

Intensive Livestock and Poultry Farming Supplementary Planning Document (SPD) Consultation Statement – November 2024

Introduction

Babergh and Mid Suffolk District Councils adopted the Babergh and Mid Suffolk Joint Local Plan (JLP) Part 1 Development Plan Document (DPD) in November 2023. The JLP Part 1 DPD contains strategic and local (development management) policies to guide development proposals in the Districts. Following adoption of the JLP Part 1 DPD, the Councils developed with stakeholders a draft Intensive Livestock and Farming SPD for consultation, which has subsequently been amended to be referred to as the Intensive Livestock and Poultry Farming SPD. The purpose of the SPD is to supplement JLP Policy LP14, by providing supplementary information on the issues and considerations that are of relevance to the determination of intensive livestock and poultry applications. It also provides detailed information and advice on established good practice for assessing the impacts of new and/or expanded livestock and poultry uses. This statement summarises the main issues raised in the comments received and how those issues have been addressed in the SPD.

Public consultation on the draft Intensive Livestock and Farming SPD

Public consultation was undertaken between 15th May and 19th June 2024, for a period of five weeks, in accordance with Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). At this formal stage of consultation, all those registered on the Councils' Joint Local Plan mailing list were directly consulted, including statutory consultees and Town and Parish Councils, and a notice was published in the local press and on the Councils' websites. Details of the consultation along with the documentation was also made available to the public on the Councils' websites and can be viewed via the page below along with copies of the full representations.

<https://baberghmidsuffolk.oc2.uk/document/77>

Hard copies were deposited at the Councils' office at Endeavour House, 8 Russell Road, Ipswich, IP1 2BX (weekdays 8am to 5pm), and at the Customer Access Points at Sudbury Library, Market Hill, Sudbury, CO10 2EN (Mondays and Thursdays 9am to 5pm) and 54 Ipswich Street, Stowmarket, IP14 1AD (Tuesdays 10am to 5pm and Fridays 9am to 4.30pm).

Comments could be made electronically through the Councils' online system via the published weblinks; by email to localplan@baberghmidsuffolk.gov.uk; or in writing to the Strategic Planning Policy Team, Babergh and Mid Suffolk District Councils, Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX.

12 organisations or individuals commented on the draft Intensive Livestock and Poultry SPD as follows:

- Environment Agency
- Historic England

- Natural England
- Babergh and Mid Suffolk District Councils' Environmental Team
- Breckland District Council
- East Suffolk Council
- Ipswich Borough Council
- Suffolk County Council
- Amber REI
- Anglian Water Services Ltd
- River Waveney Trust
- Suffolk Preservation Society

The table below provides a summary of the main issues raised in the consultation responses, the Councils' response and where the SPD has been revised.

Chapter 1 – Introduction / General comments			
Respondent / Rep ID	Comment Summary	Councils' Response	Action
Environment Agency / 23598	Recommend parallel tracking of intensive livestock planning applications with their permitting process.	Paragraph 1.2 defines what is meant by Intensive Livestock and Poultry Farming, which is agreed by the Environment Agency. The SPD is focused on the planning process.	None.
Historic England / 23607	As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Do not have any specific comments to make at this stage.	Comment noted.	None.
Suffolk County Council / 23601	Suggest the title of the SPD include the word 'Farming' at the end, in order to be more aligned with Joint Local Plan Policy LP14.	Comment noted.	Amend title of the SPD to read 'Intensive Livestock and Poultry Farming SPD'.

<p>Amber REI / 23588</p>	<p>Whilst the principle of the SPD is supported, there are concerns that it does not actively meet with the purpose of Policy LP14 which recognises the importance and supports development of Intensive livestock and poultry farms. Respondent feels the SPD adopts an overall negative tone in relation to the environmental and amenity impacts of this form of intensive agri-farming.</p> <p>The SPD places a particular emphasis on the impact on intensive livestock and poultry farming on the amenity of existing residential homes. However, the SPD fails to set out any clear thresholds / development criteria for proposed residential development in having regard to the proximity of existing livestock and poultry farms, when the issues of conflict remain the same in either context.</p> <p>Of greater concern, the SPD fails to acknowledge opportunities arising through the redevelopment of existing poultry farms. Modern replacement agricultural buildings and associated modern technology, have the ability to deliver numerous benefits particularly when replacing older obsolete forms of buildings and other agricultural practices. This includes</p>	<p>Note the principle of the SPD is supported. Paragraph 1.5 explains that Policy LP14 of the Joint Local Plan seeks to support the sustainable development of this agricultural sector, whilst ensuring appropriate consideration is given to environmental protection as well as the wellbeing of people and the impacts on natural resources. Paragraph 1.6 states that the SPD provides 'supplementary information on the issues and considerations that are of relevance to the determination of intensive livestock and poultry applications.'</p> <p>Policy LP14 (4) states: 'Proposals for residential buildings ... within 400m of established intensive livestock and/or poultry units will be subject to special consideration. Such proposals which would be subject to significant adverse environmental impact will not be permitted.' This is also referred to in paragraph 5.11.1 of the SPD.</p> <p>Comment noted and these benefits are supported. However, the SPD seeks to provide supplementary information and guidance on issues and considerations the Councils deem necessary to provide support in the determination of planning applications.</p>	<p>None.</p> <p>None.</p> <p>None.</p>
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	<p>environmental improvements, including air quality / reducing ammonia emission, additional planting / landscape strategies and water resource management for example; operational and economic benefits; and enhanced working environment/animal welfare conditions. These positive attributes should be fully recognised as having the potential to provide a number of benefits in the SPD rather than the adverse impacts of the agricultural industry as currently written.</p> <p>In placing an emphasis on ‘detrimental’ and ‘negative’ impacts of intensive poultry farming rather than the opportunities and benefits associated with the use, there is concern that the SPD fails to address the policies of the Joint Local Plan, economic strategies at a regional level nor is it compatible with the provisions of national planning policy and legislation in supporting a prosperous rural economy and in particular agricultural economic growth and diversification.</p> <p>The SPD fails to make reference to national policy provisions, in particular in ‘supporting a prosperous rural economy’. NPPF Paragraph 88 is clear that ‘Planning Policies and decisions should enable the development and diversification of agricultural and other land based rural businesses’.</p>	<p>The Councils support a prosperous rural economy and through the SPD are seeking to ensure development that occurs addresses issues and considerations the Councils deem necessary in the determination of planning applications.</p> <p>The supporting text to JLP Policy LP14 details how the Councils are supporting a prosperous rural economy and through the SPD are seeking to ensure development that occurs addresses issues and considerations the Councils deem necessary in the determination of planning applications.</p>	<p>None.</p> <p>None.</p>
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	<p>SPD currently makes no reference to DEFRA's up to date national guidance, the 'Code of Good Agricultural Practice (COGAP) for Reducing Ammonia Emissions' which should be used as the basis on which to inform the content of the SPD in relation to good practice and in particular the reduction of ammonia emissions.</p> <p>The SPD fails to identify relevant policy context at a regional level (references - Norfolk and Suffolk Economic Strategy 2022). SPD fails to align with the objectives of the Joint Local Plan and provisions of national policy and regional economic strategies in supporting agricultural landowners/farmers to enhance and develop existing farms.</p> <p>Currently there is an emphasis on the negative impacts of intensive livestock and poultry farming on the environment rather than the managed and sustainable development of these farms. The use of emotive language through the SPD has the ability to ostracize further agricultural / poultry farm landowners and in turn making obtaining the necessary planning permissions for new development an extremely difficult process. The SPD should instead take a balanced approach to the development of intensive livestock and poultry farming. This includes the economic importance of the sector and the opportunities development offers in improving amenities of local residents and the environmental and biodiversity impacts; as well as the potential impacts which must be carefully</p>	<p>Comment noted.</p> <p>The supporting text to JLP Policy LP14 details how the Councils are supporting a prosperous rural economy and through the SPD are seeking to ensure development that occurs addresses issues and considerations the Councils deem necessary in the determination of planning applications.</p> <p>The SPD seeks to ensure development that occurs addresses issues and considerations the Councils deem necessary in the determination of planning applications.</p>	<p>Reference to the document added to paragraph 5.2.7.</p> <p>None.</p> <p>None.</p>
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	<p>addressed through the planning application process.</p> <p>Greater emphasis should also be placed throughout the SPD on the need to protect established farms and their long-term operational capabilities, ensuring sufficient offset distances between any new residential development proposals and existing farms.</p> <p>SPD should be reviewed to readdress the approach currently taken and ensure it aligns with wider economic policy ambitions and does not restrict appropriate development coming forward through a difficult and prolonged planning process. In particular, emphasis on the submission of information (to be agreed by external bodies) at the pre application stages should be removed.</p>	<p>Policy LP14 (4) states: 'Proposals for residential buildings ... within 400m of established intensive livestock and/or poultry units will be subject to special consideration. Such proposals which would be subject to significant adverse environmental impact will not be permitted.' This is also referred to in paragraph 5.11.1 of the SPD.</p> <p>It is necessary to require information such as this to ensure that the issues and considerations that are of relevance to the determination of intensive livestock and poultry applications are appropriately evaluated.</p>	<p>None.</p> <p>None.</p>
<p>Anglian Water Services Ltd / 23590</p>	<p>Broadly supportive of the key objectives of this additional guidance, particularly regarding the requirements for the sustainable use of water resources and ensuring adequate measures for protecting water quality.</p> <p>Paragraph 1.4: support the identification of ground water protection and drinking water abstraction points as sensitive land uses and environments, where particular care would need to be undertaken when locating pig and poultry farms due to potential pollutant impacts. In our</p>	<p>Comment noted.</p> <p>Comment noted.</p>	<p>None.</p> <p>None.</p>

	<p>region, we face significant challenges when addressing raw water quality and ensuring improvements are made both for the environment and the water we treat for our customers. Pollutants such as nitrates, phosphates and pesticides can end up in groundwater aquifers and watercourses as a result of activities such as private discharges (point source pollution) and agricultural practices (diffuse pollution). This can often cause harm to the aquatic environment such as eutrophication, as well as posing challenges to our reservoirs that receive direct input of river flows.</p>		
River Waveney Trust / 23602	<p>Overall, there must be a far greater emphasis on rivers and watercourses, and their health and protection, through the document.</p>	<p>Rivers and watercourses are sensitive environmental receptors which are considered through JLP Policy LP14 section 5.3 in particular. Water resources are also considered in detail in section 5.4.</p>	<p>None.</p>

Chapter 3 – The wider planning context			
Respondent / Rep ID	Comment Summary	Councils' Response	Action
Breckland District Council / 23579	<p>Noted the importance of the Design and Access Statement has been highlighted in paragraphs 3.5 and 3.6. Like to further suggest including in paragraph 3.6 for Design and Access Statement to cover waste management and odour management.</p>	<p>Comment noted.</p>	<p>Added an extra sentence to paragraph 3.6 for a design concept statement to include how odour management and waste management have been considered.</p>

Chapter 5 – Joint Local Plan Policy LP14 Guidance			
Respondent	Comment Summary	Councils' Response	Action
Environment Agency / 23598	Paragraph 5.2.1: recommend that noise and pests including but not limited to flies are added.	Paragraph 5.2.1 reflects the policy wording of JLP Policy LP14 (1) [a]. Other forms of pollution and disturbance would cover pests as well as noise pollution.	Pests added to wording of paragraph 5.2.2.
	Paragraph 5.2.23: noise from the livestock itself should be considered, particularly from pigs.	Comment noted.	Added the word livestock to paragraph 5.2.23.
	Paragraph 5.2.4: pests such as flies should be included in this list.	Comment noted.	Pests have been added to the list.
	Paragraphs 5.4.1 and 5.4.6: if development requires water from any other source than mains water such as surface waters or ground waters, the applicant should be mindful that they will require a water abstraction licence. There is no guarantee that increases in volumes will be permitted.	Comment noted. Paragraph 5.4.3 notes that the regulation of abstraction licences intends to prevent increases in the level of abstraction in the short term and to reduce the level of abstraction over the long term.	None.
	Paragraph 5.5.2: it should be noted that the Woodland Trust uses lower critical load (ammonia) and critical levels (nutrient enrichment) when assessing the impact of ammonia emissions on ancient woodland.	Comment noted but do not consider it necessary to state this in the SPD.	None.
	As stated in paragraph 5.11.1, it is important to consider the proximity of new residential and sensitive development to existing intensive pig and poultry sites. The environmental impacts of the farm on new developments should be taken into consideration.	Comment noted.	None.

Babergh and Mid Suffolk District Councils

<p>Natural England / 23578</p>	<p>Suggest amendment to section 5.3.9 with the following wording:</p> <p>‘For small scale intensive livestock and poultry extension applications, it may be appropriate to use the ‘Simple Calculation of Atmospheric Impact Limits’ (SCAIL) model to screen the proposal for air quality impacts to nearby sensitive receptors of designated sites. However, if this shows that there may be a potential impact, detailed emissions modelling should be carried out.’</p>	<p>Comment noted.</p>	<p>Wording amended in paragraph 5.3.9.</p>
<p>Babergh and Mid Suffolk District Councils’ Environmental Team / 23563</p>	<p>Supportive of the SPD. Include guidance on the management and prevention of flies at such sites. Include additional and specific guidance on fly management / controls.</p>	<p>Comment noted. To add sub-section added in section 5.2.</p>	<p>Sub-section added in section 5.2 introducing pest concerns and measures to address these concerns.</p>
<p>East Suffolk Council / 23591</p>	<p>East Suffolk Council supports Babergh and Mid Suffolk District Councils in providing clear guidance about how intensive livestock and poultry farming should be developed.</p> <p>However, East Suffolk Council is also keen to ensure that the following issues are dealt with adequately by the draft Intensive Livestock and Poultry SPD.</p> <p>Water pollution: East Suffolk is downstream of Mid Suffolk and therefore is vulnerable to water pollution from intensive livestock and poultry farming taking place in Mid Suffolk, and therefore welcome inclusion of guidance on this matter (paragraphs 5.2; 5.3).</p>	<p>Comment noted.</p> <p>JLP Policy LP14 and the SPD provide clear guidance on how amenity impacts should be considered. This would include any cross-boundary issues as it is not locationally specific</p>	<p>None.</p> <p>Acknowledgement of the wider catchment added into paragraphs 5.2.2, 5.2.4 and 5.3.1.</p>

	<p>Transport: as East Suffolk has the potential to be adversely impacted by HGV movements generated by intensive farming, support the inclusion of this topic in the guidance.</p> <p>Other activities: A few sentences could be added to state that intensive farming should be sensitive to other rural activities and should be located away from those that could be adversely affected. This could include tourist activities and accommodation (paragraph 5.2).</p> <p>Water supply: further clarity could be provided as to what might constitute ‘an acceptable level’ of water demand (paragraph 5.4.4). The second sentence of paragraph 5.4.5 states that ‘calculations should demonstrate water neutrality... [and that] there is water headroom’. It is therefore assumed that the ‘acceptable level’ of water demand is a level that can be demonstrably supplied.</p>	<p>but will acknowledge wider catchment.</p> <p>Comment noted.</p> <p>JLP Policy LP14 and the SPD provide clear guidance on how amenity impacts should be considered. This would include any cross-boundary issues as it is not locationally specific but will acknowledge wider catchment and that residential properties can include those staying in tourist accommodation.</p> <p>Comment noted and will add further wording to paragraph 5.4.4.</p>	<p>None.</p> <p>Acknowledgement of the wider catchment and those staying close to development added into paragraphs 5.2.2 and 5.2.4.</p> <p>Amended text in paragraph 5.4.4 to add words following ‘an acceptable level’, to read ‘determined in collaboration with the relevant water company.’</p>
<p>Ipswich Borough Council / 23561</p>	<p>There are concerns about the potential impact on amenity of residential areas within the Borough that are within close proximity to new potential processing plants that border the south (e.g. Wherstead), west (e.g. Sproughton and Bramford) and north-west (e.g. Akenham) of Ipswich.</p>	<p>JLP Policy LP14 and the SPD provide clear guidance on how amenity impacts should be considered. This would include any cross-boundary issues as it is not locationally specific but will acknowledge wider catchment.</p>	<p>Acknowledgement of the wider catchment added into paragraphs 5.2.2, 5.2.4 and 5.3.1.</p>

	<p>The SPD needs to consider the Suffolk Coastal District Council and Ipswich Borough Council 2019 Cross Boundary Water Cycle Study (https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/cross-boundary-water-cycle-study_jan_2019.pdf) due to the intensive use of water in the operation of livestock and poultry processing plants.</p> <p>Paragraph 5.4.1 of the SPD makes reference to the Babergh and Mid Suffolk Water Cycle Study and some of the constraints of water supply in the Hartismere Water Resource Zone, but does not reference and consider some of the water supply constraints from the East Suffolk and Ipswich area, which may impact the Borough of Ipswich.</p>	<p>Comment noted and reference to be added to the SPD.</p> <p>JLP Policy LP14 (c) and the supporting guidance refers to the need to consider and address the impact on water resources and the capacity of the water supply infrastructure network. If appropriate, this would include any cross-boundary resource and network issues.</p>	<p>Reference added to paragraph 5.4.1.</p> <p>Reference made in 5.4.1 to the Suffolk Coastal District Council and Ipswich Borough Council 2019 Cross Boundary Water Cycle Study.</p>
<p>Suffolk County Council / 23601</p>	<p>Consideration of cumulative impacts should be of all industries which operate in a rural setting, not just agriculture. Any operations or allocated facilities should be taken into account if they have the potential to cause cumulative impacts on the local area, especially if allocated through a local plan.</p> <p>The Biodiversity Net Gain (BNG) section is accurate in its descriptions. This could be expanded to show how intensive farming can work alongside the ambitions for BNG delivery.</p>	<p>Paragraph 5.10.1 explains that ‘the cumulative impacts resulting from similar developments (including other similar uses or uses associated within part of the processing chain) nearby must also be taken into account.’ If there are significant developments or Local Plan allocations nearby, then these would be considered through the relevant assessments.</p> <p>The Councils are producing a Biodiversity and Trees SPD which will address BNG.</p>	<p>None.</p> <p>None.</p>

	<p>Farms will be a valuable asset for BNG delivery in the future if managed correctly.</p> <ul style="list-style-type: none"> • Create Biodiverse Habitats: Livestock areas can be transformed into mini wildlife sanctuaries. • Adopt Regenerative Farming Practices: Implement regenerative farming practices that benefit crops and livestock, improve soil health, and enhance biodiversity. Methods that work with nature can create a more sustainable and diverse ecosystem on the farm. • Collaborative with Local Conservation Groups: Implementing wildlife corridors or creating buffer zones around the farm can support local biodiversity. • Integrate Agroforestry: Integrating trees and shrubs into the farming landscape can provide habitat for wildlife, improve soil health, and contribute to sustainability goals. Encourage farmers to embrace innovative and sustainable practices that align with the goals of increasing biodiversity and reducing carbon emissions. <p>Paragraph 5.3.11 on BNG could also make direct reference to the Environment Act and is a legal requirement for development.</p> <p>Suffolk County Council suggest exploring alternative energy sources, such as solar panels or wind turbines, to power farm</p>	<p>Comment noted.</p> <p>JLP Policy LP23 (1) requires all new development 'to minimise its dependence on fossil fuels and to</p>	<p>Paragraph 5.3.11 amended to refer to the legal requirement for BNG.</p> <p>Additional text added to paragraph 5.12.1 to give an example of JLP</p>
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	<p>operations and reduce carbon footprints. Considered sustainable farming practices can reduce carbon emissions and enhance energy efficiency within intensive livestock and poultry operations to align with net-zero objectives.</p> <p><u>Landscape</u></p> <p>Suffolk County Council would recommend that the title of section 5.7 is expanded to be more in line with the text from Policy ‘LP14 (1) [f] – serve to minimise visual and landscape impact and incorporate suitable landscaping proposals’.</p> <p>The reports/assessments section of the Draft SPD (paragraph 5.7.6) refers however to Landscape and Visual Appraisals (LVA) only, a simplified and less strenuous assessment than a full Landscape and Visual Impact Assessment (LVIA). LVAs are suitable for smaller and less complex developments. Larger or more sensitive developments, and particularly those requiring an Environmental Impact Assessment (EIA) need to include a full LVIA as part of the Environmental Statement (ES). SCC would suggest that this is explained in this SPD.</p> <p>For developments requiring an EIA, a number of photo montages from selected representative viewpoints should be agreed with the Local Planning Authority in advance. They do not only help the representatives of the Local Planning Authority in their assessment of the proposal,</p>	<p>make the fullest contribution to the mitigation of climate change through adopting a sustainable approach to energy use.’</p> <p>It is considered that the title ‘serve to minimise visual and landscape impacts’ is appropriate.</p> <p>Comment noted.</p> <p>Comment noted.</p>	<p>Policy LP23 (1) in terms of reducing a development’s dependence on fossil fuels.</p> <p>None.</p> <p>Added a new paragraph 5.7.6 to the report, which states: ‘For larger or more sensitive developments and those requiring an Environmental Impact Assessment (EIA), a full Landscape and Visual Impact Assessment (LVIA) will be required as part of the Environmental Statement (ES), unless the Scoping Opinion concludes otherwise. Where an EIA is required, a number of photo montages from selected representative</p>
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	<ul style="list-style-type: none"> • Hard landscape details, such as levels, surfaces, and boundaries <u>boundary treatments</u>. • Soft landscape proposals such as <u>showing</u> existing and new planting, <u>such as Tree shelter belts, buffer zones and other mitigative planting in an appropriate scale (such as 1:200) and providing clear specifications (species, sizes, densities, total numbers, provenance, soil preparation, aftercare and management, including, but not limited to, watering and weed control)</u>. • Details of external materials, colours and finishes. These should be chosen with the surrounding landscape in mind and with reference to the local geology and seasonal changes. • Details of any ecological and biodiversity enhancements that are required (<u>BNG</u>) and integrated drainage solutions. Integrated drainage solutions should follow the Sustainable Drainage Systems (SuDS) hierarchy with respect to surface and water flows, taking account of the potentially higher nutrient and/or contaminant levels in the water content. • <u>A separate lighting design should be submitted, that addresses landscape as well as ecology (wildlife) requirements.</u> <p><u>Transport</u></p> <p>Suffolk County Council notes that paragraph 5.8.5 refers to a 'Transport Impact Assessment'.</p>	<p>Comment noted.</p>	<p>Amendments made to paragraphs 5.8.2, 5.8.3</p>
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	<p>and the Environment Agency. This will enable us to assess whether there is sufficient headroom available to supply the identified demand for non-domestic water supply, and whether identified water efficiency and integrated water management measures have adequately addressed reductions in overall demand.</p> <p>Paragraph 5.4.5: Note the specific requirements of the methodology to be employed in the Water Resources Assessment, and are supportive of measures that would demonstrate water neutrality.</p> <p>Paragraph 5.4.6: Agree that water resources from all sources should be accounted for in the Water Resource Assessment, including private boreholes (noting that abstraction from a surface or underground water source of up to 20m³/day can be undertaken from the same source without an abstraction licence) and agricultural reservoirs.</p>	<p>Comment noted.</p> <p>Comment noted.</p>	<p>None.</p> <p>None.</p>
<p>River Waveney Trust / 23602</p>	<p>Sections 5.2 to 5.8 set out a number of subheadings for consideration including water resources (c) and visual and landscape impacts (f). This would be the ideal place to have a further subsection specifically on water quality and also water quality (flows) in rivers. Water quality is referred to in a few places (e.g.: 2.3b, 5.3.1, 5.6.2), but their impact is dramatically lessened by not being in a single coherent section, which would emphasise the need to protect rivers and watercourses. A new section</p>	<p>Chapter 5 is structured around JLP Policy LP14, which was adopted in November 2023 following an Independent Examination. As noted, water matters are addressed in the SPD.</p>	<p>None.</p>

	<p>on riverine water quality and quantity would helpfully balance the existing section on water resources.</p> <p>Paragraph 5.10.1 discusses the need to consider cumulative impacts resulting from similar developments. This is crucial, but the language here could be clearer and tighter.</p> <p>Section 5 goes into detail on number of specific types of pollution (noise, air and ammonia / nitrogen). It would be helpful if a section specifically on phosphates could be added, as they are a key nutrient leading to eutrophication. Other authorities have guidance on phosphates, such as Somerset, and this could be adapted for the Suffolk context.</p> <p>Would urge a presumption against any new abstraction from the River Waveney or any of its tributaries, for any purpose, regardless of whether a proposal suggests that the return of treated wastewater would theoretically make the impact on the river flow to be neutral. This should apply to the entire catchment, not just the Hartismere water resources zone. At some</p>	<p>Paragraph 5.10.1 sets out that 'Where an individual intensive livestock or poultry development is considered acceptable, the cumulative impacts resulting from similar developments (including other similar uses associated within part of the processing chain) nearby must also be taken into account. The Councils consider this wording is appropriate for the determination of planning applications.</p> <p>Phosphates are referred to in paragraph 5.3.4 along with ammonia, nitrogen deposition and particulate matter as requiring full assessment through the planning application process. Ammonia and Nitrogen have been matters previously raised by statutory bodies that require a more detailed explanation.</p> <p>Paragraph 5.4.3 acknowledges that the consequences of unsustainable water usage in vulnerable groundwater areas can be significant, potentially causing rivers to dry up and notes the regulation of abstraction licences.</p>	<p>None.</p> <p>None.</p> <p>None.</p>
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	<p>times of the year, parts of the Waveney have little or no flow – with significant impacts on wildlife but also on the ability of local people to access and use the river.</p> <p>Would urge mixed vegetative buffers (not simply grass) be required along all watercourses. A buffer strip is a physical barrier that slows the flow of overland runoff, increases infiltration and prevents soil, sediment and nutrient loss from fields – indeed provide a measure of protection from and adjacent land use. Buffer strips can trap and filter runoff therefore improving the water quality of the river by helping to prevent nutrients, sediments and pesticides from reaching the river. Keeping livestock out of the water protects the banks and channel, and therefore water quality, and also reduces the risk of livestock acquiring waterborne diseases.</p>	<p>Comment noted and wording to be added.</p>	<p>Wording added to former paragraph 5.7.8 to state: 'In the case of watercourses, it is recommended that mixed vegetative buffers are provided.'</p>
<p>Suffolk Preservation Society / 23564</p>	<p>Refer to the setting of heritage assets as a material consideration within the paragraph titled 'Other Considerations'.</p>	<p>Paragraph 5.12.1 already details that any assessment should take account of all relevant policies in the JLP, Neighbourhood Plans and any other guidance and material considerations. Add example of JLP Policy LP19 regarding the setting of heritage assets.</p>	<p>Additional text added to paragraph 5.12.1 to give an example of JLP Policy LP19 when considering the setting of heritage assets.</p>