

Babergh and Mid Suffolk Joint Local Plan

Statement of Common Ground

Between

Babergh and Mid Suffolk District Councils

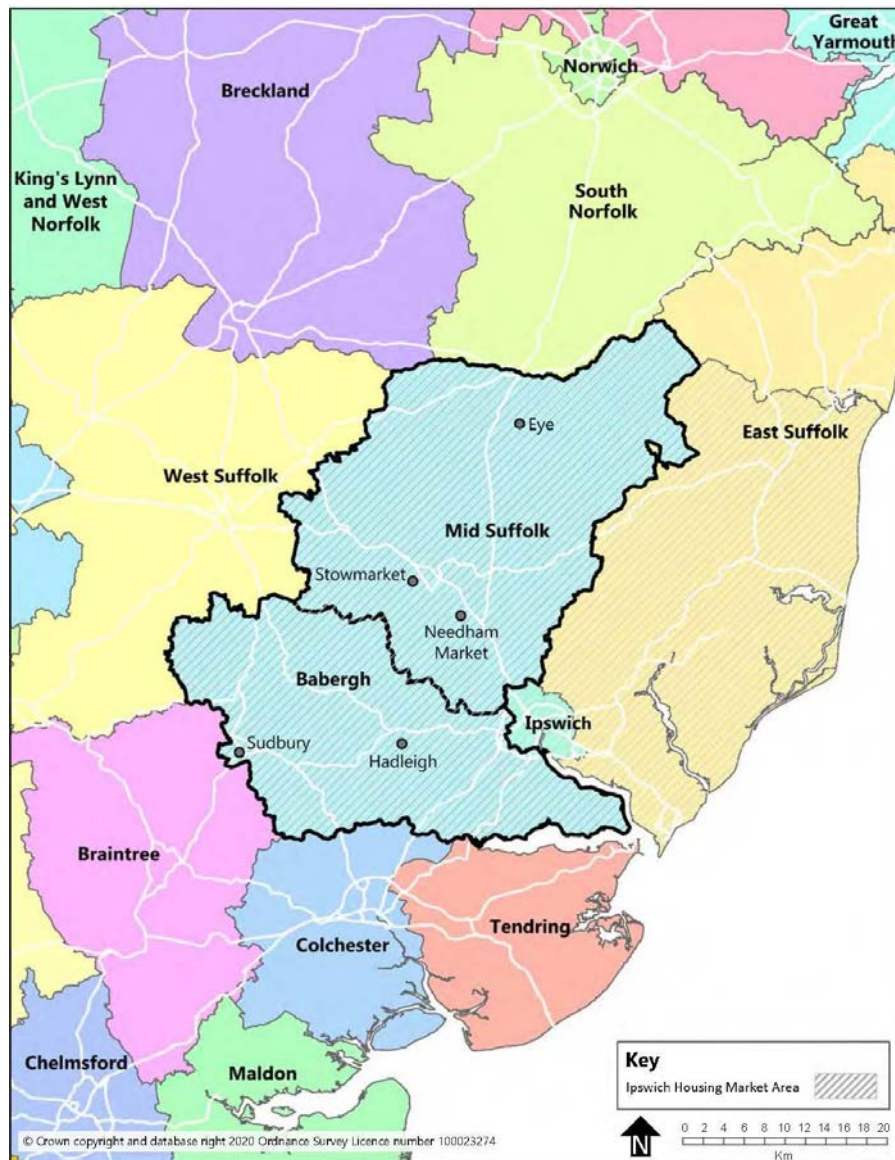
and

Natural England

March 2021

1. Areas covered by the Statement of Common Ground

The Statement of Common Ground relates to the area covered by the local planning authorities of Babergh and Mid Suffolk District Councils, who are preparing a Joint Local Plan.



2. Signatories to this Statement of Common Ground

The signatories to this Statement of Common Ground are:

- Babergh District Council;
- Mid Suffolk District Council; and
- Natural England.

3. Purpose and scope of Statement of Common Ground

There has been extensive ongoing engagement between Babergh and Mid Suffolk District Councils and Natural England throughout the preparation of the Joint Local Plan as it has developed alongside a Recreational disturbance Avoidance and Mitigation Strategy (RAMS). This is detailed in Ipswich Strategic Planning Area (ISPA) Statement of Common Ground to which Natural England are a signatory. Initial correspondence regarding the Joint Local Plan was also received on 10th July 2017.

Natural England have formally responded to the Councils at each stage of the Joint Local Plan with comments made on 10th November 2017 and 30th September 2019. Natural England welcomed the changes made to the Joint Local Plan resulting from their earlier correspondence. In their response of 10th November 2017, Natural England were satisfied that the Habitats Regulations Assessment (HRA) including Appropriate Assessment (June 2019) provided a robust assessment of the Preferred Options stage of the Joint Local Plan, in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and having regard to relevant case law. It was noted by Natural England that it was too early for the HRA to provide for a conclusion that the plan will not lead to any adverse effects on European sites.

This statement sets out a position to confirm that Babergh and Mid Suffolk District Councils are continuing to work collaboratively with Natural England to fully consider and seek to address the issues raised in the representations to the HRA and the Sustainability Appraisal supporting the Babergh and Mid Suffolk Joint Local Plan Pre-Submission (Reg 19) Document (November 2020). There is ongoing engagement and, where relevant, additional information is being collated. Further information is set out in the relevant sections of this SoCG.

4. Habitats Regulations Assessment

Natural England have made a representation objecting to the HRA dated 23rd December 2020. However, following a meeting held with Babergh and Mid Suffolk District Councils, Natural England are pleased to confirm the following matters have now been resolved.

- Comment in respect of Table 7 of the HRA – Policies that have the Potential to Cause a Likely Significant Effect and their Impact Pathways.
- Comment in respect of Loss of functionally Linked Land / Impact on Features on Land outside Habitats Site – Policies / Allocations and Habitats Sites within scope.
- Acknowledgement of the comment regarding the use of mitigation measures in respect of disturbance.

In order to address Natural England's representations to the HRA, where necessary, Place Services who are appointed by Babergh and Mid Suffolk District Councils have produced an addendum to the HRA, which is appended to this document addressing the following points:

- Review of the use of the terminology 'Zone of Influence' & 'Impact Risk Zones'.
- Clarification on the screening of impacts from Surface Water Drainage (Water Quality and Water Quantity).
- Clarification on how the baseline air quality information has been interpreted, with reference to the Air Pollution Information System (APIS), and the air quality monitoring required to confirm there are no likely significant effects
- Define 'direct disturbance'.
- Reference the 13km Zone of Influence for the Recreational disturbance Avoidance and Mitigation Strategy (RAMS).
- Demonstrate where Net Regs has been changed throughout the document.

Natural England confirm that the HRA addendum (Appendix 1) has addressed the concerns raised in their representation, with the only outstanding concern in respect of air quality impacts.

Natural England also confirm the HRA technical note (Appendix 2) provides a helpful analysis of available air quality monitoring data, details of available baseline habitat information regarding critical loads, and a brief assessment of potential air quality impacts arising from the Babergh and Mid Suffolk Joint Local Plan.

Natural England considers that information gaps remain and therefore has requested that the Councils commit to monitoring air quality in areas within/adjacent to 'habitat sites' where a 'likely significant effect' could occur as a result of local plan policies. This will form a mitigation package to prevent impacts. Natural England has requested that the Councils establish a brief plan for air quality monitoring within six weeks of Submission, including:

- the number / position of monitoring stations;
- the pollutants to be monitored;
- the regularity at which they would be monitored;
- the regularity of reporting; and
- the expected timeframe for getting the monitoring stations in place and collecting data.

Natural England recommend that the air quality monitoring is in place at the earliest possible occasion, preferably no later than July 2021, allowing for sufficient baseline data to be collected prior to any plan related air quality effects taking place. Natural England has also advised that the monitoring should only be used as an early warning mechanism, and therefore recommends that clear plans in place for action in light of monitoring findings, and with sufficient certainty that such action will be effective. Natural England has agreed that the Local Plan review which is expected to occur five years after plan adoption, will provide an appropriate stage and timescale to determine whether the plans policies are having (or could have) an adverse effect on the integrity (AEOI) of the relevant 'habitat sites'. Additionally, Natural England recommends that the monitoring findings are reported on a regular basis (to be agreed within the requested monitoring plan) to act as an early warning mechanism.

All parties agree to work collaboratively to fully consider and seek to address the issues raised regarding air quality matters and that these are considered adequately resolvable through the Examination process. Babergh and Mid Suffolk District Councils commit to producing a brief plan for the air quality monitoring shortly after submission of the Joint Local Plan for Examination, and to undertake the air quality monitoring thereafter allowing sufficient time prior to adoption of the Joint Local Plan.

In addition to the Joint Local Plan, it also needs to be noted that Neighbourhood Plans for areas close to the Protected Habitats have undergone HRA Screening. Listed below are those

Neighbourhood Plans (NP) in close proximity to the Protected Habitats and their current position.

Babergh District

- Chelmondiston NP (Reg 16 Submission consultation 15th Feb to 9th Apr 2021)
- Bentley NP (Reg 14 pre-submission consultation closed on 16th Nov 2020)
- Copdock & Washbrook NP (Reg 14 pre-submission consultation closed on 13th Apr 2020)

Natural England agreed that further Stage 2 Appropriate Assessment is required for the Bentley NP in January 2021.

An Appropriate Assessment was produced for the Copdock & Washbrook NP and Natural England agreed with the conclusions.

Natural England agreed that the Chelmondiston NP did not require further assessment under the Habitats Regulations 2017.

Mid Suffolk District

- Botesdale & Rickinghall NP (adopted 23rd Jan 2020)
- Redgrave NP (Reg 14 pre-submission consultation closed on 8th Nov 2020)

Natural England agreed that both Neighbourhood Plans did not require further assessment under the Habitats Regulations 2017.

A number of sites identified in both the Joint Local Plan and Neighbourhood Plans also have the benefit of having been granted planning permission and in some instances are currently under construction.

5. Sustainability Appraisal

Natural England have made a representation objecting to the SA dated 23rd December 2020 on the basis that:

- There is considerable uncertainty regarding the impact of the Local Plan's policies with SA Objective 11 (conserve & enhance biodiversity and geodiversity) which, should be resolved where possible through further analysis of the baseline information.
- A significant proportion of designated biodiversity sites are in very close proximity to allocated sites. If mitigation is not achievable, any policies or proposals that do not adequately protect or fully consider the impacts of development on N2K or SSSI should be removed or modified.
- It should be made clear as to which alternatives have been considered and adopted to demonstrate that avoidance of significant negative effects on biodiversity has been a priority.
- The SA recommends prioritising brownfield over greenfield sites for development but care is needed to ensure that the aspects of those brownfield sites that are biodiverse, home to rare species, and offer connectivity to the wider environment, are not lost.
- The monitoring indicators proposed are not sufficient to meet the relevant regulations to include suitable monitoring indicators in the SA as they need to focus on the effects of the Local Plan itself on biodiversity, rather than to monitor wider changes in biodiversity.

Following a meeting with Natural England on 4th March 2020, it was agreed that Babergh and Mid Suffolk District Councils and Natural England will continue to work collaboratively to fully consider and seek to address the issues raised regarding the Sustainability Appraisal. The matters are considered adequately resolvable through the Examination process.

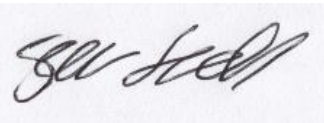
6. Outcomes

Both Babergh and Mid Suffolk District Councils and Natural England consider that the matters raised through Natural England's representations dated 23rd December 2020 can be addressed as detailed above. In respect of the HRA, clarity changes addressing Natural England's representations are appended to this Statement of Common Ground. It is agreed that a plan for air quality monitoring will be produced within 6 weeks of submission of the Joint Local Plan for Examination and that air quality monitoring will be undertaken thereafter, preferably no later than July 2021, to allow sufficient time for baseline monitoring prior to adoption of the Joint Local Plan. In respect of the SA, all parties will continue to work collaboratively to fully consider and seek to address the issues raised.

7. Process for reviewing the Statement of Common Ground

All parties will work continue to work collaboratively as matters are reviewed during the Examination. The Statement of Common Ground will be updated where amendments are necessary.

8. Signatories

<p>Signed on behalf of Babergh District Council</p>  <p>Name: Tom Barker Position: Assistant Director Sustainable Communities</p>	<p>Date: 26/3/21</p>
<p>Signed on behalf of Mid Suffolk District Council</p>  <p>Name: Tom Barker Position: Assistant Director Sustainable Communities</p>	<p>Date: 26/3/21</p>
<p>Signed on behalf of Natural England</p>  <p>Name: Sam Kench Position: Lead Adviser</p>	<p>Date: 26.03.2021</p>

Appendix 1 – Addendum to Habitats Regulations Assessment

Appendix 2 – Technical Note – Air Quality



Babergh and Mid Suffolk Joint Local Plan: Pre-Submission (Regulation 19) **Habitats Regulations Assessment Addendum**

March 2021



Essex County Council



About us

Place Services is a leading public sector provider of integrated environmental assessment, planning, design and management services. Our combination of specialist skills and experience means that we are uniquely qualified to help public organisations meet the requirements of the planning process, create practical design solutions and deliver environmental stewardship.

Our Natural Environment Team has expertise of arboriculture, biodiversity, countryside management and ecology. This multidisciplinary approach brings together a wide range of experience, whether it is for large complex briefs or small discrete projects. We aim to help our clients protect and improve the natural environment through their planning, regulatory or land management activities. This approach ensures that not only that our clients will fulfil their legal duties towards the natural environment, but they do so in a way that brings positive benefits to wildlife and people.

Address: County Hall, Market Road, Chelmsford, Essex, CM1 1QH

Contact no: 0333 013 6840

Email: placeservicesecology@essex.gov.uk

Website: www.placeservices.gov.uk

VAT number: GB 104 2528 13



Report Checking and Version Control

Prepared by:

Hamish Jackson | Ecological Consultant | hamish.jackson@essex.gov.uk

Sue Hooton | Principal Ecological Consultant | sue.hooton@essex.gov.uk

Report version control:

Version	Date	Author	Description of changes
1.1	02.03.2021	Hamish Jackson	Drafted
1.2	05.03.2021	Sue Hooton	Reviewed
1.3	09.03.2021	Sue Hooton	Issued
1.4	25.03.2021	Hamish Jackson	Revised
1.5	26.03.2021	Sue Hooton	Issued

Copyright:

This report may contain material that is non-Place Services copyright. (e.g. Ordnance Survey, British Geological Survey, Historic England), or the intellectual property of third parties, which Place Services is able to provide for limited reproduction under the terms of our own copyright licences or permissions, but for which copyright itself is not transferable by Place Services. Users of this report remain bound by the conditions of the Copyright, Designs and Patents Act 1988 with regard to multiple copying and electronic dissemination of the report.

Disclaimer:

The material contained in this report was designed as an integral part of a report to an individual client and was prepared solely for the benefit of that client. The material contained in this report does not necessarily stand on its own and is not intended to nor should it be relied upon by a third party. To the fullest extent permitted by law Place Services will not be liable by reason of breach of contract, negligence, or otherwise for any loss or damage (whether direct, indirect or consequential) occasioned to any person acting or omitting to act or refraining from acting in reliance upon the material contained in the report. Loss or damage as referred to above shall be deemed to include, but is not limited to, any loss of profits or anticipated loss of profits damage to reputation or goodwill, loss of business, or anticipated loss of business, damages, costs, expense incurred or payable to any third party (in all cases whether direct, indirect or consequential) or any other direct, indirect or consequential loss or damage



1. Introduction

- 1.1 Babergh and Mid Suffolk District Councils are currently preparing a new Joint Local Plan for their administrative areas. The Joint Local Plan will set out the vision, spatial principles, planning policies and site allocations that will guide development in the local authority areas in the period up to 2037.
- 1.2 The Councils published the Babergh and Mid Suffolk Joint Local Plan - Pre-Submission Document¹ (hereafter referred to as the 'Joint Local Plan') for consultation between 11th November 2020 and 24th December 2020, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012². Place Services have been assisting the Councils with their Habitats Regulations Assessment – Appropriate Assessment of the new Joint Local Plan and provided the HRA report³ to support the consultation on the Joint Local Plan.
- 1.3 Natural England provided representation for the Joint Local Plan and provided comments on the Habitat Regulations Assessment including Appropriate Assessment. The comments highlighted that an Adverse Effect On the Integrity (AEOI) on Habitats Sites, either alone or in combination with other plans and projects cannot be discounted without clarity changes to Habitats Regulations Assessment including Appropriate Assessment. Therefore, clarity changes to the Habitats Regulations Assessment including Appropriate Assessment were requested by Natural England to support the Joint Local Plan to ensure that it is legally and procedurally compliant and sound.
- 1.4 Place Services and Babergh & Mid Suffolk District Councils attended a meeting with Natural England (Sam Kench – Lead Advisor and John Jackson – Senior Advisor) on the 5th February 2021 to discuss the proposed clarity changes recommended within Natural England's representation and set out a strategy to ensure that sufficient detail will be provided within the Habitats Regulations Assessment including Appropriate Assessment to avoid an AEOI on Habitats Sites. As a result, Place Services have been commissioned by

¹ Babergh and Mid Suffolk (2020) Joint Local Plan - Regulation 19 Pre-submission (Nov 2020). Available from <https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/> [Accessed March 2021].

² HM Government (2012) The Town and Country Planning (Local Planning) (England) Regulations 2012. Available from http://www.legislation.gov.uk/uksi/2012/767/pdfs/uksi_20120767_en.pdf [Accessed March 2021].

³ Place Services (2020) Babergh and Mid Suffolk Joint Local Plan: Pre-Submission (Regulation 19) - Habitats Regulations Assessment including Appropriate Assessment. Available from <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/HRA2020/BMSDC-JLP-Reg-19-HRA-AA-Oct20.pdf> [Accessed March 2021].



Babergh & Mid Suffolk District Councils to provide an addendum to the Habitats Regulations Assessment to support the Babergh and Mid Suffolk Joint Local Plan: Pre-Submission (Regulation 19).

- 1.5 The revised clarity changes to the Habitats Regulations Assessment including Appropriate Assessment conclusions have been reviewed to ensure it remains robust. This Habitats Regulations Assessment Addendum summarises the review process and its findings and sets out the proposed conclusions of the HRA process. It therefore does not repeat the baseline or assessments set out in the Habitats Regulations Assessment including Appropriate Assessment and should therefore be read in conjunction with this report.

2. Previous Habitats Regulations Assessment Work

- 2.1 The Babergh and Mid Suffolk Joint Local Plan has been the subject of Habitats Regulations Assessment throughout its preparation. The following stages have been undertaken:
 - Babergh and Mid Suffolk Joint Local Plan: Preferred Options (Regulation 18) - Habitats Regulations Assessment including Appropriate Assessment 2019
 - Babergh and Mid Suffolk Joint Local Plan: Pre-Submission (Regulation 19) - Habitats Regulations Assessment including Appropriate Assessment 2020
 - Habitats Regulations Assessment Addendum 2021

3. Approach

- 3.1 The Habitats Regulations Assessment including Appropriate Assessment has been prepared by Place Services for the Joint Local Plan to enable Babergh and Mid Suffolk District Councils to comply with Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended). Therefore, this Habitats Regulations Assessment Addendum aims to provide clarity on the changes to this document and should be read in conjunction with the Habitats Regulations Assessment including Appropriate Assessment.
- 3.2 The Habitats Regulations Assessment Addendum addresses the comments provided by Natural England's representation at Pre-Submission (Regulation 19), which recommended that further work and clarification is required to enable the assessment to be sufficiently rigorous and robust.
- 3.3 The Habitats Regulations Assessment Addendum also provides matters of clarification between the Regulation 18 Joint Local Plan and the Regulation 19 Joint Local Plan to the Councils' allocation sites and policies. In summary, it is clarified whether these allocation sites and policies would:



- lead to any new effects on any Habitats Sites (alone or in combination) that have not been considered by the HRA to date; or
- alter the magnitude of any effects previously considered through the HRA, such that the proposed conclusions of the HRA are no longer valid.

4. Review of Natural England issues raised within their representation at Pre-Submission (Regulation 19)

- 4.1 Place Services and Babergh & Mid Suffolk District Councils attended a meeting with Natural England to resolve the comments provided by Natural England for the provided representation of the Joint Local Plan. The meeting concluded that further work and clarifications were required within the Habitats Regulations Assessment including Appropriate Assessment to ensure clarity and avoid adverse effects on the integrity of Habitats Sites, either alone or in combination with other plans and projects, and ensure the Joint Local Plan is legally compliant and sound.
- 4.2 Therefore, Table 1 sets out the updates undertaken following consultation with Natural England, as well as the reasons for the updates. It identifies the proposed changes and whether the updates are of significant consequence for the findings of the HRA.
- 4.3 The measures set out below summarise Natural England's representation at Pre-Submission (Regulation 19), as well as the updates undertaken within the Habitats Regulations Assessment Addendum as a result of Natural England's comments. In addition, further clarification has been provided on whether the proposed amendments will affect the conclusion of the Joint Local Plan.

Zone of Influence (ZOI)

- 4.4 Natural England requested clarification over the regular use of the term 'Zone of Influence' (ZOI) when determining the effects of the Joint Local Plan on designated sites. This further clarification is required to allow Natural England to determine whether 'Habitats Sites' have been scoped in or out of the assessment stage with sound logic and reasoning.
- 4.5 Therefore, to meet the requirement of Natural England's comments on Zone of Influence and SSSI Impact Risk Zones, the text has been amended within the Habitats Regulations Assessment including Appropriate Assessment to ensure that each term has been used in its correct format.
- 4.6 Consequently, it is indicated that these clarity changes do not alter the conclusions of the HRA such that additional assessment is required.



Impact Risk Zones (IRZs)

- 4.7 Natural England highlighted that *“the SSSI IRZs only indicate Natural England’s assessment of likely risk to the notified features of SSSIs. Where they indicate such a risk is unlikely, this does not mean that there are no potential impacts on biodiversity or the wider natural environment.”* As a result, they requested that the Habitats Regulations Assessment should be amended to ensure rigorous enough reasoning to screen out ‘habitat sites’ from further assessment, as Section 2.2.5 of the HRA states that “Impact Risk Zones can be interrogated on MAGIC and these show which elements may have an effect. Those sites not identified as being within any IRZ have been scoped out for any further assessment.”
- 4.8 Therefore, to meet the requirement of Natural England’s comments on Zone of Influence and Impact Risk Zones, the text has been amended within the Habitats Regulations Assessment including Appropriate Assessment to ensure that each term has been used in its correct format.
- 4.9 Consequently, it is indicated that these clarity changes do not alter the conclusions of the HRA such that additional assessment is required.

Screening and Impact Pathways - Water Quality and Quantity

- 4.10 Natural England requested further clarification over the distance between development and ‘habitats site’ at which water pollution is considered to be sufficiently diluted and dispersed. This is because Section 2.3.15 of the Habitats Regulations Assessment, states that *“Any water pollution which may be caused from more distant development was assumed to be sufficiently diluted and dispersed as to cause a negligible impact.”*
- 4.11 They highlighted that contaminated surface run-off could transmit trans-boundary via waterways and have requested further clarification, as paragraph 2.3.16 of the Habitats Regulations Assessment states, *“water pollution, such as contaminated surface run-off, is assumed incapable of significant effects on Habitats Sites beyond the District boundary. Therefore, Likely Significant Effects could only affect the Stour and Orwell Estuaries SPA and Ramsar site, Redgrave & South Lopham Fens Ramsar site and Waveney & Lt Ouse Valley Fens SAC.”*
- 4.12 They also noted that only two policies have been screened into the Appropriate Assessment stage, both due to their proximity to Redgrave and South Lopham Fens Ramsar site and Waveney & Lt Ouse Valley Fens SAC. As a result, they have queried whether any housing allocations within proximity to the Stour and Orwell Estuaries SPA and Ramsar site may also result in a Likely Significant Effect (LSE) to these Habitats Sites.
- 4.13 Furthermore, they highlighted that the information currently provided within the Habitats Regulations Assessment is not robust enough to predict with sufficient certainty that any



changes to the water supply or flow from the proposed allocation sites, will cause negligible impacts to Stour and Orwell Estuaries SPA and Ramsar site.

- 4.14 As a result, further clarification has been provided within Table 1 to address Natural England's comments in regard to Section 2.3.15 – 16.
- 4.15 In addition, it has been proposed that Site allocations, situated within the 5km Impact Risk Zone for high levels water discharge to the Stour Estuary and Orwell Estuaries SSSI, which underpins the Stour & Orwell Estuaries SPA and Ramsar site, should be screened in and proceed to Appropriate Assessment. This amended precautionary approach has been set out within Table 1 below.
- 4.16 The 5km Impact Risk Zone for high levels water discharge to the Stour and Orwell Estuaries SSSI indicates that Natural England should be consulted on any schemes which involve discharge of water or liquid waste of more than 20m³/day to ground (i.e. to seep away) or to surface water. This is because applications which involve more than 20m³/day require licensing by a regulator (Environment Agency). In addition, it is highlighted that the impact pathways have been reviewed to identify any other site allocations outside of the 5km radius, which may still result in a Likely Significant Effect outside of the 5km IRZ.
- 4.17 Therefore, should the development of any Site allocations involve discharge of water or liquid waste of more than 20m³/day to ground, this could potentially involve surface water flooding which would result in Adverse Effects on Integrity of the Stour & Orwell Estuaries SPA and Ramsar site and underpinning SSSI. However, with mitigation measures for surface water flooding embedded within the policies of the Joint Local Plan, we are satisfied that sufficient information will be present to avoid Adverse Effects on Integrity upon the Habitats Sites from the site allocations and any future developments within the lifetime of the Joint Local Plan.
- 4.18 Consequently, it is indicated that these clarity changes do not alter the conclusions of the HRA such that additional assessment is required.

Screening and Impact Pathways - Air Quality

- 4.19 Natural England indicated that section 2.3 of the Habitats Regulations Assessment currently contains no mention of traffic emissions within this section of the report and as a result requested further clarification on whether this has been considered.
- 4.20 However, this matter was resolved following discussions with Natural England on 5th February 2021, as traffic emissions have been referenced in section 2.3.
- 4.21 Nevertheless, further clarity has been provided within Table 1, as well as the Technical Note on Air Quality, which demonstrates that the following further work and clarifications will not affect the conclusion of the Joint Local Plan.



Policies that have the Potential to Cause a Likely Significant Effect and their Impact Pathways - Table 7

- 4.22 Natural England indicated that a range of policies are considered to be Category B (Likely Significant Effect uncertain) in Table 7 of the Habitats Regulations Assessment. As a result, they have requested further clarification should be made on this matter, as they have considered that some policies may fall within Category C (Likely Significant Effect).
- 4.23 However, this matter was resolved following discussions with Natural England on 5th February 2021. Place Services explained that there was uncertainty on the likely impacts with some policies. Therefore, some policies had been screened in as a precaution.
- 4.24 Natural England confirmed they were satisfied with this explanation. Consequently, no further work or clarifications is necessary to address their comments.

Habitats Sites, Impact Pathways and Examples of LSE Identified at Screening Stage - Table 8

- 4.25 Natural England has indicated that they consider that the reasoning for scoping out some Habitats Sites which the Joint Local Plan could affect (alone or in combination with other plans and project) is currently unclear. As a result, they requested further clarification on this matter.
- 4.26 As a result, further clarification has been provided on potential impact pathways to Habitats Sites within Table 1 to address Natural England's comment.
- 4.27 Consequently, it is indicated that these clarity changes do not alter the conclusions of the HRA such that additional assessment is required.

Appropriate Assessment - Loss of Functionally Linked Land / Impact on Features on Land outside Habitats Sites

- 4.28 Natural England identified that Policy LP09 (Provision for Gypsy and Traveller and Travelling Showpeople) is the only policy which has been carried forward to Appropriate Assessment stage, with mitigation measures embedded into the Joint Local Plan to avoid impacts from development alone or in combination with other plans and projects. Therefore they requested further clarity on whether this is the only policy which will potentially result in a loss of functionally linked land.
- 4.29 However, this matter was resolved following discussions with Natural England on 5th February 2021. Place Services explained that there are no other policies for development within 2km and further detail had been summarised within the Appendices of the Habitats Regulations Assessment including Appropriate Assessment.



4.30 Natural England confirmed they were satisfied with this explanation. Consequently, no further work or clarifications is necessary to address their comments.

Appropriate Assessment - Air Quality

4.31 Natural England noted that air quality monitoring has been proposed in section 4.14.2 of the Habitats Regulations Assessment in relation to ever increasing traffic volume within the districts. As a result, they highlighted that whilst air quality may not relate to a specific policy or allocation, the mitigation (and monitoring) does need to be considered at Appropriate Assessment stage due to the possible cumulative effect from many policies.

4.32 In addition, Natural England noted that paragraph 4.11.2 of the Habitats Regulations Assessment is addressing water quality issues, when it should be addressing air quality issues. Natural England also sought further clarity on why the Deben Estuary SPA & Ramsar site had not been included within Table 8, when the Deben Estuary is then assessed for air quality impacts within 4.11.3.

4.33 Furthermore, Natural England noted that the only policy listed as having the potential for Likely Significant Effects as a result of air quality issues was Policy LP24 - New Agricultural/Rural Buildings in the Countryside. As a result, they requested further clarity on whether there are any additional policies which will contribute to traffic emissions.

4.34 As a result, a separate Technical Note to this Habitats Regulations Assessment Addendum has been provided to support Natural England's comments on Air Quality at Appropriate Assessment stage. However, it is highlighted that this matter was resolved following discussions with Natural England on 5th February 2021, as they confirmed that they would accept a precautionary approach for this scheme as impacts from the monitoring areas will likely result in a negligible impact as a result of the Joint Local Plan.

4.35 Consequently, it is indicated that these clarity changes do not alter the conclusions of the HRA such that additional assessment is required.

Appropriate Assessment – Disturbance

4.36 Natural England requested a definition on what 'direct disturbance' constitutes. In addition, they have highlighted that impacts from disturbance are not solely related to the construction phase and can also occur at the operation phase of development. However, they accept that this matter may need to be addressed on a case by case basis, which may require the provision of a project level HRA.

4.37 Natural England also requested further clarity on recreational disturbance. This is because they indicate that impacts could still be caused to Habitats Sites within the 13km ZOI of Suffolk Coast RAMS, if a site is allocated for less than 50 dwellings. In addition, they requested a reference and explanation on why mapping of residential site allocations has



been prepared to show that open space is available within 2.7km walking distance for daily recreational needs with no restrictions on dogs.

- 4.38 Furthermore, they indicated that it is unclear whether the Suffolk Coast RAMS tariff, where the development is within the 13km ZOI of the Habitat Sites of the Suffolk Coast RAMS, will be embedded into the Joint Local Plan within policy.
- 4.39 As a result, further clarification has been provided within Table 1 to summarise what constitutes 'direct disturbance' during the construction and operation phases of development.
- 4.40 However, in terms of Natural England's queries on recreational disturbance, it is highlighted that all matters raised are now resolved as a result of further discussion with Natural England on 5th February 2021. This is because the Habitats Regulations Assessment and the Joint Local Plan Policies have ensured that an effective strategy, in line with Suffolk Coast RAMS, has been embedded into the Joint Local Plan.
- 4.41 In terms of paragraph 4.13.10 of the Habitats Regulations Assessment, it is highlighted that the 2.7km (i.e. 1.3km return route) walking distance for daily recreational needs with no restrictions on dogs, is an adopted strategy by Natural England. The guidance which supports this strategy is as follows: Jenkinson, S (March 2013). *Planning for dog ownership in new developments: Access and greenspace design guidance for planners and developers*. Hampshire County Council.
- 4.42 Consequently, it is indicated that these clarity changes do not alter the conclusions of the HRA such that additional assessment is required.

5. Matters of clarification between the Babergh and Mid Suffolk Joint Local Plan Preferred Options (Regulation 18) Document and the Joint Local Plan Pre-Submission (Regulation 19) Document.

- 5.1 Babergh & Mid Suffolk District Councils requested matters of clarification to site allocations. Appendix 1 - Strategic Housing Land Area Assessment has therefore been updated.
- 5.2 The Site allocation LA116 – Land east of Loraine Way, Sproughton, has been screened in for potential likely significant effects and Appendix 2 HRA Screening of Individual Policies has been updated. Although this site allocation is within the SSSI IRZ and has the potential to cause a Likely Significant Effect related to surface water flooding (para 2.3.19), alongside other policies listed in this section, it is considered that they will not cause an Adverse Effect on Integrity from impacts of increased water quantity to the Stour and Orwell Estuaries SPA and Ramsar site. This is because the Policy LP28 – Water resources and infrastructure and



Policy LP29 – Flood risk and vulnerability will ensure that impacts from surface water flooding will be considered for each site allocation at a project level. Furthermore, it is highlighted that the Stour and Orwell estuaries are a dynamic natural system, regularly exposed to rapid changes of depth, duration, frequency, magnitude and timing of water supply or flow due to tidal changes.

- 5.3 As Site allocation LA116 – Land east of Loraine Way, Sproughton lies within the 13km ZOI of Suffolk Coast RAMS, it is listed in para. 4.13.4 and the mitigation measures listed in paragraphs 4.13.6 - 4.13.10 are applicable. Appendix 3 Results of embedding mitigation within the Appropriate Assessment has also been updated to include this site allocation.
- 5.4 In addition, it is identified that the Habitats Regulations Assessment including Appropriate Assessment can no longer include reference to Net Regs (Sector specific environmental guidance for businesses), as this environmental guidance is now only relevant for Northern Ireland & Scotland. Alternative supporting guidance has been issued by Gov.UK and therefore all references to Net Regs within the HRA report have been changed to this alternative guidance.
- 5.5 Consequently, it is indicated that these clarity changes do not alter the conclusions of the HRA such that additional assessment is required.

6. Conclusions

- 6.1 Following the updates and clarifications set out in the Babergh and Mid Suffolk Joint Local Plan: Pre-Submission (Regulation 19) - Habitats Regulations Assessment Addendum, it is concluded that the Babergh & Mid Suffolk Districts Joint Local Plan will not have any Adverse Effect On Integrity (AEOI) on any Habitats Sites, either alone or in combination with other plans and projects. Therefore, Babergh and Mid Suffolk District Councils can demonstrate that the Pre-Submission Joint Local Plan is legally and procedurally compliant and sound so that a Statement of Common Ground can be reached with Natural England.



Table 1: Review of HRA updates following Natural England Comments at Pre-Submission Regulation 19

Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
21	2.25	<p>A distance of 20km was used to identify Habitats Sites likely to be affected by impacts relating to Babergh and Mid Suffolk Local Plan. There are 35 Habitat Sites which lie within 20 km of the Babergh and Mid Suffolk Districts authorities including some marine sites. However, the <u>underpinning SSSI Impact Risk Zones (IRZ) can be reviewed interrogated on www.magic.defra.gov.uk, and these show which elements may have an effect which help identify whether a development is likely to impact upon a SSSI that underpins a Habitats Site. Zones of Influence (ZOI) should also be reviewed, which are also listed on Magic.defra.gov.uk, as residential applications within a Habitats Sites ZOI will likely result in adverse effects to site integrity. In addition, impact pathways must be reviewed within the scoping assessment, irrespective of whether a site is within a SSSI IRZ or ZOI of a Habitats Site.</u></p> <p>Those sites <u>The Habitats Sites within 20km have therefore been scoped out from further assessment if IRZs of the underpinning SSSI's of the Habitats Sites do not fall within the district boundaries, if the Habitats Sites ZOI's do not fall</u></p>	To provide clarity on the use of the terms 'Impact Risk Zone' and 'Zone of Influence' and demonstrate that Habitat Sites within 20km have been scoped in or out of the assessment stage with sound logic and reasoning.	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		<u>within the district boundaries and that there are no impact pathways within districts which could potentially result in a Likely Significant Effect.</u> not identified as being within any IRZ have been scoped out for any further assessment. The sites scoped in and out are shown in Table 3.		
21 - 23	Table 3	<i>Table 3 has been updated following correspondence with Natural England.</i>	To provide clarity on the use of the terms 'Impact Risk Zone' and 'Zone of Influence' and demonstrate that Habitats Sites within 20km have been scoped in or out of the assessment stage with sound logic and reasoning.	None
24	2.3.3	The ZOIs <u>and IRZ for the Underpinning SSSI's</u> , which are provided on the MAGIC website <u>www.magic.defra.gov.uk</u> , have been used as a starting point in determining Likely Significant Effect on Habitats Sites and spatial data has been used to determine the	To provide clarity on the use of the terms 'Impact Risk Zone' and 'Zone of Influence' and demonstrate that	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		proximity of potential development locations to the Habitats Sites. There are many uncertainties associated with using trigger distances as there are very few standards available as a guide to how far impacts will travel. Therefore, during the screening stage a number of assumptions based on professional judgement have been applied in relation to assessing <u>impact pathways which may cause Likely Significant Effects on Habitats Sites that may as a result from the Joint Local Plan</u> , as described below.	Habitats Sites within 20km have been scoped in or out of the assessment stage with sound logic and reasoning.	
26 - 27	2.3.15	This HRA has assumed that the potential for Likely Significant Effects due to reduced water quality, either from the development alone or in-combination of other plans and projects, only exists for Habitats Sites which are hydrologically connected and have been scoped in with Table 3. Any water pollution which may be caused from more distant development (<u>i.e. over 15km of the linear distance of a watercourse</u>) was assumed to be sufficiently diluted and dispersed as to cause a negligible impact. A map showing the proximity of main rivers to Habitat Sites and the Joint Local Plan's housing allocations can be found in Appendix 6. Therefore, any additional pollutant loads as	To provide clarity on the professional judgement was used to identify what allocations were ruled out on potential impacts upon Water Quality.	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		at Halesworth, Thurston, Brettenham and Ringshall were considered to be negligible as the Water Recycling Centres are situated a sufficient distance away that no Likely Significant Effects are predicted to any Habitats Sites.		
27	2.3.16	It is also indicated that water pollution, such as contaminated surface run-off, <u>will not be cable of resulting in impacts outside of the districts boundary as there are no catchments outside the districts which will be able to be affected by surface water runoff from the proposed allocation sites.</u> is assumed incapable of significant effects on Habitats Sites beyond the District boundary. Therefore, Likely Significant Effects could only affect the Stour and Orwell Estuaries SPA and Ramsar site, Redgrave & South Lopham Fens Ramsar site and Waveney & Lt Ouse Valley Fens SAC. <u>However, as no housing allocations or infrastructure have been proposed adjacent to the Stour and Orwell Estuaries SPA & Ramsar site, it is considered reasonable to screen out likely significant effects from surface runoff and impact upon water quality to the Stour and Orwell Estuaries.</u>	To provide clarification on why impacts from surface water run-off will not impact upon Habitats Sites outside the district boundaries or the Stour and Orwell Estuaries SPA & Ramsar site.	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
27	2.3.17	Furthermore, all housing allocations sites situated within the 5km ZOI <u>SSSI IRZ for the Underpinning SSSIs</u> of Redgrave and South Lopham Fens Ramsar site and Waveney & Lt Ouse Valley Fens SAC must also be considered for impacts of water quality. Adjacent to the settlement boundary of Botesdale & Rickinghall to the south east lays a Source Protection Zone (Zone I – inner protection zone). Land within Zone II – outer protection zone radiates out from Zone I further to the south east away from the settlement boundary. Therefore, the following policies have been screened into Appropriate Assessment stage:	To provide clarity on the use of the terms 'Impact Risk Zone' and 'Zone of Influence'.	None
27	2.3.19	The following policies were considered within the scope of the HRA, as magic.gov.uk indicates that the allocations underpinned within the policy are situated within the 5km ZOI for high levels water discharge for the for the Stour & Orwell Estuaries SPA and Ramsar. This includes consideration of any discharge of water or liquid waste of more than 20m³/day to ground (i.e. to seep away) or to surface water:	To provide clarity on the use of the terms 'Impact Risk Zone' and 'Zone of Influence'.	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		<p><u>Therefore, the below policies should be screened into Appropriate Assessment Stage. It is highlighted that none of the allocation sites contain clear impact pathways to the Stour and Orwell Estuaries. However, magic.defra.gov.uk indicates that the allocations are situated within the 5km ZOI SSSI IRZ for the Underpinning SSSI's for the Stour and Orwell Estuaries SPA and Ramsar site and could result in potential impacts upon watercourses if the applications cause high levels water discharge. It is highlighted that applications which involve more than 20m³/day require licencing by a regulator and Natural England will also need to be consulted to identify whether impacts will be caused by nearby designated sites.</u></p>		
28	2.3.20	<p>However, it is <u>highlighted that</u> considered that these policies will not cause a Likely Significant Effect from impacts of increased water quantity to the Stour and Orwell Estuaries SPA and Ramsar. This is because the Stour and Orwell estuaries are a dynamic natural system, regularly exposed to rapid changes of depth, duration, frequency,</p>	<p>To provide clarity that Surface Water Flooding has been screened in for further consideration at Appropriate Assessment stage.</p>	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		magnitude and timing of water supply or flow due to tidal changes. <u>Therefore, impacts are still considered highly unlikely even within mitigation implemented into the Joint Local Plan.</u>		
28	2.3.21	Therefore, it can be predicted with sufficient certainty that any changes to the water supply or flow from the proposed allocation sites, will cause negligible impacts to Stour and Orwell Estuaries SPA and Ramsar. Therefore, the above policies can be screened out from impacts from increased water quantity to the Stour and Orwell Estuaries SPA and Ramsar.	To provide clarity that Surface Water Flooding has been screened in for further consideration at Appropriate Assessment stage.	None
32	2.3.30	The leading cause of increased Nitrogen deposition at these Habitats Sites has been identified locally from agricultural practices, <i>i.e.</i> land spreading, outdoor pigs, high nutrient inputs on fields. This may result in protected habitats being altered, which may in turn, may impact the SPA Birds which rely on these specific habitats (<u><i>i.e.</i> saltmarshes</u>). However, the Air Pollution Information System (APIS) - http://www.apis.ac.uk/src1 - indicates that	To provide clarity on air quality screening and amend the text to indicate that baseline air quality information has been interpreted, with reference to the Air Pollution Information System (APIS).	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		<u>only Great Crested Grebe (<i>Podiceps cristatus</i>) would be sensitive to nutrient nitrogen impacts on broad habitat.</u>		
32	2.3.31	The other pollutants listed above have <u>not</u> been identified as a factor affecting site integrity and the Local Plan will not relate to agricultural practices <u>which could result increases in nitrogen deposition</u> . However, impacts caused by these pollutants may not be known due to a lack of evidence on local impacts. <u>In addition, it is highlighted that the Joint Local Plan may result in increases in air pollution (NH₃, NO_x & SO₂) from traffic emissions, if increases of traffic are caused within 200m as referenced within the Highways Agency Design Manual for Road and Bridges (DMRB).</u> Therefore, Air Quality has been scoped in for the HRA screening.	To provide clarity on why air quality has been scoped into screening with further reference to traffic emissions.	None
43-44	Table 8	<i>Table 8 has been updated following correspondence with Natural England. Amendments have been outlined in Appendix 2</i>	The table has been amended to reference 13km Zone of Influence of Habitats Sites, hydrological and atmospheric impact pathways upon specific	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
			Habitats Sites. In addition, the Deben Estuary SPA & Ramsar site has been added to Air Quality, as this was previously omitted.	
55	4.9.6	To ensure certainty that a Loss of Functionally Linked Land will not be caused by Policy LP09, it is still recommended that the Policy wording is amended to ensure that any allocation sites for Gypsy and Traveller and Travelling Showpeople will be chosen in areas which will not impact Functionally Linked Land. This should outline that the LPA will need to prepare a project-level HRA to assess the likely impacts from development if proposed sites are situated within the <u>underpinning</u> SSSI IRZ ZO of Habitats Sites.	To provide clarity on the use of the terms 'Impact Risk Zone' and 'Zone of Influence' and demonstrate that Habitat Sites within 20km have been scoped in or out of the assessment stage with sound logic and reasoning.	None
56	4.10	Water Quality <u>and Quantity</u>	To ensure a precautionary approach to avoid AEOI of the Stour and Orwell Estuaries SPA & Ramsar	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
			site from Surface Water Flooding.	
56	4.10.1	This section of the report considers the potential for adverse effects to Habitats Sites through changes in water quality <u>and water quantity</u> as a result of development.	To ensure a precautionary approach to avoid AEOI of the Stour and Orwell Estuaries SPA & Ramsar site from Surface Water Flooding.	None
56	4.10.2	Contaminants <u>and surface water flooding</u> may have a range of biological effects on different species within the supporting habitat, depending on the nature of the contaminant (Joint Nature Conservation Committee (JNCC), 2004), (UK Technical Advisory Group on the Water Framework Directive (UKTAG), 2008), (Environment Agency, 2014). This in turn can adversely affect the availability of bird breeding, rearing, feeding and roosting habitats, and potentially bird survival.	To ensure a precautionary approach to avoid AEOI of the Stour and Orwell Estuaries SPA & Ramsar site from Surface Water Flooding.	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
56	4.10.3	At Screening stage, the following Habitats Sites were listed as having the potential for Likely Significant Effects as a result of water quality <u>and quantity issues</u> :	To ensure a precautionary approach to avoid AEOI of the Stour and Orwell Estuaries SPA & Ramsar site from Surface Water Flooding.	None
56	4.10.4	All of the above Habitats Sites support features which are dependent on water quantity and quality. Any <u>changes to these factors in water quality</u> therefore have the potential to significantly impact the Habitat sites.	To ensure a precautionary approach to avoid AEOI of the Stour and Orwell Estuaries SPA & Ramsar site from Surface Water Flooding.	None
56	4.10.5	An assessment of the key vulnerabilities contained within the Site Improvement Plans for the Habitats Sites within the scope of the HRA (Appendix 4) identified that water quality was a significant factor affecting site integrity for Waveney and Little Ouse Valley Fens SAC. The primary cause of this adverse impact has been identified as being caused by nutrient enrichment from agricultural run-off particularly	To provide clarity on the use of the terms 'Impact Risk Zone' and 'Zone of Influence'.	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		from nearby outdoor poultry and pig units. However, to avoid further adverse impacts to Waveney and Little Ouse Valley Fens SAC, it is considered appropriate that a precautionary approach for water quality should be undertaken for any housing allocations within the 5km ZOI <u>SSSI Impact Risk Zone</u> of the Habitats Site. This would include water quality mitigation measures during the construction and operation phases of a development to avoid impacts from development alone or in combination with other plans and projects. These measures would also apply for Redgrave & South Lopham Fens Ramsar as the site overlaps with Waveney and Little Ouse Valley Fens SAC and contains similar qualifying features.		
57	4.10.6	The Site Improvement Plans for the Habitats sites listed above do not identify water quality as a significant factor affecting site integrity for the Stour and Orwell Estuaries SPA and Ramsar. However, a number of policies have still been considered within the appropriate assessment, because a Likely Significant Effect from water quality could be caused from the Stour and Orwell Estuaries SPA and Ramsar. This is because the impacts from policy are unknown and therefore a Likely Significant Effect cannot be	To ensure a precautionary approach to avoid AEOI of the Stour and Orwell Estuaries SPA & Ramsar site from Surface Water Flooding.	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		ruled out or a policy has referenced a location which is within or nearby the Stour and Orwell SPA and Ramsar and therefore any significant changes to the hydrological regime may result in adverse effects to the highlighted Habitats Sites due to potential impacts from the development alone or in-combination. <u>In addition, AEOI could be caused to the Stour and Orwell SPA and Ramsar from increases in water quantity from Surface Water Flooding on any schemes which involve discharge of water or liquid waste of more than 20m³/day to ground (i.e. to seep away) or to surface water of the 5km SSSI IRZ of the Stour Estuary and Orwell Estuary.</u>		
57	4.10.8	<p>At HRA Screening stage the following Policies were listed as having the potential for Likely Significant Effects as a result of water quality <u>and quantity</u> issues:</p> <ul style="list-style-type: none"> • Policy SP05 – Employment Land • Policy LP09 – Provision for Gypsy and Traveller and Travelling Showpeople • Policy LP10 – Moorings and Marinas • Policy LP24 - New Agricultural/Rural Buildings in the Countryside 	To ensure a precautionary approach to avoid AEOI of the Stour and Orwell Estuaries SPA & Ramsar site from Surface Water Flooding.	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		<ul style="list-style-type: none"> • Policy LP28 – Water resources and infrastructure • Policy LA052 – Land north of Mill Road, Botesdale & Rickinghall • <u>Policy LA001 - Land east of Norwich Road, Barham</u> • <u>Policy LA002 - Land north of Church Lane, Barham</u> • <u>Policy LA003 - Land south of Church Lane, Claydon</u> • <u>Policy LA005 - 6 Acre Field, Belstead</u> • <u>Policy LA006 - Land south of Fitzgerald Road, Bramford</u> • <u>Policy LA007 - Land east of The Street, Bramford</u> • <u>Policy LA008 - Land south east of Back Lane, Copdock and Washbrook</u> • <u>Policy LA009 - Land south west of London Road, Copdock and Washbrook</u> • <u>Policy LA010 - Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham</u> 		



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		<ul style="list-style-type: none"> • <u>Policy LA011 - Land north of Gipping Road, Great Blakenham</u> • <u>Policy LA012 - Land north of Burstall Lane and west of B1113, Sproughton</u> • <u>Policy LA013 - Land north of the A1071, Sproughton</u> • <u>Policy LA014 - Land at Poplar Lane, Sproughton</u> • <u>Policy LA016 - Land West of Bourne Hill, Wherstead</u> • <u>Policy LA018 - Former Sugar Beet Site, Sproughton</u> • <u>Policy LA053 - Land south of Ipswich Road, Brantham</u> • <u>Policy LA054 - Land East of Longfield Road, Capel St Mary</u> • <u>Policy LA055 - Land south-west of Rembrow Road, Capel St Mary</u> • <u>Policy LA059 - Land west of Hadleigh Road, East Bergholt</u> 		



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		<ul style="list-style-type: none"> • <u>Policy LA060 - Land north west of Moores Lane, East Bergholt</u> • <u>Policy LA061 - Land south of Heath Road, East Bergholt</u> • <u>Policy LA068 - Land east of Ipswich Road, Holbrook</u> • <u>Policy LA075 - Land south of The Street, Shotley</u> • <u>Policy LA101 - Land north of The Street, Wherstead</u> • <u>Policy LA116 – Land east of Loraine Way, Sproughton</u> 		
58	4.10.14	<p>The policy LP24 refers to the provision to the good design of new Agricultural buildings to increase the business operations of agricultural practices. It has partly been carried forward to appropriate assessment as the policy wording has not referenced measures to avoid impacts from water quality. The other policies listed in paragraph 4.10.8 have been screened in because they 5km SSSI IRZ of the Stour Estuary and Orwell Estuary and could result in impacts to the <u>Stour and Orwell SPA and Ramsar from</u></p>	<p>To ensure a precautionary approach to avoid AEOI of the Stour and Orwell Estuaries SPA & Ramsar site from Surface Water Flooding.</p>	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		<u>Surface Water Flooding if allocations involve discharge of water or liquid waste of more than 20m³/day to ground.</u>		
60	Added paragraph below 4.10.21	<p><u>Policies within 5km of the Stour and Orwell Estuaries SSSI IRZ</u></p> <p><u>To avoid adverse effects on integrity of the Stour and Orwell Estuaries SPA & Ramsar, it is recommended that all applications within 5km SSSI IRZ of the Stour and Orwell Estuaries must contain a general Construction Environmental Management Plan demonstrating that Policy LP17 and Government Guidance on Pollution Prevention. This will demonstrate that AEOI will not be caused from the allocations alone during the construction phase. Furthermore, these allocation sites must include a flood assessment to identify the potential risk from Surface Water drainage throughout the life of the development and to ensure that SuDs are designed appropriately. If it is identified that the indicated allocation sites will still discharge of water or liquid waste of more than 20m³/day to ground with appropriate SuDs incorporated within the development, the need for a project level Habitats Regulations Assessment should be assessed by the Local Planning Authority. This will be covered by Policy LP28–</u></p>	To ensure a precautionary approach to avoid AEOI of the Stour and Orwell Estuaries SPA & Ramsar site from Surface Water Flooding.	None



Page	Paragraph/ Table	Updated Sections	Reason	Effect of the conclusion on the JLP
		<u>Water resources and infrastructure, Policy LP29 – Flood risk and vulnerability.</u>		
61	4.11.2	At Screening stage, the following Habitats Sites were listed as having the potential for Likely Significant Effects as a result of water quality <u>air quality</u> issues:	To ensure clarity that paragraph 4.11.2 is only addressing potential impacts upon Air Quality.	None
64	4.12.2	At Screening stage, the following Habitats Sites were listed as having the potential for Likely Significant Effects as a result of direct disturbances <u>from construction or operational activities</u> issues:	To provide clarity on what is considered 'direct disturbance'	None
64	4.12.3	At Screening stage, the following Policies were listed as having the potential for Likely Significant Effects as a result of direct disturbance <u>from construction or operational activities</u> issues:	To provide clarity on what is considered 'direct disturbance'	None



Table 2: Matters of clarification relating to the Babergh and Mid Suffolk Joint Local Plan Pre-Submission (Regulation 19) and the HRA

Page	Paragraph	Updated section	Reason	Effect of the conclusion on the JLP
29	2.3.26	Delete site allocation LA051 – land between The Street and A143, Botesdale & Rickinghall	Removed from Plan	None
37	Table 7	Delete site allocation LA051 – land between The Street and A143, Botesdale & Rickinghall	Removed from Plan	None
37	Table 7	Add site allocation LA116 – land east of Loraine Way, Sproughton	Added to the Plan	None
57	4.10.12	Delete reference to site allocation LA051 – land between The Street and A143, Botesdale & Rickinghall	Site allocation removed from Plan	None
59	4.10.19	Delete paragraph	Site allocation removed from Plan	None
59	4.10.19	To avoid adverse effects on integrity of Redgrave and South Lopham Fens Ramsar site and Waveney & Lt Ouse Valley Fens SAC. The allocation site must demonstrate that it protects groundwater, surface water features and controls aquatic pollution. Therefore, compliance with Policy LP17 - Environmental Protection and Guidance for Pollution Prevention GPPs – (Netregs.org.uk) <u>Government Guidance on Pollution Prevention</u> must be demonstrated.	To remove reference to Netreg.org.uk, as this now only provides guidance on pollution prevention for Northern Ireland and Scotland.	None



Page	Paragraph	Updated section	Reason	Effect of the conclusion on the JLP
		It is recommended that this could be secured via a Construction Environmental Management Plan, which could be secured as a condition of any consent to be secured prior to commencement.		
59	4.10.20	To avoid adverse effects on integrity of Redgrave and South Lopham Fens Ramsar site and Waveney & Lt Ouse Valley Fens SAC. The allocation site must demonstrate that it protects groundwater, surface water features and controls aquatic pollution. Therefore, compliance with Policy LP17 - Environmental Protection and Guidance for Pollution Prevention (GPPs) (Netregs.org.uk) <u>Government Guidance on Pollution Prevention</u> must be demonstrated. It is recommended that this could be secured via a Construction Environmental Management Plan, which could be secured as a condition of any consent to be secured prior to commencement.	To remove reference to Netregs.org.uk, as this now only provides guidance on pollution prevention for Northern Ireland and Scotland.	None
59	4.10.21	To avoid adverse effects on integrity of the Stour and Orwell Estuaries SPA & Ramsar, Redgrave and South	To remove reference to Netregs.org.uk, as this	None



Page	Paragraph	Updated section	Reason	Effect of the conclusion on the JLP
		Lopham Fens Ramsar site and Waveney & Lt Ouse Valley Fens SAC from policy LP24, it is recommended that the all agricultural applications must include a general Construction Environmental Management Plan demonstrating that <u>Government Guidance on Pollution Prevention</u> Guidance for Pollution Prevention (GPPs) (Netregs.org.uk) will be adhered to throughout the development. This should be secured as a condition of any consent to be secured prior to commencement, unless a project level Habitats Regulations Assessment is required to support the application. This will be covered by Environmental Policy LP17.	now only provides guidance on pollution prevention for Northern Ireland and Scotland.	
85	N/A	<ul style="list-style-type: none"> • Netregs (2020) https://www.netregs.org.uk/ 	To remove reference to Netregf.org.uk, as this now only provides guidance on pollution prevention for Northern Ireland and Scotland.	None
88	Appendix 1	Delete site allocation LA051 – land between The Street	Site allocation removed	None



Page	Paragraph	Updated section	Reason	Effect of the conclusion on the JLP
		and A143, Botesdale & Rickinghall	from Plan	
92	Appendix 1	Add site allocation LA116 – land east of Loraine Way, Sproughton	Added to the Plan	None
88	Appendix 1	Amend details for site allocation LA053 – land south of Ipswich Road, Brantham	Housing number for site allocation amended	None
117	Appendix 2	Delete site allocation LA051 – land between The Street and A143, Botesdale & Rickinghall	Removed from Plan	None
130	Appendix 2	Add site allocation LA116 – land east of Loraine Way, Sproughton	Added to the Plan	None
136	Appendix 3	Delete site allocation LA051 – land between The Street and A143, Botesdale & Rickinghall	Removed from Plan	None
139	Appendix 3	Add site allocation LA116 – land east of Loraine Way, Sproughton	Added to the Plan	None



7. Amended Table and Appendices from HRA (October 2020) report

Table 3 Habitats Sites within 20 km for Babergh and Mid Suffolk.

Site	Location	Scoped in or out
Deben Estuary SPA & Ramsar Site	Estuary in Suffolk located from Woodbridge to Felixstowe	Scoped in This Habitat site falls partly within Mid Suffolk District. Within the ZOI as identified on MAGIC. Mid Suffolk District is also within the SSSI IRZ of the Deben Estuary SSSI and <u>ZOI of the Habitats Sites.</u> In addition, there is possibility that there are potential hydrological and atmospheric impact pathways
Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar site	Heaths and marshes on the east coast of Suffolk	Scoped in This Habitat site falls partly within Mid Suffolk District. Within the ZOI as identified on MAGIC. Mid Suffolk District is also within the underpinning SSSI IRZ of the Minsmere to Walberswick Heaths & Marshes and <u>ZOI of the Habitats Sites as identified on MAGIC.</u>
Redgrave & South Lopham Fens Ramsar Site	Fens located to the north of Mid Suffolk	Scoped in This Habitat site falls partly within Mid Suffolk District. Within the ZOI as identified on MAGIC. Mid Suffolk District is also within the underpinning SSSI IRZ of the Habitats Site, as identified on MAGIC. In addition, there are potential hydrological and atmospheric impact pathways.
Stour & Orwell Estuaries SPA & Ramsar site	Two estuaries to the south of Suffolk. The Orwell Estuary is located from Ipswich to Shotley. The Stour Estuary is located from Manningtree to Shotley	Scoped in This Habitat site falls partly within both Babergh and Mid Suffolk Districts. Within the ZOI as identified on MAGIC. Babergh and Mid Suffolk Districts are also within the SSSI IRZ of the underpinning SSSIs, as well as the ZOI of the Habitats Sites. In addition, there is possibility that there are potential hydrological and atmospheric impact pathways, <u>as well potential impacts which would result in disturbance and loss of functionally linked land.</u>
Waveney & Lt Ouse Valley Fens SAC	Fens located to the north of Mid Suffolk	Scoped in This Habitat site falls partly within Mid Suffolk District. Within the ZOI as identified on MAGIC. Mid Suffolk District is also within the underpinning SSSI IRZ of the Habitats



Site	Location	Scoped in or out
		<u>Site, as identified on MAGIC. In addition, there are potential hydrological and atmospheric impact pathways.</u>
Alde-Ore (& Butley) Estuary SAC, SPA & Ramsar site	Estuary located on south-east Suffolk coast	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSI's and ZOI of the Alde-Ore (& Butley) Estuary SAC, SPA & Ramsar site as identified on MAGIC. In addition, there are no clear impact pathways to these Habitats Sites.</u>
Benacre to Easton Barents SAC & SPA	Lagoons located on the north-east Suffolk coast	Scoped out <u>Outside the ZOI of the Benacre to Easton Barents SAC & SPA as identified on MAGIC. In addition, there are no clear impact pathways to these Habitats Sites.</u>
Blackwater Estuary SPA & Ramsar site	Estuary in Essex located from Maldon to Mersea Island	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSI's and the ZOI of the Blackwater Estuary SPA & Ramsar site as identified on MAGIC. In addition, there are no clear impact pathways to these Habitats Sites.</u>
Broadlands & Broads SAC, SPA & Ramsar	Designated for a variety of Protected habitats and species and located to the north-east Suffolk coast.	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSI's and the ZOI of Broadlands & Broads SAC, SPA & Ramsar as identified on MAGIC. In addition, there are no clear impact pathways to these Habitats Sites.</u>
Colne Estuary SPA & Ramsar site	Estuary located in north Essex, situated from Colchester to East Mersea.	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSI's and the ZOI of the Colne Estuary SPA & Ramsar site as identified on MAGIC. In addition, there are no clear impact pathways to these Habitats Sites.</u>
Dew's Ponds SAC	A group of ponds situated near the east coast of Suffolk	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSI's and the ZOI of the Dew's Ponds SAC as identified on MAGIC. In addition, there are no clear impact pathways to these Habitats Sites.</u>
Essex Estuaries SAC	Estuaries from Clacton on Sea to Southend	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSI's and the ZOI of the Essex Estuaries SAC as identified on MAGIC. In addition, there are no clear impact pathways to these Habitats Sites.</u>



Site	Location	Scoped in or out
Hamford Water SAC, SPA & Ramsar site	Estuary situated to the north-east of Essex.	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSIs and the ZOI of the Hamford Water SAC, SPA & Ramsar site as identified on MAGIC. In addition, there are no clear impact pathways to these Habitats Sites.</u>
Norfolk Valley Fens SAC	Group of fens situated to the south-west of Norfolk	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSIs the ZOI of the North Valley Fens SAC as identified on MAGIC. In addition, there are no clear impact pathways to the Habitats Site.</u>
Orfordness Shingle-Street SAC	Shingle structure and Lagoons situated to the south-east of Suffolk	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSIs the ZOI of the Orfordness Shingle-Street SAC as identified on MAGIC. In addition, there are no clear impact pathways to the Habitats Site.</u>
Outer Thames Estuary SPA	Covers most marine areas near to Essex coast	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSIs and the ZOI of the Outer Thames Estuary SPA as identified on MAGIC. In addition, there are no clear impact pathways to these Habitats Sites.</u>
Rex Graham Reserve SAC	Dry grassland and conifer forest situated to the east of Mildenhall	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSIs the ZOI of the Rex Graham Reserve SAC as identified on MAGIC. In addition, there are no clear impact pathways to the Habitats Site.</u>
Sandlings SPA	Heathland and commercial conifer forest situated to the south-east of Suffolk	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSIs the ZOI of the Sandlings SPA as identified on MAGIC. In addition, there are no clear impact pathways to the Habitats Site.</u>
Southern North Sea (cSAC)	Covers the entire coast of East Anglia	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSI's the ZOI of Southern North Sea (cSAC) as identified on MAGIC.</u>
Staverton Park & The Thicks, Wantisden SAC	Old acidophilous oak woods situated to the south-east of Suffolk.	Scoped out <u>The districts fall outside the SSSI IRZ of the underpinning SSSIs and the ZOI of Staverton Park & The Thicks, Wantisden SAC as identified on MAGIC. In addition, there are no clear impact pathways to the Habitats Site.</u>



Table 7. Policies that have the Potential to Cause a Likely Significant Effect and their Impact Pathways

Policy	Loss of Functionally Linked Land	Disturbance	Water Quality	Water Quantity	Air Pollution	Potential for In Combination Effects
Policy SP01 – Housing Needs		✓				✓
Policy SP05 – Employment Land		✓	✓			✓
Policy SP08 – Infrastructure Provision						✓
Policy LP09 - Provision for Gypsy and Traveller and Travelling Showpeople	✓	✓	✓			✓
Policy LP10 - Moorings and Marinas		✓	✓			✓
Policy LP24 – New Agricultural/ Rural Buildings in the Countryside	✓	✓	✓		✓	✓
LA001 – Allocation: Land east of Norwich Road, Barham				✓		✓



Policy	Loss of Functionally Linked Land	Disturbance	Water Quality	Water Quantity	Air Pollution	Potential for In Combination Effects
LA002 – Allocation: Land north of Church Lane, Barham				✓		✓
LA003 – Allocation: Land south of Church Lane, Claydon				✓		✓
LA005 – Allocation: 6 Acre Field, Belstead				✓		✓
LA006 – Allocation: Land south of Fitzgerald Road, Bramford				✓		✓
LA007 – Allocation: Land east of The Street, Bramford				✓		✓
LA008 - Allocation: Land south east of Back Lane, Copdock and Washbrook				✓		✓
LA009 – Allocation:				✓		✓



Policy	Loss of Functionally Linked Land	Disturbance	Water Quality	Water Quantity	Air Pollution	Potential for In Combination Effects
Land south west of London Road, Copdock and Washbrook						
LA010 – Allocation: Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham				<u>✓</u>		✓
LA011 – Allocation: Land north of Gipping Road, Great Blakenham				<u>✓</u>		✓
LA012 – Allocation: Land north of Burstall Lane and west of B1113, Sproughton				<u>✓</u>		✓
LA013 – Allocation: Land north of the A1071, Sproughton				<u>✓</u>		✓
LA014 – Allocation: Land at Poplar				<u>✓</u>		✓



Policy	Loss of Functionally Linked Land	Disturbance	Water Quality	Water Quantity	Air Pollution	Potential for In Combination Effects
Lane, Sproughton						
LA016 – Allocation: Land West of Bourne Hill, Wherstead				<u>✓</u>		✓
LA018 - Former Sugar Beet Site, Sproughton				<u>✓</u>		
LA027 - Allocation: Former Babergh District Council Offices, Hadleigh						✓
LA028 – Allocation: Land north east of Frog Hall Lane, Hadleigh						✓
LA052 – Land north of Mill Road, Botesdale & Rickinghall			✓			
LA053 – Allocation: Land south of				<u>✓</u>		✓



Policy	Loss of Functionally Linked Land	Disturbance	Water Quality	Water Quantity	Air Pollution	Potential for In Combination Effects
Ipswich Road, Brantham						
LA054 – Land East of Longfield Road, Capel St Mary				✓		✓
LA055 – Land south-west of Rembrow Road, Capel St Mary				✓		✓
LA059 – Allocation: Land west of Hadleigh Road, East Bergholt				✓		✓
LA060 – Allocation: Land north west of Moores Lane, East Bergholt				✓		✓
LA061 – Land south of Heath Road, East Bergholt				✓		✓
LA068 – Allocation: Land east of Ipswich Road, Holbrook				✓		✓



Policy	Loss of Functionally Linked Land	Disturbance	Water Quality	Water Quantity	Air Pollution	Potential for In Combination Effects
LA075 – Land south of The Street, Shotley				<u>✓</u>		✓
LA101 – Allocation: Land north of The Street, Wherstead				<u>✓</u>		✓
LA102 – Allocation: Land west of Old Norwich Road, Whitton						✓
LA107 – Allocation: Land east of Bramford Road, Bramford				<u>✓</u>		✓
LA116 – Land east of Loraine Way, Sproughton				<u>✓</u>		✓



Table 8 Habitats Sites, Impact Pathways and Examples of LSE Identified at Screening Stage.

Nature of potential impact	Which Habitats Site(s) could the Babergh and Mid Suffolk Joint Local Plan affect (alone or in combination with other plans and project)?	How the Babergh and Mid Suffolk Local Plan (alone or in combination with other plans and projects) could affect a Habitats site?	Likely to result in Significant Effect and therefore require further assessment?
Habitat loss / Land take by development	N/A	Allocations are all outside the boundaries of any Habitats sites	No
Impact on features (protected species) outside the protected site boundary	<ul style="list-style-type: none"> Stour and Orwell Estuaries SPA & Ramsar Site 	Some allocations are within the Zone of Influence of Habitats sites & policies may affect features outside the protected site boundary.	Possible
Recreational disturbance Other Disturbance	<ul style="list-style-type: none"> Stour and Orwell Estuaries SPA & Ramsar Site Deben Estuary SPA & Ramsar Minsmere – Walberswick SPA & Ramsar site; Minsmere to Walberswick Heaths & Marshes SAC 	<p>Some residential allocations are within the <u>13km</u> Zone of Influence of Habitats sites</p> <p>Some allocations are within the Zone of Influence of Habitats sites & policies may affect features outside the protected site boundary</p>	Yes
Water quantity and quality (pollution)	<ul style="list-style-type: none"> Stour and Orwell Estuaries SPA & Ramsar Site Redgrave and South Lopham Fens Ramsar site Waveney & Lt Ouse Valley Fens SAC 	Some allocations <u>contain hydrological impact pathways to are within the Zone of Influence of</u> Habitats sites and policies may affect features outside the protected site boundary	Yes



Nature of potential impact	Which Habitats Site(s) could the Babergh and Mid Suffolk Joint Local Plan affect (alone or in combination with other plans and project)?	How the Babergh and Mid Suffolk Local Plan (alone or in combination with other plans and projects) could affect a Habitats site?	Likely to result in Significant Effect and therefore require further assessment?
Air Quality	<ul style="list-style-type: none"> • Stour and Orwell Estuaries SPA & Ramsar Site • Redgrave and South Lopham Fens Ramsar site • Waveney & Lt Ouse Valley Fens SAC • <u>Deben Estuary SPA & Ramsar</u> 	Some allocations <u>could contain atmospheric impact pathways to are within the Zone of Influence</u> of Habitats sites and policies may affect features outside the protected site boundary.	Possible



Appendix 1. Strategic Housing Land Area Assessment

Local Plan Policy Reference	Allocation Name	Capacity
LA001	Land east of Norwich Road, Barham	Approximately 325 dwellings (with associated infrastructure)
LA002	Land north of Church Lane, Barham	Approximately 270 dwellings (and associated infrastructure)
LA003	Land south of Church Lane, Claydon	Approximately 75 dwellings (and associated infrastructure)
LA005	6 Acre Field, Belstead	Approximately 14 dwellings (and associated infrastructure)
LA006	Land south of Fitzgerald Road, Bramford	Approximately 100 dwellings (with associated infrastructure)
LA007	Land east of The Street, Bramford	Approximately 195 dwellings (with associated infrastructure)
LA008	Land south east of Back Lane, Copdock and Washbrook	Approximately 226 dwellings (with associated infrastructure)
LA009	Land south west of London Road, Copdock and Washbrook	Approximately 12 dwellings (with associated infrastructure)
LA010	Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham	Approximately 8 dwellings (with associated infrastructure)
LA011	Land north of Gipping Road, Great Blakenham	Approximately 20 dwellings (with associated infrastructure)
LA012	Land north of Burstall Lane and west of B1113, Sproughton	Approximately 75 dwellings (and associated infrastructure)
LA013	Land north of the A1071, Sproughton	Approximately 1,100 dwellings (and associated infrastructure)
LA014	Land at Poplar Lane, Sproughton	Approximately 475 dwellings (and associated infrastructure)
LA016	Land West of Bourne Hill, Wherstead	Approximately 75 dwellings (and associated infrastructure)
LA018	Former Sugar Beet Site, Sproughton	B1/B2/B8 uses



Local Plan Policy Reference	Allocation Name	Capacity
LA020	Land north of Magdalen Street, Eye	Approximately 80 dwellings (with associated infrastructure)
LA021	Land north of Church Street, Eye	Approximately 20 dwellings (with associated infrastructure)
LA022	Land north of Maple Way, Eye	Approximately 250 dwellings (with associated infrastructure)
LA027	Former Babergh District Council Offices, Hadleigh	Approximately 50 dwellings (with associated infrastructure)
LA028	Land north east of Frog Hall Lane, Hadleigh	Approximately 500 dwellings (with associated infrastructure)
LA030	Land west of Stowmarket Road, Needham Market	Approximately 66 dwellings (with associated infrastructure)
LA031	Former Needham Market Middle School, Needham Market	Approximately 40 dwellings (with associated infrastructure)
LA032	Former Mid Suffolk District Council Offices and Car Park, Needham Market	Approximately 80 dwellings (with associated infrastructure)
LA033	Land south of Gun Cotton Way, Stowmarket	Approximately 68 dwellings (with associated infrastructure)
LA034	Chilton Leys, Stowmarket	Approximately 600 dwellings (with associated infrastructure)
LA035	Ashes Farm, Stowmarket	Approximately 570 dwellings (with associated infrastructure)
LA036	Land south of Union Road, Stowmarket	Approximately 400 dwellings (with associated infrastructure)
LA037	Former Stowmarket Middle School, Stowmarket	Approximately 40 dwellings (with associated infrastructure)
LA038	Land south of Creting Road West, Stowmarket	Approximately 25 dwellings (with associated infrastructure)
LA039	Land west of Bures Road, Great Cornard	Approximately 8 dwellings (with associated infrastructure)
LA040	Land west of Bures Road, Great Cornard	Approximately 46 dwellings (with associated infrastructure)



Local Plan Policy Reference	Allocation Name	Capacity
LA041	Land north-west of Waldingfield Road, Chilton	Approximately 130 dwellings (with associated infrastructure)
LA042	Land at Tye Farm, Great Cornard	Approximately 500 dwellings (with associated infrastructure)
LA044	Land at Mill Lane, Stowmarket (Gateway 14)	Approximately 4ha of B1 offices, 4.5ha of Suit Generis Use and Class D commonly found on business parks, open space, leisure and recreation (with associated infrastructure).
LA045	Land south of Tamage Road, Acton	Approximately 100 dwellings (with associated infrastructure)
LA046	Former Bacton Middle School, Bacton	Approximately 50 dwellings (with associated infrastructure)
LA047	Land north east of Turkey Hall Lane, Bacton	Approximately 51 dwellings (with associated infrastructure)
LA048	Land south of Wattisham Road, Bildeston	Approximately 75 dwellings (with associated infrastructure)
LA049	Land south of Back Hills, Botesdale & Rickinghall	Approximately 40 dwellings (with associated infrastructure)
LA050	Land north of Gardenhouse Lane, Botesdale & Rickinghall	Approximately 42 dwellings (with associated infrastructure)
LA052	Land north of Mill Road, Botesdale & Rickinghall	Approximately 69 dwellings (with associated infrastructure)
LA053	Land south of Ipswich Road, Brantham	Approximately 125 dwellings (with associated infrastructure)
LA054	Land East of Longfield Road, Capel St Mary	Approximately 100 dwellings (with associated infrastructure)
LA055	Land south-west of Rembrow Road, Capel St Mary	Approximately 550 dwellings (with associated infrastructure)
LA056	Land south of Low Road, Debenham	Approximately 35 dwellings (with associated infrastructure)
LA057	Land north of Ipswich Road, Debenham	Approximately 140 dwellings (with associated infrastructure)



Local Plan Policy Reference	Allocation Name	Capacity
LA058	Land east of Aspoll Road, Debenham	Approximately 87 dwellings (with associated infrastructure)
LA059	Land west of Hadleigh Road, East Bergholt	Approximately 10 dwellings (with associated infrastructure)
LA060	Land north west of Moores Lane, East Bergholt	Approximately 144 dwellings (with associated infrastructure)
LA061	Land south of Heath Road, East Bergholt	Approximately 75 dwellings (with associated infrastructure)
LA062	Land East of Ashfield Road, Elmswell	Approximately 106 dwellings (with associated infrastructure)
LA063	Land south of Church Road, Elmswell	Approximately 60 dwellings (with associated infrastructure)
LA064	Land north of Church Road, Elmswell	Approximately 60 dwellings (with associated infrastructure)
LA065	Land north west of School Road, Elmswell	Approximately 50 dwellings (with associated infrastructure)
LA066	Land west of Station Road, Elmswell	Approximately 100 dwellings (with associated infrastructure)
LA067	Land South of Bacton Road, Haughley	Approximately 98 dwellings (with associated infrastructure)
LA068	Land east of Ipswich Road, Holbrook	Approximately 10 dwellings (with associated infrastructure)
LA069	Land north west of Melford Road, Lavenham	Approximately 20 dwellings (with associated infrastructure)
LA073	Land south of Glebe Way, Mendlesham	Approximately 25 dwellings (with associated infrastructure)
LA074	Land north-east of Chapel Road, Mendlesham	Approximately 50 dwellings (with associated infrastructure)
LA075	Land south of The Street, Shotley	Approximately 50 dwellings (with associated infrastructure)
LA076	Land south of The Street, Stonham Aspal	Approximately 35 dwellings (with associated infrastructure)
LA077	Land south of Church Road, Stowupland	Approximately 18 dwellings (with associated infrastructure)



Local Plan Policy Reference	Allocation Name	Capacity
LA078	Land south of Stowmarket Road, Stowupland	Approximately 300 dwellings (with associated infrastructure)
LA079	Land south of Gipping Road, Stowupland	Approximately 100 dwellings (with associated infrastructure)
LA080	Land west of Queen Street, Stradbroke	Approximately 75 dwellings (with associated infrastructure)
LA081	Land north of Laxfield Road, Stradbroke	Approximately 45 dwellings (with associated infrastructure)
LA082	Land south of New Street, Stradbroke	Approximately 60 dwellings (with associated infrastructure)
LA083	Land east of Farriers Close, Stradbroke	Approximately 35 dwellings (with associated infrastructure)
LA084	Land west of Meadow Lane, Thurston	Approximately 64 dwellings (with associated infrastructure)
LA085	Land east of Church Road and south of Old Post Office Lane, Thurston	Approximately 25 dwellings (with associated infrastructure)
LA086	Land south of Heath Road, Thurston	Approximately 110 dwellings (with associated infrastructure)
LA087	Land south of Beyton Road, Thurston	Approximately 200 dwellings (with associated infrastructure)
LA088	Land west of Ixworth Road, Thurston	Approximately 250 dwellings (with associated infrastructure)
LA089	Land east of Ixworth Road, Thurston	Approximately 200 dwellings (with associated infrastructure)
LA090	Land west of Barton Road, Thurston	Approximately 129 dwellings (with associated infrastructure)
LA091	Land west of Wattisfield Road, Walsham le Willows	Approximately 60 dwellings (with associated infrastructure)
LA092	Land east of Wattisfield Road, Walsham le Willows	Approximately 22 dwellings (with associated infrastructure)
LA093	Land East of Green Road, Woolpit	Approximately 49 dwellings (with associated infrastructure)



Local Plan Policy Reference	Allocation Name	Capacity
LA094	Land South of Old Stowmarket Road, Woolpit	Approximately 120 dwellings (with associated infrastructure)
LA095	Land north east of The Street, Woolpit	Approximately 500 dwellings (with associated infrastructure)
LA096	Land north east of Heath Road, Woolpit	Approximately 10 dwellings (with associated infrastructure)
LA097	Land west of Heath Road, Woolpit	Approximately 30 dwellings (with associated infrastructure)
LA098	Land south of High Road, Leavenheath	Approximately 40 dwellings (with associated infrastructure)
LA099	Land at Eye Airfield, Eye	Employment uses (with associated infrastructure)
LA100	Land north of B1115, Stowupland	Approximately 143 dwellings (with associated infrastructure)
LA101	Land north of The Street, Wherstead	3.3ha of B1 development.
LA102	Land west of Old Norwich Road, Whitton	Approximately 190 dwellings and associated infrastructure.
LA103	Land South of Barrells Road, Thurston	Approximately 6 dwellings (with associated infrastructure)
LA104	Land West of Fishponds Way, Haughley	Approximately 98 dwellings (with associated infrastructure)
LA105	Land north of Church Road, Bacton	Approximately 50 dwellings (with associated infrastructure)
LA106	Land south of Pretymen Avenue, Bacton	Approximately 85 dwellings (with associated infrastructure)
LA107	Land east of Bramford Road, Bramford	Approximately 14 dwellings (with associated infrastructure)
LA108	Land south of Gun Cotton Way, Stowmarket	Proposed allocation site with 11ha
LA109	Land south of Eye Airfield	Approximately 174 dwellings (with associated infrastructure)
<u>LA116</u>	<u>Land East of Loraine Way, Sproughton</u>	<u>Approximately 50 dwellings (with associated infrastructure)</u>



Appendix 2. HRA Screening of Individual Policies

Where mitigation is necessary to avoid Likely Significant Effects (LSE), then in line with CJEU *People over Wind* court ruling, this cannot be taken into consideration at HRA Screening Stage 1. Any policies providing mitigation are therefore also carried forward to Stage 2 Appropriate Assessment.

Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Policy SP01 – Housing Needs	✓	✓	✓	✓	✓	The policy must be screened as it includes reference to secure land for housing applications. Consequently, as the impacts from the locations are not currently known, there is a potential for LSE. This could include: Recreational disturbance & Non-recreational disturbance.
Policy SP02 – Affordable Housing						Screen out. This is a criteria-based policy relating to affordable housing developments and will cause no LSE.
Policy SP03 - Settlement Hierarchy						Screen out. This is a criteria-based policy relating to how the scale and location of



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						development will be considered. Therefore, housing developments and will cause no LSE.
Policy SP04 - Housing Spatial Distribution						Screen out. This is a criteria-based policy relating to how the Spatial Distribution of new development will be considered. Therefore, this policy will cause no LSE.
Policy SP05 – Employment Land	✓					The policy must be screened as it includes reference to secure land for Employment within the Stour and Orwell Estuaries SSSI Impact Risk Zone. Consequently, as the impacts from the locations are not currently known, there is a potential for LSE. This could include: Water pollution & Non-recreational disturbance.
Policy SP06 – Retail and Town Centre Use						Screen out. The proposed retail and leisure locations are further 5 kilometres away, and therefore unlikely to cause impacts from Water



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						and air pollution. Therefore, this policy will cause no LSE.
Policy SP07 – Tourism						Screen out. The policy relates that well-designed tourism and leisure facilities will be encouraged. Therefore, this policy will cause no LSE.
Policy SP08 – Strategic Infrastructure Provision	✓	✓				Screen in. The policy relates to a strategic approach to deal with infrastructure within Habitats Sites ZOI . However, indication of how mitigation will be implemented has not been outlined. Therefore, the policy must be considered at appropriate assessment.
Policy SP09 - Enhancement and Management of the Environment						Screen out. The policy aims to outline when project level Habitats Regulations Assessments and a financial contribution to towards the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy are required



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						for residential developments within the identified ZOI's.
Policy SP10 - Climate Change						Screen out. The Policy relates to ensuring a proactive approach to deal with climate change, which will benefit the identified Habitats Sites in the long-term.
Policy LP01 - Windfall development in hamlets and dwellings clusters						Screen out. The policy relates to good design with small settlements. Therefore, this policy will cause no LSE.
Policy LP02 - Residential Annexes						Screen out. The policy relates to good design of residential annexes. Therefore, this policy will cause no LSE.
Policy LP03 - Residential						Screen out. The policy relates to good design of residential Extensions. Therefore, this policy will cause no LSE.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Extensions and Conversions						
Policy LP04 - Replacement Dwellings In The Countryside (Outside of Settlement Boundaries)						Screen out. The policy relates to preferred design criteria to replace existing dwellings or the conversion/erection of ancillary buildings or boundary treatments in the countryside. Therefore, this policy will cause no LSE.
Policy LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries						Screen out. The policy relates to preferred design Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries. Therefore, this policy will cause no LSE.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Policy LP06– Mix and type of composition						Screen out. The policy relates to the delivery of supported and special needs housing with new development proposals, to ensure scheme composition accommodates affordable housing, accessible and adaptable dwellings. As a result, this policy will cause no LSE.
Policy LP07 - Supported and Special Needs Housing						Screen out. The policy relates to preferred design residential nursing homes. Therefore, this policy will cause no LSE.
Policy LP08 - Affordable Housing						Screen out. This is a criteria-based policy relating to affordable housing developments and will cause no LSE.
Policy LP09 - Provision for Gypsy and Traveller and	✓	✓	✓	✓	✓	Screened in. No locations are yet identified. Possible LSE if future Gypsy & Traveller provision are provided within areas close to



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Travelling Showpeople						European Sites. Water and air pollution, recreational disturbance.
Policy LP10 - Moorings and Marinas	✓					Screened in. The policy relates to the provision of house boats within the Orwell Estuary. It highlights that house boats must not have detrimental impact on the surrounding area in terms of pollution and biodiversity value. However, it has not considered detailed impacts to the Stour and Orwell Estuaries SPA and Ramsar. Therefore, impacts to this Habitats Sites need to be considered further at Appropriate Assessment.
Policy LP11 - Self-Build and Custom-Build						Screen out. This policy relates to the council supporting Self-build and custom-build houses. Therefore, the policy will not result in LSE.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Policy LP12 - Employment Development						Screen out. The policy relates to good design of employment development. Therefore, the policy will not result in LSE.
Policy LP13 - Safeguarding Economic Opportunities						Screen out. The policy relates to safeguarding employment development and also outlines the premises of which will be required to result in the loss of proposed employment areas. Therefore, the policy will cause no LSE.
Policy LP14 -Town Centre and Retail						Screen out. The proposed retail and leisure locations are further 5 kilometres away. Therefore, impacts from water and air pollution can be scoped out. Therefore, this policy will not result in LSE.
Policy LP15 - Tourism and Leisure						Screen out. The policy relates to good design of new tourism and leisure facilities. Therefore, this policy will cause no LSE.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Policy LP16 - Countryside Tourist Accommodation						Screen out. The policy relates to restrictions on Countryside Tourist accommodation. Therefore, this policy will cause no LSE.
Policy LP17 - Environmental Protection						Screen out. The policy relates to good design of all developments to protect the environment. Therefore, this policy will not result in LSE, as it will likely have a positive benefit to Habitats Sites which have been screened in.
Policy LP18 - Biodiversity						Screen out. The policy relates to good design of all developments to undertaken to conserve and enhance biodiversity. Therefore, this policy will cause no LSE, as it will likely have a positive benefit to Habitats Sites which have been screened in.
Policy LP19 - Landscape						Screen out. The policy ensures development will not negatively effect on the natural environment including landscape character sensitivity and



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						visual impacts. It also aims to avoid disturbance from lighting to the wider landscape. Therefore, this policy will cause no LSE, as it will likely have a positive benefit to Habitats Sites which have been screened in.
Policy LP20 - Area of Outstanding Natural Beauty						Screen out. The policy relates to good design within the AONB. Therefore, this policy will cause no LSE.
Policy LP21 - The Historic Environment						Screen out. The policy relates to good practices involving heritage assets. Therefore, this policy will cause no LSE.
Policy LP22 - Change in Land Use for Equestrian or other animal/rural land base uses						Screen out. The policy ensures good design for equestrian uses or other animal/rural land-based uses in the countryside. Therefore, this policy will cause no LSE.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Policy LP23 - Agricultural Land To Residential Garden Land						Screen out. The policy is criteria-based policy for the change in use of agricultural land to residential garden land or land ancillary to a residential dwelling and will not cause any LSE.
Policy LP24 – New Agricultural/Rural Buildings in the Countryside	✓	✓	✓	✓	✓	Screen in. The policy is a criteria-based policy for new agricultural/Rural buildings in the Countryside. It is indicated that planning applications must consider impacts in relation to biodiversity, which would include schemes which may result in adverse impacts to the identified Habitats Sites. This could include impacts on water pollution from discharges into watercourses or air pollution from pigs or poultry. As a result, there is a possibility that the provision of new agricultural and Rural buildings could result in LSE.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Policy LP25 - Sustainable Construction and Design						Screen out. The policy relates to good design of new developments to ensure that a sustainable approach is delivered, to achieve reductions in CO2 emissions and meet the high-water efficiency standards. Therefore, this policy will cause no LSE, as it will likely have a positive benefit to Habitats Sites which have been screened in.
Policy LP26 - Design and Residential Amenity						Screen out. The policy ensures high quality design in relation to its character and context. It also ensures that any development will be sustainable. Therefore, the policy will not cause any LSE.
Policy LP27 - Energy Sources, Storage and Distribution						Screen out. The policy ensures good design in relation to alternative energy source. It also indicates that new proposals must demonstrate that conservation sites will not be adversely



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						impacted to the LPA. Therefore, the policy will not cause any LSE.
Policy LP26 - Flood Risk						Screen out. The policy ensures that new developments should be undertaken in areas with the least impact on flooding or water resources. Therefore, the policy will not cause any LSE.
Policy LP27 - Sustainable Drainage Systems						Screen out. The policy requires that all new developments must mitigate against existing and potential flood risks /i.e. through a sequential approach and implementation of SuDs. Therefore, this policy will cause no LSE, as it will likely have a positive benefit to Habitats Sites which have been screened in.
Policy LP28 – Water resources and infrastructure						Screen out – The policy requires that all new developments must use appropriate water efficiency and re-use measures, together with



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						surface water drainage, which provides environmental benefits. This includes consideration of water use and supply, as well as ensuring that the relevant authorities for wastewater treatment are consulted. As a result, this policy will cause no LSE, as it will likely have a positive benefit to Habitats Sites which have been screened in.
Policy LP29 – Flood risk and vulnerability						Screen out – The policy relates to the flood risk and surface water strategies and sets out good design measures for proposed mitigation measures. Therefore, the policy will not cause any LSE.
Policy LP30 - Designated Open Spaces						Screen out. The policy ensures good design in relation to designated open spaces. Therefore, the policy will not cause any LSE.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Policy LP31 - Services and Facilities Within the Community – Provision / Retention						Screen out. The policy outlines when the provision of new or the removal of local community services and facilities will be supported. Therefore, the policy will not cause any LSE.
Policy LP32 - Safe, Sustainable and Active Transport						Screen out. The policy promotes sustainable transport systems within the districts. Therefore, the policy will not cause any LSE.
Policy LP33 - Managing Infrastructure Provision						Screen out. The policy relates to the management of infrastructure provision strategically. Therefore, the policy will not cause any LSE.
Policy LP34 – Health and Education Provision						Screen out. The policy relates to the promotion and maintenance of health and education development. Therefore, the policy will not cause any LSE.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Policy LP35 - Developer Contributions and Planning Obligations						Screen out. The policy relates to developer contributions and planning obligations and will not cause any LSE.
LA001 – Allocation: Land east of Norwich Road, Barham	✓	✓				The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA002 – Allocation: Land north of Church Lane, Barham	✓	✓				The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA003 – Allocation: Land south of Church Lane, Claydon	✓	✓				The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA005 – Allocation: 6 Acre Field, Belstead	✓	✓				The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA006 – Allocation: Land south of Fitzgerald Road, Bramford	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA007 – Allocation: Land east of The Street, Bramford	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA008 - Allocation: Land south east of Back Lane, Copdock and Washbrook	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA009 – Allocation: Land south west of London Road, Copdock and Washbrook	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA010 – Allocation: Land south of Chalk	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Hill Lane and West of Hood Drive, Great Blakenham						Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA011 – Allocation: Land north of Gipping Road, Great Blakenham	✓					The allocated site is situated within the SSSI ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA012 – Allocation: Land north of Burstall Lane and west of B1113, Sproughton	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA013 – Allocation: Land north of the A1071, Sproughton	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in,



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA014 – Allocation: Land at Poplar Lane, Sproughton	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA016 – Allocation: Land West of Bourne Hill, Wherestead	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA018 – Allocation: Former Sugar Beet Site, Sproughton	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA020 – Allocation: Land north of Magdalen Street, Eye						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA021 – Allocation: Land north of Church Street, Eye						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA027 - Allocation: Former Babergh District Council Offices, Hadleigh	✓					The allocated site is situated within the <u>underpinning SSSI IRZ</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance. In addition, the site is situated within an identified catchment of a Water Recycling Centre where Water Framework Directive deterioration cannot be prevented by treatment at the technically achievable limit. Therefore, the



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						policy will need to be screened in, as the proposal may result in LSE from deterioration of water quality.
LA028 – Allocation: Land north east of Frog Hall Lane, Hadleigh	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance. In addition, the site is situated within an identified catchment of a Water Recycling Centre where Water Framework Directive deterioration cannot be prevented by treatment at the technically achievable limit. Therefore, the policy will need to be screened in, as the proposal may result in LSE from deterioration of water quality.
LA030 – Allocation: Land west of						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for any Habitats



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
Stowmarket Road, Needham Market						Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA031 – Allocation: Former Needham Market Middle School, Needham Market						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA032 – Allocation: Former Mid Suffolk District Council Offices and Car Park, Needham Market						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA033 – Allocation: Land south of Gun Cotton Way, Stowmarket						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA034 – Allocation: Chilton Leys, Stowmarket						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA035 – Allocation: Ashes Farm, Stowmarket						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA036 – Allocation: Land south of Union Road, Stowmarket						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA037 – Former Stowmarket Middle School, Stowmarket						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA038 – Allocation: Land south of Creeting Road West, Stowmarket						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA039 – Allocation: Land west of Bures Road, Great Cornard						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA040 – Allocation: Land west of Bures Road, Great Cornard						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA041 – Allocation: Land north-west of Waldingfield Road, Chilton						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA042 – Allocation: Land at Tye Farm, Great Cornard						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA044 – Allocation: Land at Mill Lane, Stowmarket (Gateway 14)						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA045 – Allocation: Land south of Tamage Road, Acton						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA046 – Allocation: Former Bacton Middle School, Bacton						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA047 – Allocation: Land north east of Turkey Hall Lane, Bacton						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA048 – Allocation: Land south of Wattisham Road, Bildeston						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA049 – Allocation: Land south of Back Hills, Botesdale & Rickinghall						The allocated site is situated with the <u>underpinning SSSI IRZ</u> for Redgrave & South Lopham Fens Ramsar site & Waveney & Lt Ouse Valley Fens SAC. However, the site has been screened out within the Botesdale and Rickinghall Neighbourhood Plan. Therefore, this policy can be screened out from further assessment.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA050 – Allocation: Land north of Gardenhouse Lane, Botesdale & Rickinghall						The allocated site is situated with the <u>underpinning</u> SSSI <u>IRZ</u> for Redgrave & South Lopham Fens Ramsar site & Waveney & Lt Ouse Valley Fens SAC. However, the site has been screened out within the Botesdale and Rickinghall Neighbourhood Plan. Therefore, the policy can be screened out from further assessment.
LA052 – Land north of Mill Road, Botesdale & Rickinghall				✓	✓	The allocated site is situated with the <u>underpinning</u> SSSI <u>IRZ</u> for Redgrave & South Lopham Fens Ramsar site & Waveney & Lt Ouse Valley Fens SAC. Therefore, the policy must be screened in as there is potential for LSE without mitigation.
LA053 – Allocation: Land south of Ipswich Road, Brantham	✓					The allocated site is situated within <u>underpinning</u> SSSI <u>IRZ</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as there is



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA054 – Land East of Longfield Road, Capel St Mary	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA055 – Land south-west of Rembrow Road, Capel St Mary	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA056 – Allocation: Land south of Low Road, Debenham						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA057 – Allocation: Land north of Ipswich Road, Debenham						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA058 – Allocation: Land east of Aspoll Road, Debenham						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA059 – Allocation: Land west of Hadleigh Road, East Bergholt	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA060 – Allocation: Land north west of Moores Lane, East Bergholt	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA061 – Land south of Heath Road, East Bergholt	✓					The allocated site is situated within the <u>underpinning SSSI IRZ</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA062 – Allocation: Land East of Ashfield Road, Elmswell						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA063 – Allocation: Land south of Church Road, Elmswell						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA064 – Allocation: Land north of Church Road, Elmswell						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA065 – Allocation: Land north west of School Road, Elmswell						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA066 – Allocation: Land west of Station Road, Elmswell						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA067 – Allocation: Land South of Bacton Road, Haughley						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA068 – Allocation: Land east of Ipswich Road, Holbrook	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance. This development was consented with project level HRA AA and is now built out.
LA069 – Land north west of Melford Road, Lavenham						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA073 – Allocation: Land south of Glebe Way, Mendlesham						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for any Habitats Sites. However, the site is situated within an identified catchment of a Water Recycling Centre where Water Framework Directive deterioration cannot be prevented by treatment at the technically achievable limit. Therefore, the



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						policy will need to be <u>reviewed</u> screened in , as the proposal may result in LSE from deterioration of water quality.
LA074 – Land north-east of Chapel Road, Mendlesham						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for any Habitats Sites. However, the site is situated within an identified catchment of a Water Recycling Centre where Water Framework Directive deterioration cannot be prevented by treatment at the technically achievable limit. Therefore, the policy will need to be <u>reviewed</u> screened in , as the proposal may result in LSE from deterioration of water quality.
LA075 – Land south of The Street, Shotley	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA076 – Land south of The Street, Stonham Aspal						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA077 – Allocation: Land south of Church Road, Stowupland						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA078 – Allocation: Land south of Stowmarket Road, Stowupland						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA079 – Allocation: Land south of Gipping Road, Stowupland						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA080 – Allocation: Land west of Queen Street, Stradbroke						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA081 – Allocation: Land north of Laxfield Road, Stradbroke						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA082 – Allocation: Land south of New Street, Stradbroke						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA083 – Allocation: Land east of Farriers Close, Stradbroke						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA084 – Land west of Meadow Lane, Thurston						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA085 – Land east of Church Road and south of Old Post Office Lane, Thurston						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA086 – Allocation: Land south of Heath Road, Thurston						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA087 – Land south of Beyton Road, Thurston						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA088 – Land west of Ixworth Road, Thurston						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA089 – Land east of Ixworth Road, Thurston						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA090 – Land west of Barton Road, Thurston						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA091 – Allocation: Land west of Wattisfield Road, Walsham le Willows						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA092 – Allocation: Land east of Wattisfield Road, Walsham le Willows						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA093 – Allocation: Land East of Green Road, Woolpit						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA094 – Allocation: Land South of Old Stowmarket Road, Woolpit						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA095 – Allocation: Land north east of The Street, Woolpit						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA096 – Land north east of Heath Road, Woolpit						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA097 – Land west of Heath Road, Woolpit						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA098 – Allocation: Land south of High Road, Leavenheath						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA099 – Allocation: Land at Eye Airfield, Eye						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA100 – Allocation: Land east and west of Prentice Road, Stowmarket						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for any Habitats Sites and <u>no impact pathways</u> . Therefore, the policy can be screened out.
LA101 – Allocation: Land north of The Street, Wherstead	✓					The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA102 – Allocation: Land west of Old Norwich Road, Whitton	✓	✓				The allocated site is situated within the <u>underpinning</u> SSSI <u>IRZ</u> ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA103 – Allocation: Land South of Barrells Road, Thurston						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA104 – Allocation: Land West of Fishponds Way, Haughley						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA105 – Allocation: Land north of Church Road, Bacton						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA106 – Allocation: Land south of Pretymen Avenue, Bacton						The allocated site is situated outside the <u>underpinning</u> SSSI <u>IRZ</u> <u>ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
LA107 – Allocation: Land east of Bramford Road, Bramford	✓					The allocated site is situated within the <u>underpinning SSSI IRZ ZOI</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance.
LA108 – Allocation: Land south of Gun Cotton Way, Stowmarket						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA109 – Allocation: Land south of Eye Airfield						The allocated site is situated outside the <u>underpinning SSSI IRZ ZOI</u> for any Habitats Sites <u>and no impact pathways</u> . Therefore, the policy can be screened out.
LA116 – Allocation: <u>Land east of Loraine Way, Sproughton</u>	✓					The allocated site is situated within the <u>S underpinning SSSI IRZ</u> for ticked Habitats Sites. Therefore, the policy must be screened in, as



Policy	Stour and Orwell SPA & Ramsar	Deben Estuary SPA & Ramsar	Minsmere to Walberswick Heaths & Marshes SAC, SPA & Ramsar Site	Redgrave & South Lopham Fens Ramsar Site	Waveney & Lt Ouse Valley Fens SAC	Will Policy have Likely Significant Effect (LSE) on Habitats Sites?
						<u>there is potential for LSE without mitigation.</u> <u>Water and air pollution; recreational disturbance.</u>



Appendix 3. Results of embedding mitigation within the Appropriate Assessment

Policy	Loss of Functionally Linked Land	Disturbance	Water Quality	Water Quantity	Air Pollution	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats Sites be avoided?
Policy SP01 – Housing Needs		✓				✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
Policy SP05 – Employment Land		✓	✓			✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
Policy SP08 – Infrastructure Provision						✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
Policy LP09 - Provision for	✓	✓	✓			✓	No adverse effects on site integrity to identified Habitats



Gypsy and Traveller and Travelling Showpeople							sites with mitigation embedded.
Policy LP24 – New Agricultural/Rural Buildings in the Countryside	✓	✓	✓		✓	✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
Policy LP10 - Moorings and Marinas		✓	✓			✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA001 – Allocation: Land east of Norwich Road, Barham				<u>✓</u>		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA002 – Allocation: Land north of				<u>✓</u>		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.



Church Lane, Barham							
LA003 – Allocation: Land south of Church Lane, Claydon				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA005 – Allocation: 6 Acre Field, Belstead				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA006 – Allocation: Land south of Fitzgerald Road, Bramford				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA007 – Allocation: Land east of The Street, Bramford				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.



LA008 - Allocation: Land south east of Back Lane, Copdock and Washbrook				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA009 – Allocation: Land south west of London Road, Copdock and Washbrook				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA010 – Allocation: Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA011 – Allocation:				✓		✓	No adverse effects on site integrity to identified Habitats



Land north of Gipping Road, Great Blakenham							sites with mitigation embedded.
LA012 – Allocation: Land north of Burstall Lane and west of B1113, Sproughton				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA013 – Allocation: Land north of the A1071, Sproughton				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA014 – Allocation: Land at Poplar Lane, Sproughton				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA016 – Allocation:				✓		✓	No adverse effects on site integrity to identified Habitats



Land West of Bourne Hill, Wherstead							sites with mitigation embedded.
LA018 – Allocation: Former Sugar Beet Site, Sproughton				✓			No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA027 - Allocation: Former Babergh District Council Offices, Hadleigh				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA028 – Allocation: Land north east of Frog Hall Lane, Hadleigh				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.



LA052 – Land north of Mill Road, Botesdale & Rickingham			✓	✓			No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA053 – Allocation: Land south of Ipswich Road, Brantham				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA054 – Land East of Longfield Road, Capel St Mary				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA055 – Land south-west of Rembrow Road, Capel St Mary				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA059 – Allocation: Land west of				✓		✓	No adverse effects on site integrity to identified Habitats



Hadleigh Road, East Bergholt							sites with mitigation embedded.
LA060 – Allocation: Land north west of Moores Lane, East Bergholt				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA061 – Land south of Heath Road, East Bergholt				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA068 – Allocation: Land east of Ipswich Road, Holbrook				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA075 – Land south of The Street, Shotley				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.



LA101 – Allocation: Land north of The Street, Wherstead				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA102 – Allocation: Land west of Old Norwich Road, Whitton				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
LA107 – Allocation: Land east of Bramford Road, Bramford				✓		✓	No adverse effects on site integrity to identified Habitats sites with mitigation embedded.
<u>LA116 –</u> <u>Allocation:</u> <u>Land east of</u> <u>Lorraine Way,</u> <u>Sproughton</u>				<u>✓</u>		<u>✓</u>	<u>No adverse effects on site integrity to identified Habitats sites with mitigation embedded.</u>



Place Services

Essex County Council

County Hall, Chelmsford, Essex CM1 1QH

T: +44 (0)333 013 6840

E: enquiries@placeservices.co.uk

www.placeservices.co.uk

March 2021



Essex County Council



Technical Note

Project: Babergh and Mid Suffolk Joint Local Plan: Pre-Submission (Regulation 19)
Subject: Consideration of the impact of Air Quality on ecological receptors
Prepared by: Hamish Jackson ACIEEM BSc (Hons) - Ecological Consultant
Reviewed by: Sue Hooton CEnv MCIEEM BSc (Hons) - Principal Ecological Consultant
Date: 26th March 2021

1. Summary

Babergh and Mid Suffolk Councils are currently preparing a new Joint Local Plan for their administrative areas. The Joint Local Plan will set out the vision, spatial principles, planning policies and site allocations that will guide development in the local authority area in the period up to 2037.

The Councils published the Babergh and Mid Suffolk Joint Local Plan - Pre-Submission Document¹ (hereafter referred to as the 'draft Joint Local Plan') for public consultation between 11th November 2020 and 24th December 2020, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012². Place Services have been assisting the Councils with their Habitats Regulations Assessment (HRA) – Appropriate Assessment of the new Joint Local Plan and have provided the HRA report³ to support the consultation on the draft Joint Local Plan.

The Habitats Regulations Assessment – Appropriate Assessment included consideration on whether there would be a Likely Significant Effect from the draft Joint Local Plan upon Habitats Sites from Air Quality and Surface Water Drainage (from the development alone and in combination with other plans and projects).

Natural England provided representation for the draft Joint Local Plan and provided comments on the Habitat Regulations Assessment including Appropriate Assessment. The comments highlighted that an

¹ Babergh and Mid Suffolk (2020) Joint Local Plan - Regulation 19 Pre-submission (Nov 2020). Available from <https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/> [Accessed March 2021].

² HM Government (2012) The Town and Country Planning (Local Planning) (England) Regulations 2012. Available from http://www.legislation.gov.uk/uksi/2012/767/pdfs/uksi_20120767_en.pdf [Accessed March 2021].

³ Place Services (2020) Babergh and Mid Suffolk Joint Local Plan: Pre-Submission (Regulation 19) - Habitats Regulations Assessment including Appropriate Assessment. Available from <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/HRA2020/BMSDC-JLP-Reg-19-HRA-AA-Oct20.pdf> [Accessed March 2021].

adverse effect on the integrity (AEOL) on Habitats Sites, either alone or in combination with other plans and projects cannot be discounted without clarity changes to the Habitat Regulations Assessment including Appropriate Assessment. This included the request to provide further clarification on potential impacts from Air Quality upon the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar Site, the Deben Estuary SPA and Ramsar Site, Redgrave and South Lopham Fens Ramsar Site and Waveney & Lt Ouse Valley Fens Special Area of Conservation (SAC).

Place Services have therefore been requested by Babergh and Mid Suffolk Councils to complete a Habitats Regulations Assessment Addendum to address the comments provided by Natural England in their representation for the draft Joint Local Plan. In addition, a Technical Note on Air Quality has been requested to provide further clarification on the likely impacts upon the above referenced Habitats Sites.

2. Natural England's comments on Air Quality

"2.3 Screening and Impact Pathways – Air Quality

There is currently no mention of traffic emissions within this section of the report. This appears to be an oversight. Increased traffic emissions as a result of plan policies should be screened in at this stage as an LSE on 'habitat sites' cannot be discounted at this stage.

4.11 Air Quality

Previous comments on Air quality have also been provided on the previous page under the heading 2.3 Screening and Impact Pathways – Air Quality, we reiterate the importance of screening in air quality as a potential impact pathway.

4.11.1 "As a result, further air quality monitoring has been proposed in section 4.14.2, in relation to ever increasing traffic volume within the districts. These monitoring proposals do not relate to any specific policy or allocation and will not be further considered within section 4.11."

With reference to 4.11.1, air quality may not relate to a specific policy or allocation, but as it is a cumulative effect from many of the plans policies, then mitigation (and monitoring) does need to be considered at this stage.

Where information gaps remain, monitoring may need to be part of a mitigation package to prevent impacts. In such situations the monitoring should only be used as an early warning mechanism, with clear plans in place for action in light of monitoring findings, and with sufficient certainty that such action will be effective – a fall back "Plan B". Monitoring that simply informs of an effect is not a measure to prevent impacts. It is for the LPA to propose any monitoring methodology and fall back plan, and for NE to check these. NE may provide expertise in the design of that monitoring and fall back plan if requested to do so. I should note that it is my understanding that there has been a request to provide advice on this matter which has not yet been fulfilled by NE; however, a meeting is currently being arranged to discuss air quality monitoring and mitigation.

Policies / Allocations and Habitats Sites within Scope

Regarding 4.11.2, it is stated that the section is addressing water quality issues, when it should be addressing air quality issues. Further to this, the Deben Estuary SPA & Ramsar was screened out regarding Air quality according to table 8. The Deben is then assessed for air quality impacts within 4.11.3. Therefore, we are seeking clarification for this section.

4.11.4 states that "At HRA Screening stage the only policy listed as having the potential for Likely Significant Effects as a result of air quality issues was Policy LP24 - New Agricultural/Rural Buildings in the Countryside." Further to our previous comments on air quality, we believe that any policy which contributes to traffic emissions should be included at this stage."

3. Review

The Habitats Regulations Assessment – Appropriate Assessment has indicated that there are number of atmospheric pollutants which can result in direct or indirect impacts to Habitats sites, these include Acid Deposition, Nitrogen deposition (N), Ammonia (NH₃), Nitrogen oxides (NO_x), Ozone (O₃) and Sulphur Dioxide (SO₂). However, it is acknowledged that there are other air pollutants which can be harmful to human health.

Nitrogen deposition has been included as a key vulnerability/ factors affecting site integrity for the Site Improvement Plans for the Stour and Orwell Estuaries SPA and Minsmere to Walberswick Heaths & Marshes SPA, Deben Estuary SPA and Waveney and Little Ouse Valley Fens SAC because Nitrogen deposition exceeds relevant 'critical loads' for these sites. However, the Minsmere to Walberswick Heaths & Marshes SPA has been screened out within the Habitats Regulations Assessment – Appropriate Assessment because there no policies which would result in air pollution at the Habitats Site, which is also situated over 10km from the district boundaries of Babergh and Mid Suffolk.

For the purpose of clarification, it is highlighted that Critical Loads are defined as: *"a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge"*⁴.

Therefore, where Nitrogen deposition exceeds relevant critical loads there is a possibility that the eutrophication, acidification and changes to habitat type will be caused, which could affect qualifying

⁴ Air Pollution Information System. Critical Loads and Critical Levels - a guide to the data provided in APIS. Available from http://www.apis.ac.uk/critical-loads-and-critical-levels-guide-data-provided-apis#_Toc279788052 [Accessed March 2021].

features of a Habitat Site. Critical loads for nitrogen deposition are in units of kilogrammes of nitrogen per hectare per year (kg N/ha/year) and vary with habitat sensitivity⁵.

Stour and Orwell Estuaries SPA:

Nitrogen levels exceed the relevant critical loads at the Stour and Orwell Estuaries SPA for ecosystem protection and hence there is a risk of harmful effects. However, the sensitive features are currently considered to be in favourable condition on the site. The sensitive habitat features on site include intertidal mudflats coastal saltmarsh and vegetated shingle.

Although the APIS database⁶ considers that mudflats are sensitive to nitrogen deposition, there are no comparable habitats with established critical load estimates available and therefore no critical loads for intertidal mudflats are listed. In addition, there is no habitat terminology which meets definition of vegetated shingle, however coastal dunes will exceed relevant critical loads at 10-20 kg N ha⁻¹ year⁻¹. In terms of saltmarsh, this habitat will exceed relevant critical loads if nitrogen deposition exceeds 20-30 kg N ha⁻¹ year⁻¹. Furthermore, it is highlighted that impacts upon vegetated shingle and saltmarsh both require professional judgement to identify and will be noticeable if there is a productivity increase in late successional species and graminoids.

In terms of the individual qualifying features of the Stour and Orwell Estuaries SPA, the APIS database indicates that only wintering Great Crested Grebe (*Podiceps cristatus*) would be sensitive to increases in nitrogen deposition, if the relevant critical loads are exceeded for saltmarsh. However, it is uncertain how this species could be affected from increases of nitrogen deposition upon saltmarsh, as the species forages over open water during the wintering period. As a result, based on expert judgement, the only possible indirect link would be if nitrogen deposition upon saltmarsh changed fish stock levels in the estuary, which Great Crested Grebe feed upon during the winter period.

The APIS database provides indicates that the concentration and deposition values across the whole site the Stour and Orwell Estuary is 11.232 - 15.658 (kg N/ha/yr), which does not exceed the relevant critical loads upon saltmarsh. However, this data is measured from a desk study using 5km squares across the Stour and Orwell Estuary and is not specific enough to justify whether relevant critical loads will be exceeded within specific locations.

It is highlighted that Place Services previously referenced that nitrogen levels exceed the relevant critical loads for coastal dune Habitats used by breeding terns. However, the only location of shingle dunes is located outside of the boundaries of the districts, as the habitat is present on the Stour Estuary within

⁵ IAQM (June 2019). Available from <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2019.pdf> [Accessed March 2021].

⁶ APIS. Available from <http://www.apis.ac.uk/> [Accessed March 2021].

Tendring District Council, Essex⁷. In addition, breeding terns are not listed as a qualifying feature of the Stour and Orwell Estuaries SPA & Ramsar, as well as the underpinning Sites of Special Scientific Interest and not listed within the Site Improvement Plans. Therefore, this statement shall be reviewed further in the Habitats Regulations Assessment Addendum.

Deben Estuary SPA:

Nitrogen levels exceed the relevant critical loads at the Deben Estuary SPA, according to the Site Improvement Plans, which is likely being caused by in combination impacts from land spreading and land use practices with high nutrient inputs *e.g.* outdoor pig farms. The sensitive habitat features on site also include intertidal mudflats coastal saltmarsh and vegetated shingle. Therefore, the habitats present have the same relevant critical load thresholds for nitrogen deposition as the Stour and Orwell Estuaries SPA.

In terms of the individual qualifying features of the Deben Estuary SPA, the APIS database indicates that breeding Pied Avocet (*Recurvirostra avosetta*) and Dark-bellied Brent Goose (*Branta bernicla bernicla*) would be sensitive to increases in nitrogen deposition, if the relevant critical loads are exceeded for saltmarsh.

The APIS database provides indicates that the concentration and deposition values across the whole site the Deben Estuary SPA is 11.536 - 18.475 (kg N/ha/yr), which does not exceed the relevant critical loads upon saltmarsh. However, this data is measured from a desk study using 5km squares across the Deben Estuary and is not specific enough to justify whether relevant critical loads will be exceeded within specific locations.

Waveney and Little Ouse Valley Fens SAC:

Nitrogen levels also exceed the relevant critical loads at the Waveney and Little Ouse Valley Fens SAC, according to the Site Improvement Plans, with impacts likely being caused from agricultural practices. The sensitive habitat features include H6410 Purple moor-grass meadows, H7210 Calcium-rich fen (dominated by great fen sedge).

Moist and wet oligotrophic grasslands: Purple Moor Grass (*Molinia caerulea*) meadows will exceed the relevant critical loads at 15-25 kg N ha⁻¹ year⁻¹. This will cause the functional diversity of the grassland to be lost, as more common grass species dominate. The loss of forbs will have implications for pollinators and the aesthetic qualities of the ecosystem.⁸

⁷ The Suffolk Coast & Heaths AONB (2018). The Suffolk Coast & Heaths AONB Management Plan 2018-2023. Available from <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/SCH-AONB-Management-Plan-2018-23.pdf> [March 2021].

⁸ Stevens, C.J.; Maskell, L.C. ; Smart, S.M.; Caporn, S.J.M. ; Dise, N.B.; Gowing, D.J. 2009 Identifying indicators of atmospheric nitrogen deposition impacts in acid grasslands Biological Conservation 142 2069-2075

Whereas, Rich Fen habitats will exceed the relevant critical loads at 15-30 kg N ha⁻¹ year⁻¹. This will cause differentially impact upon the complex calcareous plant communities and potentially disrupt the balance between them.

In terms of the individual qualifying features of the Waveney and Little Ouse Valley Fens SAC, the APIS database indicates that only Desmoulin's Whorl Snail (*Vertigo moulinsiana*) would potentially be affected by increases in nitrogen deposition. However, the species is associated with rivers and streams and the APIS database indicates that there is no comparable habitat with established critical load to impacts to be estimated for this species.

The APIS database provides indicates that the concentration and deposition values across the whole site the Waveney and Little Ouse Valley Fens SAC is 21.864 - 26.759 (kg N/ha/yr). Therefore, nitrogen levels are clearly exceeding the relevant critical loads for both habitat types.

4. Conclusions of the Habitats Regulations Assessment

The Habitats Regulations Assessment – Appropriate Assessment has considered the potential for an Adverse Effect to Site Integrity upon Habitats Sites through changes in air quality as a result of new site allocations policies provided within the Joint Local Plan Pre-Submission (Regulation 19) Document (November 2020).

This identified that Policy LP24 – New Agricultural/ Rural Buildings in the Countryside could result in an Adverse Effect to Site Integrity upon the Stour and Orwell Estuaries SPA (and Ramsar), the Deben Estuary SPA (and Ramsar Site), Waveney & Little Ouse Valley Fens SAC and Redgrave and South Lopham Fens Ramsar site) from increases in nitrogen deposition, particularly from ammonia (NH₃) if projects are proposed which involve pig or poultry farming. As a result, changes to the policy text were made to ensure that impacts from air quality will be considered on designated sites. In addition, the following statement was made to ensure Air Quality Reports and project level Habitats Regulations Assessments are provided to support any future pig or poultry farming application within Babergh and Mid Suffolk Districts:

“4.11.8 Therefore, all applications which involve pig or poultry farming should contain an Air Quality Report to accompany the planning application. This should screen the proposal to check for the likelihood of significant effects from aerial emissions on the highlighted designated sites. This should particularly consider impacts from the development alone from ammonia and must conclude that the proposal will result in ammonia concentrations would be below the Natural England advisory criterion of 1% of the Critical Level OF 3.0 µg/m³ and the Critical Load of 10.0 kg/ha at the above designated sites. In addition, a project level Habitats Regulations Assessment – Appropriate Assessment should be undertaken by the Local Authority, to be reviewed by Natural England as the Nature Conservation Body.”

In addition, it was also presumed that the creation of new housing and infrastructure within the districts could result in increases of traffic on roads. Therefore, whilst no allocations sites are proposed immediately adjacent to Habitats Sites located within the Babergh and Mid Suffolk districts

boundaries, any increases in traffic on roads adjacent to these Habitats Sites may have the potential to result in an Adverse Effect to Integrity of Habitats Sites in combination with other plans and projects.

The Highways Agency Design Manual for Road and Bridges (DMRB)⁹ assumes that air pollution (i.e. nitrogen deposition and Sulphur Dioxide) from roads is unlikely to be significant beyond 200m from the road itself. Therefore, as there are no allocation sites within 200 metres, an Adverse Effect to Site Integrity of Habitats sites, from the development alone, will be avoided due to increases in traffic emissions. However, there are 12 locations which have been identified as being present within 200m from a Habitats Sites within Babergh and Mid Suffolk Districts. Therefore, if traffic levels were to increase in these locations as a result of the Joint Local Plan, with levels exceeding the relevant critical loads of nitrogen deposition and sulphur dioxide, this could result in an Adverse Effect to Site Integrity (in combination with other plans and projects).

Therefore, it is highlighted that the APIS database does not indicate that the sites where monitoring is proposed adjacent to the Stour and Orwell Estuaries SPA will exceed the relevant critical loads for the habitat present within 200 metres. However, it does indicate that the Waveney and Little Ouse Valley Fens SAC has exceeded its relevant critical loads for the relevant habitat present within 200 metres. Notwithstanding the above, it is Place Services position that traffic emission increases, as a result of the Joint Local Plan, would likely not occur at the indicated 12 locations. This is because each location is situated in a highly rural area and not located near to any allocation sites. Therefore, based on the evidence provided, an Adverse Effect to Site Integrity (in combination with other plans and projects) could be ruled out from impacts arising from increasing traffic as a result of the Joint Local Plan.

However, Place Services have recommended that a pragmatic approach is undertaken, which involves monitoring/modelling to be completed at these locations during the lifetime of the Joint Local Plan. This would identify whether increasing traffic emissions will exceed the relevant critical loads of nitrogen deposition and sulphur dioxide at these locations and ensure no reasonable scientific doubt about the adverse effects of the Joint Local Plan upon the indicated Habitats Sites.

It is highlighted that Place Services are aware of the implication of the Wealden Judgement, which means that it is no longer appropriate to scope out the need for a detailed assessment of an individual project or plan using, for example, the 1000 annual average daily traffic (AADT) increase in the Design Manual for Roads and Bridges (DMRB) or the 1% of the critical level or load used by Defra/Environment Agency without first considering the in-combination impact with other projects and plans. However, as impacts of increasing traffic are likely to be negligible and could be screened out, it is our position that the

⁹ Design Manual for Roads and Bridges (DMRB) (2019). Sustainability & Environment Appraisal LA 105 Air quality. Available at: <https://www.standardsforhighways.co.uk/dmrb/search/10191621-07df-44a3-892e-c1d5c7a28d90> [Accessed October 2020]



baseline information for the monitoring/modelling does not need to be submitted before the Joint Local Plan has been adopted.

Place Services and Babergh & Mid Suffolk District Councils attended a meeting with Natural England (Sam Kench – Lead Advisor and John Jackson – Senior Advisor) on the 5th February 2021 to discuss the proposed clarity changes recommended within Natural England’s representation. It was also to set out a strategy to ensure that sufficient detail will be provided within the Habitat Regulations Assessment including Appropriate Assessment to Avoid an Adverse Effect on the Integrity (AEOI) of Habitats Sites. This resulted in Natural England in agreeing with Place Services and Babergh & Mid Suffolk District Councils’ approach on Air Quality and confirmed that it would not be a constraint that would result in the Joint Local Plan not being adopted.

In terms of Natural England’s comments on the Deben Estuary for paragraphs 4.11.2 & 4.11.3, it is accepted that Deben Estuary SPA & Ramsar needs to be included in table 8, as the Deben Estuary SPA & Ramsar should not have been screened out. Furthermore, we can confirm that water quality was wrongly referenced in this section. As a result, these changes will be included within the Habitats Regulations Assessment Addendum.