



*Suffolk Minerals & Waste Local Plan  
Strategic Habitats Regulation Assessment  
Appendix 2 – Screening & Appropriate  
Assessment*

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**OCTOBER  
2018**



**The Conservation of Habitats and Species Regulations 2017**

**Regulation 63 Assessment**

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**Re: The Suffolk Minerals & Waste Local Plan**

**August 2018**

**Strategic Habitats Regulations Assessment**

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# **Appendix Two: HRA Screening & Assessment**

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# The Suffolk Minerals and Waste Local Plan – Habitats Regulations Screening and Assessment

This Appendix reviews the various Policies within the Suffolk Minerals and Waste Local Plan and assesses whether or not such policies may result in a Likely Significant Effect upon the features of the relevant Natura 2000 sites.

There are three Tables set out below, the first of which (Table One) deals with the General Minerals and Waste Policies within the Plan; the second (Table Two) deals with the site-specific allocations and the third (Table Three) sets out various mitigation strategies that SCC's Minerals and Waste Team consider as industry standards and appropriate for Suffolk.

The majority of Policies are not considered to have a Likely Significant Effect upon the features of the various sites however there are certain policies which, if implemented in an unsympathetic or may.

In previous Habitats Regulations Assessments, it was considered sufficient to ensure that any site-specific plan or proposal for which suitable mitigation was considered, should undergo Appropriate Assessment at the planning application phase however, since the initial Assessment was submitted, the Court of Justice of the European Union Case C-323/17 *People Over Wind v Coillte Teoranta* has concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of the HRA should not take account of them.

The issue the Court considered is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the European site. If not, then they should be considered mitigation measures, and must considered at the Appropriate Assessment stage of the HRA.

The Appropriate Assessment exercise has been undertaken below in Table Two.

**Table One - Screening:**

<b><u>Policies:</u></b>	<b><u>Details:</u></b>	<b><u>Screening Comments:</u></b>	<b><u>Likely Significant Effect (Alone and In-combination) and any Further Actions:</u></b>
<b><u>General Policies:</u></b>			
<b>Policy GP1: Presumption in favour of sustainable development</b>	<p>The County Council will take a positive approach to minerals and waste development that reflects the presumption in favour of sustainable development.</p> <p>It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure minerals and waste development that improves the economic, social and environmental conditions in the area.</p>	<p>This Policy is not considered to have a Likely Significant Effect upon the relevant Designated Sites as it acknowledges, amongst other things, the requirement to contribute “...to protecting and enhancing our natural, built and historic environment...helping to improve biodiversity, use</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>

	<p>Planning applications that accord with the site allocations and policies in this Plan will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or the relevant policies are demonstrably out-of-date at the time of making the decision, the County Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <p>Any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework and National Planning Policy for Waste taken; or</p> <p>Specific policies in the National Planning Policy Framework or National Planning Policy for Waste indicate that development should be restricted.</p>	<p><i>natural resources prudently...</i></p> <p>Individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process. This will ensure that any such allocations consider the Conservation Objectives of the relevant Designated Sites and develop strategies that deliver the necessary avoidance, mitigation, compensation and enhancement required in order to ensure that there are No Likely Significant Effects.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	
<b>Policy GP2: Climate change mitigation and adaptation</b>	<p>New minerals and waste management facilities should through their construction and operation minimise their potential contribution to climate change through reducing carbon and methane emissions, incorporate energy and water efficient design strategies and be adaptable to future climatic conditions.</p> <p>Proposals for new minerals and waste facilities should where appropriate:</p> <p>take account of landform, layout, building orientation, massing and</p>	<p>This Policy is not considered to have a Likely Significant Effect upon the relevant Designated Sites as it acknowledges, amongst other things, the requirement to “...to take account of potential changes in climate including rising sea levels and coastal erosion...”<sup>1</sup></p>	No Likely Significant Effect alone or in combination with other proposals.

	<p>landscaping to minimise energy consumption, including maximising cooling and avoiding solar gain in the summer;</p> <p>be planned so as to minimise carbon dioxide and methane emissions, and support opportunities for decentralised and renewable or low-carbon energy supply;</p> <p>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>take account of potential changes in climate including pluvial and fluvial flooding, rising sea levels and coastal erosion, and;</p> <p>incorporate proposals for sustainable travel including travel plans where appropriate.</p>	<p>Individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process. This will ensure that any such allocations consider the Conservation Objectives of the relevant Designated Sites and develop strategies that deliver the necessary avoidance, mitigation, compensation and enhancement required in order to ensure that there are No Likely Significant Effects.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	
<b>Policy GP3: Spatial strategy</b>	<p>Preference will be given to proposals for minerals and waste development in accordance with the Key Diagram where individual sites are well related to the Suffolk Lorry Route Network (or rail network or navigation) major centres of population and do not have potentially significant adverse impacts upon features of environmental importance (natural or man-made) or endanger human health.</p>	<p>This Policy is not considered to have a Likely Significant Effect upon the relevant Designated Sites as it acknowledges, amongst other things, the requirement not to have <i>"...adverse impacts upon features of environmental importance (natural or man made)...and take into account the views of statutory bodies including ...Natural England"</i></p> <p>Individual site-specific allocations within The SMWLP will be required to undergo a project-</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>

		<p>specific HRA process. This will ensure that any such allocations consider the Conservation Objectives of the relevant Designated Sites and develop strategies that deliver the necessary avoidance, mitigation, compensation and enhancement required in order to ensure that there are No Likely Significant Effects.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	
<b>Policy GP4: General environmental criteria</b>	<p>Minerals and waste development will be acceptable so long as the proposals, adequately access and address the potentially significant adverse impacts upon:</p> <p>pluvial, fluvial, tidal and groundwater flood risk;</p> <p>vehicle movements, access and the wider highways network;</p> <p>landscape character, visual impact, and protected landscapes;</p> <p>biodiversity;</p> <p>geodiversity;</p> <p>historic environment, heritage assets and their setting;</p> <p>public rights of way;</p> <p>neighbouring land-use;</p>	<p>This Policy is not considered to have a Likely Significant Effect upon the relevant Designated Sites as it requires developers to address “<i>potentially significant impacts</i>” upon, amongst other things, biodiversity, geodiversity, light pollution and the local water environment.</p> <p>Individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process. This will ensure that any such allocations consider the Conservation Objectives of the relevant Designated Sites and develop strategies that deliver the</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>



	<p>soil resources including the best and most versatile agricultural land;</p> <p>noise and vibration;</p> <p>air quality including dust and odour;</p> <p>light pollution;</p> <p>the local water environment;</p> <p>land instability;</p> <p>airfield safeguarding;</p> <p>the differential settlement of quarry backfilling;</p> <p>mud and aggregates on the road;</p> <p>litter, vermin and birds.</p> <p>(or the use of) alternative forms of transport including the use of rail freight shipping;</p> <p>Proposals should where applicable meet or exceed the appropriate national or local guidelines for each criterion, including reference to any hierarchy of importance, and also comply with other policies of the development plan.</p>	<p>necessary avoidance, mitigation, compensation and enhancement required in order to ensure that there are No Likely Significant Effects.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	
<b><u>Minerals Policies:</u></b>			
<b>Policy MP1: Provision of land won for sand and gravel</b>	<p>The County Council will allocate sites for the extraction of sand and gravel sufficient to supply 9.300 Mt over the Plan period to the end of 2036. It will also seek to maintain a landbank of permitted reserves of at least 7 years based upon the average of the last ten years' sales and calculated in the annual Local Aggregates Assessment.</p>	<p>This Policy is considered that it may have a Likely Significant Effect upon the relevant Designated Sites. Site allocations have not been made at this stage but the general principles of mitigation will be considered in the Appropriate Assessment below. At the planning application stage, individual site-specific allocations within The</p>	<p>There is the potential for Likely Significant Effects alone or in combination with other proposals and this will be discussed in the Appropriate Assessment below.</p>

		<p>SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	
<p><b>MP2: Proposed sites for sand and gravel extraction</b></p>	<p>The County Council will grant planning permission for sand and gravel extraction from within the following specific sites, as shown on the proposals map, subject to the other relevant policies of the Development Plan.</p> <p>Site M1 Barham</p> <p>Site M2 Barnham</p> <p>Site M3 Belstead</p> <p>Site M4 Cavenham</p> <p>Site M5 Layham</p> <p>Site M6 Tattingstone</p> <p>Site M7 Wangford</p> <p>Site M8 Wetherden</p> <p>Site M9 Wherstead</p> <p>Site M10 Worlington</p>	<p>This Policy is considered that it may have a Likely Significant Effect upon the relevant Designated Sites. The general principles of mitigation will be considered in the Appropriate Assessment below. At the planning application stage, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>There is the potential for Likely Significant Effects alone or in combination with other proposals and this will be discussed in the Appropriate Assessment below.</p>
<p><b>MP3: Borrow pits</b></p>	<p>Borrow pits to provide sand and gravel to serve major civil engineering projects will be acceptable as long as:</p> <p>they are within 10 km of the project site;</p> <p>the borrow pit is worked and reclaimed as part of the project;</p> <p>they comply with the general environmental criteria Policy GP4.</p>	<p>This Policy is not considered to have a Likely Significant Effect upon the relevant Designated Sites but individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>



		enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.	
<b>MP4: Agricultural and public supply reservoirs</b>	Proposals for the extraction of minerals (which would involve the removal of mineral off site) to enable the construction of a reservoir for agriculture, flood alleviation and/or public water supply will be permitted where there is a demonstrated need for the storage of water at the capacity proposed at the given location and subject to the proposals complying with the general environmental criteria Policy GP4.	<p>This Policy is not considered to have a Likely Significant Effect upon the relevant Designated Sites but individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	No Likely Significant Effect alone or in combination with other proposals.
<b>MP5: Cumulative environmental impacts and phasing of workings</b>	Where a proposed minerals site is considered acceptable (in its own right) but the cumulative impact of a proposal in conjunction with other existing, permitted or allocated minerals sites or other development in the proximity is considered unacceptable, the proposal may be considered acceptable if phased so that one site follows the completion of the other or it can be demonstrated that the adverse cumulative impacts can be adequately mitigated.	<p>This Policy is not considered to have a Likely Significant Effect upon the relevant Designated Sites but individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	No Likely Significant Effect alone or in combination with other proposals.
<b>MP6: Progressive working and</b>	Proposals for new mineral workings should be accompanied by a scheme for the progressive	This Policy is not considered to have a Likely Significant Effect upon the relevant	No Likely Significant Effect alone or in combination with other proposals.

<p><b>restoration</b></p>	<p>working and restoration of the site throughout its life.</p> <p>Preference will be given to restoration proposals that incorporate a net gain for biodiversity with the creation and management of priority habitats and that support protected priority and Red Data Book Species and/or that conserve geological and geomorphological resources. Such habitats, species and resources should be appropriately and sustainably incorporated into restoration proposals focussed on flood alleviation, reservoirs, agriculture, forestry, amenity, or ecology. Providing links to surrounding habitats is also encouraged.</p>	<p>Designated Sites but individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	
<p><b>MP7: Aftercare</b></p>	<p>Where the proposed restoration is to an agriculture, forestry, amenity or ecology after-use following minerals extraction, an outline aftercare strategy of five years or more is required prior to the determination of the planning application. The outline strategy should set out the land management proposed to bring the restored land up to the required standard for the proposed after-use. The outline strategy should also allow for additional measures that may be required following the annual aftercare inspection and the subsequent submission of a finalised version of the annual aftercare report detailing the actions required.</p>	<p>This Policy is considered to have a Positive Effect upon the relevant Designated Sites as it requires preference to be given for proposals which “...<i>incorporate a net gain for biodiversity...</i>”. Specific mention that “...<i>ecological interest can be incorporated into most schemes...</i>” supports this assertion.</p> <p>Individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will</p>	<p>No Likely <i>Negative</i> Significant Effect alone or in combination with other proposals.</p>

		be submitted to Natural England.	
<b>MP8: Concrete batching plants and asphalt plants</b>	<p>Proposals for concrete batching plants or asphalt plants at sand and gravel quarries must stipulate the proportion of indigenous sand and gravel that will be used in the production of ready mixed concrete or asphalt.</p> <p>At sand and gravel quarries, planning permission will be limited to the end date of the quarry planning permission or the when the indigenous material is no longer being used, whichever is the sooner.</p> <p>Any proposals for concrete batching plants or asphalt plants that are County matters must also comply with the environmental criteria set out in Policy GP4.</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites but individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	No Likely Significant Effect alone or in combination with other proposals.
<b>MP9: Safeguarding of port and rail facilities, and facilities for the manufacture of concrete and asphalt:</b>	<p>When proposals are made which would result in the loss of or might potentially compromise the use of:</p> <p>an existing, planned or potential rail head, wharf or associated storage, handling or processing facilities for the bulk transport by rail or sea of minerals, including recycled, secondary and marine-dredged materials, and/or;</p> <p>an existing, planned or potential site for concrete batching, the manufacture of coated materials, other concrete products or the handling, processing and distribution of substitute, recycled and secondary aggregate material;</p> <p>applicants will be required to demonstrate to the County Council that those sites no longer meet the needs of the aggregates industry. Where this is not the case, satisfactory</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites but individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	No Likely Significant Effect alone or in combination with other proposals.

	<p>alternative handling facilities should be made available by the developer. Development proposals in close proximity to the above minerals related facilities should demonstrate that they would not prejudice or be prejudiced by those facilities.</p> <p>Any mitigation required falls on the development that receives planning permission last.</p> <p>District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies MP9 before providing a consultation response.</p>		
<p><b>MP10: Minerals consultation and safeguarding areas</b></p>	<p>The County Council will safeguard:</p> <p>those Minerals Safeguarding Areas located within the Minerals Consultation Areas identified on the Proposals Map from proposed development in excess of five hectares which is not in accordance with the Development Plan. The County Council will, when consulted by the Local Planning Authority, object to such development unless it can be shown that the sand and gravel present is not of economic value, or not practically or environmentally feasible to extract, or that the mineral will be worked before the development takes place;</p> <p>areas falling within 250m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction. The MPA will advise the Local Planning Authority whether any proposed development might prejudice the future extraction of minerals and</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites but individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>

	<p>should be refused, or whether such development itself might be prejudiced by proposed mineral working.</p> <p>District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the Minerals Safeguarding Area as defined on the Proposals Map. The County Council will then refer to Policy MP10 before providing a consultation response</p>																										
<b><u>Waste Policies:</u></b>																											
<b>Policy WP1: Management of waste (Mt)</b>	<p>Policy WP1: Management of waste (Mt)</p> <p>The County Council anticipates the following annual levels of waste arisings for which appropriate waste management facilities will be granted planning permission, provided they are in accordance with the Waste Hierarchy and the policies of the Development Plan and there are no other material considerations which indicate otherwise.</p> <table><tr><td></td><td>20 15/ 16</td><td>20 20/ 21</td><td>20 25/ 26</td><td>20 30/ 31</td><td>20 35/ 36</td></tr><tr><td>LA C W</td><td>0.3 97</td><td>0.4 15</td><td>0.4 33</td><td>0.4 52</td><td>0.4 70</td></tr><tr><td>C&amp; I</td><td>0.7 95 to 0.7 69</td><td>0.8 57 to 0.6 97</td><td>0.9 60 to 0.6 32</td><td>1.0 39 to 0.5 74</td><td>1.0 39 to 0.5 31</td></tr><tr><td>CD &amp;E</td><td>0.5 17</td><td>0.4 69</td><td>0.4 34</td><td>0.3 86</td><td>0.3 50</td></tr></table>		20 15/ 16	20 20/ 21	20 25/ 26	20 30/ 31	20 35/ 36	LA C W	0.3 97	0.4 15	0.4 33	0.4 52	0.4 70	C& I	0.7 95 to 0.7 69	0.8 57 to 0.6 97	0.9 60 to 0.6 32	1.0 39 to 0.5 74	1.0 39 to 0.5 31	CD &E	0.5 17	0.4 69	0.4 34	0.3 86	0.3 50	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the requirement to be within the Waste Hierarchy and the policies of the Development Plan. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>
	20 15/ 16	20 20/ 21	20 25/ 26	20 30/ 31	20 35/ 36																						
LA C W	0.3 97	0.4 15	0.4 33	0.4 52	0.4 70																						
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CD &E	0.5 17	0.4 69	0.4 34	0.3 86	0.3 50																						

	HA Z	0.0 44	0.0 39	0.0 34	0.0 31	0.0 31		
<b>Policy WP2: Proposed site for radioactive waste management</b>	<p>The County Council will grant planning permission for radioactive waste management on the following specific site, as shown on the proposals map, subject to the other relevant policies of the Development Plan.</p> <p>Site W1 Sizewell A Nuclear Power Station</p>						<p>Because of the location of the Sizewell A Nuclear Power Station within an Area of Outstanding Natural Beauty and the relatively close proximity to the Minsmere-Walberswick Ramsar Site, Minsmere to Walberswick Heaths and Marshes SAC and Minsmere-Walberswick SPA to the north and the Sandlings SPA to the south, Natural England have raised a concern that this proposal may result in a Likely Significant Effect upon these sites.</p> <p>This will be discussed in the Appropriate Assessment below.</p>	Potential for Likely Significant Effect. See Appropriate Assessment below.
<b>Policy WP3: Existing or designated land-uses potentially suitable for waste development</b>	<p>General waste management facilities (other than landfill sites and waste water treatment facilities) may be acceptable within the following areas:</p> <p>land in existing waste management use;</p> <p>land in existing general industrial use (B2 use class) or in existing storage or distribution use (B8 use class) (excluding open air composting);</p> <p>land allocated for B2 and B8 purposes in a local plan or development plan document (excluding open air composting);</p> <p>within or adjacent to agricultural and forestry buildings;</p>						<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policy GP 4 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will</p>	No Likely Significant Effect alone or in combination with other proposals.

	<p>agricultural and forestry land (open air composting only);</p> <p>brownfield land (excluding open air composting);</p> <p>former airfields (open air composting only);</p> <p>waste water treatment facilities (composting and anaerobic digestion only);</p> <p>current and former mineral workings (open air composting and construction, demolition and excavation waste recycling only).</p> <p>Proposals must also comply with the environmental criteria set out in Policy GP4.</p>	be submitted to Natural England.	
<b>Policy WP4: Household waste recycling centres</b>	<p>Household waste recycling centres may be acceptable within purpose designed or suitably adapted facilities on land within the land uses identified within Policy WP3.</p> <p>Proposals for such facilities at landfill sites may 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>Where it can be demonstrated that no suitable sites consistent with Policy WP3 are available within the area to be served by the household waste recycling centre, household waste recycling centres may be acceptable on other sites provided these are consistent with Policy GP4 and are accessible to the public.</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policy WP 3 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	No Likely Significant Effect alone or in combination with other proposals.
<b>Policy WP5: Open air composting</b>	Open air composting facilities may be acceptable on land within	This Policy is considered to have a Neutral Effect upon the relevant Designated Sites	No Likely Significant Effect alone or in



	<p>the uses identified within Policy WP3.</p> <p>Proposals for such facilities at landfill sites may be considered acceptable on a temporary basis whilst landfilling and restoration is taking place on site.</p> <p>Proposals for open air 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, 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 must also comply with the environmental criteria set out in Policy GP4.</p>	<p>because of the proposed sites being within already developed land and the requirement to comply with Policy WP 3 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>combination with other proposals.</p>
<p><b>Policy WP6: In-vessel composting facilities</b></p>	<p>Enclosed composting facilities may be acceptable on land within the uses identified within Policy WP3.</p> <p>Proposals for such facilities at landfill sites may be considered acceptable on a temporary basis whilst landfilling and restoration is taking place on site.</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 must also comply with the environmental criteria set out in Policy GP4.</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policy WP 3 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>

<p><b>Policy WP7: Anaerobic digestion</b></p>	<p>Anaerobic digestion facilities may be acceptable on land:</p> <p>within the uses identified within Policy WP3; or</p> <p>integrated with waste water treatment plants.</p> <p>Proposals for such facilities at landfill sites may be considered acceptable on a temporary basis whilst landfilling and restoration is taking place on site.</p> <p>Proposals must also comply with the environmental criteria set out in Policy GP4.</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policies GP 4 and WP 3 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>
<p><b>Policy WP8: Proposals for recycling or transfer of inert and construction, demolition and excavation waste</b></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 WP3.</p> <p>At mineral sites, planning permission will be limited to the life of the mineral operation.</p> <p>Proposals for such facilities at landfill sites may be considered acceptable on a temporary basis whilst landfilling and restoration is taking place on site.</p> <p>On land suitable for General Industrial or Storage &amp; Distribution uses, activities shall take place within purpose-designed facilities.</p> <p>Proposals must also comply with the environmental criteria set out in Policy GP4.</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policy WP 3 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>
<p><b>Policy WP9: Waste</b></p>	<p>Waste transfer stations, material recycling facilities, end of life</p>	<p>This Policy is considered to have a Neutral Effect</p>	<p>No Likely Significant Effect alone or in</p>

<p><b>transfer stations, materials recycling facilities, end of life vehicle facilities and waste electrical and electronic equipment recovery facilities</b></p>	<p>vehicle facilities and waste electrical and electronic equipment recovery facilities may be acceptable within purpose designed or suitably adapted facilities on land within the uses identified within Policy WP3.</p> <p>Proposals for such facilities at landfill sites may be considered acceptable on a temporary basis whilst landfilling and restoration is taking place on site.</p> <p>Proposals must also comply with the environmental criteria set out in Policy GP4.</p>	<p>upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policies GP 4 and WP 3 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>combination with other proposals.</p>
<p><b>Policy WP10: Residual waste treatment facilities</b></p>	<p>Residual waste treatment facilities may be acceptable where the proposed facility is:</p> <p>on land within the land-uses set out in Policy WP3, and;</p> <p>the proposals meet the environmental criteria set out in Policy GP4.</p> <p>Proposals for such facilities at landfill sites may be considered acceptable on a temporary basis whilst landfilling and restoration is taking place on site.</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>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policies GP 4 and WP 3 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>

<p><b>Policy WP11: Approval of sites for disposal of inert waste by landfilling or landraise</b></p>	<p>Additional void space or areas of landraise for the deposit of inert waste may be acceptable where:</p> <p>the importation of inert waste is required for restoration of a former mineral extraction void or;</p> <p>the importation of inert waste is required for agricultural improvement;</p> <p>and there is no acceptable alternative form of waste management further up the Waste Hierarchy that can be made available to meet the need, and;</p> <p>The proposals comply with the environmental criteria set out in Policy GP4.</p> <p>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 landfilled.</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policy GP 4 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>
<p><b>Policy WP12: Disposal of non-hazardous or hazardous waste by landfilling or landraising.</b></p>	<p>Additional void space or areas of landraising for the deposit of non-hazardous or hazardous waste may be acceptable where:</p> <p>no alternative form of waste management can be made available to meet the need, and;</p> <p>The proposals comply with the environmental criteria set out in Policy GP4.</p> <p>The landfilling of waste that could practicably be recycled, composted or recovered will not be acceptable.</p> <p>For non-hazardous waste conditions will be placed on planning permissions to ensure that only residual source-separated or pre-sorted waste is landfilled. Proposals for landfill</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policy GP 4 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>

	gas energy recovery will be required.		
<b>Policy WP13: Mining or excavation of landfill waste</b>	<p>The mining or excavation of landfill waste will be considered favourably where it is demonstrated clearly that:</p> <p>without mining or excavation of waste, the site is posing a significant risk to human health or safety, and/or;</p> <p>without mining or excavation of waste, the site is posing a significant risk to the environment or;</p> <p>removal is required to facilitate a major infrastructure project or;</p> <p>the proposals would result in the management of the excavated waste higher up the waste hierarchy and there would be significant local and global environmental benefits in doing so;</p> <p>and the proposals include detailed information upon how the types of waste deposited within the landfill are to be managed;</p> <p>and the proposals comply with the environmental criteria set out in Policy GP4.</p> <p>It must be demonstrated that any waste can be handled and if necessary removed from the site without posing additional significant risk to human health or safety, or to the environment.</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policy GP 4 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	No Likely Significant Effect alone or in combination with other proposals.
<b>Policy WP14: Waste water treatment facilities</b>	New or extended waste water treatment facilities may 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	This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policy GP 4 above.	No Likely Significant Effect alone or in combination with other proposals.

	<p>giving rise to unacceptable environmental impacts.</p> <p>Proposals must also comply with the environmental criteria set out in Policy GP4.</p>	<p>However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	
<p><b>Policy WP15: Transfer, storage, processing &amp; treatment of hazardous waste</b></p>	<p>Facilities for the transfer, storage, processing and treatment (including incineration) of hazardous waste will be acceptable on land:</p> <p>in existing general industrial use (B2), in storage and distribution use (B8) or identified for these uses in a development plan document or;</p> <p>integrated within an establishment producing much of the waste that will be dealt with.</p> <p>Facilities for the transfer and short-term storage of hazardous waste will also be acceptable on existing waste management sites identified as having potential for non-hazardous waste transfer where hazardous waste will only represent up to 5% of waste managed on site.</p> <p>Proposals must also comply with the environmental criteria set out in Policy GP4.</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policy GP 4 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	<p>No Likely Significant Effect alone or in combination with other proposals.</p>
<p><b>Policy WP16: Treatment and storage of radioactive waste at Sizewell nuclear power stations</b></p>	<p>Planning permission for the treatment and/or interim storage of radioactive waste at Sizewell nuclear power stations may be granted within the licensed area subject to the applicant demonstrating that the proposed development:</p>	<p>Because of the location of the Sizewell Nuclear Power Stations within an Area of Outstanding Natural Beauty and the relatively close proximity to the Minsmere-Walberswick Ramsar</p>	<p>Potential for Likely Significant Effect. See Appropriate Assessment below.</p>

	<p>is consistent with national strategies for radioactive waste management;</p> <p>there are exceptional circumstances why the development is justified within the Suffolk Coasts &amp; Heaths Area of Outstanding Natural Beauty;</p> <p>includes adequate measures to mitigate adverse impacts on the environment and local community or, as a last resort, proportionately compensate for or offset such impacts;</p> <p>is supported by robust economic and environmental assessments;</p> <p>utilises the existing rail link for the transportation of the radioactive waste unless it is demonstrated to be economically unviable, and;</p> <p>the proposals comply with the environmental criteria set out in Policy GP4.</p>	<p>Site, Minsmere to Walberswick Heaths and Marshes SAC and Minsmere-Walberswick SPA to the north and the Sandlings SPA to the south, Natural England have raised a concern that this proposal may result in a Likely Significant Effect upon these sites.</p> <p>This will be discussed in the Appropriate Assessment below.</p>	
<b>Policy WP 17: Design of waste management facilities</b>	<p>Waste management facilities will be considered favourably where they incorporate:</p> <p>designs of an appropriate scale, density, massing, height and materials;</p> <p>safe and convenient access for all potential users;</p> <p>schemes for the retention of existing and provision of new landscape features;</p> <p>measures which will protect, preserve and where practicable enhance the natural, historic environment including the setting and built environment, and:</p> <p>comply with Policy GP2.</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land and the requirement to comply with Policy GP 2 above. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will</p>	No Likely Significant Effect alone or in combination with other proposals.



		be submitted to Natural England.	
<b>Policy WP18: Safeguarding of waste management sites</b>	<p>The County Council will seek to safeguard existing sites and sites proposed for waste management use as shown on the Proposals &amp; Safeguarding 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>Development proposals in close proximity to existing sites, should demonstrate that they would not prejudice or be prejudiced by a waste management facility. The safeguarding policy will also apply to any site where planning permission has already been granted.</p> <p>Any mitigation required falls on the development that receives planning permission last.</p> <p>District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 or 400 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies WP18 before providing a consultation response.</p>	<p>This Policy is considered to have a Neutral Effect upon the relevant Designated Sites because of the proposed sites being within already developed land. However, individual site-specific allocations within The SMWLP will be required to undergo a project-specific HRA process.</p> <p>Any developer must provide SCC with sufficient information to enable SCC to complete HRA/Appropriate Assessment which will be submitted to Natural England.</p>	No Likely Significant Effect alone or in combination with other proposals.

**Table Two – Discussion and Assessment:**

	<u><b>Proposed Site:</b></u>	<u><b>Effects:</b></u>	<u><b>Comments:</b></u>
1.	<b><u>Barham</u></b> (see SW&MP, Page 43)	<b>None likely to suffer any Significant Effects.</b>	<p>This Objective is considered to have a Neutral Effect upon the Designated Sites as the proposed site is in excess of 10 kilometres from any Natura 2000 Site.</p> <p>However, individual developments within the SMWLP will be required to undergo a project-specific HRA screening process and Appropriate Assessment where required. This will ensure that any development takes into account the Conservation Objectives of the Designated Sites.</p> <p>In addition, there may well be other ecological constraints which will need to be assessed and the necessary mitigation strategies agreed.</p>
2.	<b><u>Barnham</u></b> (see SW&MP, Page 48)	<b>Breckland SAC; Breckland SPA</b>	<p>This Objective may result in a Likely Significant Effect upon the Designated Sites.</p> <p><b>Appropriate Assessment:</b></p> <p>Developments that take place within or close to the Breckland SAC and Breckland SPA have the potential to result in Likely Significant Effects upon the features of European Interest. The details of these species and habitats are set out elsewhere (Appendix One).</p> <p>The disturbance or damaging factors include:</p> <ul style="list-style-type: none"> <li>• Disturbance from construction and extraction processes, that is the physical movements, noise etcetera, together with the visual disturbance and potential interference with the movement of biodiversity caused by the various works.</li> <li>• Disturbance from the infrastructure associated with construction and extraction 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.</li> <li>• Disturbance from new street lighting, lights on, in and around new buildings, vehicle headlamps and all other artificial illumination.</li> <li>• Disturbance consequent upon the operation of any new facilities. This may include such factors as vehicle movements, lighting, corvid and gull activity.</li> <li>• 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.</li> </ul>

			<ul style="list-style-type: none"> <li>• Potential damaging effects upon the hydrology including quality and quantity of water flow into SACs and/or SPAs. This includes increased water use.</li> <li>• Increased air pollution (from construction, extraction, use, commuting, recreational and occupation of the district) having a detrimental effect on sensitive species and habitats.</li> <li>• Increased air pollution and pollutant deposition in the form of Nitrogen Oxide (NOx) 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 (although these sorts of operations are not currently being considered within the SMWLP).</li> <li>• Changes to air quality arising from fugitive dusts which may affect the functioning of plants.</li> <li>• Changes to vegetation and soils arising from the deposition of fugitive dusts.</li> </ul> <p>However, these potential disturbance issues can be mitigated by the various mitigation methods set out in Table Three Below.</p> <p>These include mitigation by timings (particularly avoiding high disturbance factors during, e.g., Stone Curlew breeding season), paying attention to climatic conditions, restricting working times and practices in periods of high sensitivity and so on.</p> <p>Developments may be phased when working large deposits to provide for a rotation of existing habitat, working phases and restoration.</p> <p>Mitigation measures such as those set out in Table Three below have enabled minerals and waste developments to take place in sensitive areas. In many cases management arrangements have been agreed with nature conservation organisations which can result in a nett gain for biodiversity in the aftermath of the necessary works.</p> <p>For each specific site, the developers will need to undertake suitable survey work and prepare a detailed avoidance, mitigation, compensation and enhancement strategy. Thereafter, such information should be submitted to SCC where it will be considered by the Ecology Team and, if required, submitted to the Proper Officer at Natural England for approval.</p>
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			<p>This will ensure that any development takes into account the Conservation Objectives of the Designated Sites. It is anticipated that sensitive working methods (including the mitigation measures set out elsewhere) and post-extraction restoration will result in a nett gain for biodiversity in the future, despite the potential for a nett loss in the working phase.</p> <p>In addition to the above, there may well be other ecological constraints (such as obtaining NE's Assent for a Potentially Damaging Operation, European Protected Species Licenses and so on) which will need to be assessed and the necessary avoidance, mitigation, compensation and enhancement strategies agreed.</p> <p>In conclusion, although there is the possibility of a short-term nett loss of habitat and increased disturbance factors, the long-term position is that there could be a nett gain in habitat available for the sensitive species.</p>
3.	<b>Belstead</b> (see SW&MP, Page 60)	<b>Stour &amp; Orwell Ramsar Site; Stour &amp; Orwell Estuaries SPA</b>	<p>This Objective may result in a Likely Significant Effect upon the Designated Sites.</p> <p><b>Appropriate Assessment:</b></p> <p>Developments that take place within or close to the Stour &amp; Orwell Ramsar Site and Stour &amp; Orwell Estuaries SPA have the potential to result in Likely Significant Effects upon the features of European Interest. The details of these species and habitats are set out elsewhere (Appendix One).</p> <p>The disturbance or damaging factors include:</p> <ul style="list-style-type: none"> <li>• Disturbance from construction and extraction processes, that is the physical movements, noise etcetera, together with the visual disturbance and potential interference with the movement of biodiversity caused by the various works.</li> <li>• Disturbance from the infrastructure associated with construction and extraction 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.</li> <li>• Disturbance from new street lighting, lights on, in and around new buildings, vehicle headlamps and all other artificial illumination.</li> <li>• Disturbance consequent upon the operation of any new facilities. This may include such factors as vehicle movements, lighting, corvid and gull activity.</li> </ul>

			<ul style="list-style-type: none"> <li>• 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.</li> <li>• Potential damaging effects upon the hydrology including quality and quantity of water flow into SACs and/or SPAs. This includes increased water use.</li> <li>• Increased air pollution (from construction, extraction, use, commuting, recreational and occupation of the district) having a detrimental effect on sensitive species and habitats.</li> <li>• Increased air pollution and pollutant deposition in the form of Nitrogen Oxide (NOx) 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 (although these sorts of operations are not currently being considered within the SMWLP).</li> <li>• 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 (although these sorts of operations are not currently being considered within the SMWLP).</li> <li>• The specific effects of pollutant deposition on the composition and integrity of Mudflats including Estuarine Invertebrates.</li> <li>• Changes to air quality arising from fugitive dusts which may affect the functioning of plants.</li> <li>• Changes to vegetation and soils arising from the deposition of fugitive dusts.</li> </ul> <p>However, these potential disturbance issues can be mitigated by the various mitigation methods set out in Table Three Below.</p> <p>These include mitigation by timings, paying attention to climatic conditions, restricting working times and practices in periods of high sensitivity and so on.</p> <p>Developments may be phased when working large deposits to provide for a rotation of existing habitat, working phases and restoration.</p> <p>Mitigation measures such as those set out in Table Three below have enabled minerals and waste developments to take place in sensitive areas. In many cases management arrangements have been</p>
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			<p>agreed with nature conservation organisations which can result in a nett gain for biodiversity in the aftermath of the necessary works.</p> <p>For each specific site, the developers will need to undertake suitable survey work and prepare a detailed avoidance, mitigation, compensation and enhancement strategy. Thereafter, such information should be submitted to SCC where it will be considered by the Ecology Team and, if required, submitted to the Proper Officer at Natural England for approval.</p> <p>This will ensure that any development takes into account the Conservation Objectives of the Designated Sites. It is anticipated that sensitive working methods (including the mitigation measures set out elsewhere) and post-extraction restoration will result in a nett gain for biodiversity in the future, despite the potential for a nett loss in the working phase.</p> <p>In addition to the above, there may well be other ecological constraints (such as obtaining NE's Assent for a Potentially Damaging Operation, European Protected Species Licenses and so on) which will need to be assessed and the necessary avoidance, mitigation, compensation and enhancement strategies agreed.</p> <p>In conclusion, although there is the possibility of a short-term nett loss of habitat and increased disturbance factors, the long-term position is that there could be a nett gain in habitat available for the sensitive species.</p>
4.	<b><u>Cavenham</u></b> (see SW&MP, Page 64)	<b>Breckland SAC; Breckland SPA</b>	<p>This Objective may result a Likely Significant Effect upon the Designated Sites.</p> <p>Please see the comments to <u>(2) Barnham</u> above.</p>
5.	<b><u>Layham</u></b> (see SW&MP, Page 69)	<b>None likely to suffer any Significant Effects.</b>	<p>This Objective is considered to have a Neutral Effect upon the Designated Sites as the proposed site is in excess of 10 kilometres from any Natura 2000 Site.</p> <p>However, individual developments within the SMWLP will be required to undergo a project-specific HRA screening process and Appropriate Assessment where required. This will ensure that any development takes into account the Conservation Objectives of the Designated Sites.</p>

			In addition, there may well be other ecological constraints which will need to be assessed and the necessary mitigation strategies agreed.
6.	<b>Tattingstone</b> (see SW&MP, Page 73)	<b>Stour &amp; Orwell Ramsar Site; Stour &amp; Orwell Estuaries SPA</b>	<p>This Objective may result in a Likely Significant Effect upon the Designated Sites.</p> <p>Please see the comments to <u>(3) Belstead</u> above.</p>
7.	<b>Wangford</b> (see SW&MP, Page 77)	<p><b>Benacre to Easton Bavents Lagoons SAC; Benacre to Easton Bavents SPA;</b></p> <p><b>Minsmere to Walberswick Heaths &amp; Marshes SAC;</b></p> <p><b>Minsmere-Walberswick Ramsar Site; Minsmere-Walberswick SPA;</b></p>	<p>This Objective may result in a Likely Significant Effect upon the Designated Sites.</p> <p><b>Appropriate Assessment:</b></p> <p>Developments that take place within or close to the Benacre to Easton Bavents Lagoons SAC; Benacre to Easton Bavents SPA, Minsmere to Walberswick Heaths &amp; Marshes SAC and Minsmere-Walberswick Ramsar Site; Minsmere-Walberswick SPA have the potential to result in Likely Significant Effects upon the features of European Interest. The details of these species and habitats are set out elsewhere (Appendix One).</p> <p>The disturbance or damaging factors include:</p> <ul style="list-style-type: none"> <li>• Disturbance from construction and extraction processes, that is the physical movements, noise etcetera, together with the visual disturbance and potential interference with the movement of biodiversity caused by the various works.</li> <li>• Disturbance from the infrastructure associated with construction and extraction 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.</li> <li>• Disturbance from new street lighting, lights on, in and around new buildings, vehicle headlamps and all other artificial illumination.</li> <li>• Disturbance consequent upon the operation of any new facilities. This may include such factors as vehicle movements, lighting, corvid and gull activity.</li> <li>• 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.</li> <li>• Potential damaging effects upon the hydrology including quality and quantity of water flow into SACs and/or SPAs. This includes increased water use.</li> </ul>



			<ul style="list-style-type: none"> <li>• Increased air pollution (from construction, extraction, use, commuting, recreational and occupation of the district) having a detrimental effect on sensitive species and habitats.</li> <li>• Increased air pollution and pollutant deposition in the form of Nitrogen Oxide (NOx) 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 (although these sorts of operations are not currently being considered within the SMWLP).</li> <li>• 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 (although these sorts of operations are not currently being considered within the SMWLP).</li> <li>• The specific effects of pollutant deposition on the composition and integrity of Mudflats including Estuarine Invertebrates.</li> <li>• Changes to air quality arising from fugitive dusts which may affect the functioning of plants.</li> <li>• Changes to vegetation and soils arising from the deposition of fugitive dusts.</li> </ul> <p>However, these potential disturbance issues can be mitigated by the various mitigation methods set out in Table Three Below.</p> <p>These include mitigation by timings, paying attention to climatic conditions, restricting working times and practices in periods of high sensitivity and so on.</p> <p>Developments may be phased when working large deposits to provide for a rotation of existing habitat, working phases and restoration.</p> <p>Mitigation measures such as those set out in Table Three below have enabled minerals and waste developments to take place in sensitive areas. In many cases management arrangements have been agreed with nature conservation organisations which can result in a nett gain for biodiversity in the aftermath of the necessary works.</p> <p>For each specific site, the developers will need to undertake suitable survey work and prepare a detailed avoidance, mitigation, compensation and enhancement strategy. Thereafter, such information</p>
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			<p>should be submitted to SCC where it will be considered by the Ecology Team and, if required, submitted to the Proper Officer at Natural England for approval.</p> <p>This will ensure that any development takes into account the Conservation Objectives of the Designated Sites. It is anticipated that sensitive working methods (including the mitigation measures set out elsewhere) and post-extraction restoration will result in a nett gain for biodiversity in the future, despite the potential for a nett loss in the working phase.</p> <p>In addition to the above, there may well be other ecological constraints (such as obtaining NE's Assent for a Potentially Damaging Operation, European Protected Species Licenses and so on) which will need to be assessed and the necessary avoidance, mitigation, compensation and enhancement strategies agreed.</p> <p>In conclusion, although there is the possibility of a short-term nett loss of habitat and increased disturbance factors, the long-term position is that there could be a nett gain in habitat available for the sensitive species.</p>
8.	<b>Wetherden</b> (see SW&MP, Page 86)	<b>None likely to suffer any Significant Effects.</b>	<p>This Objective is considered to have a Neutral Effect upon the Designated Sites as the proposed site is in excess of 10 kilometres from any Natura 2000 Site.</p> <p>However, individual developments within the SMWLP will be required to undergo a project-specific HRA screening process and Appropriate Assessment where required. This will ensure that any development takes into account the Conservation Objectives of the Designated Sites.</p> <p>In addition, there may well be other ecological constraints which will need to be assessed and the necessary mitigation strategies agreed.</p>
9.	<b>Wherstead</b> (see SW&MP, Page 90)	<b>Stour &amp; Orwell Ramsar Site; Stour &amp; Orwell Estuaries SPA</b>	<p>This Objective may result in a Likely Significant Effect upon the Designated Sites.</p> <p>Please see the comments to (3) Belstead above.</p>
10.	<b>Worlington</b> (see SW&MP, Page 94)	<b>Breckland SAC; Breckland SPA</b>	<p>This Objective may result a Likely Significant Effect upon the Designated Sites.</p> <p>Please see the comments to (2) Barnham above.</p>

11.	<b><u>Sizewell “A” Nuclear Power Station</u></b> (see SW&MP, Page 98)	<p><b>Minsmere to Walberswick Heath &amp; Marshes SAC;</b></p> <p><b>Minsmere-Walberswick Ramsar Site;</b></p> <p><b>Minsmere-Walberswick SPA;</b></p> <p><b>Outer Thames Estuary SPA;</b></p> <p><b>Sandlings SPA;</b></p> <p><b>Southern North Sea cSAC</b></p>	<p>This Objective may result in a Likely Significant Effect upon the Designated Sites.</p> <p><b>Appropriate Assessment:</b></p> <p>Developments that take place within or close to the Minsmere to Walberswick Heath &amp; Marshes SAC, Minsmere-Walberswick Ramsar Site; Minsmere-Walberswick SPA, Outer Thames Estuary SPA, Sandlings SPA and Southern North Sea cSAC have the potential to result in Likely Significant Effects upon the features of European Interest. The details of these species and habitats are set out elsewhere (Appendix One).</p> <p>The disturbance or damaging factors include:</p> <ul style="list-style-type: none"> <li>• Disturbance from construction and extraction processes, that is the physical movements, noise etcetera, together with the visual disturbance and potential interference with the movement of biodiversity caused by the various works.</li> <li>• Disturbance from the infrastructure associated with construction and extraction 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.</li> <li>• Disturbance from new street lighting, lights on, in and around new buildings, vehicle headlamps and all other artificial illumination.</li> <li>• Disturbance consequent upon the operation of any new facilities. This may include such factors as vehicle movements, lighting, corvid and gull activity.</li> <li>• 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.</li> <li>• Potential damaging effects upon the hydrology including quality and quantity of water flow into SACs and/or SPAs. This includes increased water use.</li> <li>• Increased air pollution (from construction, extraction, use, commuting, recreational and occupation of the district) having a detrimental effect on sensitive species and habitats.</li> <li>• The specific effects of pollutant deposition on the composition and integrity of Mudflats including Estuarine Invertebrates.</li> <li>• Changes to air quality arising from fugitive dusts which may affect the functioning of plants.</li> <li>• Changes to vegetation and soils arising from the deposition of fugitive dusts.</li> </ul>

			<p>However, these potential disturbance issues can be mitigated by the various mitigation methods set out in Table Three Below.</p> <p>These include mitigation by timings, paying attention to climatic conditions, restricting working times and practices in periods of high sensitivity and so on.</p> <p>Developments may be phased when working large deposits to provide for a rotation of existing habitat, working phases and restoration.</p> <p>The amounts of waster being considered for this site are very modest, being considered at a couple of hundred tons over a period of years. This waste will be processed within existing buildings (on a large site) but it is possible that additional storage and processing facilities may be required but these will be within the existing curtilage.</p> <p>For this Nuclear site, the developers will need to undertake suitable survey work and prepare a detailed avoidance, mitigation, compensation and enhancement strategy. Thereafter, such information should be submitted to SCC where it will be considered by the Ecology Team and, if required, submitted to the Proper Officer at Natural England for approval.</p> <p>This will ensure that any development takes into account the Conservation Objectives of the Designated Sites. It is anticipated that sensitive working methods (including the mitigation measures set out elsewhere) will not result in any nett loss for biodiversity in the future.</p> <p>In addition to the above, there may well be other ecological constraints (such as obtaining NE's Assent for any Potentially Damaging Operation, European Protected Species Licenses and so on) which will need to be assessed and the necessary avoidance, mitigation, compensation and enhancement strategies agreed.</p> <p>In conclusion, although there is only a negligible possibility of a short-term nett loss of habitat and increased disturbance factors.</p>
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**Table Three – Mitigation Methods:**

Mitigation methods (some methods are shared between different types of development as appropriate)			
Type of development	Activity	Potential impacts	Mitigation methods
Sand and gravel extraction and restoration including infilling with inert waste materials	Soil stripping	Dust	<ul style="list-style-type: none"> <li>Avoiding windy weather</li> </ul>
	Soil storage	Dust	<ul style="list-style-type: none"> <li>Grass seeding</li> </ul>
		Weeds	<ul style="list-style-type: none"> <li>Spraying</li> <li>Mowing</li> <li>Weeding</li> <li>Grass seeding</li> </ul>
	Extraction	Loss of agricultural etc land	<ul style="list-style-type: none"> <li>Phased working and restoration</li> </ul>
		Noise	<ul style="list-style-type: none"> <li>Buffer zones</li> <li>Earth bunds</li> <li>Effective silencers</li> <li>Well maintained machinery</li> <li>Restricted working hours</li> </ul>
		Dust	<ul style="list-style-type: none"> <li>Water bowsers on haul routes</li> <li>Restricted vehicles speeds</li> <li>Minimising material drop heights</li> </ul>
		Dewatering	<ul style="list-style-type: none"> <li>Monitoring boreholes with piezometres</li> <li>Wet working</li> <li>Suction dredger working</li> </ul>
	Processing	Noise	<ul style="list-style-type: none"> <li>Restricted working hours</li> <li>Buffer zones</li> <li>Earth bunds</li> <li>Effective silencers</li> <li>Well maintained machinery</li> </ul>
		Dust	<ul style="list-style-type: none"> <li>Wet process</li> <li>Water bowsers</li> <li>Water sprays</li> </ul>
		Lights	<ul style="list-style-type: none"> <li>Restricted working hours</li> <li>Hooded and directed lighting</li> </ul>
		Silt washings	<ul style="list-style-type: none"> <li>Collect in silt lagoon or silt plant</li> <li>Incorporate in site restoration</li> </ul>

		Waste sand	<ul style="list-style-type: none"> <li>• Incorporate in site restoration</li> </ul>
		Stockpiles	<ul style="list-style-type: none"> <li>• Restrict height</li> </ul>
	HGV traffic	Noise	<ul style="list-style-type: none"> <li>• Restricted working hours</li> </ul>
		Emissions	<ul style="list-style-type: none"> <li>• Use of latest specification lorries</li> </ul>
		Congestion	<ul style="list-style-type: none"> <li>• Lorry management plans</li> </ul>
		Load spillage	<ul style="list-style-type: none"> <li>• Sheeting of loads</li> </ul>
		Mud on road	<ul style="list-style-type: none"> <li>• Surfaced haul route</li> <li>• Wheel cleaning facilities</li> <li>• Road sweeper</li> </ul>
	Restoration	Noise	<ul style="list-style-type: none"> <li>• Effective silencers</li> <li>• Well maintained machinery</li> <li>• Restricted working hours</li> </ul>
		Dust	<ul style="list-style-type: none"> <li>• Water bowsers on haul routes</li> <li>• Restricted vehicles speeds</li> <li>• Minimising material drop heights</li> </ul>
		Infilling with inert waste materials	<ul style="list-style-type: none"> <li>• Reject inappropriate waste materials</li> </ul>
	Aftercare	Poor drainage	<ul style="list-style-type: none"> <li>• Deep ploughing</li> <li>• Field drains</li> </ul>
		Poor soil structure	<ul style="list-style-type: none"> <li>• Cultivation</li> </ul>
		Fertility too low	<ul style="list-style-type: none"> <li>• Apply fertilizer</li> </ul>
		Fertility too high	<ul style="list-style-type: none"> <li>• Mow and remove cuttings</li> </ul>
		Planting failures	<ul style="list-style-type: none"> <li>• Replacement planting</li> </ul>
		Leaking ponds	<ul style="list-style-type: none"> <li>• Reline ponds</li> </ul>
Waste Development	Household waste recycling centres	Hazardous waste handling	<ul style="list-style-type: none"> <li>• Bespoke containers etc.</li> </ul>
	Open air composting	Bioaerosols	<ul style="list-style-type: none"> <li>• Buffer zones</li> </ul>
		Fires	<ul style="list-style-type: none"> <li>• Turning windrows regularly</li> </ul>
		Odour	<ul style="list-style-type: none"> <li>• Turning windrows regularly</li> </ul>

		Leachate	<ul style="list-style-type: none"> <li>Sealed drainage</li> </ul>
	In-vessel composting	Bioaerosols	<ul style="list-style-type: none"> <li>Biofilters</li> </ul>
		Odours	<ul style="list-style-type: none"> <li>Biofilters</li> </ul>
		Leachate	<ul style="list-style-type: none"> <li>Sealed drainage</li> </ul>
		Fires	<ul style="list-style-type: none"> <li>Forced air control &amp; water sprays</li> </ul>
		Noise	<ul style="list-style-type: none"> <li>Electrical inverter fans</li> </ul>
	Anaerobic Digestion	Odour	<ul style="list-style-type: none"> <li>Feed stock management</li> </ul>
		Noise	<ul style="list-style-type: none"> <li>Insulated generator housing</li> </ul>
		Leachate	<ul style="list-style-type: none"> <li>Sealed drainage</li> </ul>
	Aggregates recycling	Noise	<ul style="list-style-type: none"> <li>Rubber lined machinery</li> </ul>
			<ul style="list-style-type: none"> <li>White noise reversing warnings</li> </ul>
		Dust	<ul style="list-style-type: none"> <li>Water sprays</li> </ul>
			<ul style="list-style-type: none"> <li>Surfaced yards</li> </ul>
	Waste Transfer, Materials Recycling, End of Life Vehicle Facilities, Waste Electrical Equipment Recovery Facilities	Noise	<ul style="list-style-type: none"> <li>Buffer zones</li> <li>Bunds</li> <li>Buildings</li> </ul>
		Leachate	<ul style="list-style-type: none"> <li>Sealed Drainage</li> </ul>
	Residual Waste Treatment	Odour	<ul style="list-style-type: none"> <li>Negative air pressure within building</li> <li>Fast acting doors</li> <li>High temperature combustion</li> </ul>



	Facility (Energy from waste)	Flue gas emissions	<ul style="list-style-type: none"> <li>• High temperature combustion to destroy dioxins</li> <li>• Addition of activated carbon to prevent reformation of dioxins</li> <li>• Filter bags to remove particulates</li> <li>• Sophisticated plant control</li> </ul>
		Noise	<ul style="list-style-type: none"> <li>• Enclosed within buildings</li> </ul>
	Inert landfilling	Potential pollution	<ul style="list-style-type: none"> <li>• Reject inappropriate materials</li> </ul>
	Landfilling with non-hazardous or hazardous waste	Odour	<ul style="list-style-type: none"> <li>• Daily covering of waste with soils</li> <li>• Perfumed sprays</li> </ul>
		Leachate	<ul style="list-style-type: none"> <li>• Impermeable site liners</li> <li>• Leachate treatment plants</li> </ul>
		Landfill gas	<ul style="list-style-type: none"> <li>• Impermeable site liners</li> <li>• Landfill gas abstraction systems</li> </ul>
		Vermin	<ul style="list-style-type: none"> <li>• Daily covering of waste with soils</li> <li>• Traps</li> </ul>
		Birds	<ul style="list-style-type: none"> <li>• Daily covering of waste with soils</li> <li>• Hawks</li> <li>• Kites</li> <li>• Acoustic air guns</li> </ul>
		Flies	<ul style="list-style-type: none"> <li>• Daily covering of waste with soils</li> <li>• Insecticides</li> </ul>
		Hazardous waste	<ul style="list-style-type: none"> <li>• Discrete cells</li> </ul>
	Landfill mining	As for landfilling	<ul style="list-style-type: none"> <li>• As for landfilling</li> </ul>
	Hazardous waste handling	Hazardous waste handling	<ul style="list-style-type: none"> <li>• Bespoke containers etc.</li> </ul>
	Treatment & Storage of Radioactive Waste	Radiation	<ul style="list-style-type: none"> <li>• As advised by the National Radiological Protection Board</li> </ul>



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