

**BABERGH DISTRICT COUNCIL**

**FROM:** Head of Natural and Built Environment

**REPORT NUMBER:** **H195**

**TO:** STRATEGY COMMITTEE

**DATE OF MEETING:** 12 February 2009

**[DRAFT]**

**Babergh DC (Planning) Response to SCC Waste Core Strategy (Issues and Options Part II stage) Consultation**

This response was agreed by Babergh's Strategy Committee at its meeting held on 12 February 2009 as Babergh's formal response to the above consultation exercise

**1. Strategic Sites**

1.1 This response deals in turn primarily with the 2 sites proposed for inclusion within the document that lie within the Babergh district. Babergh recognises and indeed wishes to emphasise the fact that the 2 site specific proposals affecting Babergh are separate and very different from each other, as are the considerations relating to each one

1.2 Residual Waste Treatment Facilities Strategy

- Babergh supports the general approach of the proposed Core Strategy document and that of identifying the strategic sites for residual waste treatment facilities (RWTF) in the Plan itself at Core Strategy stage
- This is in line with the Plan-led approach
- This also duly reflects both:
  - The strategic importance of dealing with the identified level of waste within the county for the Plan period and
  - Its more localised implications, in terms of the actual sites for this purpose and their potential impacts
- Babergh supports the case set out to ensure that sufficient residual waste treatment capacity is identified in order to minimise the amount of (non-hazardous) landfilling capacity to be made available for the Plan period
- Babergh also notes that relatively few sites have emerged from the analytical work carried out by SCC as part of the evidence base, as suitable for RWTF use

1.3. Former British Sugar site, Sproughton

- The proposal for a RWTF here is considered to accord with the site's Local Plan allocation (for unspecified employment / commercial uses)
- In particular the proposal is not different in principle from the site's previous and authorised use, since it would merely substitute one industrial process for another

- However, technology has of course moved on greatly since the 1920s when the former use was established and accordingly, this would be reflected in any new processing of materials (of any kind) carried out at the site
- The assessments carried out to date on the various site options are not disputed
- Babergh notes the assessment work carried out in respect of the former British Sugar site at Sproughton and that the site performs well against the various criteria applied (including absolute and comparative criteria and broader sustainability appraisal)
- The Council notes and agrees the scope of the further detailed work (for current purposes) that would be necessary to support a RWTF operation here (in Site 2, section 2, Environmental Safeguards) as part of material required to support a planning application, as an initial, informal opinion. However, this should not be interpreted as either a formal or binding view in relation to any subsequent input to a scoping opinion (for the purposes of the Environmental Impact Assessment Regulations) and Babergh reserves the right to revise its view in the light of any detailed planning proposals that may emerge for the site
- Babergh offers its in-principle support, subject to more detailed assessments, findings and any possible balances and judgements, on the legitimate planning merits of the case, that need to be made at that stage

However, a number of important salient points that can be identified at this stage are as follows:

#### Concerns

These are outlined briefly in the consultation document and relate mainly to environmental issues / concerns of local residents and the relationship between the site and sensitive land uses. These have been identified as:

- Possible health / air quality impacts arising from the treatment of waste (particularly airborne emissions)
- Potential visual impacts – that is, whether new development would have a detrimental impact compared to the current development on site
- Noise
- Transport impacts

Characteristics of the site considered as advantageous to Waste Treatment Proposals include:

- In terms of the important 'proximity principle' (proximity between where waste is generated and where it is processed / disposed of) the site performs more favourably than most alternatives (although the difference between a location here or at Great Blakenham appears relatively marginal)
- In terms of access to the strategic highway network, the site has very substantial advantages
- In terms of the overall, existing conditions at the site, it also has significant points in favour of such a proposed use

It is considered that among the 5 sites for RWTF put forward under this consultation exercise, site no. 2, the former sugar beet site at Sproughton, should be supported for further consideration in the Waste Core Strategy preparation subject to the satisfactory detailed resolution of the above issues and concerns (through the analysis set out in the 'Environmental Safeguards' at section 2.0).

#### 1.4 Strategy for Non Hazardous Landfill and sites for this purpose

- As set out above, and given that the two approaches are very closely interlinked, Babergh supports the overall approach proposed in the draft Core Strategy document
- In particular, although it is difficult to be absolutely precise over the amount of waste to end up as that deemed suitable for landfilling, the concern that care should be taken to avoid over providing future landfilling capacity is strongly supported
- This is in the interests of maximising waste dealt with further up the established waste hierarchy and the effect that excessive landfilling capacity would have on facilities operating towards the higher end of the waste hierarchy

#### 1.5 Proposed Landfill Site at Layham

The key points on this proposal include the fact that:

- It largely concerns the broadening of the type of waste to be landfilled here (from the currently permitted industrial and commercial waste, to residual materials from processed municipal solid waste)
- A changing of timescale, as the site is currently permitted for landfill operations until only 2013, whereas a timeframe until 2021 is now required
- It is significant that the site's future role is seen in the context of the above 2 factors. Another factor is that such a site would not be considered permanent (unlike a RWTF), as it would instead provide a space for landfilling until 2021 and the land then restored, as currently envisaged

- At a more detailed level, relevant site specific considerations indicate that the location is generally suitable for landfilling purposes (a principle that has already been established)

Such considerations include:

- The site's relatively remote location
- Local topography
- Visual impacts and
- Its current authorised use

Major concerns are:

- Its proximity to a designated County Wildlife Site (woodland area enclosed on several sides by Layham Quarry)  
*(due regard needs to be given to the level or status of this site, as it is a local ecological designation only, unlike higher order sites, such as SSSI)*
- Possible Environment Agency concerns regarding groundwater vulnerability (subject to further consideration), and
- The effects of HGVs on the A1071; including traffic volumes that may increase; road safety issues and the extension of time for which the site would be in operation  
*(however, the site is served by a designated A road, with a suitable feeder road from this and in the Suffolk highway network context, site access is relatively acceptable)*
- The above issues are not currently envisaged as of such a fundamental nature that they are incapable of satisfactory resolution through a combination of detailed design, mitigation / compensatory measures

1.6 No objection in principle raised subject to the satisfactory detailed resolution of the above specific issues and concerns.

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on behalf of Babergh District Council