

# Cabinet



*St Edmundsbury*  
BOROUGH COUNCIL

<b>Title of Report:</b>	<b>West Suffolk Operational Hub</b>	
<b>Report No:</b>	<b>CAB/SE/15/040</b> [to be completed by Democratic Services]	
<b>Report to and date:</b>	<b>Cabinet</b>	23 June 2015
	<b>Council</b>	7 July 2015
<b>Portfolio holder:</b>	Peter Stevens Portfolio Holder for Operations <b>Tel:</b> 07775 877000 <b>Email:</b> peter.stevens@stedsbc.gov.uk	
<b>Lead officer:</b>	Mark Walsh Head of Operations <b>Tel:</b> 01284 757300 <b>Email:</b> mark.walsh@westsuffolk.gov.uk	
<b>Purpose of report:</b>	<p>To provide an update on the progress of the joint West Suffolk and Suffolk County Council project, including feasibility and deliverability, of a West Suffolk Operational Hub at Hollow Road Farm in Bury St Edmunds to deliver a combined depot, waste transfer station and Household Waste Recycling Centre for West Suffolk.</p> <p>For Members to note that further consultation will take place concerning site selection before a planning application is made.</p> <p>For Members to recommend to full Council the allocation of funding to allow the project to progress.</p>	

<b>Recommendation:</b>	<b>It is <u>RECOMMENDED</u> that:</b> <ol style="list-style-type: none"> <li>(1) the contents of this report and the summarised feedback from pre-application consultation be noted;</li> <li>(2) further pre-application consultation to include the site selection be approved; and</li> <li>(3) subject to the approval of full Council, funding of £180,000, as detailed in Section 4 of Report No: CAB/SE/15/040, be approved (£98,000 FHDC and £82,000 SEBC).</li> </ol>		
<b>Key Decision:</b>	<p>Is this a Key Decision and, if so, under which definition?</p> <p>Yes, it is a Key Decision - <input type="checkbox"/></p> <p>No, it is not a Key Decision - <input checked="" type="checkbox"/></p> <p>As approval for funding is required by full Council, this is not constituted a Key Decision as it is not a Cabinet decision.</p>		
<p><i>The decisions made as a result of this report will usually be published within <b>48 hours</b> and cannot be actioned until <b>five clear working days of the publication of the decision</b> have elapsed. This item is included on the Decisions Plan.</i></p>			
<b>Consultation:</b>	<ul style="list-style-type: none"> <li>• Through pre-application consultation and any subsequent planning application.</li> </ul>		
<b>Alternative option(s):</b>	<ul style="list-style-type: none"> <li>• Covered in previous reports.</li> </ul>		
<b>Implications:</b>			
Are there any <b>financial</b> implications? If yes, please give details	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> • Outlined in section 4.		
Are there any <b>staffing</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> •		
Are there any <b>ICT</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> •		
Are there any <b>legal and/or policy</b> implications? If yes, please give details	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> • Land transactions, procurement and planning process.		
Are there any <b>equality</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> •		
<b>Risk/opportunity assessment:</b>		<i>(potential hazards or opportunities affecting corporate, service or project objectives)</i>	
<b>Risk area</b>	<b>Inherent level of risk</b> (before controls)	<b>Controls</b>	<b>Residual risk</b> (after controls)
Planning consent or environmental permitting for the site is refused or significantly delayed and / or leads to high mitigation costs	Medium	Develop a detailed planning strategy with supporting evidence. Engage early with stakeholders.	Medium

Ground and environmental elements (inc archaeology) leading to extra cost and delay.	Medium	Initial surveys of site undertaken. Engaging with appropriate experts to manage risk	Medium
Escalating project costs,	Medium	Land costs fixed. Elemental cost plan developed to manage budget moving forward.	Medium
Lack of resource, skills and capacity to deliver project.	Medium	External support engaged and further support will be called upon as required. Sharing officer resources with SCC.	Low
<b>Ward(s) affected:</b>	All Wards		
<b>Background papers:</b> <i>(all background papers are to be published on the website and a link included)</i>	St Edmundsbury Borough Council report F51 dated 30 June 2014 - <a href="#">Hyperlink to report</a> Forest Heath District Council report CAB/FH/15/001 dated 17 February 2015 - <a href="#">Hyperlink to reports pack</a> St Edmundsbury Borough Council report CAB/SE/15/015 dated 10 February 2015 - <a href="#">Hyperlink to reports pack</a> Suffolk County Council report to Cabinet dated 24 February 2015 agenda item 8 - <a href="#">Hyperlink to report</a>		
<b>Documents attached:</b>	<b>Appendix A</b> – Response to the West Suffolk Operational Hub pre-application consultation		

## **1. Background**

1.1 The previous Forest Heath and St Edmundsbury Cabinet reports on this matter (CAB/FH/15/001 dated 17 February 2015 and CAB/SE/15/015 dated 10 February 2015 respectively) detailed the key drivers and benefits for a West Suffolk Operational Hub. These included:

- (a) the changing nature of waste collection and disposal in Suffolk;
- (b) relocating St Edmundsbury's ageing fleet depot from Western Way in Bury St Edmunds;
- (c) relocating Forest Heath's Mildenhall depot;
- (d) co-locating with Suffolk County Council's waste transfer station and Household Waste Recycling Centre (HWRC);
- (e) releasing assets at Mildenhall, and Bury St Edmunds (Western Way and Rougham Hill) for alternative use or development;
- (f) meeting the objectives of the Government's 'One Public Estate Programme';
- (g) reducing fleet mileage and increasing capacity; and
- (h) reducing running costs through using modern, efficient facilities on a combined site.

Further detailed background can be found through links to the previous reports referenced in the 'Background Papers' section of this report above.

1.2 During these initial stages of the project we have secured an option to purchase the land at Hollow Road Farm and developed an early iteration of a site design and cost plan. Alongside this we have reviewed the potential operational benefits, cost savings and revenue we could expect to derive through collocating facilities, increasing commercial capacity and releasing value from other sites. In comparing the costs to the taxpayer (for both tiers of Local Government) across a range of potential options, there are considerable ongoing savings and benefits to be derived. However, there is also considerable capital cost associated with the project for which the funding options need further investigation.

1.3 In February 2015, Members of respective Cabinets gave approval for the project to progress to the next stage which is to seek a planning consent for a West Suffolk Operational Hub at Hollow Road Farm on the northern edge of Bury St Edmunds.

## **2. Pre-Application Consultation**

2.1 Community engagement, which in this case has taken the form of public consultation, is increasingly encouraged in the planning process. The National Planning Policy Framework places particular emphasis on developers and prospective applicants engaging with the communities who lie close to or may

be affected by their development proposals. Used in this way community engagement usually takes place at some point prior to submission of a planning application.

- 2.2 There are many reasons for undertaking pre-application public consultation, including:
- to inform people about a proposed development prior to a planning application being submitted;
  - to engage the local community and stakeholders in the planning process;
  - to give interested parties the chance to express their views on the proposed development;
  - to gain particular insight or detailed information which is relevant to the scheme;
  - to gauge local opinion; and
  - to identify ways in which a proposed development could be improved.
- 2.3 It is worth noting that pre-application public consultation is not a referendum on the development proposals. It is also worth noting that community engagement, including pre-application consultation, is not a statutory requirement. The outcome of the community engagement process does not bind the developer to any particular course of action. However, whether the developer observes the findings of the process or not, they remain a material consideration in the determination of any related planning application, as to the extent to which the developer has observed them.
- 2.4 Pre-application consultation started on 6 March 2015 and was originally scheduled to run for one month until 6 April 2015. However, given the large response, it was decided to extend the consultation period by two further weeks and end it on 20 April 2015. The process was advertised in the press, online in a dedicated webpage on the Council's website, through parish noticeboards, letters to local residents, letters to Parish Councils, emails to local district and county councillors and through a press release and related press articles.
- 2.5 A public consultation event was held at Great Barton Village Hall on 16 March 2015 where over a six hour period those attending could view information boards, discuss the plans and leave comments. Council officers also attended Parish Council meetings at Great Barton, Fornham St Martin, Ingham, Culford and Fornham All Saints. Meetings were also held with Bury St Edmunds Town Council and the proposed development was also on the agenda for a local Suffolk County Council 'Our Place' Meeting.
- 2.6 640 responses were received during the consultation period. They came via the web-based comment form, paper comment forms at events/meetings, e-mail responses and letters and forms in the post. In addition, one paper petition (555 signatures) was submitted to the councils and they were notified of a further online petition (283 signatures) at the end of April. A summary of the pre-application consultation responses is shown in the table below.

<b>Nature of response</b>	<b>Number of</b>	<b>Percentage</b>
Support	19	3%
Comment	36	6%
Query/queries	12	2%
Express concern(s)	35	5%
Object	540*¬	84%

\* = including paper petition with 555 signatures (counted as 1 response)

¬ = including online petition with 283 signatures as at 30.4.15 (counted as 1 response)

2.7 The ten most frequent issues raised by those that objected (in descending order of frequency) were:

- Highways / traffic
- Location / site selection
- Noise
- Odour / smell
- Planning policy
- Vermin
- Pollution / contamination
- Safety
- Landscape and visual impact
- Consultation / publication

Further detail on the responses received during the pre-application consultation can be found at Appendix A. A detailed analysis of all the responses received (Statement of Community Involvement) would form part of any planning application.

### **3. Next Steps**

3.1 Having received and analysed the pre-application consultation responses we are now developing our proposals further to take account of the issues that have been raised. Traffic survey work will be undertaken to understand with better accuracy the potential impact of the development to the surrounding road network (with addition of known sugar beet campaign traffic loading). Site access and egress will also be reviewed as part of the developing site design which will, where possible, also seek to address many of the other matters raised during the consultation period.

3.2 It is clear from many of the consultation responses received that further information is required in terms of our justification for a single site operation and the process with which we reviewed potential sites and concluded that Hollow Road Farm is the best overall option. It is therefore recommended that further pre-application consultation is undertaken to allow public scrutiny of these proposals ahead of any planning application coming forward. This is likely to be issued later in the summer.

3.3 Site design work will continue to develop in order to bring further clarity to our proposals, address some of the issues that have been raised during pre-

application consultation, provide further accuracy to cost estimates and develop a package of information for planning and any procurement process.

3.4 Further communication will be required as it is clear from many of the responses that there is still a lack of understanding about the proposals and specifically the nature of a waste transfer station.

3.5 There are three distinct phases to this project:

1. Feasibility (including planning)
2. Procurement
3. Construction

We are still in the feasibility phase of the project which includes site selection, developing a business case and seeking a planning consent. In order to prepare a business case and have the necessary information to make a detailed planning application, design needs to progress sufficiently to inform these elements of the project. The funding requested in this report will allow more detailed iterations of design and work on the required planning information to progress.

#### **4. Finance**

4.1 To date, all costs during the feasibility and deliverability phases of this project have been shared equally with Suffolk County Council and St Edmundsbury Borough Council. St Edmundsbury provided initial funding of £100,000 (report F51 dated 30 June 2014). A further £20,000 of funding has been made available through the Cabinet Office under the One Public Estate Programme (OPEP) which aims to support projects to co-locate public sector assets.

4.2 In order for the project to progress, funding, in line with other equivalent projects, will be required to finalise a business case in the autumn. Estimates elements of further cost required are:

Project Management / Concertus	£40,000
Planning advice	£15,000
BREEAM advisors	£4,000
Images and visual impact studies	£6,000
Planning application and land option	£52,000
Legal advice	£13,000
Direct costs	£30,000
Communications	£20,000
Consulting engineers (surveys / design)	£130,000
Other / contingency	£50,000
Total	£360,000

4.3 The anticipated share of these costs for West Suffolk is anticipated to be £180,000. Appropriate arrangements need to be made to share these costs between Forest Heath District Council and St Edmundsbury Borough Council. An accurate basis on which to share these costs between the West Suffolk Councils will be made for the business case. Until then it is recommended that they be shared on the standard 35:65 ratio and reconciled at a later date.

- 4.4 In order to reflect a 35:65 cost share between the West Suffolk authorities on both the current and future expenditure for this project, Forest Heath DC will be requested to make budget provision for £98,000 (35% of West Suffolk's £280,000 share – net of £20,000 OPEP funding) and St Edmundsbury will be requested to make a further budget provision of £82,000 (65% of West Suffolk's £280,000 share – net of £20,000 OPEP funding, minus the £100,000 already approved Report F51). Both amounts to be funded from each authority's Strategic Priorities and Medium Term Financial Strategy reserve.
- 4.5 A separate report that seeks financial approval for the funding of a number of major projects will come forward separately.

## **Appendix A – Response to the West Suffolk Operational Hub pre-application consultation**

### **The main issues raised**

#### **Highways/traffic**

The highways and traffic comments claim that the existing highway network in the vicinity of the site could not cope with the additional traffic which would be generated by the proposed development. They also suggest that the additional traffic would give rise to safety issues, that the proposed means of access to the site is unsatisfactory or unsafe and that the proposed development would create or worsen a number of “rat-run” routes.

**Note:** A Traffic Assessment will be submitted with any planning application and will consider these matters during development of the scheme’s design.

We anticipate that the majority of vehicle movements to and from the site will be outside peak times. A Traffic Assessment will be submitted as part of the planning application; this is likely to include data from surveys of existing traffic movements.

*Source: Frequently Asked Questions, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)*

## Location/site selection

The comments relating to this issue claim that there are more suitable sites for the proposed development, that the site is too close to residential areas or too close to Bury St Edmunds, that the proposed development should be located in a rural area away from housing or simply that the site shouldn't be developed.

**Note:** Further pre-application consultation will be undertaken to explain the reason for co-location to a single site in terms of operational efficiency and within the context of National and European waste regulation and policy. It will also explain the process of selection and why the proposed site at Hollow Road Farm has been chosen.

The initial feasibility work to find a suitable location looked at a wide range of sites around the town based on the following criteria:

- their availability;
- their suitability for this type of use;
- their accessibility;
- how well they relate to the main centres of population;
- their planning designation.

The site needs to have good access to the trunk road network and not to lead to heavy goods vehicles running through residential areas.

The ideal situation would have been to find a site which was allocated within the Development Plan but none were available for this type of use. For example, there are no sites available on Bury St Edmunds industrial estates of sufficient size to accommodate the proposed development and with direct access to the primary road network.

We will therefore be making a strong case as to why an exception to planning policy should be made. The case will focus on the absence of other suitable sites and suitability and availability of this site.

As a departure from the development plan, the application, if approved, will be referred to the Secretary of State. The Secretary of State will consider whether it needs to be called in for their determination.

*Source: Frequently Asked Questions, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)*

## Noise

The comments made in respect of noise relate to the impact of noise from the various noise sources which people believe would be created by the proposed development. Some comments refer to the possibility of the noise being generated 24 hours a day and one or two refer to the impact of vibration in addition to noise and the noise generated by the construction of the scheme.

There would be some daytime construction noise for about 12 months whilst the site is prepared and facilities built. This would be controlled through planning conditions.

Once in operation there would be some low levels of noise, mainly from vehicles moving around the site. The design has included features which reduce the need for reversing (and the associated bleeping noise) and this will be considered again in the next design stage.

A noise assessment will be carried out to support the planning application. If the assessment identifies that noise mitigation measures will be required to make the development acceptable these measures will be incorporated into the design of the facility. Overall noise levels would be maintained within guidelines so that they would not be high enough to be likely to give rise to complaints.

*Source: Consultation Leaflet, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)*

## **Vermin**

The comments on this issue claim that the development would attract vermin to the area, particularly seagulls, rats and flies, and that these may harm public health.

Waste will not be on site very long and therefore should not attract significant numbers of pests, vermin or birds. Normal pest control measures will also be in place. The waste transfer station will be fully enclosed and doors kept shut when not accepting vehicles.

Concerns about seagulls will also be addressed by ensuring that the design of the buildings and materials used act as a deterrent to nesting.

*Source: Frequently Asked Questions, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)*

## **Pollution/contamination**

The comments on this issue centre on the air pollution which would be caused by the vehicles travelling to and from the site.

## **Odour/smell**

The majority of comments made in respect of odour and smell express a desire not to have another odour generating use in the locality. The British Sugar plant is cited most regularly in the responses as the current odour concern. A number of comments made related to the proposed mitigation measures referred to in the public consultation material. Some expressed concern about the impact of certain mitigation measures themselves on the health of nearby residents, another sought further information on the proposed measures and others claimed that the mitigation measures would not be sufficient.

All waste would be stored within a closed building before being transferred and would usually be on site for less than a day so we do not expect there to be any major smells or problems with vermin. We would also have 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. Drainage from all hard standing areas would be through oil and petrol interceptors to prevent pollution.

*Source: Consultation Leaflet, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)*

## **Planning**

The comments made in respect of this issue are dominated by claims that the proposed development is contrary to planning policy. They also pick up on the fact that the Hollow Road Farm site is not an allocated site. Another line of commenting suggests that the proposals should be considered through the local plan process.

**Note:** These comments will be considered as part of the Planning Statement which will be submitted with any planning application. Also, see response to Location/site selection, above.

## **Landscape and visual impact**

The comments made on this point claim that the proposed development will have an unacceptable landscape and visual impact on the site and the surrounding area. Some of the comments suggest that it will compound the negative landscape and visual impact of the nearby British Sugar plant while others suggest it will be out of keeping with the rural landscape. A few responses argue that the site comprises elevated ground which is more easily seen from the surrounding area. A handful of responses request that the landscape proposals for the site be bolstered. One response requests that the southern edge of the site be screened in addition to the other three sides.

**Note:** A Landscape and Visual Impact Assessment will be submitted with the planning application which will consider these comments.

The waste transfer station will be a steel-framed building measuring around 68 metres by 37 metres. We have taken into consideration the siting and visual impact of the new buildings in relation to views close to the site, from the town centre and from Barton Hill. We will keep as much vegetation on site as possible including existing banking on the western edge of the site and a new 15 metre strip of hedge and planting would be created at the north and east boundaries of the site. Our lighting plans would also help to minimise any impact on the surrounding area, including wildlife.

*Source: Consultation Leaflet, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)*

## Light pollution

The comments here expressed concern about light pollution which may result from the proposed development if it is to be lit during the hours of darkness. Some suggest that the lighting for the proposed development should be designed so as to minimise light spillage.

**Note:** Lighting plans will be submitted with any planning application.

## Consultation / publication

Those commenting on the consultation itself felt that only a single option for the proposed development did not make for meaningful consultation.

It was also claimed that the publicity material and the public consultation material did not give enough information on the proposed development; some specifically cited the omission of the findings of the survey and assessment work. Additionally, respondents contended that the consultation was held at short notice, was poorly timed (given the upcoming elections), that the consultation period was too short and that the public consultation was not publicised widely enough.

On the issue of submitting their comments, concerns were expressed by some respondents that submissions were not acknowledged, that forms supplied at the public consultation event were unsuitable and that at one point during the public consultation event the response forms ran out due to the high attendance.

**Note:** A Statement of Community Involvement, outlining the level of community engagement will be submitted with any planning application.

## Property values

Comments on this topic claim that property values in the area surrounding the site would be reduced by the proposed development. Some respondents ask whether compensation would be paid to those affected while one response asks if the council tax band of affected properties would be adjusted.

The effect of development and proposed development on property prices is not a material consideration in planning decisions.

Source: *Frequently Asked Questions*, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)

**Note:** Requests for changes to a property's council tax valuation are dealt with by the Government's Valuation Office Agency. [www.gov.uk/government/organisations/valuation-office-agency](http://www.gov.uk/government/organisations/valuation-office-agency)

## Process

The comments on this matter express concern that the means by which the development proposals for Hollow Road Farm have been progressed have been in some way improper or procedurally incorrect. Some claim that the development has

been presented as a fait accompli, some are concerned that money has already been paid to the landowner, some say the process is too quick while others claim it is undemocratic.

A small number of respondents suggested that a public consultation on all of the alternative sites should be carried out while another respondent said that the wider strategic consequences of the proposed development should be publicly debated and thought through. Further responses suggest that it was not right to consult on the proposals because they were not complete. Comments in a similar vein said that not enough information on the project had been shared with the public and that more information was needed on the scheme's potential impacts.

Finally, concern was raised about how the councils, which include St Edmundsbury Borough Council, could apply for planning permission from St Edmundsbury Borough Council, implying a lack of impartiality.

St Edmundsbury Borough Council is the planning authority for this application. The council carries out a wide range of services and has a number of different roles, many of them governed by legislation. There are times when it is involved in different aspects of a project – in this case the council is both an applicant (alongside Suffolk County Council and Forest Heath District Council) and decision-maker, as the local planning authority. By law, St Edmundsbury's planning function is kept completely separate from the council's other functions. The actual decision about whether to grant approval or not rests with councillors on the Development Control Committee. Their decisions have to take regard of the relevant planning laws and guidance.

Source: *Frequently Asked Questions*, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)

## **Cost**

The comments received in relation to cost claim that the cost of the proposed West Suffolk operational hub to the taxpayer is unacceptable, that the project is a waste of money or that the money would be better spent elsewhere. Some said that the councils' financial justification for the proposed development needs to be evidenced while others complained that the project was entirely cost driven.

## **Litter/fly-tipping**

The comments here raise concerns that the proposed development will increase levels of litter in the area surrounding the site as well as increasing fly-tipping. Some respondents suggest that the roads and verges in the vicinity of the site should be kept free of litter.

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

Source: *Frequently Asked Questions*, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)

### **Agricultural land**

The comments made in respect of agricultural land state that the proposed development should not be located on or is a waste of such land.

### **Ecology**

The comments made in respect of this matter claim that wildlife will be affected, harmed or driven away by the proposed development and imply that the site ought to be preserved in its current form to protect wildlife. One response asks how the impact of the proposed development on wildlife will be known.

**Note:** A Preliminary Ecological Assessment has been undertaken and will be submitted with any planning application.

### **Environment**

These comments claim that the proposed development will have a negative effect on the local environment. One response asks whether an assessment of the scheme's environmental impact has been carried out.

The applicants have written to St Edmundsbury Borough Council's Planning Team to ask for an Environmental Impact Assessment (EIA) Screening Opinion. This will determine whether the proposal is likely to have a significant effect on the environment and therefore whether it requires an Environmental Statement to be submitted in support of the planning application. If it does require an assessment there is a prescribed process which will be followed. If an EIA is not required the site's environmental impact will be considered through a number of different assessments which will be submitted with the planning application and reviewed by the local planning authority as decision maker.

Source: *Frequently Asked Questions*, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)

### **Cumulative impact**

The comments here express concern about the cumulative impact of the proposed development and other significant developments proposed in the locality. The other significant developments referred to are the housing allocations for this part of the Borough as set out in the Bury St Edmunds and Rural Vision 2031 documents.

Particular concern is expressed about the Berkeley Homes proposal for the land to the north of Moreton Hall.

Both councils have been involved in the process that led to approval for development in this area and so are aware of the need to take this into account. Cumulative impacts will be considered as part of the planning process.

Source: *Frequently Asked Questions*, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)

## Design

The comments on design are particularly varied. A variety of layout and design alterations or improvements are suggested with a view to reducing the proposed development's impact on residential amenity and for several other reasons. A contingent of the comments suggest that the buildings as proposed would be too high and should be single storey, no higher than the buildings on the adjacent site or cut into the ground. Numerous comments were made in respect of the architectural and design approach to the buildings proposed; some in favour of striking designs, some in favour of traditional or functional designs and still others in favour of buildings designed to blend into the surroundings.

Other lines of commenting are that considering design is premature unless planning permission has been granted; that the scheme offers little in terms of original or low impact design and that the level access recycling facilities proposed are a good idea.

**Note:** Design will be one of the factors taken into account by the Development Control Committee as part of the planning decision-making process

## Operating hours

The comments received in respect of operating hours were expressions of concern that the site may or will operate 24 hours a day.

We are not anticipating that there would be much of a requirement for night operations (after 10pm and before 6am) on the site. However, 24/7 consent would provide some flexibility if we ever needed a small overnight operation some time in the future.

Source: *Frequently Asked Questions*, [www.westsuffolk.gov.uk/wsoh](http://www.westsuffolk.gov.uk/wsoh)

## Health

The comments here ranged from general expressions of concern that the proposed development will be harmful to the health of local residents to specific concerns such as microbes being blown from the site on the wind, cyanide release from the site and the health impact that the news of the proposed development has had on local residents.

## Future expansion

The comments on this point express concern about the proposed development being expanded in the future. Another line of commenting queries the purpose of the additional land within the proposed application site.

### **Future maintenance**

The comments on future maintenance express concern that the councils' proposals for maintaining the site will be would not be followed through. One comment raised specific concern about future management of any landscape planting on the site based on poor management of landscape planting elsewhere.

### **Adjacent land**

Concern was expressed in relation to land adjacent to the proposed site being developed for commercial or industrial purposes should the proposed development be granted planning permission.

### **Additional services**

The comments received on this point were mixed. They were the result of the second question on the comments form. The question asked:

*"In addition to the Household Waste Recycling Centre please tell us of other public services you would like to see offered at the new site."*

A number of respondents answered as intended with suggestions of additional services. These included paint recycling/disposal, asbestos disposal, the sale of garden compost and mulch (presumably recycled from brown bin waste), a Gumtree drop-off area and a shop for unwanted items (it should be noted a shop for unwanted items formed part of public consultation proposals). One respondent requested that the list of permitted blue bin waste collection items be extended to include glass.

Other respondents commented in different ways on the issue of additional services. Some expressed a desire to see no additional services saying those already proposed were enough and that providing more services would generate more traffic. Other responses sought to clarify whether a waste incinerator would form part of the proposals. Finally, some responses suggested other unrelated uses for the site (e.g. park and ride, hotel, supermarket etc) which one assumes are suggested instead of the proposed development rather than in addition to it.

### **Surveys**

The comments made in respect of this topic were: a request that the results of the survey and assessment work used to inform and support the proposals be made public; claims that the survey work was unsatisfactory or claims that further survey and assessment work was necessary. The further survey and assessment work sought related to noise, low frequency ground vibration, light pollution, odour, vermin and traffic. A "full" consultation was also sought.

**Note:** Survey information and assessments carried out will be submitted with the planning application and, alongside all the other accompanying documentation, will be made public. There is also a statutory requirement for formal consultation on planning applications.

## **Economy/tourism**

The comments received in respect of this issue claim that the proposed development would make Bury St Edmunds less attractive to tourists, or would even put them off coming to Bury St Edmunds, and therefore would harm Bury's economy.

## **Archaeology**

The comment received in respect of archaeology suggests that the site is of high archaeological interest and therefore that a full archaeological investigation of the site should be carried out.

**Note:** A report on archaeology will be submitted with any planning application