

## 6. Environment

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## Introduction

- 6.1 The Development Plan Regulations 1999 require local authorities to have regard to environmental considerations in preparing Structure Plans. Government guidance also places considerable weight on the environment, in particular in PPG1 “General Policies and Principles”, PPG7 “The Countryside - Environmental Quality and Economic and Social Development”, PPG9 “Nature Conservation”, PPG15 “Planning and the Historic Environment” and PPG16 “Archaeology and Planning”.
- 6.2 The importance of the environment is reflected throughout this Plan and particularly in Strategic Aim 1 “to sustain and enhance the health, quality and integrity of the built and natural environment, and to ensure that development does not result in material damage to critical environmental resources”. Twenty one of the Plan’s thirty two objectives flow from this strategic aim. (See section 3 for the full text of these objectives). Many of the characteristics of the county’s environment have been documented in the report prepared jointly by the Suffolk Local Authorities entitled “Suffolk’s Environment... Towards Sustainable Development”.

## Conservation of the Built Environment

- 6.3 Suffolk’s towns and villages have many buildings and groups of buildings which have special merit in terms of architecture, archaeology or historic interest. Some towns have street patterns which have remained intact for centuries and a number have been listed by the Council for British Archaeology as being of national importance.
- 6.4 This character can be threatened by pressures for development, redevelopment and change of use. Road traffic may affect the fabric of buildings and intrude by way of noise, pollution and road signs. Less apparent factors such as new social patterns, fashions and the replacement of local crafts by mass production also combine to change historic towns and villages indirectly. New activities can, however, be a positive factor if they are accommodated in an attractive or historic building that has outlived its original use and thereby make its retention viable.
- 6.5 The preservation and enhancement of townscape and individual buildings is best achieved by a combination of controls and positive measures, by public bodies and the owners in partnership. A prerequisite is the availability of specialist advice to cover such aspects as how to alter historic

buildings, or to carry out development in close proximity to them without spoiling their qualities, and the availability of local materials, building components and traditional skills. Policy ENV1 is a statement of general principles. Fuller guidance is included in local plans and in PPG15 “Planning and the Historic Environment”.

**ENV1 The character and setting of conservation areas and buildings listed as being of special architectural and/or historic interest will be protected and enhanced. The demolition or major alteration of buildings in the statutory list will not be acceptable. Demolition of unlisted buildings in conservation areas will only be acceptable if it is demonstrated that redevelopment would preserve or enhance the conservation area. New developments in conservation areas or affecting the setting of listed buildings must be in harmony with their surroundings.**

## Re-use of Rural Buildings

- 6.6 In many parts of rural Suffolk traditional style dwellings and farm buildings are characteristic features of the environment. Many such buildings could disappear with changes in the rural economy and agricultural practice, unless steps are taken to preserve them. The re-use or conversion of traditional buildings for appropriate new uses including small businesses and tourism can contribute to the retention of an important part of the county’s heritage, while meeting economic objectives such as the diversification of the rural economy. In considering such proposals, the presence of any species protected under the terms of policy ENV18 should be taken into account. Surveys should be undertaken prior to development to ascertain the presence of such species. The appropriate re-use of other rural buildings can also contribute to economic objectives, although care would be needed to ensure that both the design and appearance of a building and the proposed new use are consistent with their rural settings. This would include an examination of the environmental impact of any traffic generation. Proposals for retail developments would also need to be considered in the light of policies ECON9, ECON10 and ECON11. More detailed advice on the re-use of rural buildings is given in paragraph 3.14 of PPG7.

**ENV2 The conversion or re-use of sound, traditional rural buildings will be supported where consistent with other Structure Plan policies, particularly where employment can be generated and where a significant environmental benefit would result from their retention. The conversion or re-use of other sound rural buildings for employment or tourism purposes will be acceptable where the building and the proposed new use respect the rural setting. Proposals likely to lead to unacceptable levels or types of traffic or problems of road safety will not be acceptable.**

**ENV3 To conserve and enhance the special character of Suffolk, the local planning authorities will require high standards of siting, design and landscaping in all development. Designs and layouts should respect the characteristics of their sites and surroundings, while achieving densities of development consistent with the efficient use of land.**

**In new housing, a mix of types, sizes and densities of dwelling should be provided consistent with local needs, the characteristics of the area and the principles of good design.**

## Design Standards

- 6.7 New development should be built and landscaped to designs consistent with a high environmental standard. The effective use of design can make a major contribution to achieving the principles of sustainable development. A number of factors will influence the appropriate design for a site, such as location, landform, existing landscape features, range of access options and characteristics of adjoining development. The Suffolk Design Guide produced by the Suffolk local authorities looks at the local characteristics affecting design and provides advice for those considering new developments.
- 6.8 The Suffolk Design Guide concludes that the appropriate density can only be established after full consideration of the interrelated factors referred to above. In addition it is important to make the most efficient use of land in order to minimise the loss of land from the countryside, although sufficient land should be incorporated into a scheme to allow for an appropriate level of landscaping. The appropriate density can best be assessed through local plan preparation, design briefs and master plans prepared with planning applications.
- 6.9 Providing a mix of types, sizes and densities of new housing can frequently aid good design by establishing interest and variety in areas of residential development. This can also assist in meeting the diverse housing needs of the population and, in particular, in accommodating the projected increase in the number of smaller households.

## The Countryside and Coast

- 6.10 The value of the Suffolk countryside and coast as an economic, ecological, recreational, historical and aesthetic resource is widely acknowledged. PPG7 "The Countryside - Environmental Quality and Economic and Social Development" states that Government policy is to safeguard the countryside for its own sake and to afford protection to non-renewable and natural resources. "Suffolk's Environment... Towards Sustainable Development", identifies many of the factors which are of importance in the countryside and coast of Suffolk.
- 6.11 Two of the principal land uses in the countryside, agriculture and forestry, fall largely outside the scope of planning control. Therefore conservation depends on a co-operative approach between all the parties involved in managing the countryside. Within the context of the Development Plan, the County Council has prepared a countryside strategy "A Role in the Countryside" (1997), setting out comprehensive policies for co-ordinating action, conserving the countryside and improving recreation opportunities. It is concerned with change outside the statutory planning system.
- 6.12 The former Countryside Commission developed the concept of Countryside Character Areas. This is supported by a map and descriptions defining local distinctiveness, which it compiled with English Nature. The approach recognises that not all important landscapes are contained within the designated areas referred to in policies ENV7 and ENV8 below.
- 6.13 The Development Plan has a major role in protecting the countryside from inappropriate development and, for those developments that are appropriate, guiding their location and design.

The Structure Plan seeks to meet most demands for housing, industrial and commercial development in urban areas. Minerals on the other hand can only be won where they lie (see section 10). Linear features such as roads, power lines, and pipelines have to cross rural areas. Tourism, recreation and leisure activities are an important rural land use and policies are set out in sections 6 and 9. Inappropriate development can include not only large buildings or significant land uses but also smaller features which impose urban characteristics on rural areas.

- 6.14 The natural environment of the countryside and coast will be protected, conserved and enhanced, in particular by restricting development to that associated with essentially rural activities and outdoor recreation. In the case of prominent structures including buildings, pylons, telecommunications facilities and wind powered generators, proposals will have to demonstrate that a countryside location is essential. This policy is not intended to restrict local plan allocations adjoining settlements consistent with the county strategy, in particular policy CS3.

**ENV4 The landscape quality and character of the countryside and coast will be protected for their own sake and their non-renewable and natural resources will be conserved. Development not required for the efficient operation of agriculture, forestry and recreation will only be acceptable where there is an overriding case for a location in the countryside. Proposals for prominent structures will only be acceptable if the local planning authority is satisfied that they are essential in the countryside, and that the location, siting and design minimises adverse impact on the environment.**

- 6.15 Planning issues relating specifically to the coast are also dealt with in policies ENV7 (Conservation of Designated Landscapes), ENV15 (Sea Defences and Embanked Watercourses), REC3 (Recreation in the Countryside), REC4 (Waterborne Recreation), ECON14 (Tourist Accommodation in the Countryside) and T15 (Seaports).

## Pollution

- 6.16 Many aspects of pollution control are outside the remit of the planning system. Bodies such as the Environment Agency and District Council Environmental Health Departments have statutory responsibilities in the field, while some pollution issues can only be addressed at the national or international level. PPG23 'Planning and Pollution Control' advises that development plans should

not duplicate controls which are the responsibility of other bodies. Policy ENV5 below provides guidance specifically related to planning control. In interpreting and applying this policy, the acceptability or otherwise of a pollution impact should be assessed against standards set by relevant European directives, national legislation and national agencies.

- 6.17 Circular 15\97: "The United Kingdom National Air Quality Strategy and Local Air Quality Management: Guidance for Local Authorities" was published by the former DETR in December 1997. The circular and accompanying guidance notes advise that the land use planning system should make an appropriate contribution to achieving air quality objectives. They also state that air quality considerations should be properly taken into account along with other material considerations in the planning process.
- 6.18 Objective 10 of the Structure Plan promotes "development and transport patterns which maintain and where possible improve air quality". Air quality improvements are expected to flow primarily from measures to reduce the need to travel and minimise the use of private cars in meeting residual travel needs, thereby reducing exhaust emissions. The development location strategy and transport policies are designed to help achieve the plan objective.
- 6.19 Policy ENV13 on water resources and policy WD7 on waste disposal embrace the maintenance of water quality, including the protection of ground and surface water from pollution.
- 6.20 Noisy activities should be located to avoid adverse impact on other uses; similarly new development, especially where noise-sensitive, should avoid areas already affected by problems of noise.
- 6.21 Increased levels of light at night in the right places may improve safety, provide additional opportunities for recreation, or increase the appreciation of historic buildings. However unwanted light can harm the character of an area and can have other adverse effects, for example by impacting on privacy. The design of lighting schemes should ensure the minimum level of illumination commensurate with the safe operation of the use.
- 6.22 Pollution issues should also be considered through the Local Agenda 21 process and the County Council's Environmental Management System.

**ENV5 New development, including transport development, should be located and designed to minimise or avoid air, noise, water, land and light pollution. The polluting effects of a development, the presence of other existing or proposed sources of pollution which may affect it, and any cumulative pollution impacts arising, should all be taken into account. Development which would result in a significant pollution impact, and in particular development which would introduce a significant source of light which is not required for safety reasons, will not be acceptable.**

### **New Housing in the Countryside**

6.23 There is a long established national policy of restraint on new development in the open countryside away from settlements, in the interests of agriculture, rural amenity, road safety, and economy in service provision. This policy is retained and explained in detail in Appendix 1 to PPG7 and is consistent with the objective of minimising travel demand. The only exceptions should be to meet the needs of personnel employed in agricultural (including animal husbandry), horticultural or forestry activities who must live close to their work. These principles are reflected in policy ENV6. For the purposes of interpreting this policy, the expression “open countryside” refers to any land outside settlement boundaries defined in local plans, other than where deemed appropriate for development under the terms of policy CS3. Local planning authorities should ensure that any exceptions permitted continue to be used for the purpose originally intended, for example, by the imposition of occupancy conditions.

**ENV6 New housing in the open countryside will only be acceptable where essential for key personnel employed in agriculture, horticulture or forestry.**

### **Conservation of Designated Landscapes**

6.24 This Plan includes two policies for the conservation of designated landscapes. Policy ENV7 refers to those with a national designation, while policy ENV8 covers Special Landscape Areas which are specific to Suffolk.

6.25 In 1988, the Broads area of Norfolk and Suffolk was given a special status similar to that of a

National Park. National Parks were designated for their natural beauty and the opportunities which they offer for public open air recreation.

6.26 Two areas of Suffolk, the Dedham Vale and the Suffolk Coast and Heaths are designated as AONB. In addition, 57 km. of coastline and adjacent land have been defined as Heritage Coast jointly by the local planning authorities and the former Countryside Commission. The Heritage Coast lies wholly within the Suffolk Coast and Heaths AONB.

6.27 PPG7 confirms that planning policy and development control decisions in AONBs should favour conservation of the natural beauty of the landscape, with the environmental effects of proposals being a major consideration in all cases. The PPG states that it would normally be inconsistent with the aims of designation to permit the siting of major industrial or commercial development in these areas. Only proven national interest and lack of alternative sites can justify an exception. Many recreational uses are of a commercial nature, and may have material adverse effects. The former Countryside Commission also produced guidance for AONBs and Heritage Coasts (CCP 356 and 305). The relevant Joint Advisory Committees for the AONB have published the Dedham Vale and Stour Valley Management Plan (1992) and the Suffolk Coast and Heaths Management Plan (1994), both of which are currently under review.

6.28 In partnership with interested parties, the County Council will prepare Supplementary Planning Guidance on the special qualities of protected areas, to assist in the interpretation of the policy expression ‘material adverse impact’.

**ENV7 Development which would have a material adverse impact on the Broads, Areas of Outstanding Natural Beauty, or the Heritage Coast will only be acceptable where an overriding national need for development in the particular location can be demonstrated and there is a lack of acceptable alternative sites. Where development proceeds because of an overriding national requirement, removal and restoration of the site will be required in the event of redundancy at a later date.**

6.29 There are other areas, not nationally recognised, where change could have an adverse impact upon a high quality environment and where the landscape requires protection. Within Suffolk, Special Landscape Areas (SLA) are designated to protect locally important areas of countryside

from unsuitable development. SLAs should exhibit specific characteristics in order to provide a consistent basis for definition. These are set out in policy ENV8.

- 6.30 PPG7 stresses that local landscape designations such as SLAs do not carry the same weight as national designations and development plan policies should not seek to apply the same level of protection. Policy ENV8 is drafted accordingly.
- 6.31 PPG7 also requires local planning authorities to re-examine local landscape designations when reviewing development plans. The County Council has done this with the SLAs and considers, given the detailed criteria set out in policy ENV8 (a) - (d) which form a basis for the definition of such areas in local plans, that they are clearly based on the qualities of those parts of the countryside.

**ENV8 Special Landscape Areas are defined in local plans. They have the characteristics of one or more of the following:**

- (a) river valleys which still possess traditional grazing meadows with their hedgerows, dykes, and associated flora and fauna;
- (b) the Brecks, including remaining heathland, former heath recently ploughed, other arable areas, river valleys and the characteristic lines and belts of Scots pine;
- (c) historic parklands and gardens which still possess significant features of their former status;
- (d) other areas of countryside where topography and natural vegetation, particularly broad-leaved woodland, combine to produce an area of special landscape quality and character.

**Development will not be acceptable which would have a material adverse impact on a Special Landscape Area. The only exception to this policy will be where an overriding national or local need for development in a particular location can be demonstrated and there is a lack of acceptable alternative sites.**

- 6.32 The general location of SLAs is shown on the key diagram. The following areas are defined in detail in local plans:
- (a) the Waveney and Dove Valleys and the Little Ouse Valley east of Brandon;
  - (b) the Upper Deben, Ore and Alde Valleys,

Minsmere River/Yox Valley and parts of the Blyth Valleys and the Kessingland Hundred;

- (c) the Fynn and Mill River Valleys;
- (d) the Gipping, Rattlesden and Dagworth Valleys;
- (e) the Black Bourne Valley;
- (f) the Lark Valley and Brecks from Fornham St Genevieve to Herringswell, Barton Mills and Lakenheath;
- (g) the Stour Valley from Long Melford to the Dedham Vale AONB, and the Glem, Brett, Box and Chad Brook Valleys;
- (h) areas east of Newmarket and south of Bury St Edmunds;
- (i) historic parklands and gardens which still possess significant features of their former status, such as boundary tree belts, tree clumps, grassland with veteran trees, pleasure grounds, ha has and garden buildings, many of which are included in the English Heritage register.

## Energy Generation

- 6.33 PPG12 identifies energy generation, including renewable energy, as a topic for inclusion in the Structure Plan.
- 6.34 At Sizewell, within the Suffolk Coast and Heaths AONB near Leiston, two nuclear power stations are currently operating. An application for a third station was submitted in 1993 to the Department of Trade and Industry (DTI) but subsequently withdrawn by Nuclear Electric before being determined.
- 6.35 The County Council is unaware of any major proposed energy developments requiring policy guidance in the Structure Plan. However, proposals may be forthcoming from generators during the plan period.

**ENV9 Proposals for non-renewable energy generation will be considered against policy ENV4, ENV7 or ENV8, depending on location, and against other Structure Plan policies for transport and the protection of the environment.**

## Resource Conservation

### Renewable Energy

- 6.36 Policy ENV9 above applies to proposals for energy developments based on conventional or nuclear

technology. PPG22 "Renewable Energy" emphasises the importance of renewable energy development in providing for diversity in energy supply and reducing the production of harmful greenhouse gases.

- 6.37 Renewable energy is the term used to cover those continuous energy flows that occur naturally and repeatedly in the environment from the sun, the wind and oceans, from plants and the fall of water and from within the earth itself. Industrial, agricultural and domestic waste materials which are combustible or digestible are also potential sources of renewable energy.
- 6.38 The largest renewable energy scheme in Suffolk is at Eye Airfield where a 12.7MW generating station is fuelled by the incineration of chicken litter. Six landfill gas schemes are also operational, at Foxhall, Bramford, Lackford, Wangford, Great Blakenham and Wetherden. A number of other renewable energy proposals have received support.
- 6.39 The County Council acknowledges the increasing importance of renewable energy schemes and wishes the County to make an appropriate contribution to development of renewable sources. It was supportive of an initiative of the Energy Technology Support Unit (ETSU) (a branch of the Department of Trade and Industry) and part funded through the EU ALTENER programme to undertake a detailed study of the potential for developing renewable energy technologies in the Eastern Region. This study, known as the Eastern Region Renewable Energy Planning Study (ERREPS) was made available to local authorities in summer 1997, and published in 1998.
- 6.40 The study concludes that there is minimal potential for wind or hydro power in Suffolk. This is due to the low lying and sheltered nature of the county, the environmental quality of most of the coastal area, and assumptions made about the economics of these relatively well established renewable energy technologies. However, the study stresses that for both technologies small scale schemes may be viable where favourable conditions exist.
- 6.41 The study identifies significant theoretical potential for the development of solar power, and waste and biomass resources. Solar power is generally harnessed at the individual building level as an energy efficiency measure rather than a means of power generation. Policy ENV11 seeks to promote energy efficiency in design. Further guidance on energy efficiency will be given in the revised Suffolk Design Guide and in local plans.

- 6.42 Domestic and industrial wastes can be burned, as can straw or crops grown specifically for this purpose (known as biofuels). The land use impact of the technology used to generate electricity is similar in each case. The source material, often produced over a wide area, is collected at a central point before combustion to generate power which is then exported to the national grid.
- 6.43 Such generating stations may have an impact on the landscape both directly and through the power lines needed to serve them. They may also require substantial water supplies, create noise and cause traffic problems. In most cases such uses will be best located on employment land allocated in Local Plans. However, to avoid problems or to obtain a satisfactory connection into the national grid, a countryside location may be necessary.
- 6.44 Policy ENV10 reflects the conclusions of the ERREPS insofar as it focuses on the potential for harnessing renewable energy technologies based on combustion. The policy also provides for such uses in the open countryside, away from designated areas of landscape or ecological importance, if it can be shown that suitable alternative sites are not available.
- 6.45 No part of policy ENV10 is intended to restrict the implementation of very small scale schemes, for example to help meet the energy needs of an individual dwelling. Such schemes should be considered on their merits through the development control process.

**ENV10 Proposals for all types of renewable energy development will be supported where there is no material conflict with residential amenity or with policies for transport or protection of the environment.**

**Most new combustion-based renewable energy development will be located on employment areas allocated in local plans. Development will be acceptable in the countryside as an exception to ENV4, where it can be demonstrated that there is a lack of suitable alternative sites and there is no material conflict with residential amenity or with policies for transport or protection of the environment.**

## Energy Conservation

- 6.46 The design of buildings, their layout and the materials used can impact on the amount of energy they use both in their construction and when completed and occupied. Minimisation of energy consumption is a key element in delivering Strategic Aim 1 of the Plan. The density of development can also impact on energy conservation (see policy ENV3).
- 6.47 Energy conservation should be incorporated into the design process at an early stage. South facing buildings, use of glass on south facing aspects, use of landscaping to shelter development and the avoidance of overshadowing can all lead to energy conservation. Attention should also be given to opportunities to generate energy through solar power and photovoltaic cells. Further guidance on these issues will be given in the forthcoming review of the Suffolk Design Guide. Energy conservation can also be promoted through energy efficiency measures such as Combined Heat and Power (CHP), and district heating schemes. CHP is defined as the simultaneous production of power and usable heat. District heating schemes use waste heat from a major installation to heat nearby homes or industry, and may include CHP. Policy CS3(d), which seeks a range of non-residential uses in all major development areas, would allow the integration of such schemes into new development.
- 6.48 Policy ENV11 encouraging energy conservation in new development provides a framework for planning authorities in drawing up their local plans and supplementary planning guidance and in development control.

**ENV11 Energy conservation will be promoted in new development which should maximise energy efficiency through siting, design, landscaping, orientation and choice of materials, consistent with the principles of good design.**

## Water Conservation

- 6.49 Technical and design measures associated with new development offer significant opportunities to reduce water consumption. The application of such measures should be pursued where appropriate through the development control process.

**ENV12 Water conservation will be promoted in new development, which should encourage the efficient use of water through design, metering, the re-use of grey water, the collection and treatment of rainwater and the installation of other water efficiency measures.**

## Water Resources

- 6.50 The long term management and use of water resources is critical to the achievement of the Structure Plan aims. The Environment Agency and Water Companies should ensure a sustainable approach through the mechanisms of the Regional Water Resources Strategy, Catchment Abstraction Management Plans and Local Environment Agency Plans, particularly when addressing any issue of water importation or transfer.
- 6.51 The maintenance of river levels and water quality is essential for wildlife. Groundwater reserves are equally important, having a key role in public supply in Suffolk. Protection of these resources from adverse effects of development and from inappropriate use is vital. The County Council will continue to maintain close liaison with the Environment Agency which has a duty to protect the quality and availability of inland and coastal waters including groundwater. As the contamination of water resources could have severe consequences, their protection is essential. Detailed advice is set out by the Environment Agency in its policy statement "Policy and practice for the protection of groundwater", updated and republished in 1998.
- 6.52 Over recent decades there has been a substantial increase in the demand for water. In part this has been due to growth in the resident population, but it has also been caused by higher per capita consumption, as living standards rise, and by the use of irrigation for crops. During the last few years, the relatively dry climate of Suffolk has been exacerbated at times by below average rainfall. As a consequence, there is widespread concern over the ability to meet future water needs arising from both existing and new development without unacceptable environmental consequences for water-courses, habitats and fisheries. On the basis of discussions with the Environment Agency and Water Companies, the County Council believes that the development policies and proposals in this Structure Plan are compatible with Objective 8 and policy ENV13.

**ENV13 Development will not be acceptable if it would have a material adverse impact on the availability or quality of ground or surface water.**

- 6.53 The Environment Agency and the Construction Industry Research and Information Association are researching whether specific forms of development can be defined which promote the efficient use of water.

### **Flood Protection**

- 6.54 The Environment Agency advises Local Planning Authorities on areas at risk from flooding, to seek to ensure that new development is not at risk from flooding and does not put other areas at risk of flooding which could endanger life or built property. In the absence of associated proposals for flood protection agreed by the Environment Agency and where these consequences could result, development will not be acceptable. Particular care should be taken with applications for development on low lying ground. The Government issued fresh advice on flood risk in July 2001 (PPG25).

**ENV14 Development will not be acceptable if it would impede materially the flow or storage of floodwater, increase the risk of flooding elsewhere or increase the number of people or properties at risk of flooding.**

### **Sea Defences and Embanked Watercourses**

- 6.55 A breach in the defences along an embanked watercourse or coastal or estuarial defence can lead to significant flooding in areas of low lying land often well away from the breach. To protect people and built property from inundation, the integrity of defences and embankments should be maintained.
- 6.56 The Environment Agency, in conjunction with those local authorities with coastal responsibilities, has prepared shoreline management plans setting down strategies for sea defence. On parts of the coast these may give opportunities for the creation of new coastal habitats and suitable opportunities should be identified in local plans.
- 6.57 On parts of the Suffolk coastline that may be subject to marine erosion, new development should be avoided. Local plans should define areas at risk.

**ENV15 Development will not be acceptable which would adversely affect the integrity of tidal or fluvial defences, or would be likely to be affected by marine erosion during its expected lifetime.**

### **Agricultural Land, Woodland and Hedgerows**

- 6.58 Agricultural land is a valuable resource and has been provisionally classified into five grades in accordance with the Department for the Environment, Farming and Rural Affairs (DEFRA) Agricultural Land Classification System. (The middle grade, 3, has been subdivided into 'a' and 'b'.) Much of the land in Suffolk is of above average quality. It remains national policy to safeguard the best and most versatile land (defined as grades 1, 2 and 3a). Policy ENV16 includes protection for such land. However, PPG7 "The Countryside - Environmental Quality and Economic and Social Development" acknowledges that where there is a need for development and a lack of suitable alternative sites, either within the built up area of a town or on lower grade sites around the town, development of higher grade land may be appropriate. Paragraphs 2.16-2.20 of the PPG (as amended in March 2001) provide detailed advice on the issue.
- 6.59 Around 75% of the agricultural land in Suffolk is of grade 3 or higher and much of the lower grade land (mostly Coastal Heath or Brecks) is protected for landscape and/or wildlife reasons. There is limited information about the extent of grade 3a and grade 3b land around many of the towns in Suffolk. As it is possible that development on grade 3a will be needed to implement the County Strategy, provision is made for this within policy ENV16.
- 6.60 Timber production is also an important function of the countryside with substantial areas of the Brecks and coastal Sandlings under plantations. Policy ENV16 also extends protection to such areas. Where development on agricultural land or woodland is proposed, the implications for wildlife conservation should be assessed under the terms of policies ENV18, ENV19 and ENV20. In the sense that nature conservation projects on agricultural land will not normally constitute an irreversible loss of such land, these projects would normally be acceptable under the terms of policy ENV16.

**ENV16 In the provision of land for development and in the consideration of development proposals full recognition will be given to the need to minimise the irreversible loss of best and most versatile agricultural land and woodland, and to minimise the severance and disruption of farms and commercial woodland. Best and most versatile land includes that in the Department for the Environment, Farming and Rural Affairs grades 1, 2 and 3a.**

**Where agricultural land is needed for development, the use of grade 3a land will be acceptable where it can be demonstrated that no suitable alternative sites are available on lower grade land.**

- 6.61 Trees and woodlands are important to the attractiveness of the Suffolk landscape and for their wildlife habitats. In addition, woodland and hedgerows and the boundaries which they delineate are often of historic interest, with some protection being provided under the Hedgerow Regulations 1997. Losses due to natural causes such as Dutch Elm Disease and storm damage, or due to agricultural practices, need to be made good. The County Council promotes the management of small farm woodlands, and identifies areas where new woodland planting is desirable, or conversely where it should be resisted. Its Countryside Strategy supports the sustainable management of woodlands and promotes the creation of new woodland areas, particularly community woodland.
- 6.62 The local planning authorities (District Councils and the Broads Authority) are responsible for administering the hedgerow protection system in accordance with The Hedgerow Regulations 1997 and "The Guide to the Law and Good Practice" produced by the former Ministry of Agriculture, Fisheries and Food (MAFF) and the Welsh Office. The County Council will support the local planning authorities in exercising this duty, provide an overview of the importance of hedgerows in Suffolk and collate statistics on hedgerow removal. The County Council holds information on the historic importance of hedgerows, and their relationship to recorded archaeological sites and will provide the local planning authorities with the necessary advice and interpretation of this information when requested.

**ENV17 The retention and appropriate management of existing trees, hedgerows and woodlands will be encouraged for their economic, landscape and ecological value and historic interest. Applications for the removal of hedgerows which are deemed to be important according to the criteria set down in the Hedgerow Regulations 1997 will not be acceptable. Where serious harm to the landscape or wildlife would result from tree felling, District Councils will, where appropriate, impose Tree Preservation Orders. The local planning authorities will carry out planting themselves, will support planting by others, and provide advice on the conservation of the landscape.**

### **Conservation of Ecological Assets**

- 6.63 Suffolk has many sites important for wildlife. Some are, or are proposed to be, subject to international treaty obligations ('Ramsar' sites) and EU Directives (Special Protection Areas for birds, and Special Areas of Conservation for habitats). National Nature Reserves are declared and Sites of Special Scientific Interest are notified by English Nature under the Wildlife and Countryside Act 1981.
- 6.64 By contrast, Local Nature Reserves are established by local authorities in response both to the nature conservation interest of a site and its potential for environmental education.
- 6.65 The Suffolk Wildlife Trust and Suffolk County Council, with the co-operation of English Nature and the Suffolk Biological Records Centre have compiled a list of sites known as County Wildlife Sites. English Nature has recognised these as being of regional importance.
- 6.66 Habitat protection is complemented by measures to protect species which are rare and/or vulnerable. Such protection is provided principally by the Wildlife and Countryside Act 1981 and the appended schedules of protected species (since updated). Red Data Books include species of flora and fauna which do not have the statutory protection of this Act but are nationally rare. Many of these species are found outside the designated habitats described above.
- 6.67 In addition to sites of ecological interest, protection is also afforded to regionally important geological or geomorphological sites.
- 6.68 Policy ENV18 covers all areas which are subject to international or national designations under the

terms of European directives and national legislation. The general principle established by the policy for the purposes of the Structure Plan is that development will only be acceptable where there is an overriding national need and a lack of alternative sites. The precise terms of the protection enjoyed by these areas are set out in PPG9 'Nature Conservation' and in the directives and legislation, which apply alongside the Plan.

- 6.69 The EU Habitats Directive provides protection for Special Protection Areas and Special Areas of Conservation and the Government has chosen to apply the same level of protection to Ramsar sites. Where development proposals would adversely affect the integrity of such a site, these proposals can only be judged acceptable where there is no alternative solution, and where there are imperative reasons of overriding public interest for development to take place. Where priority natural habitat types or species are present, these reasons must relate to human health or public safety, to beneficial consequences of development of primary importance to the environment, or be as specified by the EU. Regard should be had to these provisions when considering any particular proposal against policy ENV18.
- 6.70 Policy ENV19 relates to regional and locally-designated sites and provides a lower level of protection than policy ENV18. In both cases any development materially affecting sites would require the implementation of measures to ameliorate the impact. Such measures should be implemented as close as possible to the affected site.

**ENV18 Development which would have a material adverse impact on:**

- (a) 'Ramsar' sites;
- (b) Special Protection Areas established in accordance with the EU directive on the conservation of wild birds (79/409/EEC);
- (c) Special Areas of Conservation established in accordance with the EU directive on the conservation of natural habitats and wild flora and fauna (92/43/EEC);
- (d) National and Marine Nature Reserves;
- (e) Sites of Special Scientific Interest;
- (f) sites proposed for the above designations;
- (g) sites supporting species protected

**by specific legislation and species listed in Red Data Books (nationally rare species)**

**will only be acceptable where an overriding national need for development in the particular location can be demonstrated and there is a lack of acceptable alternative sites. Where development proceeds because of an overriding national need, significant habitat creation measures and/or improved management measures for existing habitats will be required.**

**ENV19 Development will not be acceptable which would have a material adverse impact on regionally important habitats, in particular County Wildlife Sites, regionally important geological or geomorphological sites, or sites proposed for such designations. The only exception to this policy will be where an overriding national or local need for development in the particular location can be demonstrated and there is a lack of acceptable alternative sites. Significant habitat creation measures and/or improved management measures for existing habitats will be required.**

**The County Council will declare Local Nature Reserves on its own land or acquire land for that purpose, and will by agreement with landowners declare and promote Local Nature Reserves on private land.**

- 6.71 The natural wildlife heritage of Suffolk is not confined to designated sites. To reflect this policy ENV20 seeks to preserve and enhance the biodiversity of the County, where appropriate in association with development. Biodiversity is the variety of life around us, encompassing the whole range of mammals, birds, reptiles, amphibians, fish, insects and other invertebrates, plants, fungi and micro-organisms. In 1994, the U.K. Government published "Biodiversity: the U.K. Action Plan", which set an overall goal "to conserve and enhance biological diversity within the U.K. and to contribute to the conservation of global biodiversity through all appropriate mechanisms". Policy ENV20 is intended to contribute to the achievement of the aims and objectives of both the UK and Suffolk Biodiversity Action Plans.

**ENV20 In the provision of land for development and in the consideration of development proposals, full recognition will be given to the need to preserve and enhance the biodiversity of the county. The County Council, in conjunction with nature conservation organisations and other local authorities, will prepare and implement a Biodiversity Action Plan for Suffolk.**

## The Broads

- 6.72 A relatively small part of the Broads lies within Suffolk, stretching from Oulton Broad westward along the south bank of the River Waveney. In accordance with the Norfolk and Suffolk Broads Act 1988, the Broads are under the control of a special statutory authority, equivalent in most respects to a National Park but having special powers to regulate navigation. Its functions include the conservation and enhancement of the natural beauty of the Broads, defined in the Act as including conservation of flora and fauna. The Broads Authority is the Local Planning Authority for the area and adopted a Broads Local Plan in 1997. The Broads Authority also has a programme of measures to conserve the area's resources, manage current pressures and restore the integrity of the Broadland waterways for navigation. These are set out in the Broads Plan. The County Council will work with the Broads Authority to achieve these objectives.
- 6.73 The adopted Broads Local Plan and the Broads Plan together set out comprehensive policy advice on the control and promotion of development in the Broads and a framework for their conservation and management.

**ENV21 The overall strategy for the Broads is:**

- (a) to protect and conserve the landscape, waterways and wildlife of the area from inappropriate uses and development;**
- (b) to protect and enhance the built environment by only allowing development which is appropriate in location, scale and form;**
- (c) to allow the development of new facilities for informal recreation and holidays only in locations and on a scale which will not damage the ecological and landscape qualities of the area and its built environment;**
- (d) to give priority to the conservation**

**and enhancement of the Broads landscape, waterways, water quality and wildlife over other considerations in the determination of development proposals; and**

- (e) to consider development proposals having regard to the social and economic well being of the area.**

**Proposals for development inconsistent with the above and/or policy ENV7 will not be acceptable.**

## Archaeology

- 6.74 Suffolk is one of the outstanding areas in Britain for its wealth of archaeological sites of all periods. Over 17,000 sites are listed in the County Sites and Monuments Record although these may only represent a small proportion of the total archaeological resource of the County as many more sites remain to be discovered.
- 6.75 Archaeological remains are a finite, non-renewable resource, in many cases highly fragile and vulnerable to damage. Appropriate management is therefore essential to ensure that they survive in good condition.
- 6.76 The County Council seeks to conserve a representative sample of archaeological sites. Sites of national importance are recommended to English Heritage, which advises the Secretary of State on the scheduling of sites as Ancient Monuments. 277 sites are currently scheduled in Suffolk and more are under consideration. The County Council encourages owners of archaeological sites to conserve them with appropriate management measures, supporting them with advice and, where resources permit, financial assistance. As necessary the County Council will take Ancient Monuments into Guardianship to ensure their preservation. Development affecting Ancient Monuments or their settings will require Scheduled Ancient Monument consent as well as planning permission.
- 6.77 The County Council provides archaeological advice to District Planning Authorities both in the preparation of development plans and in the exercise of their development control functions. PPG16 "Archaeology and Planning" contains detailed guidance on the handling of archaeological matters in the planning process. The PPG stresses that the desirability of preserving an ancient monument and its setting is a material consideration in determining planning

applications, whether that monument is scheduled or not.

- 6.78 In order that archaeological interests are fully protected, it is important that the potential of possible sites is evaluated before local plan proposals are finalised. The County Archaeologist can provide guidance on such evaluation.
- 6.79 Where a site the subject of a planning application is known to be of archaeological importance or has archaeological potential, an archaeological evaluation will normally be required so that the local planning authority has the information necessary to determine the application. Detailed guidance on this process is set out in PPG16. The results of the evaluation will determine which of several possible approaches referred to in policy ENV22 will be appropriate.
- 6.80 The preservation of remains within a development may be possible by careful siting of landscaped or open areas or by sympathetic design of structures such that foundations do not disturb the remains.
- 6.81 Given the historic nature of many of Suffolk's towns, the increased emphasis on the use of brownfield sites is likely to result in more frequent calls for excavation. In some cases the cost could threaten the viability of a development site and funding by public agencies may be necessary.

**ENV22 Development will not be acceptable if it would have a material adverse effect on Scheduled Ancient Monuments or other sites of national archaeological importance, or their settings. On other sites of archaeological importance or potential, provided there is no overriding case against development, planning permission will be subject to satisfactory prior arrangements being agreed including one or more of the following:**

- (a) the preservation of remains within a development;**
- (b) the recording of remains by archaeological excavation before development commences;**
- (c) a watching brief during development.**

## **Environmental Impact Assessment**

- 6.82 The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 implement the requirements of EU Directive 85/337 on the assessment of the effects of certain public and private projects on the environment. The Directive provides that for specified projects, information about the environmental effects must be supplied by the developer in the form of an Environmental Impact Assessment; and that planning permission should not be granted unless that information has been taken into account.
- 6.83 The Directive provides a more formal basis for the assembly and analysis of environmental information as part of the development control process; the Regulations and Circular 02/99 "Environmental Impact Assessment" offer guidance on assessment procedures and practice, and types of project likely to be affected.