

The Conservation (Natural Habitats &c.) Regulations 1994

Regulation 48 Assessment

Re: The Suffolk County Council Minerals & Waste Development Framework

Waste Core Strategy

1. Introduction:

Pursuant to Regulation 48 of the **Conservation (Natural Habitats &c.) Regulations 1994**, this is a Habitats Regulations Assessment of Suffolk County Council's Waste Core Strategy. Habitats Regulations Assessment (HRA) is the assessment of the impacts of a land use proposal against the conservation objectives of a **Natura 2000** site. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would adversely affect that site's integrity.

It is required because, in October 2005, the European Court of Justice ruled that the United Kingdom was obliged to carry out an Appropriate Assessment of any land use plan that might impact upon a designated Natura 2000 site. The legal basis for the HRA process stems from the EC **Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats & of Wild Flora & Fauna)** passed in to domestic law by way of the **Habitat Regulations (Conservation (Habitats &c) Regulations, 1994)**. As a consequence, any proposal that is not part of a specific management prescription that might have a significant effect on a Natura 2000 site must be subject to Habitats Regulations Assessment.

The principle is that projects should only be permitted when it has been proven that there will be no adverse effects on the integrity of a European Designated Site. The legislation can allow projects that may result in negative impacts on the integrity of a site if there are imperative reasons of overriding

public importance, however these will require suitable compensation to ensure that the overall integrity of such sites is retained.

The Legislation:

The Conservation (Natural Habitats, &c.) Regulations 1994

Part IV Adaptation of Planning and Other Controls

Regulation 48; Assessment of implications for European site:

- (1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which-
 - (a) is likely to have a significant effect on a European site in Great Britain (either alone or in combination with other plans or projects), and
 - (b) is not directly connected with or necessary to the management of the site, shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives.
- (2) A person applying for any such consent, permission or other authorisation shall provide such information as the competent authority may reasonably require for the purposes of the assessment.
- (3) The competent authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority may specify.
- (4) They shall also, if they consider it appropriate, take the opinion of the general public; and if they do so, they shall take such steps for that purpose as they consider appropriate.
- (5) In the light of the conclusions of the assessment, and subject to regulation 49, the authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.
- (6) In considering whether a plan or project will adversely affect the integrity of the site, the authority shall have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which they propose that the consent, permission or other authorisation should be given.
- (7) This regulation does not apply in relation to a site which is a European site by reason only of regulation 10(1) (c) (site protected in accordance with Article 5(4)).

Within the County of Suffolk there are a number of Natura 2000 sites, recorded as **Special Areas for Conservation (SACs)** and **Special Protection Areas (SPAs)**. The list of these sites - that could conceivably sustain a significant effect - together with the Conservation Objectives for the features of European interest on their component Sites of Special Scientific Interest (SSSI) are set out in Table 1: **"SACs & SPAs and their Conservation Objectives"** below. Included within the list are some Natura 2000 sites that are not partly or wholly within Suffolk. They are included because it is possible that these sites could also sustain significant effects from some of the impacts set out below as they are close to or adjacent to this County.

Natura 2000 Sites: Ramsars, SACs and SPAs

Some explanation may be helpful in resolving the myriad number of designations and acronyms within this document.

The Ramsar List of Wetlands of International Importance is a result of an inter-governmental treaty "The Convention on Wetlands of International Importance especially as Waterfowl Habitat" which was signed in the town of Ramsar, Iraq in 1971 ("The Ramsar Convention"). It was ratified into UK Law in 1976 and the UK Government is fully committed to implementation of the Convention. All Ramsar sites in England are Sites of Special Scientific Interest (SSSIs). All Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) are constituted from component SSSIs.

'Natura 2000' is the name given to the European Union-wide network of nature conservation sites designated under two EU Directives: Council Directive 79/409/EEC on the Conservation of Wild Birds ('The Birds Directive') and Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora ('The Habitats Directive'). The former sites are classified as SPAs and the latter as SACs. The sites thus designated under these Directives include most Ramsar sites in England and they are, therefore, part of the Natura 2000 network.

2. Method:

This Habitats Regulations Assessment has followed the following methodological steps:

(a) Identification of European Sites that could sustain significant effects from the implementation of the Waste Core Strategy

This information is available to Suffolk County Council from the regularly updated records held in our MapInfo system. This produces accurate information on each site including the name, Joint Nature Conservation Committee (JNCC) code, location and area. We also hold paper records of each designated site and are able to use the publically accessible parts of the JNCC website to confirm information. The MapInfo record is updated by Suffolk Biological Records Centre (SBRC) from time-to-time as appropriate. The list of sites that might receive impacts is shown in Table 1.

(b) Acquisition, examination and understanding of the Conservation Objectives for each European site that could potentially be affected.

The relevant information on the Conservation Objectives for the European interest on each relevant SSSI compartment within the SPA or SAC has been obtained from Natural England. The complete list of Conservation Objectives is shown in Table 1. This information has been considered in detail by professional County Council Ecologists.

In addition, considerable reliance has been placed on the “**Review of Emissions from Potential Waste Processing Sites: Cumulative Assessment and Assessment of Ecological Impacts upon Natura 2000 Sites within 20km**” prepared by The Landscape Partnership (Dr. J. Parmenter) and dated May 2009 and which accompanies this Assessment.

The Landscape Partnership’s report is based on the “**Cumulative Air Quality Assessment of Potential Waste Facilities to inform an Appropriate Assessment**” produced by Entec UK Limited (Daniel Moon) and dated May 2009 which also accompanies this Assessment.

A professional judgement has been made based on the information contained in the above-mentioned reports together with an understanding of the effects of different factors upon, for example, breeding birds during the summer, feeding birds over winter and impacts upon habitats as a result of increased levels of Nitrates and other chemicals.

The judgement has also been informed by the Natural England publication “**State of the Natural Environment Report; Resource Document: Coastal Habitats**” (Natural England, 2008), particularly Chapter 8: **Key Issues**.

A detailed series of discussions have been entered into with Natural England regarding the Waste Core Strategy itself and this Habitats Regulations Assessment. This final version is the result of that iterative process.

(c) Consideration of the effects of the Policies within the Waste Core Strategy and the likely impact that they may have on the European Sites.

The matters of concern for each of the Natura 2000 sites include how, for example, the provision of new waste treatment facilities could impact upon sensitive ecological receptors due to factors such as the potential increase in harmful atmospheric emissions. The issue of local air quality and pollutant

deposition has been researched by Entec Ltd. and their results have been analysed and assessed in The Landscape Partnership's report mentioned above.

Explanations of the methodology and the results are given in their report but, in brief, scientific forecasts have been made on how increased levels of certain chemicals (which may be produced as a result of these constructions) might impact upon the sensitive habitats highlighted in Table 1 below. This is the **Critical Load** or that point at which the effects of, for example, fertilisation, are believed to result in significant impacts. Reference should be made to pages 2 and 3 of the report for fuller details. In the study of air pollution, a Critical Load is defined as "*A quantitative estimate of an 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*". (Nilsson and Grennfelt 1988).

If the contribution forecast by the proposed waste sites exceeds 1% of the Critical Load threshold, this is likely to present an increased risk of significant impacts upon the Natura 2000 sites and further, site-specific investigation may be required once the specifications for each proposal are known.

For the purposes of this Habitats Regulations Assessment, simply the policies themselves will be considered.

In addition, the concerns raised by Natural England in our discussions have raised the issue of a potential increase in numbers of Gulls and Corvids attracted to landfill sites and potential problems of contaminated groundwater feeding into local estuarine sites. Both of these factors could, conceivably, have likely significant effect upon Natura 2000 sites unless appropriate controls are put in place and monitored.

(d) Assessment of Implications and Consultation pursuant to Regulation 85B of the Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007.

The potential implications for the sites across Suffolk include the following:

- Disturbance from construction processes, that is the physical movements, noise etcetera, together with the visual disturbance and potential interference with the movement of biodiversity caused by the finished structures.
- Disturbance from the infrastructure associated with construction processes, that is the building of new roads, paths and any other highway (either public or private) together with the increased disturbance and pollution from the traffic using them.
- Disturbance from new street lighting, lights on, in and around new buildings, vehicle headlamps and all other artificial illumination.
- Disturbance consequent upon the operation of any new facilities. This may include such factors as vehicle movements, lighting, corvid and gull activity.
- Increased risk of pollution to streams, dykes and ditches as well as the main water courses themselves from construction processes and industrial, domestic and recreational use of any new development.
- Potential damaging effects upon the hydrology including quality and quantity of water flow into SACs and/or SPAs. This includes increased water use.
- Increased air pollution (from construction, use, commuting, recreational and occupation of the district) having a detrimental effect on sensitive species and habitats.
- Increased air pollution and pollutant deposition in the form of Nitrogen Oxide (NO_x) from burning processes: these pollutants act as a fertiliser enabling competitive plant species such as

some grass species to out-compete some of the more specialist, low-nutrient plant species on the areas of Heathland and Grassland.

- Increased air pollution and pollutant deposition in the form of Acidification from burning processes: the acid soils of Heathland and Dry-Acid Grassland are unable to neutralise excess acids which can lead to plant damage through impaired photosynthesis and the leaching of essential nutrients. Lichens are particularly sensitive to pH changes.
- The specific effects of pollutant deposition on the composition and integrity of Mudflats including Estuarine Invertebrates.

This series of potential issues has formed the basis of Suffolk County Council's consultations with Natural England and will also inform the public consultation which has now commenced.

(e) Dealing with negative and potentially negative impacts on the features of European interest.

Natural England have been fully involved throughout the draft stages of the Habitats Regulations Assessment of the Waste Core Strategy resulting in a number of positive changes and amendments to the policies which will remove, as far as can be forecast at this stage, the risk of significant impacts upon Natura 2000 Sites in Suffolk and neighbouring counties.

The result of this iterative process has been that Policy WCS 7 "General Considerations Relevant to all Waste Management Facilities" has been amended with the following wording:

"In general, waste management development will be acceptable so long as the proposals adequately address, where appropriate, the following: (a) Potential for adverse impact upon the integrity of Natura 2000 sites."

(f) Mitigation

During the consultation process, Natural England have raised various concerns (mentioned above) but this process has led to certain changes of Policies within the Waste Cores Strategy which will result in "built-in" mitigation of any likely significant effects upon Natura 2000 sites.

The mitigation strategies include (but are not limited to):

Landfill Sites:

- Raptors (which are commonly used)
- Gas gun type scarers
- Reflective scarers of various types
- Netting (in extreme cases)
- Daily covering of the freshly tipped waste with inert materials (which is standard practice)
- Pyrotechnics
- Helium filled kites
- Kites

Landfill Sites – measures to protect groundwater:

- Risk based analysis of existing hydro-geological environment surrounding potential void space including sensitive surrounding receptors

- Fully lined and capped void space
- Active leachate management
- Surface run-off water management

Energy from Waste:

- Adjustment of stack height to disperse emissions
- High temperature combustion to destroy pollutants
- Activated carbon to remove pollutants
- Bag filters to remove particulates
- Negative air pressure buildings to contain odours
- Acoustic cladding to contain noise within buildings
- Lighting schemes designed to minimise impact upon surrounding areas
- Sustainable drainage schemes to protect water resources

Mechanical & Biological Treatment:

- Bark filters to contain odours within buildings
- Negative air pressure buildings to contain odours
- Acoustic cladding to contain noise within buildings
- Lighting schemes designed to minimise impact upon surrounding areas
- Sustainable drainage schemes to protect water resources

Suitable measures will be required to be put in place and programmes of monitoring meeting, for example, Environment Agency requirements, will be specific within planning conditions.

We believe that these strategies along with the requirement for any proposal to demonstrate that it will not result in adverse impacts upon the integrity of any Natura 2000 site, will result in successful mitigation of any potential harm to features of European conservation interest.

3. Description of the Waste Core Strategy:

The Waste Core Strategy Submission Draft dated December 2009 and forming part of the Minerals & Waste Development Framework is to be read in conjunction with this document.

The Aims of the Strategy are:

Aim 1: To manage that volume of waste identified in the East of England Plan as being apportioned to Suffolk.

Aim 2: To promote and encourage sustainable practices in the transportation and management of wastes.

Aim 3: To contribute to social and economic well-being.

Aim 4: To protect against adverse impacts on human well-being and to ensure waste management facilities do not endanger human health.

Aim 5: To protect and enhance the built, natural and historic environment.

Aim 6: To assist in reducing the impacts of climate change upon the environment.

The list of Aims is supplemented by a list of 11 Objectives of which Objective 9 states:

“To minimise adverse ecological and geological/geomorphological impacts and to encourage opportunities for restoration, creation and enhancement of wildlife habitats.”

Objective 10 states:

“To minimise adverse impacts on water quality”

Suffolk County Council is confident that these Objectives will inform and underline their implementation of the Waste Core Strategy via Policies and proposals.

Suffolk County Council does not propose to further assess these Aims within this Assessment as the detailed Waste Core Strategy Policies are a far more accurate way of determining any potential impacts on the Conservation Objectives for the European Interests on each SSSI.

In relation to this Habitats Regulations Assessment, these Objectives are further reinforced by the addition to WCS7 “General Considerations Relevant to all Waste Management Facilities” which states:

“In general, waste management development will be acceptable so long as the proposals adequately address, where appropriate, the following: (a) Potential for adverse impact upon the integrity of Natura 2000 sites.”

This important addition will cover all land use policies within the Waste Core Strategy.

4. Conservation Objectives:

Table 1: SACs & SPAs and their Conservation Objectives:

Special Areas of Conservation (SAC)/Special Protection Areas (SPA)	SSSI Compartment	Conservation Objectives for the European interests on the SSSI
Benacre to Easton Barents Lagoons SAC	Benacre to Easton Barents SSSI	Subject to natural change, to maintain, in favourable condition, the saline lagoon feature.
Breckland SAC	RAF Lakenheath SSSI	To maintain, in favourable condition, the: <ul style="list-style-type: none"> • Inland Dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands. • Semi-natural Dry Grasslands and Scrubland Facies: on calcareous substrates (<i>Festuco-Brometalia</i>). •

Breckland SAC and Breckland SPA	Berner's Heath, Icklingham SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • European Dry Heaths. • Semi-natural Dry Grasslands and Scrubland Facies: on calcareous substrates (<i>Festuco-Brometalia</i>). <p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>*Stone Curlew, Woodlark, Nightjar.</p>
Breckland SAC and Breckland SPA	Bridgham and Brettenham Heaths SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • European Dry Heaths. <p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>*Stone Curlew, Woodlark, Nightjar.</p>
Breckland SAC and Breckland SPA	Cavenham-Icklingham Heaths SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • European Dry Heaths. • Alluvial Forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alno incanae</i>, <i>Salicion alvae</i>). <p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>*Stone Curlew, Woodlark, Nightjar.</p>
Breckland SAC and Breckland SPA	Deadman's Grave, Icklingham SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • Semi-natural Dry Grasslands and Scrubland Facies: on calcareous substrates (<i>Festuco-Brometalia</i>) <p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland

		<ul style="list-style-type: none"> Chalk Grassland and/or Inland Dune Communities. <p>* Woodlark, Nightjar, Stone Curlew.</p>
Breckland SAC and Breckland SPA	Foxhole Heath, Eriswell SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> Semi-natural Dry Grasslands and Scrubland Facies: on calcareous substrates (<i>Festuco-Brometalia</i>) <p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> Heathland Acid Grassland Chalk Grassland and/or Inland Dune Communities. <p>* Woodlark, Stone Curlew.</p>
Breckland SAC and Breckland SPA	Lakenheath Warren SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> Semi-natural Dry Grasslands and Scrubland Facies: on calcareous substrates (<i>Festuco-Brometalia</i>). European Dry Heaths. <p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> Heathland Acid Grassland Chalk Grassland and/or Inland Dune Communities. <p>* Woodlark, Stone Curlew, Nightjar.</p>
Breckland SAC and Breckland SPA	Thetford Heath SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> Semi-natural Dry Grasslands and Scrubland Facies: on calcareous substrates (<i>Festuco-Brometalia</i>). European Dry Heaths. <p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> Heathland Acid Grassland Chalk Grassland and/or Inland Dune Communities. <p>* Woodlark, Nightjar, Stone Curlew.</p>
Breckland SAC and Breckland SPA	Wangford Warren and Carr SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> Inland Dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands. <p>To maintain, in favourable condition, the habitats for the populations of</p>

		<p>the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>* Woodlark, Nightjar, Stone Curlew.</p>
Breckland SAC and Breckland SPA	Weather and Horn Heaths, Eriswell	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • European Dry Heaths. <p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>* Woodlark, Nightjar, Stone Curlew.</p>
Minsmere to Walberswick Heath and Marshes SAC	Minsmere to Walberswick Heath and Marshes SSSI	<p>Subject to natural change, to maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • Annual vegetation of drift lines • Perennial vegetation of stony banks <p>To maintain, to maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • European dry heaths <p>To maintain, in favourable condition, the habitats for the populations of Annex 1 species of European importance¹ with particular reference to:</p> <ul style="list-style-type: none"> • Shingle • Swamp, marginal and inundation communities • Saltmarsh • Standing water • Grassland • Heathland <p>¹Avocet, Bittern, Little Tern, Marsh Harrier, Nightjar, Woodlark, Hen Harrier.</p> <p>To maintain, in favourable condition, the habitats for the populations of migratory bird species of European importance² with particular reference to:</p> <ul style="list-style-type: none"> • Grassland, marsh and standing water <p>²Gadwall, Teal, Shoveler, European White-Fronted Goose.</p>
Waveney & Little Ouse Valley Fens SAC	Blo' Norton and Thelnetham Fens SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • Calcareous Fens with <i>Cladium mariscus</i> and the species of the <i>Caricion davallianae</i>. • <i>Molinia</i> Meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>).

Waveney & Little Ouse Valley Fens SAC	Redgrave and Lopham Fens SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • Calcareous Fens with <i>Cladium mariscus</i> and the species of the <i>Caricion davallianae</i>. • <i>Molinia</i> Meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>).
Waveney & Little Ouse Valley Fens SAC	Weston Fen SSSI	<p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • Calcareous Fens with <i>Cladium mariscus</i> and the species of the <i>Caricion davallianae</i>. • <i>Molinia</i> Meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>). <p>To maintain, in favourable condition, the habitats for the population of Desmoulin's Whorl Snail (<i>Vertigo moulinsiana</i>).</p>
Benacre to Easton Bavents SPA	Benacre to Easton Bavents SSSI	<p>To maintain, in favourable condition, the habitats for the populations of Bittern (<i>Botaurus stellaris</i>) and Marsh Harrier (<i>Circus aeruginosus</i>), with particular reference to swamp, marginal and inundation and standing water.</p> <p>Subject to natural change, to maintain in favourable condition, the habitats for the populations of Little Tern (<i>Sterna albifrons</i>), with particular reference to shingle and shallow coastal waters.</p>
Breckland SPA	Barnham Heath SSSI	<p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>* Stone Curlew.</p>
Breckland SPA	Eriswell Low Warren SSSI	<p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>* Stone Curlew, Woodlark.</p>
Breckland SPA	How Hill Track SSSI	<p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>* Stone Curlew.</p>

Breckland SPA	Little Heath, Barnham SSSI	<p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>* Stone Curlew, Nightjar, Woodlark.</p>
Breckland SPA	West Stow Heath SSSI	<p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>* Woodlark, Nightjar.</p>
Breckland SPA/Rex Graham Reserve SAC	Rex Graham Reserve SSSI	<p>To maintain, in favourable condition, the habitats for the populations of the Annex 1 species* , of European importance, with particular reference to:</p> <ul style="list-style-type: none"> • Heathland • Acid Grassland • Chalk Grassland and/or Inland Dune Communities. <p>* Nightjar.</p> <p>To maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • Semi-Natural Dry Grasslands and Scrubland Facies on calcareous substrates (<i>Festuco-Brometalia</i>) (important Orchid sites).
Deben Estuary SPA	Deben Estuary SSSI	<p>Subject to natural change, to maintain, in favourable condition, the habitats for the regularly occurring Annex 1 bird species and the regularly occurring migratory bird species¹, of European importance, with particular reference to intertidal saltmarsh and mudflats.</p> <p>¹Avocet, Brent Goose.</p>
Hamford Water SPA	Hamford Water SSSI	<p>Subject to natural change, to maintain the following habitats and geological features in favourable condition, with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, SAC, SPA, Ramsar) as listed in the Conservation Objectives Document prepared by Natural England and dated 2nd October 2008.</p> <p>Habitat types represented (BAP Categories):</p> <ul style="list-style-type: none"> • Broadleaved, Mixed and Yew Woodland (Lowland) • Arable & Horticulture

		<ul style="list-style-type: none"> • Neutral Grassland (Lowland) • Supralittoral Sediment • Littoral Sediment • Coastal Lagoon.
Minsmere – Walberswick SPA	Minsmere to Walberswick Heath and Marshes SSSI	<p>Subject to natural change, to maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • Annual vegetation of drift lines • Perennial vegetation of stony banks <p>To maintain, to maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> • European dry heaths <p>To maintain, in favourable condition, the habitats for the populations of Annex 1 species of European importance¹ with particular reference to:</p> <ul style="list-style-type: none"> • Shingle • Swamp, marginal and inundation communities • Saltmarsh • Standing water • Grassland • Heathland <p>¹Avocet, Bittern, Little Tern, Marsh Harrier, Nightjar, Woodlark, Hen Harrier.</p> <p>To maintain, in favourable condition, the habitats for the populations of migratory bird species of European importance² with particular reference to:</p> <ul style="list-style-type: none"> • Grassland, marsh and standing water <p>²Gadwall, Teal, Shoveler, European White-Fronted Goose.</p>
Sandlings SPA	Blaxhall Heath SSSI	To maintain, in favourable condition, the habitats for the populations of Woodlark (<i>Lullula arborea</i>) and Nightjar (<i>Caprimulgus europaeus</i>).
Sandlings SPA	Leiston – Aldeburgh SSSI	To maintain, in favourable condition, the habitats for the populations of Woodlark (<i>Lullula arborea</i>) and Nightjar (<i>Caprimulgus europaeus</i>).
Sandlings SPA	Sandlings Forest SSSI	To maintain, in favourable condition, the habitats for the populations of Woodlark (<i>Lullula arborea</i>) and Nightjar (<i>Caprimulgus europaeus</i>).
Sandlings SPA	Sutton and Hollesley Heath SSSI	To maintain, in favourable condition, the habitats for the populations of Woodlark (<i>Lullula arborea</i>) and Nightjar (<i>Caprimulgus europaeus</i>).
Sandlings SPA	Snape Warren SSSI	To maintain, in favourable condition, the habitats for the populations of Woodlark (<i>Lullula arborea</i>) and Nightjar (<i>Caprimulgus europaeus</i>).
Sandlings SPA	Tunstall Common SSSI	To maintain, in favourable condition, the habitats for the populations of Woodlark (<i>Lullula arborea</i>) and Nightjar (<i>Caprimulgus europaeus</i>).
Stour and Orwell Estuary SPA	Stour Estuary SSSI	Subject to natural change, to maintain, in favourable condition, the habitats for the populations of the regularly occurring migratory bird

		species ¹ , of European importance, with particular reference to intertidal mudflats and saltmarsh. ¹ Golden Plover, Black-Tailed Godwit, Dark-Bellied Brent Goose, Dunlin, Grey Plover, Redshank, Ringed Plover, Shelduck, Turnstone.
Stour and Orwell Estuary SPA	Orwell Estuary SSSI	Subject to natural change, to maintain, in favourable condition, the habitats for the populations of the regularly occurring migratory bird species ¹ , of European importance, with particular reference to intertidal mudflats, saltmarsh and grazing marsh. ¹ Black-Tailed Godwit, Dark-Bellied Brent Goose, Dunlin, Grey Plover, Redshank, Ringed Plover, Shelduck, Turnstone.

5. Effects of The Waste Core Strategy Policies on the Conservation Objectives for the Features of European Interest on each SSSI:

All of the abovementioned stages have been consolidated into the Table 2 below. Each policy has been looked at carefully, guidance has been taken from all of the sources described in 2(b) and the range of impacts described in 2(c) applied to the Conservation Objectives listed in Table 1.

This has enabled us to categorise the likely impacts as either “Possible Significant Impacts” or “No Likely Significant Impacts”.

These conclusions have been arrived at by using our professional judgement based on the available evidence (referred to above) and our knowledge of the sites (often personal) and the types of habitats and species found there.

Table 2 “Impacts of the Waste Core Strategy and Policies on European Sites”

Policy No:	Policy:	Explanation:	Impact:	Comments
WCS 1	The Spatial Waste Planning Strategy for Suffolk	Preference will be given to proposals for waste management facilities in accordance with the Key Diagram where individual sites are well related to the Suffolk Lorry Route Network, centres of population and sources of waste and do not have adverse impacts upon features of environmental importance or endanger human health.	No Likely Significant Impacts	Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals

				<p>must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>
WCS 2	Management of Sub-Regional Apportionment	<p>Provision will be made to manage those volumes of Municipal Solid Waste, Commercial & Industrial Waste and London Waste identified in the East of England Plan as being apportioned to Suffolk during the plan period. This apportionment may be subject to change as a result of revision of regional guidance. The latest adopted sub-regional apportionment will be applied in calculating the provision to be made for waste management facilities. Until a revised apportionment is adopted to cover the period until 2026 the figures set out below will be used.</p> <p>Proposals for new waste management development or an extension of existing waste development will only be permitted where there is a demonstrated need in compliance with Table 6. When considering the need for such facilities the County Council will take into account the capacity of existing recycling, composting, recovery and disposal facilities and proposed facilities that have planning permission or are the subject of a current planning application.</p> <p>Permission may be granted for waste development involving importation of waste from outside the Plan area where this is demonstrated to maximise recycling, composting and recovery of waste materials and be the most</p>	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>

		sustainable option, taking into account regional self sufficiency and the Regional Spatial Strategy, proximity to point of waste arising and the waste hierarchy.		
WCS 3	Provision for the Recycling and Composting of Waste	The County Council will plan for a quantity of waste recycling and composting of at least 1,476,300 tonnes per annum, in compliance with Table 6. Relevant planning applications will be determined by reference to the appropriate criteria based policies. When considering the need for such facilities the County Council will take into account the capacity of existing recycling and composting facilities and proposed facilities that have planning permission or are the subject of a current planning application.	No Likely Significant Impacts	Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites. See WCS Objectives 9 & 10 and Policy WCS 7.
WCS 4	Proposed sites for Strategic Residual Waste Treatment Facilities	The County Council will plan for a quantity of Residual Waste Treatment capacity of up to 599,700 tonnes of waste per annum, in compliance with Table 6. Favourable consideration will be given to proposals for Strategic Residual Waste Treatment Facilities (annual capacity of 100,000 tonnes or more) within the following locations: a) Specific Site 29, Suffolk County Council Highways Depot, Lodge Lane, Great Blakenham; b) Area of Search Site 2, Former Sugar Refinery, Sroughton Road,	Likely Significant Impacts (Subject to site-specific Habitats Regulations Assessment and any necessary mitigation to meet Policy WCS 7).	Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all

		<p>Sproughton;</p> <p>c) Area of Search Site 27, Eye Airfield Industrial Estate, Eye and Brome, and;</p> <p>d) Area of Search Site 28, Masons Quarry, Great Blakenham.</p> <p>When considering the need for such facilities the County Council will take into account the capacity of existing recycling, composting and recovery facilities and proposed facilities that have planning permission or are the subject of a current planning application. The treatment of waste that could practicably be recycled or composted will not be acceptable. Conditions will be placed on planning permissions to ensure that only residual source-separated or pre-sorted waste is treated. Facilities that burn waste must provide for the recovery of energy and the use of combined heat and power will be encouraged.</p>		<p>future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>
WCS 5	Specific sites for Non-hazardous Landfill	<p>The County Council will plan for a quantity of Non-Hazardous Landfill capacity of up to 1,114,766 tonnes, in compliance with Table 6. Favourable consideration will be given to the following proposals for Non-Hazardous Landfill:</p> <p>a) extension of time and broadening of accepted waste categories to include Municipal Solid Waste residues at Site W7, Layham Landfill Site, Layham;</p> <p>b) establishment of new Non-hazardous Landfill at Site 67, Thorington;</p> <p>c) extension to existing Non-hazardous Landfill at Site W17, Foxhall Landfill Site, Foxhall, and;</p> <p>d) re-contouring of existing Non-hazardous Landfill at Site W11, Masons Landfill Site, Great Blakenham.</p> <p>When considering the need for such facilities the County Council will take into account the capacity of</p>	<p>Likely Significant Impacts (Subject to site-specific Habitats Regulations Assessment and any necessary mitigation to meet Policy WCS 7).</p>	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS</p>

		<p>existing recycling, composting, recovery and landfill facilities and proposed facilities that have planning permission or are the subject of a current planning application.</p> <p>The landfilling of waste that could practicably be recycled, composted or recovered will not be acceptable. Conditions will be placed on planning permissions to ensure that only residual source-separated or pre-sorted waste is land-filled. Proposals for landfill gas energy recovery will be required.</p>		Objectives 9 & 10 and Policy WCS 7.
WCS 6	Safeguarding of waste management sites	<p>The Waste Planning Authority will seek to safeguard existing sites and sites proposed for the re-use, recycling and composting, transfer, treatment, recovery or disposal of waste as shown in Appendix 1 of the Waste Core Strategy and on the Proposals and Inset Maps and will object to development proposals that would prevent or prejudice the use such sites for those purposes unless suitable alternative provision is made.</p> <p>The Waste Planning Authority will seek to safeguard Areas of Search identified in policy WCS4 and shown on the Proposal and Inset Maps and will object to development proposals that would prevent or prejudice the potential for a strategic residual waste treatment facility. This safeguarding is not intended to preclude other forms of development within the Area of Search which do not prejudice or would not be prejudiced by a strategic residual waste treatment facility.</p> <p>Development proposals in close proximity to existing sites, Specific Sites or Areas of Search should demonstrate that they would not prejudice or be prejudiced by a waste management facility. The</p>	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>

		safeguarding policy will also apply to any site where planning permission has already been granted.		
WCS 7	General considerations relevant to all waste management facilities	<p>In general waste management development will be acceptable so long as the proposals adequately address, where appropriate, the following:</p> <ul style="list-style-type: none"> a) Potential for adverse impact upon the integrity of Natura 2000 sites; b) Potential flood risk; c) Proposed vehicle movements and access; d) Potential impact upon landscape; e) Potential impact upon biodiversity; f) Potential impact upon archaeological or cultural heritage; g) Requirements of PPG13 including the use of rail freight shipping; h) Compatibility with neighbouring land use; i) Potential impact upon agricultural land; j) Potential impact from noise and vibration; k) Potential impact upon air quality including odour; l) Potential visual impact; m) Potential impact upon the local water environment; n) Land instability; o) Site management issues including litter, vermin and birds. 	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and this Policy at sub-section (a).</p>
WCS 8	Approval of sites for disposal of inert waste by landfilling or landraise.	<p>Additional voidspace or areas of landraise for the deposit of inert waste will be acceptable where:</p> <ul style="list-style-type: none"> a) There is an identified need for inert waste to be disposed of in this manner. When considering the need for the disposal of inert waste by landfill or landraise the County Council will take into account the capacity of existing inert waste recycling and landfill facilities and proposed facilities that have 	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and</p>

		<p>planning permission or are the subject of a current planning application;</p> <p>b) There is no acceptable alternative form of waste management that can be made available to meet the need. The landfilling of inert waste that could practicably be recycled will not be acceptable. Conditions will be placed on planning permissions to ensure that only pre-sorted wastes are land-filled;</p> <p>c) The proposals comply with the general considerations set out in Policy WCS7.</p>		<p>agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>
WCS 9	<p>Approval of sites for disposal of non-hazardous waste by landfilling or landraise.</p>	<p>Additional voidspace or areas of landraise not specifically identified in the Waste Core Strategy for the deposit of non-hazardous wastes will be approved where:</p> <p>a) There is an identified need for waste apportioned to Suffolk by the East of England Plan to be disposed of in this manner, with reference to Table 6. When considering the need for such facilities the County Council will take into account the capacity of existing recycling, composting, recovery and landfill facilities and proposed facilities that have planning permission or are the subject of a current planning application or are identified within the Waste Core Strategy, and;</p> <p>b) No acceptable alternative form of waste management can be made available to meet the need. The landfilling of waste that could practicably be recycled, composted or recovered will not be acceptable. Conditions will be placed on planning permissions to ensure that only residual source-separated or pre-sorted waste is land-filled, and;</p> <p>c) The site meets the specific criteria set out in Appendix 4 and Policy WCS7.</p> <p>Proposals for landfill gas energy recovery will be required.</p>	<p>No Likely Significant Impacts</p>	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>

<p>WCS 10</p>	<p>General Waste Management Facilities</p>	<p>General waste management facilities (other than strategic residual waste management facilities and landfill sites) are considered, in principle, unless otherwise stated, to be suitable for location within the following areas: a) Land in existing waste management use; b) Land in existing General Industrial use (B2 Use Class) or in existing Storage or Distribution use (B8 Use Class) (excluding open air composting); c) Land allocated for B2 and B8 purposes in a Local Plan or Development Plan Document (excluding open air composting); d) Redundant Agricultural and Forestry Buildings; e) Agricultural and Forestry Land (open air composting only); f) Brownfield land (excluding open air composting); g) Unallocated Former Airfields (open air composting only); h) Waste Water Treatment Facilities (enclosed composting and anaerobic digestion only); i) Current and former mineral workings (open air composting and construction, demolition and excavation waste recycling only). Proposals must also comply with the general considerations set out in Policy WCS7. When considering the need for such facilities the County Council will take into account, where applicable, if there is an identified need for waste apportioned to Suffolk by the East of England Plan to be disposed of in this manner, with reference to Table 6. as well as the capacity of existing recycling, composting, recovery and disposal facilities and proposed facilities that have planning permission or are the subject of a current planning application.</p>	<p>No Likely Significant Impacts</p>	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>
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WCS 11	Residual Waste Treatment facilities with a capacity of less than 100,000 tonnes annual throughput	<p>Residual Waste Treatment facilities with a capacity of less than 100,000 tonnes annual throughput will be acceptable where the proposed facility is on land:</p> <p>(a) Within the uses set out in Policy WCS 10, and;</p> <p>(b) The site meets the specific criteria set out in Appendix 3 and Policy WCS 7.</p> <p>The treatment of waste that could practicably be recycled or composted will not be acceptable. Conditions will be placed on planning permissions to ensure that only residual source separated or pre-sorted waste is treated. Facilities that burn waste must provide for the recovery of energy and the use of combined heat and power will be encouraged.</p>	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>
WCS 12	Waste Transfer Stations, Materials Recycling Facilities, End of Life Vehicle Facilities and Waste Electrical and Electronic Equipment Recovery Facilities.	<p>Waste Transfer Stations and Material Recycling Facilities End of Life Vehicle Facilities and Waste Electrical and Electronic Equipment Recovery Facilities will be acceptable within purpose designed or suitably adapted facilities on land within the uses identified within Policy WCS 10.</p> <p>Proposals for such facilities at landfill sites will be considered acceptable on a temporary basis whilst landfilling and restoration activity is taking place on site. Any temporary planning permissions will be linked to the time limits relating to the landfill activities on site.</p> <p>The proposals shall comply with the general considerations set out in Policy WCS7.</p>	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the</p>

				<p>integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>
WCS 13	Household Waste Recycling Centres	<p>Household Waste Recycling Centres will be acceptable within purpose designed or suitably adapted facilities on land within the land uses identified within Policy WCS 10.</p> <p>Proposals for such facilities at landfill sites will be considered acceptable on a temporary basis whilst landfilling and restoration activity is taking place on site.</p> <p>Any temporary planning permissions will be linked to the time limits relating to the landfill activities on site</p> <p>Where it can be demonstrated that no suitable sites consistent with Policy WCS10 are available within the area to be served by the Household Waste Recycling Centre, Household Waste Recycling Centres will be acceptable on other sites provided these are consistent with Policy WCS7 and are accessible to the public.</p>	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>
WCS 14	Enclosed Composting Facilities	<p>Enclosed composting facilities will be acceptable on land within the uses identified within Policy WCS10.</p> <p>Proposals for enclosed composting will not be approved unless they are accompanied by a site-specific risk assessment which shows that the bio-aerosol levels can be maintained at appropriate levels at dwelling or workspaces within 250m of a facility. Appropriate schemes for the management of odours and dust will also be required.</p> <p>Proposals shall comply with the</p>	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding</p>

		<p>general considerations set out in Policy WCS7.</p>		<p>this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS</p>
WCS 15	Open Air Composting	<p>Open air composting facilities will be acceptable on land within the uses identified within Policy WCS10.</p> <p>At landfill sites, open air composting proposals that will extend the life of landfill operations will be acceptable if the continued operations do not:</p> <ul style="list-style-type: none"> a) Result in unacceptable environmental damage, or; b) Perpetuate recycling activity poorly related in relation to sources of waste, or; c) Lead to unreasonable delay in restoration. <p>Proposals for open air composting will not be approved unless they are accompanied by a site-specific risk assessment based on clear independent evidence which shows that the bio-aerosol levels can be maintained, throughout the life of the operations, at appropriate levels at dwellings or workspaces within 250m of a facility. Appropriate schemes for the management of odours and dust will also be required.</p> <p>Proposals shall comply with the general considerations set out in Policy WCS7.</p>	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7</p>
WCS 16	Anaerobic Digestion	<p>Anaerobic digestion facilities will be acceptable on land:</p> <ul style="list-style-type: none"> a) Within the uses identified within Policy WCS10; or 	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further</p>

		<p>b) Integrated with Waste Water Treatment Plants. Proposals shall comply with the general considerations set out in Policy WCS7.</p>		<p>site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7</p>
WCS 17	<p>Proposals for recycling or transfer of inert and construction, demolition and excavation waste</p>	<p>Proposals for recycling or transfer of inert and construction, demolition and excavation waste will be acceptable on land within the uses identified within Policy WCS10. At mineral sites, planning permission will be limited to the life of the mineral operation. At landfill sites, proposals that will extend the life of landfill operations will only be acceptable if the continued operations do not: a) Result in unacceptable environmental damage, or b) Perpetuate recycling activity poorly related in relation to sources of waste; or; c) Lead to unreasonable delay in restoration. On land suitable for General Industrial or Storage & Distribution uses, activities shall take place within purpose-designed facilities. Proposals shall comply with the general considerations set out in Policy WCS7.</p>	<p>No Likely Significant Impacts</p>	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10</p>

				and Policy WCS 7
WCS 18	Waste Water Treatment Plants	<p>New or extended Waste Water Treatment facilities will be acceptable where such proposals aim to improve the quality of discharged water or reduce the environmental impact of operation. The developer will be required to demonstrate that the proposal can be located without giving rise to unacceptable environmental impacts.</p> <p>Proposals shall comply with the general considerations set out in Policy WCS7.</p>	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England. Notwithstanding this comment, all future proposals must demonstrate that they will not result in significant impacts upon the integrity of Natura 2000 Sites.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7</p>
WCS 19	Treatment, storage and disposal of Low and Very Low Level radioactive waste at Sizewell nuclear power stations.	<p>Facilities for the treatment, storage and disposal of LLW and VLLW at Sizewell nuclear power stations will be acceptable within the Nuclear Licensed Area at Sizewell where:</p> <p>(a) This is consistent with the national strategy for managing Low Level and Very Low Level radioactive wastes and discharges and/or the decommissioning plans for the Sizewell stations; and</p> <p>(b) The outcome of economic and environmental assessments justifies it being dealt with on-site.</p> <p>(c) Facilities are located and designed in order to minimise adverse impacts on the environment; Only Low Level or Very Low Level radioactive waste generated at Sizewell shall be treated, stored or</p>	No Likely Significant Impacts	<p>Treatment, storage and disposal will only take place within the existing Site Licence Area, controlled and monitored by the Nuclear Installation Inspectorate and the Environment Agency.</p> <p>It will take place in appropriately designed buildings or other suitable and approved containment vessels.</p> <p>Any new nuclear</p>

		disposed of in such facilities. Proposals shall comply with the general considerations set out in Policy WCS7.		facility construction will be subject to its own site-specific Habitats Regulations Assessment. See WCS Objectives 9 & 10 and Policy WCS 7.
WCS 20	Treatment and storage of Intermediate Level radioactive waste and spent fuel generated at Sizewell nuclear power stations.	Facilities for the treatment and storage of Intermediate Level radioactive waste and spent fuel generated at Sizewell will be acceptable within the Nuclear Licensed Area at Sizewell where: (a) This is consistent with the national strategy for managing Intermediate Level radioactive waste and spent fuel and discharges; (b) The outcome of economic and environmental assessments justify it being dealt with on site; and (c) Facilities are located and designed in order to minimise adverse impacts on the environment. Only Intermediate Level radioactive waste or spent fuel generated within the Nuclear Licensed Area at Sizewell shall be treated or stored in such facilities. There shall be no disposal of Intermediate Level radioactive waste. Proposals shall comply with the general considerations set out in Policy WCS 7.	No Likely Significant Impacts	Treatment and storage will only take place within the existing Site Licence Area, controlled and monitored by the Nuclear Installation Inspectorate and the Environment Agency. It will take place in appropriately designed buildings or other suitable and approved containment vessels. Any new nuclear facility construction will be subject to its own site-specific Habitats Regulations Assessment. See WCS Objectives 9 & 10 and Policy WCS 7.
WCS 21	Transfer, storage, processing & treatment of hazardous waste	Facilities for the transfer, storage, processing and treatment (including incineration) of hazardous waste will be acceptable where they meet a demonstrable regional need of which a significant proportion arise	No Likely Significant Impacts	Dependent upon location of any new or expanded facilities, further site-specific Habitats

		<p>from Suffolk; and are on land:</p> <p>(a) In existing General Industrial Use (B2), in Storage and Distribution Use (B8) or identified for these uses in a Local Plan or Development Plan Document or:</p> <p>(b) Integrated within an establishment producing much of the waste that will be dealt with.</p> <p>(c) Facilities for the transfer and short-term storage of hazardous waste will also be acceptable on existing waste management sites identified as having potential or non-hazardous waste transfer where hazardous waste will only represent a small proportion of waste managed on site.</p> <p>Proposals shall comply with the general considerations set out in Policy WCS 7.</p>		<p>Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>
WCS 22	Sustainable construction and demolition	<p>New development, including waste management facilities, should facilitate the efficient use of resources by addressing the principles of sustainable construction and demolition outlined in regional policy. Proposals for new development should incorporate the following:</p> <p>(a) Construction and demolition methods that minimise waste generation and re-use/recycle materials, as far as practicable on site.</p> <p>(b) Design principles and construction methods that minimise the use of primary aggregates and encourage the use of high quality building materials made from recycled and secondary sources.</p> <p>(c) Design and layout principles that reduce the amount of waste produced and allow for the effective sorting, recycling and composting of waste where appropriate.</p>	No Likely Significant Impacts	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>

WCS 23	Climate Change Mitigation and Adaptation	<p>New waste management facilities should, through their construction and operation, minimise their potential contribution to climate change through reducing carbon emissions, incorporate energy and water efficient design strategies and be adaptable to future climatic conditions. Proposals for new waste facilities should incorporate the following:</p> <p>(a) Take account of landform. layout, building orientation, massing and landscaping to minimise energy consumption, including maximising cooling and avoiding solar gain in the summer.</p> <p>(b) Be planned so as to minimise carbon dioxide emissions and support opportunities for decentralised and renewable or low-carbon energy supply.</p> <p>(c) Give priority to the use of sustainable drainage systems, paying attention to the potential contribution to be gained to water harvesting from impermeable surfaces and encourage layouts that accommodate waste water recycling.</p> <p>(d) Take account of potential changes in climate.</p> <p>(e) Incorporate proposals for sustainable travel including travel plans where appropriate.</p>	No Likely Significant Impacts.	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England.</p> <p>See WCS Objectives 9 & 10 and Policy WCS 7.</p>
WCS 24	Design of waste management facilities	<p>Waste management facilities will be considered favourably where they incorporate:</p> <p>(a) Designs of an appropriate scale, density, massing, height and materials.</p> <p>(b) Safe and convenient access for all potential users.</p> <p>Schemes for the retention of existing and provision of new landscape features.</p> <p>(c) Measures which will protect, preserve and, where practicable, enhance the natural and built environment.</p>	No Likely Significant Impacts.	<p>Dependent upon location of any new or expanded facilities, further site-specific Habitats Regulations Assessments may be required in the future which will involve further consultation and agreement with Natural England.</p>

				See WCS Objectives 9 & 10 and Policy WCS 7.
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Summary of Impacts:

Because the essential principle that “In general, waste management development will be acceptable so long as the proposals adequately address, where appropriate, the following: (a) Potential for adverse impact upon the integrity of Natura 2000 sites.” will inform any planning permissions that might subsequently be granted as a result of this policy, the policies within the Waste Core Strategy can achieve their aims and objectives and not result in any significant impacts either alone or in combination upon any features of European Interest on any Natura 2000 Site in Suffolk or the neighbouring Counties.

To ensure the integrity of European Sites, the opportunity to carry out site-specific Habitats Regulations Assessments must remain in place so that any application for planning permission to construct, expand or otherwise establish a new waste-related facility can, if necessary, be separately assessed.

6. Mitigation:

Some examples of how mitigation strategies will be approached are given in Paragraph 2 (f) above.

Because of the underlying tenet that proposals for waste management facilities will need to demonstrate that they will not have a significant effect upon the integrity of any Natura 2000 sites, any likely significant effects identified at the planning application stage will require suitable mitigation methods.

These strategies may include monitoring and other control procedures on a site- and use-specific basis.

7. Effect on Integrity of a European Designated Site:

Because of Suffolk County Council’s commitments to the conservation of Biodiversity and the explicit Objectives 9 and 10 in the Waste Core Strategy: “**To minimise adverse ecological and geological/geomorphological impacts and to encourage opportunities for restoration, creation and enhancement of wildlife habitats**” and “**To minimise adverse impacts upon water quality**” together with an on-going consultation process with the National nature conservation body (Natural England), we believe that any possible negative effects on the integrity of European Sites as a result of the policies within this Waste Core Strategy will be considered, mitigation sought and compensation agreed in order to reduce or negate any negative impacts.

Dated: 10th day of March 2010.

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