitates waste minimisation.	++	++	++	Facilitate waste minimisation.	++	++	++	Facilitates waste minimisation.
5. To reduce the effects of traffic on the environment	0	0	0	The Waste Transfer Station will form part of the integrated waste management system and will reduce the overall number of vehicles transporting waste around the county. Additional traffic movements would be accounted for by HGVs accessing the WTS and the depot to deliver or collect waste. There is expected to be an additional 240 vehicle movements per day. However, in absolute terms the anticipated trip generation is expected to be modest and consequently, impacts on sensitive receptors are expected to be minimal. Site is very well located to maximise tonnes per miles – carbon reduction. Greater waste miles efficiencies.	0	0	0	As stated the volumes of waste being accepted at the HWRC are not expected to alter significantly. This will result in there being little/no change to the vehicle numbers accessing the HWRC site through the proposed redevelopment of the site. Site is very well located to maximise tonnes per miles – carbon reduction.	0	0	0	The Waste Transfer Station will form part of the integrated waste management system and will reduce the overall number of vehicles transporting waste around the county. Additional traffic movements would be accounted for by HGVs accessing the WTS to deliver or collect waste. There is expected to be an additional 240 vehicle movements per day. However, in absolute terms the anticipated trip generation is expected to be modest and consequently, impacts on sensitive receptors are expected to be minimal. Site is very well located to maximise tonnes per miles – carbon reduction. Greater waste miles efficiencies.

Sites	Option 1 Hollow Road Farm				Option 2 (Business as usual) Rougham Hill				Option 3 Land south of West Suffolk Crematorium			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
6. To maintain/ improve biodiversity and geodiversity	0	0	0	The site does not lie within any statutory designated sites. The closest designation is the Glen Chalk Caves SSSI which is approximately 1.6km south of the application boundary.	0	0	0	It is considered unlikely that there will be significant negative effect on the conservation status of local bat populations due to the proposals. With suitable avoidance, mitigation and enhancement measures, it will be possible to ensure that residual negative impacts on ecological features due to the proposals are not significant.	0	0	0	The site scored neutrally against this SA objective. Site is within the SSSI impact risk zone relating to Breckland Farmland SSSI and Breckland SPA (its lies approx. 2.9km away). Natural England would need to be consulted on any proposals through the planning process. Hyde Wood ancient woodland is located to the north - the site falls just outside its 500m buffer zone.
7. To maintain/ improve the quality and local distinctiveness of landscapes/ townscapes	0	0	0	The existing sugar beet factory dominates views to the south from Fornham Road and the property at The Drift. There is currently existing screening in the form of a hedgerow on the approach to Bury St Edmunds from the east. The proposed design seeks to retain the vast majority of perimeter vegetation screening which already exists and it is also proposed to construct a 15m wide strip along the northern boundary for landscape planting and hedgerow growth. Appropriate design and screening as mitigation. Given the level of screening surrounding the site and the industrial nature of the nearby developments it is not anticipated that this will have any significant impacts.	0	0	0	The effect of the proposed scheme on landscape character will be limited to the local level and will not result in significant adverse effects.	–	–	–	Negative impact against this SA objective. Site is located in countryside but not far from edge of settlement. Described as 'Plateau Estate Farmlands' in SCC Landscape Character map. Not within or adjacent to national or local landscape designations and sensitivity of landscape receptor is considered medium.

Sites	Option 1 Hollow Road Farm				Option 2 (Business as usual) Rougham Hill				Option 3 Land south of West Suffolk Crematorium			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
8. To reduce contributions to climate change	+	+	+	The design of the facility can incorporate energy efficient measures. Site is very well located to maximise tonnes per miles – carbon reduction. Opportunity for WSOH to encourage new development to use renewable energy or low CO2 energy sources. Greater waste miles efficiencies.	+	+	+	The design of the facility can incorporate energy efficient measures. Site is very well located to maximise tonnes per miles – carbon reduction.	+	+	+	The design of the facility can incorporate energy efficient measures. Site is very well located to maximise tonnes per miles – carbon reduction. Opportunity for WSOH to encourage new development to use renewable energy or low CO2 energy sources. Greater waste miles efficiencies.
9. To move treatment of waste up the waste hierarchy	++	++	++	The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy.	++	++	++	The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy.	++	++	++	The site is close to areas which generate waste and will be part of a network of waste management facilities throughout the County which will encourage the movement of waste up the hierarchy.
10. To reduce vulnerability to flooding	+	+	+	Site is not within a floodplain.	+	+	+	Site is not within a floodplain.	+	+	+	Site is not within a floodplain.

Sites	Option 1 Hollow Road Farm				Option 2 (Business as usual) Rougham Hill				Option 3 Land south of West Suffolk Crematorium			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
11. To conserve and where appropriate enhance areas of historical and archaeological importance	0	0	0	Relatively low evidence for archaeological activity, with only four anomalies that appear to be of an archaeological derivation.	0	0	0	Land already disturbed and hence potential archaeological value diminished. An initial search was carried out to look for statutory designated sites or buildings within 300m of the application site. This search returned no results and it is therefore not anticipated that the development will result in any adverse effects on the built heritage, the historic landscape or archaeological remains.	–	–	–	Very high evidence for archaeological activity, It is in a location that is topographically favourable for early occupation. There is a cropmark of a ring ditch – most likely a prehistoric burial monument – recorded within the site itself (RBY 025). A further ring ditch is recorded to the west (FAS 023). Roman finds are recorded in the County Historic Environment Record to the northwest of the site and an Anglo-Saxon find spot to the southwest (FAS 016) may be indicative of further activity in the area.
Social												
12. To maximise opportunities for new/ additional employment	++	++	++	Construction will create short term jobs. Release of employment land.	+	0	0	Construction will create short term jobs.	++	++	++	Construction will create short term jobs. Release of employment land.

Sites	Option 1 Hollow Road Farm				Option 2 (Business as usual) Rougham Hill				Option 3 Land south of West Suffolk Crematorium			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
13. To maintain/ improve health of the population overall	0	0	0	The dominant background noise source is likely to be the A134, given this and the distance of 315m to the nearest sensitive receptors, it is not considered likely that noise will give rise to any potential adverse impacts. Waste mainly would be stored within a closed building before being transferred and would be removed from site as soon as possible. Features such as misting sprays and ventilation to reduce smells will be implemented within buildings.	0	0	0	The development site is the existing HWRC site on Rougham Hill which has no record of noise complaints. Rougham Hill currently has a well-served lorry park south east of the site and a number of commercial units to the east. The nearest residential receptors are located south of the site at a distance of more than 200m. Waste mainly would be stored within a closed building before being transferred and would be removed from site as soon as possible. Features such as misting sprays and ventilation to reduce smells will be implemented within buildings.	0	0	0	It is not considered likely that noise will give rise to any potential adverse impacts. All waste would be stored within a closed building before being transferred and would be on site for less than a day. Features such as misting sprays and ventilation to reduce smells will be implemented.

Sites	Option 1 Hollow Road Farm				Option 2 (Business as usual) Rougham Hill				Option 3 Land south of West Suffolk Crematorium			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
14. To minimise the impacts arising from the provision of waste facilities developments on where people live	–	0	0	Some noise during construction phase. The site scores neutrally against this in relation to the volume and distance of potential human receptors for air quality. Large site with good transport links will allow for suitable mitigation. Appropriate protection measures should be incorporated into the design. Waste transfer operations happen mainly within the building and having the doors closed would minimise the amount of noise that could be heard off site.	–	0	0	Some noise during construction phase. The site scores neutrally against this in relation to the volume and distance of potential human receptors for air quality. Waste transfer operations happen mainly within the building and having the doors closed would minimise the amount of noise that could be heard off site.	–	–	–	Some noise during construction phase. The site scores neutrally against this in relation to the volume and distance of potential human receptors for air quality. Large site with good transport links will allow for suitable mitigation. Appropriate protection measures should be incorporated into the design. Even though litter would be carefully controlled at any site, it is likely to be harder to control litter at land south of West Suffolk Crematorium than at Hollow Road Farm. The impact of the litter at land south of West Suffolk Crematorium, should it occur, may also be higher.
Economic												
15. To achieve sustainable levels of prosperity and economic growth	++	++	++	Site will impact on long-term investment in waste management infrastructure. It will offer operational flexibility and sustainability. It will optimise the number and location of Household Waste and Recycling Centres, and enhance quality of service provision.	+	+	+	It will optimise the number and location of Household Waste and Recycling Centres, and enhance quality of service provision.	++	++	++	Site will impact on long-term investment in waste management infrastructure. It will offer operational flexibility and sustainability. It will optimise the number and location of Household Waste and Recycling Centres, and enhance quality of service provision.

Sites	Option 1 Hollow Road Farm				Option 2 (Business as usual) Rougham Hill				Option 3 Land south of West Suffolk Crematorium			
SA Objectives	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments	Short term	Medium term	Long term	Comments
16. To encourage and accommodate both indigenous and inward investment	++	++	++	It will provide further capacity for commercial services and income. It will contribute to maintaining/ improving existing waste infrastructure. It will enable to accommodate growth in demand and create opportunities for staff and operational flexibility.	+	+	+	It will contribute to maintaining/ improving existing waste infrastructure.	++	++	++	It will provide further capacity for commercial services and income. It will contribute to maintaining/ improving existing waste infrastructure. It will enable to accommodate growth in demand and create opportunities for staff and operational flexibility.
17. To encourage efficient patterns of movement in support of economic growth	+	+	+	Well located next to strategic highways network. It will improve accessibility to work by public transport, walking and cycling.	+	+	+	Well located next to strategic highways network. It will improve accessibility to work by public transport, walking and cycling.	+	+	+	Well located next to strategic highways network. It will improve accessibility to work by public transport, walking and cycling.
18. Facilitate delivery of the One Public Estate Programme	++	++	++	Opportunity to generate capital receipts, running costs and deliver integrated customer focused services. The site is big enough to accommodate three proposed facilities which will release land at Olding Road for Phase II of the Public Services Village initiative. It will improve the resilience of business and the economy.	0	0	0	Does not contribute to this objective. It will not contribute to releasing land for Phase II of the Public Service Village initiative.	++	++	++	Opportunity to generate capital receipts, running costs and deliver integrated customer focused services. The site is big enough to accommodate three proposed facilities which will release land at Olding Road for Phase II of the Public Services Village initiative. It will improve the resilience of business and the economy.

++ Very positive effect
+ Positive effect
0 Neutral effect
– Negative effect
–– Very negative effect
? Uncertain

Appendix 4: Synergistic and cumulative effects of SA objectives on WSOH solution options

Synergistic Effects		SA Headline Objectives																	Overall Impact	
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
Solution option No.	WSOH solution options	To maintain/improve air and water quality (including HGV movements) in line with national standards limits	To conserve soil resources and quality	To use water and mineral resources efficiently, and re-use and recycle where possible	To reduce waste	To reduce the effects of traffic on the environment	To maintain/improve biodiversity and geodiversity	To maintain/improve the quality and local distinctiveness of landscapes/townscapes	To reduce contributions to climate change	To move treatment of waste up the waste hierarchy	To reduce vulnerability to flooding	To conserve and where appropriate enhance areas of historical and archaeological importance	To maximise opportunities for new/additional employment	To maintain/improve health of the population overall	To minimise the impacts arising from the provision of waste facilities developments on where people live	To achieve sustainable levels of prosperity and economic growth	To encourage and accommodate both indigenous and inward investment	To encourage efficient patterns of movement in support of economic growth	The One Public Estate Programme		++ Very positive effect + Positive effect 0 Neutral effect – Negative effect –– Very negative effect ? Uncertain
Option 1	Do Nothing	0	0	0	–	–	0	0	–	–	0	0	–	0	0	–	–	0	–	**–**	Not implementing WTS development at all will not have positive effects on waste mileage reduction, movements of waste up the waste hierarchy and will not contribute to the enhancement of quality of waste service provision.

Synergistic Effects		SA Headline Objectives																Overall Impact
Solution option No.	WSOH solution options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
		To maintain/improve air and water quality (including HGV movements) in line with national standards limits	To conserve soil resources and quality	To use water and mineral resources efficiently, and re-use and recycle where possible	To reduce waste	To reduce the effects of traffic on the environment	To maintain/improve biodiversity and geodiversity	To maintain/improve the quality and local distinctiveness of landscapes/townscapes	To reduce contributions to climate change	To move treatment of waste up the waste hierarchy	To reduce vulnerability to flooding	To conserve and where appropriate enhance areas of historical and archaeological importance	To maximise opportunities for new/additional employment	To maintain/improve health of the population overall	To minimise the impacts arising from the provision of waste facilities developments on where people live	To achieve sustainable levels of prosperity and economic growth	To encourage and accommodate both indigenous and inward investment	To encourage efficient patterns of movement in support of economic growth	The One Public Estate Programme	
Option 2	Implement Rougham Hill planning permission and leave depots at Olding road and Holborn Avenue	0	0	+	+	0	0	0	+	++	0	0	0	0	0	+	+	+	0	**0**
Option 3	Implement Rougham Hill planning permission and relocate depots	0	0	+	+	0	0	0	+	++	0	0	++	0	0	+	+	+	+	**+**

++ Very positive effect
+ Positive effect
0 Neutral effect
– Negative effect
–– Very negative effect
? Uncertain

Scored positively against a number of environmental SA objectives including maximising tonnes per miles-carbon emissions reduction, reducing waste and moving treatment of waste up the waste hierarchy.

Will have positive effects on improving existing waste infrastructure and enhancing quality of waste service provision.

Synergistic Effects		SA Headline Objectives																	Overall Impact
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
Solution option No.	WSOH solution options	To maintain/improve air and water quality (including HGV movements) in line with national standards limits	To conserve soil resources and quality	To use water and mineral resources efficiently, and re-use and recycle where possible	To reduce waste	To reduce the effects of traffic on the environment	To maintain/improve biodiversity and geodiversity	To maintain/improve the quality and local distinctiveness of landscapes/townscapes	To reduce contributions to climate change	To move treatment of waste up the waste hierarchy	To reduce vulnerability to flooding	To conserve and where appropriate enhance areas of historical and archaeological importance	To maximise opportunities for new/additional employment	To maintain/improve health of the population overall	To minimise the impacts arising from the provision of waste facilities developments on where people live	To achieve sustainable levels of prosperity and economic growth	To encourage and accommodate both indigenous and inward investment	To encourage efficient patterns of movement in support of economic growth	The One Public Estate Programme	
Option 4	Co-locate all facilities on new site	0	0	+	+	0	0	0	++	++	0	0	++	0	0	++	++	+	++	**++**

Post public consultation amendment/addition: This option has the best score in terms of a number of positive effects and presents the best sustainable solution option for WSOH proposal. Co-location will improve the resilience of business and the economy. In addition, it offers full integration of services. Relocation of the current HWRC at Rougham Hill site to a new site will release land at Rougham Hill which is estimated to release £750k capital based on industrial land values.

++ Very positive effect
+ Positive effect
0 Neutral effect
– Negative effect
–– Very negative effect
? Uncertain

Synergistic Effects		SA Headline Objectives																	Overall Impact
Solution option No.	WSOH solution options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
		To maintain/improve air and water quality (including HGV movements) in line with national standards limits	To conserve soil resources and quality	To use water and mineral resources efficiently, and re-use and recycle where possible	To reduce waste	To reduce the effects of traffic on the environment	To maintain/improve biodiversity and geodiversity	To maintain/improve the quality and local distinctiveness of landscapes/townscapes	To reduce contributions to climate change	To move treatment of waste up the waste hierarchy	To reduce vulnerability to flooding	To conserve and where appropriate enhance areas of historical and archaeological importance	To maximise opportunities for new/additional employment	To maintain/improve health of the population overall	To minimise the impacts arising from the provision of waste facilities developments on where people live	To achieve sustainable levels of prosperity and economic growth	To encourage and accommodate both indigenous and inward investment	To encourage efficient patterns of movement in support of economic growth	The One Public Estate Programme	
Option 5	Co-locate waste transfer facility and depots on a new site and leave HWRC at Rougham Hill	0	0	+	+	0	0	0	+	++	0	0	++	0	0	+	+	+	+	+

Very positive effect ++
Positive effect +
Neutral effect 0
Negative effect –
Very negative effect – –
Uncertain ?

Option 5 will have positive effects on improving existing waste infrastructure and enhancing quality of waste service provision. This is the cheapest option and would mean no disruption to the Household Waste Recycling Centre. However, it does not realise the improvements for HWRC customers of a split-level site and improved traffic flows. This option would not lead to partners being able to fully capitalise on the opportunity for co-location and integration.

Appendix 5: Synergistic and cumulative effects of SA objectives on Strategic Sites

Post public consultation amendment/addition:

Synergistic Effects	SA Headline Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Site Name	To maintain/improve air and water quality (including HGV movements) in line with national standards limits	To conserve soil resources and quality	To use water and mineral resources efficiently, and re-use and recycle where possible	To reduce waste	To reduce the effects of traffic on the environment	To maintain/improve biodiversity and geodiversity	To maintain/improve the quality and local distinctiveness of landscapes/townscapes	To reduce contributions to climate change	To move treatment of waste up the waste hierarchy	To reduce vulnerability to flooding	To conserve and where appropriate enhance areas of historical and archaeological importance	To maximise opportunities for new/additional employment	To maintain/improve health of the population overall	To minimise the impacts arising from the provision of waste facilities developments on where people live	To achieve sustainable levels of prosperity and economic growth	To encourage and accommodate both indigenous and inward investment	To encourage efficient patterns of movement in support of economic growth	The One Public Estate Programme
Hollow Road Farm	0	–	+	++	0	0	0	+	++	+	0	++	0	0	++	++	+	++
Overall Impact: +	Large site with good transport links will allow for suitable mitigation. Site will impact on long-term investment in waste management infrastructure. It will offer operational flexibility and sustainability. It will contribute to optimisation of the number and location of Household Waste and Recycling Centres, and enhance quality of service provision. Relocation of the current HWRC at Rougham Hill site to Hollow Road Farm due to this site being of sufficient size will release land at Rougham Hill. It is estimated to release £750k capital based on industrial land values. The size of the site and its location will enable to co-locate needed facilities on a single site and will enable to generate capital receipts, reduce running costs and deliver integrated customer focused services.																	

Synergistic Effects	SA Headline Objectives																	
Site Name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
	To maintain/improve air and water quality (including HGV movements) in line with national standards limits	To conserve soil resources and quality	To use water and mineral resources efficiently, and re-use and recycle where possible	To reduce waste	To reduce the effects of traffic on the environment	To maintain/improve biodiversity and geodiversity	To maintain/improve the quality and local distinctiveness of landscapes/townscapes	To reduce contributions to climate change	To move treatment of waste up the waste hierarchy	To reduce vulnerability to flooding	To conserve and where appropriate enhance areas of historical and archaeological importance	To maximise opportunities for new/additional employment	To maintain/improve health of the population overall	To minimise the impacts arising from the provision of waste facilities developments on where people live	To achieve sustainable levels of prosperity and economic growth	To encourage and accommodate both indigenous and inward investment	To encourage efficient patterns of movement in support of economic growth	The One Public Estate Programme
Rougham Hill	0	0	+	++	0	0	0	+	++	+	0	0	0	0	+	+	+	0
Overall Impact	**0**	The site will optimise the number and location of Household Waste and Recycling Centres, and enhance quality of service provision. However, the site will unlikely impact on long-term investment in waste management infrastructure or offer operational flexibility and sustainability as much as the Hollow Road Farm site. Unlike Hollow Road Farm site, it will not directly contribute to releasing land for Phase II of the Public Service Village initiative. Unlike the site at Hollow Road Farm, Rougham Hill, due to its size, will not be able to co-locate the three needed facilities on a single site and will not generate capital receipts, reduce running costs and deliver integrated customer focused services.																

Synergistic Effects	SA Headline Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Site Name	To maintain/improve air and water quality (including HGV movements) in line with national standards limits	To conserve soil resources and quality	To use water and mineral resources efficiently, and re-use and recycle where possible	To reduce waste	To reduce the effects of traffic on the environment	To maintain/improve biodiversity and geodiversity	To maintain/improve the quality and local distinctiveness of landscapes/townscapes	To reduce contributions to climate change	To move treatment of waste up the waste hierarchy	To reduce vulnerability to flooding	To conserve and where appropriate enhance areas of historical and archaeological importance	To maximise opportunities for new/additional employment	To maintain/improve health of the population overall	To minimise the impacts arising from the provision of waste facilities developments on where people live	To achieve sustainable levels of prosperity and economic growth	To encourage and accommodate both indigenous and inward investment	To encourage efficient patterns of movement in support of economic growth	The One Public Estate Programme
Land south of West Suffolk Crematorium	–	–	+	++	0	0	–	+	++	+	–	++	0	–	++	++	+	++
Overall Impact	+	Large site with good transport links will allow for suitable mitigation. Site will impact on long-term investment in waste management infrastructure. It will offer operational flexibility and sustainability. It will contribute to optimisation of the number and location of Household Waste and Recycling Centres, and enhance quality of service provision. Relocation of the current HWRC at Rougham Hill site to Hollow Road Farm due to this site being of sufficient size will release land at Rougham Hill. It is estimated to release £750k capital based on industrial land values. The size of the site and its location will enable to co-locate needed facilities on a single site and will enable to generate capital receipts, running costs and deliver integrated customer focused services.																	

Appendix 6: Links to other policies, plans and programmes

International/European Context

The Johannesburg Declaration on Sustainable Development – Commitments arising from summit. Sept 2002
The UN Millennium Declaration and Millennium Development Goals – Sept 2000
UNESCO Convention Concerning the Protection of the World Cultural and natural heritage (1972)
Bern Convention on the Conservation of European Wildlife and Natural Habitats – 1979
Ramsar convention on Wetlands of international importance especially as waterfowl habitat – 1971
Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)
European Spatial Development Perspective (May 1999)

European Directives

Air Quality

Air Quality Framework Directive – 96/62/EC
- The first Daughter Directive – 1999/30/EC
- The second Daughter Directive – 2000/69/EC
- The third Daughter Directive relating to Ozone – 2002/69/EC
EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EU)

Climate Change

Kyoto Protocol and the UN Framework Convention on Climate Change – May 1992
Directive to promote electricity from renewable energy – 2001/77/EC
Directive for the encouragement of bio-fuels for transport – 2003/30/EC (May 2003)
Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment. (4th April 2013) European Commission
UK Carbon Plan, 2011
Adapting to Climate Change: Ensuring Progress in Key Sectors, DEFRA 2013

Water

Water Framework Directive – 2000/60/EC
Urban Waste Water Treatment Directive – 91/271/EEC
Water pollution caused by Nitrates from agricultural sources: Nitrates Directive – 91/676/EEC
Bathing Water Quality Directive – 76/160/EEC
Drinking Water Directive – 98/83/EC
Directive on the assessment and management of flood risks(2007/60/EC)
Groundwater Directive, 1980

Nature and Biodiversity

Strategic Environmental Assessment 2001/42/EC (June 2001)
Environmental Impact Assessment 85/337/EEC and amended Directive 97/11/EC (March 1997)

Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds
Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora
EU Sixth Environmental Action Plan 2002-2012 (July 2002)
Aarhus Convention on Access to Information, public participation in decision making and access to justice in Environmental matters (June 1998)
UN Convention on Biological Diversity (1992)
EU Birds Directive (2009/147/EU)
EU Biodiversity Strategy (1998)

Waste Management

Waste Framework Directive 75/442/EEC, as amended in codified version of 2006/12/EC (April 2006)
Landfill Directive- 99/31/EC implemented July 2001
Incineration of Waste- 2000/76/EC implemented December 2002
Integrated Pollution Prevention and Control Directive- 96/61/EC implemented 2000
Sewage Sludge Directive- 86/278/EC
Landfill Directive, 1991
Waste Electrical & Electronic Equipment Directive- 02/96/EC (April 2002)
End of Life vehicles Directive 2000/53/EC (implemented April 2002)
Urban Waste water treatment directive (91/271/ECC)

Others

A New Partnership for Cohesion – Third Report on Economic and Social Cohesion (Feb 04) and Draft New Regulations for Renewed Structural Funds (July 2004)
European Landscape convention (2000)
Marine Strategy Framework Directive (2008/56/EC)
Review of the EU Sustainable Development Strategy 2009
National, Regional and Local Context – cross-cutting topics
Energy White Paper
Planning White Paper
National Planning Policy Framework March 2012
National Planning Practice Guidance, 2014
National Planning Policy for Waste, 2014
National Policy Statement for Waste Water, March 2012

Urban

Urban White Paper
Towns and Cities Strategy and Action Plan, Urban Renaissance in the East of England

Rural

Government Rural White Paper: Our Countryside – the future – a fair deal for rural England, DETR (2000)
Rural Strategy (2004)
The Countryside and Rights of Way Act 2000

Sustainable Communities

A Better Quality of Life: a Strategy for Sustainable Development in the UK (1999), Taking it on: Developing UK Sustainable Development Strategy Together (Consultation: 2004)
The UK Government Sustainable Development Strategy One future- different paths (March 2005)
Sustainable Communities Plan: Building for the Future (2003)
A Sustainable Development Framework for the East of England, October 2001
Creating Sustainable Communities – In the East of England (Jan 2005)
Embedding Sustainable Development in the East of England (August 2009)
The UK Government Sustainable Development Strategy - Securing the Future, March 2005
Mainstream Sustainable Development: The Government's Vision and What this means in Practice, DEFRA 2011

Transport

The Future of Air Transport- White Paper (Dec 2003)
Civil Aviation Act (Nov 2006)
The Future of Rail - White Paper (2004)
The Future of Transport : a network for 2030 - White Paper (2004)
East of England Regional Transport Strategy (April 2003) (Incorporated as a chapter in RPG14)
Suffolk County Council, Local Transport Plan 2011-2031
Local Transport Action Plan (Lowestoft, Beccles, Felixstowe and the Trimleys, Sudbury and Great Cornard, Saxmundham, etc)

Community Strategies and Community Development Strategies

Altogether a better Suffolk – Suffolk's Community Strategy 2004
Suffolk's Community Strategy 2008 to 2028 (June 2008)
Neighbouring Authority Plans and National Park Plans
Mid Suffolk District Council Core Strategy Focused Review (December 2012)
St Edmundsbury Borough Council, Adopted Core Strategy (December 2010)
Ipswich Borough Council, Adopted Core Strategy (December 2011)
Suffolk Coastal District Council Core strategy and development management policies adopted 5 July 2013
Babergh District Council, Core strategy and policies DPD (at examination Oct 2013)
St Edmundsbury Core Strategy 2010
Bury St Edmunds Vision 2031
Social – National, Regional and Local Context

Social Inclusion

Regional Social Strategy for the East of England (May 2004 but RSS scoped March 2004 version)
Suffolk County Council Equalities Policy, April 2003
East of England (LSC) Equalities and Diversity Action Plan (2008)

Health

Choosing Health: Making healthy choices easier (Nov 2004)
Social Care Annual Plan 2003-4
Healthy Sustainable Communities- what works? (Milton Keynes South Midlands Health & Social Care Group/NHS 2004)

Healthy Futures: A Regional Health Strategy for the East of England 2005-2010, May 2006
Health Protection Agency's position statement on Municipal Solid Waste Incineration (2005)
Health effects of climate change in the UK (2008)
Tackling health inequalities – A Programme for action (2003 including 2007 status report)
East of England Plan for Sport (2004)
The State of Suffolk - Joint Strategic Needs Assessment (2011)
Joint Health and Well-being Strategy for Suffolk (2013)
Strategic Framework for Road Safety (DfT, May 2011)
Suffolk Health and Wellbeing Strategy 2012-2022 (Early priorities for review May 2015)
Healthy Ambitions 2008-28, Nov 2008
Supporting Lives, Connecting Communities, Market Position Statement for Adult and Community Services, April 2014

Culture

Culture: a catalyst for change. A Strategy for Cultural Development for the East of England, Living East (June 2004)
A Cultural Strategy for Suffolk, March 2002

Education

Suffolk's Strategy for Learning 2004-9: The Single Plan (March 2004)
2012 Suffolk Children and Young Peoples Plan
Raising the bar – No school an island (2013) and SCC Cabinet report 2013

Housing

The East of England Regional Housing Strategy 2003-2006, Regional Housing Forum (April 04)
Regional Housing Strategy for the East of England 2005-2010 (July 2005)
Affordable Housing Study: The Provision of Affordable Housing in the East of England 1996-2021, 2003
East of England Affordable Housing Study Stage 2: Provision for Key Workers and Unmet Housing Need
Suffolk Supporting People Five-Year Strategy 2005-2010 (August 2005)
ODPM Circular January 2006: Planning for Gypsy and Traveller Caravan Sites
Ipswich Housing Market Area, Strategic Housing Market Assessment 2008
Code for Sustainable Homes: A step-change in sustainable home building practice (Communities and Local Government, 2006) and (February 2008)

Community Safety

Suffolk Coastal and Waveney Community Safety Partnership Plan 2012/13

Environmental – National, Regional and Local Context

Environmental Strategies

Biodiversity 2020: A strategy for England's Wildlife and ecosystem services (2011)
Wildlife & Countryside Act, 1981 (as Amended); Countryside and Rights of Way Act, 2000
Environment Act, 1995

The Natural Environment and Rural Communities (NERC) Act, 2006
Conservation of Habitat and Species Regulations, 2010
A Practical Guide to the Strategic Environmental Assessment Directive, 2005
Securing the Future: Delivery the Sustainable Development Strategy, 2005
Conserving Biodiversity - The UK approach (2007)
A strategy for England's trees, woodlands and forests (2007)
Open space strategies: Best practice guidance (CABE & the GLA 2009)
Natural England's Green Infrastructure Guidance (2010)
Historic Environment – A force for the future (2001)
Heritage in Local Plans: How to create a sound plan under the NPPF (2012)
Planning (Listed Buildings and Conservation Areas) Act 1990
Suffolk's Nature Strategy, 2014

Soil

Farming and Food Strategy, Facing the Future, DEFRA, (Dec 2002)
The First Soil Action Plan for England: 2004-2006 (2004)
Safeguarding our Soils, A Strategy for England, 2009
Contaminated Land (England) Regulations, 2006

Climate Change

Adapting to Climate Change in England. A Framework for Action, 2008
Climate Change UK Programme: Tomorrow's Climate Today's Challenge, 2006
An Independent National Adaptation Programme for England. Policy brief March 2013
Nottingham Declaration on Climate Change (2000)
The Suffolk Climate Action Plan 2 (July 2012)
UK Carbon Pan (2011)
Stern review for the economics of Climate change (2006)
Climate Change Risk Assessment, 2012
National Energy Policy Statement DECC, 2011
Sustainable Energy Act, 2003
Sustainable Energy Act, 2006
Energy Act, 2013
Suffolk Local Flood Risk Management Strategy, February 2013

Air Quality Post public consultation amendment/addition:

The Air Quality Strategy for England, Wales, Scotland and Northern Ireland (2007)
EPUK & IAQM - "Land-Use Planning & development Control: Planning for Air Quality (2015)

Water

National Planning Policy Framework, 2012
Flood and Water Management Act, 2010
The Flood Risk Regulations, 2009
Future Water, The Government's water strategy for England, 2008
The Water Supply (water Quality) Regulations Act, 2000

Water Act, 2003
Water Resources Act, 1991
Water Industry Act, 1999
Groundwater Regulations, 1998
Surface Waters Regulations, 1996
Guidance for risk management authorities on sustainable development in relation to their flood and coastal erosion risk management functions, 2011
Protection of Water Against Agricultural Nitrate Pollution (England and Wales) Regulations, 1996
Water for People and the Environment; Water Resources strategy for England and Wales, 2009
Directing the Flow: Priorities for Future Water Policy, 2002
The Impact of Flooding on Urban and Rural Communities, 2005
Land Drainage Act, 1991 (as Amended 2004 and 2011)
The Environmental Impact Assessment (Land drainage Improvement Works) Regulations, 1999
EA Policy: Sustainable Drainage Systems, 2002
Eutrophication strategy, 2002
Anglian River Basin Management Plan, 2009
East of England Plan (May 2008)
Suffolk Flood Risk Management Strategy February 2013
UK Marine Policy Statement, 2013
East Marine Plan, MMO 2014
Anglian Water: Water Resources Management Plan, 2014
Environment Agency draft River Basin Management Plan for the Anglian River Basin District (RBMPs), 2014
Anglian Water Business Plan 2015-2020, 2014
Essex and Suffolk Water- Water Resources Management Plan, 2010-2035

Regional/Local Biodiversity/Geodiversity Action Plans

Earth Science Conservation in Great Britain- A Strategy (1990)
Geodiversity and the Minerals Industry- Conserving our Geological Heritage (2003)
Local Geodiversity Action Plans- Setting the Context for Geological Conservation (2005)
UK RIGS Development Strategy 2006- 2010 (2006)
UK Geodiversity Action Plan (Not dated)
The Suffolk Geodiversity Action Plan- draft (March 2006)
UK Biodiversity Action Plan, 2004
Environment, Landscape and Archaeology Report April 2013
Biodiversity Action Plan for Suffolk (various dates)
Wildlife manifesto Sept 2013 Part 1 Aims and objectives

Countryside Management

Suffolk Coasts and Heaths AONB Management Plan 2008-13
Suffolk Rights of Way Improvement Plan (2006- 2016) (2006
Suffolk- Creating the Greenest County Draft Action Plan (2009)
South Sandlings Living Landscape Project Feb 2011
National Character Area profile: 82 Suffolk Coast and Heaths 2014

Suffolk Historic Landscape Characterisation Map 2008
The Countryside and Rights of Way Act 2000
Suffolk Local Geodiversity Action Plan, 2006

Woodland

Woodland for Life: The Regional Woodland Strategy for the East of England (Nov 2003)

Minerals and Waste

Waste Strategy for England (2007)
Minerals Core Strategy Adopted (2008)
Waste Core Strategy Adopted (2011)
Joint Municipal Waste Management Strategy for Suffolk 2003 - 2020

Economic – National, Regional and Local Context

Economic and Employment strategies

Inventing our Future: Collective action for a Sustainable Economy. The Regional Economic Strategy for the East of England 2008 – 2031 (2008)
Prioritisation in the East of England, June 2003
Regional Emphasis Document SR2004, December 2003
Framework for Regional Employment and Skills Action (FRESA) (2003)
International Business Strategy, Consultation Draft, December 2003
Expanding Suffolk's Horizons Economic Strategy - Taking Suffolk to 2013
Suffolk Rural Action Plan, March 2006
Economic Development Programme 2006/07-2008/09
Suffolk Economic Growth Strategy March 2013
New Anglia Local Enterprise Partnership 'Towards a Growth Plan' (2013)
New Anglia LEP Strategic Economic Plan, 2014
Leading the Way: Green Economy Pathfinder Manifesto 2012-15, New Anglia LEP
Suffolk's Local Economic Assessment 2011
St Edmundsbury Economic Assessment and Action Plan 2010-2015

Tourism

Regional Tourism Strategy 2000-2010
Tomorrows Tourism Today (August 04)
Sustainable Tourism Strategy for the East of England (March 2004)
Good Practice Guide on Planning for Tourism (DCLG May 2005)

Suffolk Tourism Partnership

The Sunrise Coast, Tourism Strategy 2006

Appendix 7: Glossary of Terms

TERM	DEFINITION
Abstraction	Removal of water from surface or groundwater.
Air Quality Management Area (AQMA)	This is an area in which the National Air Quality objectives are not likely to be achieved.
Area of Outstanding Natural Beauty (AONB)	An area of particular natural beauty to be preserved and enhanced. Designated by the Countryside Commission under Section 87 of the National Parks and Access to the Countryside Act 1949.
Baseline Data	Data collected to determine the 'baseline' or 'existing' conditions.
Biodiversity	Genetically determined variability amongst living organisms, including the variability within species, between species, and of ecosystems.
Biodegradable waste	Any waste that is capable of undergoing anaerobic or aerobic decomposition, such as food and garden waste, and paper and cardboard.
Brownfield Land	Previously developed land that is or was occupied by a permanent structure, including the curtilage of the development land and any associated fixed surface infrastructure. The definition includes defence buildings, but excludes: • Land that is or has been occupied by agricultural or forestry buildings. • Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures and • Land in built-up areas such as parks, recreation grounds and allotments, which although it may feature paths, pavilions and other buildings, has not been previously developed. • Land that has been previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings).
Conservation Area	An area of special architectural or historic interest to be preserved or enhanced. Designated by a local authority.
County Wildlife Site	A locally-designated wildlife habitat
Composting	An aerobic, biological process in which organic wastes, such as garden and kitchen waste are converted into a stable granular material which can be applied to land to improve soil structure and enrich the nutrient content of soil.

Flooding	Refers to inundation by water whether this is caused by breaches, overtopping of banks or defences, or by inadequate or slow drainage of rainfall or underlying ground water levels.
Floodplain	Areas of river valley floors or coastal plains which are inundated during times of flood, including areas protected by flood defences.
Geology	The study of the Earth's history, structure and composition.
Groundwater	Water contained in the void spaces in pervious rocks and also within soil.
Household Waste	This includes waste from household collection rounds, waste from services such as street sweeping, bulky waste collection, litter collection, hazardous household waste collection and separate garden waste collection, waste from household waste recycling centres and wastes separately collected for recycling or composting through bring or drop off schemes.
Household Waste Recycling Centres	Sites provided by waste disposal authorities where residents can deposit accepted household wastes free of charge. (Formerly known as civic amenity sites).
Landscape Character	The distinct pattern and arrangement of landscape elements or features that collectively create a sense of place.
Magnitude	A combination of the nature, size, extent and duration of an effect.
Materials Recovery Facility	A sorting facility where recyclable materials can be separated from other wastes before being sent for reprocessing or disposal.
Mitigation	The measures, including any process, activity or design to avoid, reduce or remedy or compensate for adverse landscape and visual effects of a development project.
Municipal Waste	Household waste (see above) plus any commercial waste collected by Waste Collection Authorities and waste resulting from the clearance of fly-tipped materials.
Natural	Encompasses both the small number of natural areas and the much greater semi-natural areas of Britain which have been influenced by humans over the years. It is also applied to those processes over which humans have no significant control, e.g. wind, waves, sediment transport etc.
Nitrate Vulnerability Zones (NVZs)	This is an area of surface water or groundwater that has, or is at risk of having a high nitrate concentration.
Operating Authorities	A body with statutory powers to undertake flood defence or coast protection activities, usually the Environment Agency, Internal Drainage Board or Local Authority.
Plan	A purposeful, forward looking framework or design, often with co-ordinated priorities, options and measures , that elaborates on and implements policy e.g. Shoreline Management Plans
Policy	A general course of action or proposed overall direction that an organisation is, or will be, pursuing and which guides ongoing decision making.

Receptor	Any component of the natural or man-made environment that is potentially affected by an impact from a development
Recycling	To reprocess waste materials in a production process for the original purpose or for other purposes, including composting but excluding energy recovery.
Residual waste	Waste left after having been treated such as by composting, recycling etc and which would normally be disposed of to landfill, or incineration.
Recovery	To transform material by extracting value from it through reprocessing the waste.
Residual Waste Treatment Facility (RWTF)	Facilities for dealing with waste which has not been re-used, recycled or composted.
Site of Special Scientific Interest (SSSI)	An area of land of special interest by reason of its flora, fauna, geology or physiographical features notified under Section 28 of the Wildlife and Countryside Act 1981.
Source Protection Zone (SPZ)	A Source Protection Zone is the area over which recharge is captured by an abstraction borehole. SPZs are designated by the Environment Agency and are delineated to protect potable supplies against the polluting effects of human activity.
Special Area Conservation (SAC)	Special Area of Conservation as designated under the EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora.
Strategic Environmental Assessment (SEA)	A formal process of systematic analysis of the environmental effects of the development policies, plans, programmes and other proposed strategic actions.
Surface Water	General term used to describe all the water features such as rivers, streams, springs, ponds and lakes.
Sustainability Appraisal	A systematic process that must be carried out during the preparation of a plan, programme or policy to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives.
Sustainable Development	Development that meets the needs of the present without compromising the ability of future generations to meet their own needs (WCED, 1987).
Topography	The physical features or configuration of a land surface.
Waste Arisings	The amount of waste generated in a given locality over a given period of time.

Waste Hierarchy	A theoretical framework which acts as a guide to the waste management options which should be considered when assessing the BPEO. The hierarchy defined in the National Waste Strategy is Reduction, Re-use, Recovery (recycling, composting, energy), and Disposal. The Government does not expect incineration with energy recovery to be considered before the options for recycling and composting have been explored.
Waste Transfer Stations	Vehicles collect the waste from bins and bring it to a central point. This is a large shed where the waste and recycling material is put into storage areas.
Waste Minimisation	Reducing the volume of waste that is produced. This is at the top of the Waste Hierarchy.

Appendix 8: Summary of the Consultation Responses to the SA Report December 2015

Post public consultation amendment/addition:

#	Comment	No.	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. 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: • 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 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.

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	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. 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.
213	Statement that the most important appraisal was missed; the need to give priority to long term vehicle movement in congested areas	1	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.

218	Statement that the sustainability appraisal missed the following: Adverse impact on residents of Fornham, Great Barton (access into Bury) Adverse impact on Fornham Road (Between Fornham and Gt Barton) Adverse impact on amount of extra traffic using St Saviours roundabout Adverse impact on extra traffic using Compiegne Way Adverse impact on A143 between Bury and Gt Barton Adverse impact on Sensory Receptors Adverse impact on Barton Hill (road and residents) Adverse impact on local landscape		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. 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.
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 this Final 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 independent assessment.	4	The assessment has been carried out by an independent, suitably qualified and experienced consultant. 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.
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 rood. 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.