



*Suffolk Minerals & Waste Local Plan
Modifications
Sustainability Appraisal*

**September
2019**



Contents

1.	Introduction	1
1.1	Background	1
1.2	The Minerals & Waste Local Plan	1
2.	The Requirement for an SA Addendum	3
2.1	Why is further SA work needed?	3
2.2	What is included within this SA Addendum	3
3.	Screening the Main Modifications	4
3.1	How the Changes are presented in the SMWLP Modifications September 2019	4
3.2	The SA screening process	4
4.	Main Modifications regarding Plan Policies	18
4.1	Introduction and approach of re-assessment	18
4.2	Modification (MM14) to Policy MP10	18
4.3	Modification (MM24) to Policy WP13	21
4.4	Modification (MM25) to Policy WP14	23
4.5	Modification (MM29) to Policy WP18	25
4.6	Updated Cumulative and Synergistic Impacts of the Minerals & Waste Policies	28
5.	Modifications regarding Site Allocations	31
5.1	Modification (MM32) to Policy MS1	31
6.	Considerations for SA Conclusions	49
6.1	Introduction	49
7.	Next Steps	55
8.	Monitoring	56



List of Tables

Table 1:	Table of Main Modifications and Initial Screening for Significant Effects	5
Table 2:	Impact on Sustainability Objectives: Policy MP10	18
Table 3:	Impact on Sustainability Objectives: Policy WP13.....	21
Table 4:	Impact on Sustainability Objectives: Policy WP14.....	23
Table 5:	Impact on Sustainability Objectives: Policy WP18.....	25
Table 6:	Cumulative Impacts of the Plan's General Policies	28
Table 7:	Impact on Sustainability Objectives: Policy MS1	31
Table 8:	Impact on Sustainability Objectives: Policy MS2	33
Table 9:	Impact on Sustainability Objectives: Policy MS4	35
Table 10:	Impact on Sustainability Objectives: Policy MS6	37
Table 11:	Impact on Sustainability Objectives: Policy MS7	39
Table 12:	Site appraisal for Wangford site submission	42
Table 13:	Summary of effects of minerals site allocations and alternatives	45
Table 14:	Reasons for selecting / rejecting site options.....	47



List of Acronyms

AD	Anaerobic Digestion
ALC	Agricultural Land Classification
AONB	Areas of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BARR	Buildings At Risk Register
Bq	Becquerel
C, D & E Waste	Construction, demolition and excavation waste
CH&P	Combined Heat and Power
C&I waste	Commercial and Industrial waste
CWS	County Wildlife Site
DCLG	Department for Communities and Local Government
DEFRA	Department for Environment, Food and Rural Affairs
DPD	Development Plan Document
EA	Environment Agency
EEAWP	East of England Aggregates Working Party
EC	European Community
EEC	European Economic Community
EfW	Energy from Waste facility
ELV	End of Life Vehicle
EU	European Union
FZ	Flood Zone
GIS	Global Information System
GWh	Giga Watt per hour
ha	Hectare
HEC	Historic Environment Characterisation
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
HS2	High Speed 2 proposed railway
ILW	Intermediate Level Waste (radioactive waste)
IVC	In-vessel Composting facility
kW	Kilo Watt
LACW	Local Authority Collected Waste
LAA	Local Aggregates Assessment
LLW	Low Level Waste (radioactive waste)
LNR	Local Nature Reserve
LPA	Local Planning Authority
LoWS	Local Wildlife Sites
MCA	Minerals Consultation Areas



MPA	Minerals Planning Authority
MRF	Materials Recycling Facility
MSA	Minerals Safeguarding Areas
Mt	Million Tonnes
MW	Mega Watt
NNR	National Nature Reserve
NO2	Nitrogen Dioxide
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
ODPM	Office of the Deputy Prime Minister
PAS	Planning Advisory Service
PDL	Previously Developed Land
PM10	Particle Matter
PPG	Planning Practice Guidance
PPS	Planning Policy Statement
PRoW	Public Right of Way
RCHW	Recycling Centres for Household Waste
SA	Sustainability Appraisal
SA/SEA	Sustainability Appraisal / Strategic Environmental Assessment
SAC	Special Areas for Conservation
SAM	Scheduled Ancient Monument
SARS	Strategic Aggregate Recycling Site
SFRA	Strategic Flood Risk Assessments
SMWLP	Suffolk Minerals & Waste Local Plan
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
SCC	Suffolk County Council
SuDS	Sustainable Drainage Systems
SWS	Suffolk Waste Study
VLLW	Very Low-Level Waste (radioactive waste)
WCS	Waste Core Strategy
WPA	Waste Planning Authority



Glossary

Aftercare:	Following final restoration of a former quarry, the land is likely to require further treatment to bring it up to the required standard for the approved after-use, for example agriculture. This entails annual monitoring leading to the identification of any necessary remedial works such as drainage or cultivation for five years.
Anaerobic Digestion:	Anaerobic (in the absence of oxygen) digestion of organic waste, typically energy crops, brewery waste or vegetable tailings, inside a closed vessel. The methane gas produced is used to generate electricity and the digestate residue is used for fertiliser.
Aggregates:	Aggregates include crushed rock, sand and gravel or recycled materials that are used in construction, typically for the production of concrete, mortar, asphalt or as drainage media
Area of Outstanding Natural Beauty:	An AONB is an area designated under Section 87 of the National Parks and Access to the Countryside Act 1949 as an area of particular natural beauty to be preserved and enhanced. In Suffolk, the Dedham Vale and the Suffolk Coasts & Heaths are designated AONBs.
Becquerel (Bq):	The standard international unit of radioactivity equal to one radioactive transformation per second.
Bio-aerosol:	Associated with the composting of green waste which releases small particles including spores which are carried in suspension on the wind.
Borrow Pits:	In the Suffolk context are sand and gravel workings used exclusively for a particular construction project, typically new road construction. The term borrow comes from the fact that sometimes the extracted sand and gravel is replaced in the resulting void space by surplus low-quality materials such as silt which are not strong enough to carry the weight of the new road or other structure. The main advantage of borrow pits is that they are normally very close to the construction project and are often connected to that project by routes which do not use the public highway.
Commercial & industrial waste:	Waste collected by private waste contractors.
Construction, demolition and excavation waste:	Waste soils, clays, concrete, bricks, wood etc.
Composting:	Aerobic (in the presence of oxygen) degradation of organic waste, typically green garden waste, by microbes either inside buildings which is called in-vessel composting and/or in the open air in long piles of green waste called windrows. Examples include Local Authority Collected Waste that is sorted into the green waste bin by the householder. This is then collected by the local authority and taken to an In-vessel Composting facility (IVC) where the green waste is rapidly composted within ventilated units and the resulting compost sold for soil improver. The air passed through the compost is filtered via microbe supporting filters which remove the odour before it is released back into the atmosphere.
Construction, demolition and excavation waste:	This includes rubble and clean soils.
County Wildlife Site:	Is a locally-designated wildlife habitat.



Development Plan Documents:	Contain planning policies and identify proposed sites for development and are subject to an Examination in Public before adoption by the relevant planning authority as planning policy.
End of Life Vehicle Facilities:	Also known as scrapyards.
Hazardous Waste:	This includes contaminated soils, waste oils, waste electrical goods and asbestos.
Heavy Goods Vehicle:	Is a term for any lorry with a gross weight of over 3.5 tonnes.
HS2:	High Speed 2 proposed railway between London, Birmingham, the East Midlands, Leeds and Manchester.
Household Waste Recycling Facilities:	Sites run on behalf of the County Council primarily for the collection of bulky household waste.
Inert waste:	Is a broad term but practically speaking would mean mainly surplus uncontaminated soils and clays.
Intermediate Level Waste:	In the radioactive waste context, these are radioactive wastes exceeding the upper activity boundaries for LLW but which do not need heat to be taken into account in the design of storage or disposal facilities.
Inert waste landfill or landraise:	Refers to the final disposal of inert waste either by the infill of a void space as landfill and/or construction of a mound above ground level as landraising.
Landbank:	A stock of planning permissions for land containing specified levels of minerals reserves. The landbank level is normally expressed in the number years' supply, based upon an average of the last ten years' sales or sub-regional apportionment or some other figure.
Local Aggregates Assessment:	Provides an assessment of aggregates supplies and is published by each Minerals Planning Authority.
Local Authority Collected Waste:	Waste collected by local authorities which includes household waste and trade waste.
Local Nature Reserve:	Is an area of particular wildlife interest declared by a local authority under Section 21 of the National Parks and Access to the Countryside Act 1949, and usually managed by them.
Local Planning Authority:	In Suffolk, the LPAs are the District and Borough Councils who are responsible for planning for development other than minerals, waste, County Council development or Nationally Significant Infrastructure Projects (NSIP).
Low Level Waste:	In the radioactive waste context this includes metals, soil, building rubble and organic materials, which arise principally as lightly contaminated miscellaneous scrap. Metals are mostly in the form of redundant equipment. Organic materials are mainly in the form of paper towels, clothing and laboratory equipment that have been used in areas where radioactive materials are used – such as hospitals, research establishments and industry. LLW contains radioactive materials other than those acceptable for disposal with municipal and general commercial or industrial waste. It is defined as “radioactive waste having a radioactive content not exceeding four giga-becquerels per tonne (GBq/te) of alpha or 12 GBq/te of beta/gamma radioactivity”.
Material considerations:	Is a matter that should be taken into consideration when determining planning applications. For example, highways issues are a material planning consideration



	and loss of property values is not.
Minerals Consultation Areas:	A mechanism whereby District or Borough Councils consult the Minerals Planning Authority upon proposed not minerals developments within MCAs. MCAs are designated where minerals resources are known to existing according to geological mapping.
Minerals Planning Authority:	Suffolk County Council is the MPA for Suffolk and is therefore responsible for the determination of minerals related planning applications and for the enforcement of planning control in respect of minerals issues and the production of a minerals local plan (or a combined minerals and waste local plan).
Minerals Safeguarding Areas:	Areas where the Minerals Planning Authority will seek to protect minerals development from other forms of development.
National Nature Reserve:	A nationally important area of special nature conservation interest, designated under Section 16 of the National Parks and Access to the Countryside Act 1949.
National Planning Policy Framework:	Contains Government planning policy on a range of issues including minerals.
National Planning Policy for Waste:	Contains Government planning policy on waste.
Non-hazardous Landfill and/or landraise:	Where Non-hazardous Waste is placed and compacted by machinery in engineered cells lined with plastic or clay. When each cell is full it is then sealed with plastic or clay then covered with soils and planted. The moisture that arises from the degradation of the waste is called leachate and is either extracted and treated before disposal or recirculated to aid waste degradation. The landfill gas that is generated from the degradation of the waste can be vented passively or extracted and flared off and/or used to drive electricity generating equipment.
Non-hazardous Waste:	This includes commercial & industrial and local authority collected waste.
Norfolk & Suffolk Broads:	Designated under the Norfolk & Suffolk Broads Act 1988 of equivalent status of a National Park.
PPG:	Government Planning Policy Guidance website.
Proposals Map:	Part of the development plan document with indicates on an Ordnance Survey map base the areas proposed for development (in this case minerals and waste development).
Radioactive Waste:	This includes Very Low-Level Waste (VLLW), Low Level Waste (LLW), Intermediate Level Waste (ILW) and Spent Fuel.
Ramsar:	Site of internationally important wetland for breeding birds identified for conservation under the Ramsar convention (1971).
Recycled Aggregates:	These are recycled concrete, recycled bricks, or other recycled waste materials, that are used as an alternative to sand and gravel or crushed rock.
Recycled Waste:	Involves the recovery of recyclable materials from the waste stream. Examples include Local Authority Collected Waste that is sorted into the recycled waste bin by the householder. This is then collected by the local authority and taken to the Materials Recycling Facility (MRF) where metals, plastics and paper etc. are removed and sent to commercial recyclers.



Restoration:	Refers to the reinstatement of a former quarry and/or landfill site to its final restored condition albeit not necessarily to the same level as before. Generally, where significant sized sites are involved then the restoration is carried out in stages and is said to be a phased restoration.
Residual Waste:	Waste which cannot be re-used, recycled or composted. Examples include Local Authority Collected Waste that is sorted into the residual waste bin by the householder. This is then collected by the local authority and taken to the Energy from Waste facility (EfW).
Scheduled Ancient Monument:	Is an historic building or site that is included in the Schedule of Monuments kept under the Ancient Monuments and Archaeological Areas Act 1979.
Secondary Aggregates:	By-products used as a source of construction aggregates.
Site of Special Scientific Interest:	Site notified by Natural England under Section 25 of the Wildlife and Countryside Act 1981 as having special wildlife or geological features worthy of protection.
Site Selection Reports:	Part of the evidence base in support of the Suffolk Minerals & Waste Local Plan, that contain information that was used in the selection of sites for inclusion in the Plan
Special Areas of Conservation:	Site of international importance for nature conservation, classified under the European Union Habitats Directive.
Special Protection Area:	An area of international importance for the conservation of wild birds, classified under the European Union Conservation of Wild Birds Directive.
Specific Sites:	Are, in the minerals context, where viable mineral resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms. Such sites may also include essential operations associated with mineral extraction. Specific sites may also be used to identify sites for future waste development where the proposal is likely to be acceptable in planning terms.
Spent Fuel:	After removal from the reactor, radioactive spent fuel is held in purpose built facilities including ponds or dry stores before eventual dispatch for reprocessing at Sellafield.
Suffolk Lorry Route Network:	This is a Suffolk County Council lorry management plan based upon a hierarchy of routes.
Suffolk Minerals Core Strategy:	Is a type of Development Plan Document which contains strategic minerals policies.
Suffolk Minerals Specific Site Allocations:	Is a type of Development Plan Document which allocates Specific Sites for minerals extraction.
Suffolk Minerals & Waste Local Plan:	Is a type of Development Plan Document which will contain strategic minerals and waste policies and identify sites for sand and gravel extraction and also potentially waste development.
Suffolk Waste Core Strategy:	Is a type of Development Plan Document which contains strategic waste policies and identifies Specific Sites and Areas of Search for waste development.
Suffolk Waste Study:	This is part of the evidence base for the Suffolk Minerals & Waste Local Plan and quantifies the amount of Local Authority Collected Waste, Commercial and Industrial Waste, Construction, Demolition and Excavation Waste, Hazardous



	Waste, London Waste and Radioactive Waste that needs to be managed over the Plan period.
Very Low-Level Waste:	<p>In the radioactive waste context, this is waste with very low concentrations of radioactivity. It arises from a variety of sources, including hospitals and the wider non-nuclear industry. Because VLLW contains little total radioactivity, it has been safely treated by various means, such as disposal with municipal and general commercial and industrial waste directly at landfill sites or indirectly after incineration.</p> <p>Its formal definition is, For wastes containing carbon-14 or hydrogen-3 (tritium):</p> <ul style="list-style-type: none"> - in each 0.1m³, the activity limit is 4,000 kBq for carbon-14 and hydrogen-3 (tritium) taken together; and - for any single item, the activity limit is 400 kBq for carbon-14 and hydrogen-3 (tritium) taken together. <p>Controls on disposal of this material, after removal from the premises where the wastes arose, are not necessary.</p> <p>Or; (b) in the case of high volumes of VLLW, radioactive waste with maximum concentrations of four megabecquerels per tonne (MBq/te) of total activity which can be disposed of two specified landfill sites. For waste containing hydrogen-3 (tritium), the concentration limit for tritium is 40MBq/te. Controls on disposal of this material, after removal from the premises where the wastes arose, will be necessary in a manner specified by the environmental regulators.</p>
Waste Electrical & Electronic Equipment Recovery Facilities:	Often for example located within Household Waste Recycling Centres, where members of the public can dispose of their unwanted fridges etc.
Waste Hierarchy:	The management of waste in accordance with the Government's waste hierarchy in order of preference of: prevention; preparing for re-use; recycling; other recovery and disposal is seen as an important tool for environmental protection including against climatic change and the protection of local water resources.
Waste Planning Authority:	Suffolk County Council is the WPA for Suffolk and is therefore responsible for the determination of waste related planning applications and for the enforcement of planning control in respect of waste issues and the production of a waste local plan (or a combined minerals and waste local plan)
Water Recycling Centres:	Also known as sewage works.
Waste Transfer Station:	these facilities involve the sorting of waste and the onward transfer of waste to recyclers, composters, energy from waste facilities or landfills etc.



1. Introduction

1.1 Background

Suffolk County Council (SCC) commissioned Place Services to undertake an independent Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) on the Suffolk Minerals & Waste Local Plan.

1.2 The Minerals & Waste Local Plan

1.2.1 Submission Draft (June, 2018)

As part of its work on the new Minerals & Waste Local Plan, SCC as a Minerals and Waste Planning Authority (M/WPA) prepared a Minerals & Waste Local Plan 'Submission Draft' Regulation 19 Local Plan for public consultation in 2018.

The components of the Plan were:

- Vision, Aims and Objectives
- General Policies for both minerals and waste
- Minerals specific policies
- Waste specific policies
- Proposed minerals sites and waste site policies
- Site allocations for minerals extraction and waste management facilities

This iteration of the Plan represented the Regulation 19 stage of the planning process and was made available for public consultation, accompanied by a Sustainability Appraisal undertaken by Place Services.

Following public consultation, the Suffolk Minerals & Waste Local Plan (SMWLP) was submitted to the Planning Inspectorate on the 21st December 2018 for Examination in Public (EiP).

1.2.2 Examination in Public (EiP)

The EiP hearing sessions ran for five days in total over two weeks, between the 19th and 26th June, within which elements of the Plan were discussed in order to help the independent examiner come to a conclusion as to whether the SMWLP, as submitted, could be considered 'sound' in planning terms.

The independent examiner of the SMWLP has written to SCC, post-EiP, to set out his preliminary findings of the soundness of the SMWLP. These findings concluded that the inclusion of some elements of the SMWLP as presented at EiP would likely mean that the Plan is unsound. As a result of this, modifications deleting those elements are necessary to make the Plan sound.



1.3 SMWLP Modifications (September, 2019)

The independent examiner has outlined that the submitted Policies MP2(g) and MS7: Wangford should be removed from the Plan. These policies set out the allocation of site 'M7' at Wangford for sand and gravel extraction and provided site specific criteria to be addressed through any forthcoming planning application to make development acceptable.

The independent examiner has issued concerns surrounding the site's location within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). The National Planning Policy Framework (the Framework) states that great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection. The Framework states that permission should be refused for major developments in these areas except in exceptional circumstances. After consideration at the EiP, the examiner has provisionally concluded that no exceptional circumstances apply; omission of the site would still lead to the Plan providing significantly over identified need and harm to the protected landscape during the period of working would not be consistent with national policy.

SCC have drawn up a schedule of modifications to the draft submitted SMWLP, including the omission of the Wangford site allocation for sand and gravel extraction. Additionally, other modifications have been made to other elements of the Plan in response to the discussions of the EiP and the consultation of the draft SMWLP in the summer of 2018. The schedule of modifications will be publically consulted on and further considered by the examiner.

This Sustainability Appraisal Addendum has been produced to accompany the schedule of modifications and will be available for public consultation alongside the 'Suffolk Minerals & Waste Local Plan Modifications September 2019' as procedurally required of Local Plans and Sustainability Appraisal.

.



2. The Requirement for an SA Addendum

2.1 Why is further SA work needed?

Planning Practice Guidance of Sustainability Appraisal for Local Plans states that,

'The sustainability appraisal report will not necessarily have to be amended if the Local Plan is modified following responses to consultations. Modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the Local Plan. A change is likely to be significant if it substantially alters the Plan and/ or is likely to give to significant effects.'

Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects. A further round of consultation on the sustainability appraisal may also be required in such circumstances but this should only be undertaken where necessary. Changes to the Local Plan that are not significant will not require further sustainability appraisal work.'

The Suffolk Minerals & Waste Local Plan Modifications September 2019 document is required to be screened to see if any of its content would give rise to subsequent changes in the Sustainability Appraisal of the Regulation 19 SMWLP; that is, would there be any additional significant effects on any sustainability themes, or conversely do any of the changes eradicate any effects previously identified.

2.2 What is included within this SA Addendum

This Addendum contains the following principal element:

- Screening of each Main Modification within the Suffolk Minerals & Waste Local Plan Modifications September 2019.

Additionally, if any of the above elements of this Report require changes to the Regulation 19 SMWLP SA, then these will set out in separate corresponding Sections within this Report.



3. Screening the Main Modifications

3.1 How the Changes are presented in the SMWLP Modifications September 2019

Each Main Modification within the Suffolk Minerals & Waste Local Plan Modifications September 2019 has been screened within this Section. The screening of each change will determine whether there will be any significant effects on sustainability themes that are not identified within the Regulation 19 Local Plan SA.

Reference to the initial Regulation 19 Local Plan is required in order to understand the full context of each proposed change. In the Addendum, changes are presented in the following ways:

- Underline: additional text to the Regulation 19 Local Plan
- ~~Strikethrough~~: removed text from the Regulation 19 Local Plan

3.2 The SA screening process

The table in the following sub-section includes a reference point to the initial SMWLP (policy / paragraph and page number) for each modification, outlines the proposed changes and also the implications for the Regulation 19 SA in the final column. The page numbers and paragraph numbering below refer to the submission SMWLP, and do not take account of the deletion or addition of text.

This final column will screen each change for sustainability effects and will add commentary as to whether additional SA work is needed, whether technical or explanatory. The final column in the table will also direct the reader to where in this Report any required additional work can be found.



Table 1: Table of Main Modifications and Initial Screening for Significant Effects

Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
MM1	4	1.4 & 1.5	<i>In paragraph 1.4:</i> The SMWLP has allocated ten <u>nine</u> sites for the extraction of sand and gravel sufficient to supply 9.300 Mt over the Plan period to the end of 2036. <i>In paragraph 1.5</i> Delete item g) and renumber subsequent items	There will be no direct effect resulting from this proposed modification. Please see the commentary for Main Modification 38 (below) for the implications within the SMWLP SA of the proposed removal of Wangford as an allocation for the extraction of sand and gravel in the Plan area.
MM2	8	Suffolk minerals and waste local plan vision 2036	In the second sentence: ...the environment, <u>landscape character</u> , historic environment...	There will be no change to the effects highlighted within the appraisal of the Plan's Vision within the SMWLP SA (Section 4.1.1, Page 78).
MM3	9	Aims & Objectives	<i>In Objective 1:</i> ...taking into account the <u>need to move waste management up the waste hierarchy</u> , <u>waste net self sufficiency</u> , and the contribution... <i>In Objective 2:</i> ...a Key Diagram that indicates proposed <u>illustrates a spatial strategy for the location of</u> minerals and waste development, <u>and shows</u> centres of population... <i>In Aim 2:</i> To <u>avoid</u> , minimise... <i>In Objective 5:</i> ...upon nature conservation, <u>landscape character</u> , <u>visual impact</u> , the historic environment...	There will be no change to the effects highlighted within the appraisal of the Plan's Aims and Objectives within the SMWLP SA (Section 4.1.2, Page 80).
MM4	11	GP1	<i>In item j):</i> ...National Planning Policy for Waste <u>taken as a whole</u> ;	There will be no change to the effects highlighted within the appraisal of the Plan's Policy GP1 within the SMWLP SA (Section 5.1.1, Page 83).
MM5	14	GP3	...major centres of population (<u>namely Ipswich, Lowestoft and Bury St Edmunds</u>) and do not have...	There will be no change to the effects highlighted within the appraisal of the Plan's Policy GP3 within the SMWLP SA (Section

Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
				5.1.3, Page 87).
MM6	16	GP4	<p><i>In the first paragraph:</i> Minerals and waste development will be acceptable so long as the proposals, adequately access <u>assess</u> (and address <u>where applicable any</u> the potentially significant adverse impacts <u>including cumulative impacts</u>) on the following upon:</p> <p><i>In item c):</i> landscape character, visual impact, setting, and protected designated landscapes including Areas of Outstanding Natural Beauty and the Broads;</p> <p><i>In item d):</i> biodiversity <u>including Natura 2000 sites, ancient woodlands and trees</u>;</p> <p><i>In item f):</i> historic environment, <u>archaeology</u>, heritage assets and their setting;</p> <p><i>In item s):</i> (or t) <u>The use of</u> alternative forms of transport including the use of rail freight shipping <u>should be considered</u>;</p> <p><i>Insert new item t):</i> <u>Military and civil aviation</u>.</p> <p><i>In the final paragraph:</i> Proposals should where applicable meet or exceed the appropriate national or local <u>legislation, planning policy or guidance guidelines</u> for each criterion, including reference to any hierarchy of importance, and also comply with other policies of the development plan. Proposals should aim to achieve a biodiversity net gain. Proposals should <u>demonstrate that when considering the potential for significant adverse impacts upon features of acknowledged environmental importance, that the hierarchy of firstly avoidance, then mitigation and finally compensation has been followed</u>.</p>	<p>The SA of the SMWLP identifies a number of positive effects for Policy GP4, stating, ‘<i>The policy provides a comprehensive list of potential impacts to be considered when proposing new minerals and waste development sites at the planning application stage. Impacts in relation to the Sustainability Objectives have not been assessed as significantly positive as the policy requires potential impacts to be adequately assessed, with other Plan policies being more relevant as to what constitutes an acceptable proposal.</i>’</p> <p>Although the modifications can be considered to ensure a heightened degree of positive effect in each instance, due to the consideration of cumulative effects and the aim to achieve biodiversity net gain, the initial stance of the SA commentary still applies. There will be no change to the effects highlighted within the appraisal of the Plan’s Policy GP4 within the SMWLP SA (Section 5.1.4, Page 91).</p>
MM7	20	5.17	Generally speaking planning permission is not required for wharves or railheads handling crushed rock <u>subject to the requirements of the Town and</u>	There will be no change to the effects highlighted within the appraisal of the Plan’s Minerals Policies within the SMWLP SA



Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
			<u>Country General Permitted Development Order, for example except</u> where significant infrastructure is required.	(Section 6, Page 94).
MM8	20	5.21	Generally speaking planning permission is not required for wharves or railheads handling sand and gravel <u>subject to the requirements of the Town and Country General Permitted Development Order, for example except</u> where significant infrastructure is required.	There will be no change to the effects highlighted within the appraisal of the Plan's Minerals Policies within the SMWLP SA (Section 6, Page 94).
MM9	23	MP2	<i>Delete item g) and renumber items below</i>	There will be no direct effect resulting from this proposed modification. Please see the commentary for Main Modification 38 (below) for the implications within the SMWLP SA of the proposed removal of Wangford as an allocation for the extraction of sand and gravel in the Plan area.
MM10	26	MP6	<i>In the final paragraph: ...proposals focussed on <u>the historic environment</u>, flood alleviation...</i>	There will be no change to the effects highlighted within the appraisal of the Plan's Policy MP6 within the SMWLP SA (Section 6.1.6, Page 104).
MM11	28	5.44	<i>Insert new paragraph: <u>The South East Marine Plan Area covers part of the Suffolk Minerals and Waste Local Plan Area. The South East Marine Plan is expected to be adopted in 2020. Details of the South East Marine Plan can be found at the link below:</u></i> https://www.gov.uk/government/collections/south-east-marine-plan	There will be no change to the effects highlighted within the appraisal of the Plan's Minerals Policies within the SMWLP SA (Section 6, Page 94).
MM12	28	5.45	<i>Insert new paragraph: <u>Until the South East Marine Plan is adopted, the Marine Policy Statement applies. In particular, section 3.5 refers to the importance of securing the continuous supply of marine aggregates.</u></i>	There will be no change to the effects highlighted within the appraisal of the Plan's Minerals Policies within the SMWLP SA (Section 6, Page 94).
MM13	29	MP9	<i>Change second-to-last paragraph: <u>Any mitigation required falls on the development that receives planning permission last. Where existing business or other use could have a significant adverse effect in any proposed new</u></i>	There will be no change to the effects highlighted within the appraisal of the Plan's Policy MP9 within the SMWLP SA (Section 6.1.9, Page 110).



Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
			<u>development, the applicant must provide suitable mitigation before the development is completed so that the existing use is not disadvantaged by new development.</u>	
MM14	30	MP10	<p><i>In item a):</i> 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 <u>or used within the development</u>;</p> <p><i>In the final paragraph:</i> District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the Minerals Safeguarding Consultation Area as defined on the Proposals Map. The County Council will then refer to Policy MP10 before providing a consultation response. <u>Where existing business or other use could have a significant adverse effect in any proposed new development, the applicant must provide suitable mitigation before the development is completed so that the existing use is not disadvantaged by new development.</u></p>	Please see section 4.2 of this addendum for an updated assessment of this Policy in reflection of the proposed modification.
MM15	32	6.7	<p><i>In item h):</i> the amount of radioactive waste to be managed is very small and because it can either much of it can be accepted at normal landfills or at very specialised national facilities elsewhere it is not considered necessary to plan any provision.</p> <p><i>Insert new item i):</i> <u>Using the “high” scenarios, total non-hazardous waste arisings by 2036 could be 0.47mt of LACW plus 1.39mt of C&I giving a combined total of 1.56mt of non-hazardous waste arising.</u></p>	There will be no change to the effects highlighted within the appraisal of the Plan’s Waste Policies within the SMWLP SA (Section 7, Page 116).



Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
			<p><i>Insert new item j): Using a conservative estimate of a 52% recycling rate, that would leave 0.811 million tonnes of residual waste to be managed.</i></p> <p><i>Insert new item k): Table 42 of the Waste Study shows that there is 427,000 tonnes per annum of treatment capacity plus 252,000 tonnes per annum of incineration capacity giving a current total of 679,000 tonnes per annum of active management capacity, supplemented by the availability of landfill for the remaining waste.</i></p>	
MM16	33	WP1	<p><i>Insert at end of paragraph: Waste arisings will be monitored on an annual basis and will inform consideration of when to initiate an early review of the plan if required.</i></p>	<p>The assessment of Policy WP1 in the SMWLP SA (Section 7.1.1, page 116) recommended that monitoring arrangements be included within the Policy, stating <i>'the Policy responds more directly to planned growth in the Plan period, with district and Housing Market Area growth requirements largely understood at this stage even in those cases where LPAs do not have an adopted Local Plan. Despite this, the reality of a number of LPA Local Plans being in preparation at this stage requires the Policy to be flexible in response to the reality of 'planning by appeal' which is prevalent nationally and in the County. This trend well known, the Policy could benefit from including a statement that waste arising forecasts may be updated through monitoring arrangements and any future Plan reviews within the plan period.'</i></p> <p>There will be no amendment required to the effects highlighted within the assessment of the Policy in the SMWLP SA, as significant positive effects had already been highlighted for related housing and economic SA Objectives. Despite this, whereas flexibility has been taken into account in the forecast of waste arisings in the Plan period, further positive implications can be identified through the modification to the Policy proposed.</p>



Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
MM17	34	6.10	<i>Amend last sentence:</i> <u>Proposals for managing radioactive waste, including imported</u> Only if the proposal includes the importation of radioactive waste from elsewhere would it be determined by the County Council.	There will be no change to the effects highlighted within the appraisal of the Plan's Waste Policies within the SMWLP SA (Section 7, Page 116).
MM18	35	6.11	<i>Insert at end of paragraph:</i> <u>The categories below reflect the desire to protect the open countryside as well as the practical constraints on waste development.</u>	There will be no change to the effects highlighted within the appraisal of the Plan's Waste Policies within the SMWLP SA (Section 7, Page 116).
MM19	35	WP3	<i>In first paragraph:</i> General waste management facilities (other than landfill sites and waste water treatment facilities <u>water recycling centres</u>) may be acceptable within the following areas: <i>In item e):</i> agricultural and forestry land (open air composting only) excluding <u>ancient woodland or planted ancient woodland sites;</u> <i>In item h):</i> waste water treatment facilities <u>water recycling centres (including composting and anaerobic digestion only);</u>	There will be no change to the effects highlighted within the appraisal of the Plan's Policy WP3 within the SMWLP SA (Section 7.1.3, Page 119).
MM20	39	6.15	<i>Insert at the end of the paragraph:</i> <u>Co-locating with sewage treatment allows methane to be recovered from sewage and at the same time prevents a potent green house gas from escaping into the atmosphere.</u>	There will be no change to the effects highlighted within the appraisal of the Plan's Waste Policies within the SMWLP SA (Section 7, Page 116).
MM21	39	WP8	<i>In the first paragraph:</i> ...demolition and excavation waste will <u>may</u> be acceptable... <i>In the fourth paragraph:</i> On land suitable for General Industrial (<u>B2</u>) or Storage & Distribution (<u>B8</u>) uses, activities shall take place within purpose-designed facilities.	There will be no change to the effects highlighted within the appraisal of the Plan's Policy WP8 within the SMWLP SA (Section 7.1.8, Page 130).
MM22	43	WP11	<i>In the first paragraph:</i> Additional void space or areas of land raise for the deposit <u>Proposals for the disposal of inert waste by landfilling or landraising</u> may be acceptable where:	There will be no change to the effects highlighted within the appraisal of the Plan's Policy WP11 within the SMWLP SA (Section 7.1.11, Page 137).
MM23	44	WP12	<i>In the first paragraph:</i> Additional void space or areas of land raise for the	There will be no change to the effects highlighted within the



Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
			<p>depositProposals for the disposal of non-hazardous or hazardous waste by landfilling or landraising may be acceptable where:</p> <p><i>In item b):</i> The proposals comply with the environmental criteria set out in Policy GP4 <u>and progressive restoration requirements of MP6.</u></p>	appraisal of the Plan's Policy WP12 within the SMWLP SA (Section 7.1.12, Page 140).
MM24	45	WP13	<p><i>In item f):</i> and the proposals comply with the environmental criteria set out in Policy GP4 <u>and progressive restoration requirements in MP6.</u></p>	Please see section 4.3 of this addendum for an updated assessment of this Policy in reflection of the proposed modification.
MM25	46	WP14	<p><i>Change title:</i> Policy WP14: Waste water treatment facilities <u>Water recycling centres</u></p> <p><i>Insert new paragraph at beginning:</i> <u>Proposals relating to the role, function and operation of water recycling centres including the provision of additional sewage treatment capacity and supporting infrastructure (including renewable energy) will be supported in principle particularly where it is required to meet the wider growth proposals identified in the Development Plan.</u></p> <p><i>In second paragraph:</i> New or extended waste water treatment facilities <u>water recycling centres</u> 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 giving <u>does not give</u> rise to unacceptable environmental impacts.</p>	Please see section 4.4 of this addendum for an updated assessment of this Policy in reflection of the proposed modification.
MM26	47	6.32	<p><i>Insert new paragraph:</i> <u>The Energy Act (2004) requires the Nuclear Decommissioning Authority (NDA) to review and publish its strategy every 5 years. This can be viewed on the NDA website by following the link provided below:</u></p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/</p>	There will be no change to the effects highlighted within the appraisal of the Plan's Waste Policies within the SMWLP SA (Section 7, Page 116).



Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
			attachment_data/file/518669/Nuclear Decommissioning Authority Strategy effective from April 2016.pdf	
MM27	48	WP16	<i>In item e):</i> utilises the existing rail link for the transportation of the radioactive waste unless it is demonstrated to be economically <u>or practically</u> unviable, and;	There will be no change to the effects highlighted within the appraisal of the Plan's Policy WP16 within the SMWLP SA (Section 7.1.16, Page 150).
MM28	49	WP17	<i>In item d):</i> measures which will protect, preserve and where practicable enhance the natural, and historic environment including the setting, <u>landscape</u> and built environment; and	There will be no change to the effects highlighted within the appraisal of the Plan's Policy WP17 within the SMWLP SA (Section 7.1.17, Page 153).
MM29	50	WP18	<i>Change second-to-last paragraph: Any mitigation required falls on the development that receives planning permission last. Where existing business or other use could have a significant adverse effect in any proposed new development, the applicant must provide suitable mitigation before the development is completed so that the existing use is not disadvantaged by new development.</i>	Please see section 4.5 of this addendum for an updated assessment of this Policy in reflection of the proposed modification.
MM30	52	8.7	Hedgerow vegetation must be maintained so that it is kept clear of the visibility splay <u>both</u> where the access joins Sandy Lane <u>and where Sandy Lane meets Norwich Road</u> .	There will be no change to the effects highlighted within the appraisal of the Plan's Policy MS1 within the SMWLP SA (Section 9.2.1, Page 162).
MM31	53	8.9	<i>Delete final sentence</i>	Please see the commentary for Main Modification 32 (below) for the implications within the SMWLP SA of the proposed modification.
MM32	55	MS1	<i>In item a):</i> the cutting of vegetation within the visibility splay where the quarry access joins Sandy Lane <u>and where Sandy Lane joins Norwich Road</u> ; <i>In item d):</i> potential impacts upon natural history interests including Sandy Lane Pit Barham SSSI , the Oak Wood/Broomwalk Covert County Wildlife Site, and protected species including Otters, Bats, Great Crested Newts,	Please see section 5.1 of this addendum for an updated assessment of this Policy in reflection of the proposed modifications.



Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
			<p>Turtle Dove and Nightingale;</p> <p><i>Insert new item e): <u>future access to Sandy Lane Pit Barham geological SSSI;</u></i></p> <p><i>Insert new item j): <u>the potential impact upon the settings of the Grade I listed medieval church of St Mary and Shrublands Park.</u></i></p>	
MM33	61	MS2	<p><i>In item c): the use of an off-road haul route <u>a suitable means of highways access</u> to reach the site stockpiling area at Contract Farm;</i></p> <p><i>In item d): the provision of a signalised junction where the <u>any</u> haul road crosses the B1106</i></p> <p><i>In item e): the storage of stockpiled material at Contract Farm <u>if the off-road haul route is used;</u></i></p> <p><i>In item f): measures to maximise highway safety and minimise amenity impacts at Elveden Primary School <u>if the off-road haul route is used;</u></i></p> <p><i>In item g): provision of a phased working and restoration scheme that is sympathetic to the Special Landscape Area, the <u>and Brecks landscape and the Special Protection Area;</u></i></p> <p><i>In item i): measures to safeguard and enhance the setting <u>of the Barnham Atomic Bomb Store Scheduled Monument and listed buildings in the vicinity of the site;</u></i></p> <p><i>Insert at the end of item j): <u>including the provision of a project level Habitats Regulations Assessment, that would make clear the broad avoidance and/or mitigation measures and robust monitoring, identified at a strategic level that will be required and that restoration will ensure delivery of a net biodiversity gain long term, specifically with regard to the Breckland Special Protection Area;</u></i></p> <p><i>Insert at the end of item k): <u>and to the Special Protection Area</u></i></p> <p><i>Insert new item q): <u>a traffic management plan drafted to avoid traffic routing</u></i></p>	Please see section 5.2 of this addendum for an updated assessment of this Policy in reflection of the proposed modifications.

Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
			<u>through local villages including Barnham and Belstead except in the case of local deliveries.</u>	
MM34	67	MS3	<i>In item c):</i> adequate mitigation of potential significant adverse impacts upon <u>listed buildings and their settings within the vicinity of the site; Bentley Old Hall and its setting;</u>	There will be no change to the effects highlighted within the appraisal of the Plan's Policy MS3 within the SMWLP SA (Section 9.2.3, Page 167).
MM35	73	MS4	<i>Insert at the end of item b):</i> <u>and the Breckland Special Protection area</u> <i>Insert at the end of item e):</i> <u>including the provision of a project level Habitats Regulations Assessment, that would make clear the broad avoidance and/or mitigation measures and robust monitoring, identified at a strategic level that will be required and that restoration will ensure delivery of a net biodiversity gain long term, specifically with regard to the Breckland Special Protection Area</u> <i>Insert at the end of item f):</i> <u>and to the Breckland Special Protection area</u> <i>In item i):</i> <u>the proposed enlarged inert waste recycling facility and the use of inert wastes to help restore the site.</u>	Please see section 5.3 of this addendum for an updated assessment of this Policy in reflection of the proposed modification.
MM36	81	13.22	Boundaries should be so arranged to ensure Tattingstone BR 37A is unobstructed. A good wide corridor should be retained for bridleway of 5 metres minimum width. If the site boundaries are bunds, this should be 10m wide. Part of Tattingstone FP 37 is within the site. This should either be accommodated, or a temporary extinguishment order sought. Bridleway 37A and Footpath 37 will require diversion during the working and restoration of the proposed development.	There will be no change to the effects highlighted within the appraisal of the Plan's Policy MS6 within the SMWLP SA (Section 9.2.6, Page 174).
MM37	82	MS6	<i>In item d):</i> potential impacts upon nature conservation interest including trees, ditches, watercourses, <u>the Stour & Orwell Special Protection Area,</u> European Protected Species (Bats), Priority Species, Priority Habitats, which	Please see section 5.4 of this addendum for an updated assessment of this Policy in reflection of the proposed modification.

Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
			need to be adequately assessed and where necessary mitigation proposed; <i>In item g): the diversion of Bridleway 37A and Footpath 37 and;</i>	
MM38	84	MS7	<i>Delete policy MS7 and chapter 13 and renumber subsequent chapters</i>	The removal of site M7 – Wangford as an allocation within the Plan leads to some procedural changes within the SA. Please see section 6.5 of this addendum for those elements of the SA that need updating as a result of this proposed modification.
MM39	93	MS8	<i>In item g): proposals to <u>divert</u> mitigate the impacts upon the existing rights of way network, and;</i> <i>Insert new item i): a traffic management plan drafted to avoid traffic routeing through local villages including Elmswell and Whetherden except in the case of local deliveries.</i>	There will be no change to the effects highlighted within the appraisal of the Plan's Policy MS8 within the SMWLP SA (Section 9.2.8, Page 180).
MM40	98	MS9	<i>In item c): likely adverse effects (either individually or in combination with other developments) on the notified special interest features of <u>potential impacts upon nature conservation interest including hedgerows, ditches, Freston and Cutler's Wood SSSI, CWS ancient woodland, Ground Water Source Protection Zone, European Protected Species (dormice and bats), priority species (BAP) and habitats, and another protected species;</u></i> <i>In item g): the implications for the underlying groundwater and controlled waters including the potential impacts on the Ground Water Source Protection Zone, and;</i>	There will be no change to the effects highlighted within the appraisal of the Plan's Policy MS9 within the SMWLP SA (Section 9.2.9, Page 181).
MM41	102	MS10	<i>In item c): likely adverse effects (either individually or in combination with other developments) on the notified special interest features of Red Lodge Heath SSSI, <u>potential impacts upon nature conservation interest including Breckland SPA, Breckland SAC, Breckland Flora CWS, Ground Water Source Protection zone, European Protected Species, Other Protected</u></i>	The assessment of this Policy in the SMWLP SA highlighted uncertainty regarding effects on biodiversity (Sustainability Objective 6). The SA stated that, 'at the time of writing, a number of comments were made on the HRA work undertaken to accompany the Plan by Natural England. In consideration of the potential impacts highlighted for the site within Section 10

Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
			<p>Species, and Priority Habitats;</p> <p><i>In item e):</i> the implications for the underlying groundwater, controlled waters and the local water environment, <u>including the potential impacts on the Ground Water Source Protection Zone.</u></p>	<p><i>regarding Natura 2000 sites, it is recommended that the Policy add further detail regarding the specific assessment requirements of work related to 'nature conservation interests', for instance whether there is a need for a project-level HRA to be undertaken to accompany any forthcoming planning application.'</i></p> <p>The modification to item (c) does not indicate that a project-level HRA would be required, as the newly introduced text refers to potential impacts on a SSSI (not a 'Habitats Site' which would require HRA).</p> <p>To this extent, there will be no change in effect identified within the SA of the SMWLP as the initial reason for uncertain effects still applies.</p>
MM42	107	19.18	<i>Delete paragraph</i>	There will be no change to the effects highlighted within the appraisal of the Plan's Policy WS1 within the SMWLP SA (Section 9.3.1, Page 185).
MM43	108	WS1	<p><i>In first paragraph:</i> Development <u>Proposals for the management of waste arising from the decommissioning of Sizewell A, together with other waste from sister stations in accordance with the national policy to share waste facilities,</u> will be acceptable so long as the proposals, adequately address the following:</p> <p><i>In item b):</i> potential impacts upon nature conservation interest including likely adverse impacts (either individually or in combination with other developments) on the notified special interest features of Sizewell Marshes SSSI, Suffolk Shingle Beaches CWS, Minsmere-Walberswick Heaths & Marshes SSSI, Minsmere-Walberswick SPA/Ramsar, Sandlings SPA, Leiston-Aldeburgh SSSI, on <u>European and UK protected species, UK priority</u></p>	There will be no change to the effects highlighted within the appraisal of the Plan's Policy WS1 within the SMWLP SA (Section 9.3.1, Page 185).



Ref.	Page	Policy / Paragraph	Main Modification	Implications within the SMWLP SA & screening of sustainability effects
			<p>species, and the preservation of the flora and fauna associated with the established sand dunes on Sizewell beach including protect species such as Adders, unless there is an overriding need;</p> <p><i>In item c): potential impacts upon the <u>detailed assessment of the impacts on the special qualities of the</u> Suffolk Coasts & Heaths AONB <u>and on the Suffolk Heritage Coast, and demonstration of the exceptional circumstances that justify development within the AONB;</u></i></p> <p><i>Insert new item d): <u>mitigation of identified landscape and visual impacts and reinstatement which is in keeping with the local landscape character;</u></i></p> <p><i>Delete item g)</i></p>	
MM44	117	Glossary	<p>Waste Water Treatment Facilities <u>Water recycling centres</u>; also known as sewage works.</p>	There will be no implications of this modification on the SA of the SMWLP.



4. Main Modifications regarding Plan Policies

4.1 Introduction and approach of re-assessment

As set out above in Section 4 of this Addendum, a number of the modifications proposed to the SMWLP have been ascertained to give rise to different sustainability effects than identified within the SA of the SMWLP at the Regulation 19 stage.

The SA at this stage is required to consider whether the modifications will have any likely effects on sustainability themes. This Section represents the appraisal of those proposed modifications to the SMWLP that have been screened (in Section 4) as altering the effects highlighted within the initial SA.

In addition to the identification of sustainability effects resulting from the modifications, the consideration of whether there are any new alternative approaches resulting from each modification should be re-explored and where necessary assessed alongside the modified policies. This Section also provides a narrative as to whether any new alternatives are generated and should be introduced for consideration at this stage.

The remainder of this Section assesses each screened modification chronologically and as they appear in the schedule contained within the Suffolk Minerals & Waste Local Plan Modifications September 2019.

4.2 Modification (MM14) to Policy MP10

The table below sets out the sustainability implications of this modification, and the changes in effect predicted from the initial SA of the SMWLP at the Regulation 19 stage.

Table 2: Impact on Sustainability Objectives: Policy MP10

SA Objective		Pre-Modification Policy MP10	Post-Modification Policy MP10
Environmental	1 – Surface water / groundwater	0	0
	2 – Water use	0	0
	3 – Soils	0	0
	4 – Landscape / townscape	0	0
	5 – Emissions / energy efficiency	0	0
	6 – Biodiversity / Geodiversity	0	0
	7 – Historic environment	0	0



SA Objective		Pre-Modification Policy MP10	Post-Modification Policy MP10
	8 – Flood risk	0	0
	9 – Traffic impacts	0	0
	10 – Air quality	0	0
	11 – Restoration / after use	0	0
	12 – Mineral resources	+	++
	13 – Economic use of resources	+	+
	14 – Minerals supply	+	+
	15 – Waste	0	0
Social	16 – Public nuisance	+	+
	17 – Housing needs	+	+
	18 – Noise	+	+
	19 – Recreation & amenity	0	0
	20 – Health and well-being	+	+
Economic	21 – Economic growth / jobs	+	+
	22 - Infrastructure	0	0
	23 – Investment	0	0
	24 – Transport	0	0

Commentary

SA Commentary at the Regulation 19 SMWLP stage

There will be no impacts on the majority of the environmental sustainability objectives in light of the purpose of the policy as a consultation mechanism to avoid the sterilisation of mineral resources. For this reason, the Policy will have positive impacts on those objectives regarding mineral resources, as well as ensuring the economic use of natural resources and the alternative has been assessed as having significant positive impacts associated with a more precautionary approach to consultation.

The notion of safeguarding can arguably be considered contrary to other development needs, such as housing and employment. For that reason, the Alternative will have uncertain impacts associated with such growth. For comparison purposes, the Policy has been assessed as having minor positive impacts associated with a higher hectare threshold to warrant consultation. Safeguarding can ensure a number of indirect social benefits aside from



SA Objective	Pre-Modification Policy MP10	Post-Modification Policy MP10
	<p>protecting mineral resources from sterilisation. Safeguarding, as a consultation mechanism, can help prevent incompatible development proposals in close proximity to any extraction sites allocated within the Plan which could otherwise give rise to a number of negative cumulative impacts on local communities should other development types be permitted. For these notional reasons, both the Policy and the Alternative have been assessed as having positive secondary outcomes.</p> <p>The Policy states that the County Council will safeguard those Minerals Safeguarding Areas from proposed development in excess of five hectares which are not in accordance with the Development Plan. It could be considered, from a point of view to ensure that mineral deposits are safeguarded, that all applications in such areas could require consultation with the County Council. This would be in order to ensure, statutorily, that the applications of Development Plan allocated sites are also consulted upon. This would subsequently protect the MPA's interests in the possible eventuality that applications, when submitted, might differ from those proposals allocated in district Development Plans. Nevertheless, in light of wider development pressures in the Plan area and nationally, and also in regard to the Plan's wider target regarding sand and gravel extraction to meet the County's development needs, a balanced approach is supported in this SA. For that reason, the Policy's impacts predicted for housing and employment related objectives are strengthened in light of what can be considered a holistic and pragmatic Policy approach.</p> <p>Updated effects in response to the Policy modification</p> <p>The assessment of Policy MP10 within the SMWLP SA, stated that, in regard to the previous policy wording that indicated that consultation would only be required for proposed development in excess of five hectares which is not in accordance with the Development Plan, <i>'the Policy states that the County Council will safeguard those Minerals Safeguarding Areas from proposed development in excess of five hectares which are not in accordance with the Development Plan. It could be considered, from a point of view to ensure that mineral deposits are safeguarded, that all applications in such areas could require consultation with the County Council. This would be in order to ensure, statutorily, that the applications of Development Plan allocated sites are also consulted upon. This would subsequently protect the MPA's interests in the possible eventuality that applications, when submitted, might differ from those proposals allocated in district Development Plans.'</i></p> <p>The omission of the text <i>'which is not in accordance with the Development Plan'</i> will ensure heightened positive effects regarding SA Objective 12 (Avoid sterilisation of minerals resources). The modification ensures that planned growth, as identified in Local Plans in Suffolk, will also require consultation with SCC (as the MPA), at the planning application stage.</p> <p>It could be expected that this strengthened stance on protecting the sterilisation of mineral resources could have secondary potentially negative implications for District-level Local Plan allocations and thus growth in the County. However the inclusion of the text <i>'where existing business or other use could have a significant adverse effect in any proposed new development, the applicant must provide suitable mitigation before the development is completed so that the existing use is not disadvantaged by new development'</i> ensures that a</p>	



SA Objective		Pre-Modification Policy MP10	Post-Modification Policy MP10
	pragmatic balance between minerals and other development can be restored. This additional text in the final paragraph of the Policy seeks to ensure that any new / proposed minerals development will not have any negative effects on existing business (or other) uses within Minerals Consultation Areas.		

4.2.2 Consideration of alternatives

The proposed modification in part includes an element of the alternative approach explored in the initial SA for this Policy; specifically the removal of reference to Development Plan allocations. The initial pre-modification wording of Policy MP10 can now be seen as an alternative approach, which has been fully appraised. No other alternative approaches have been identified for exploration at this stage as sufficiently distinct from the Policy as modified, or those previous alternatives identified.

4.3 Modification (MM24) to Policy WP13

The table below sets out the sustainability implications of this modification, and the changes in effect predicted from the initial SA of the SMWLP at the Regulation 19 stage.

Table 3: Impact on Sustainability Objectives: Policy WP13

SA Objective		Pre-Modification Policy WP13	Post-Modification Policy WP13
Environmental	1 – Surface water / groundwater	+	+
	2 – Water use	0	0
	3 – Soils	0	0
	4 – Landscape / townscape	-	?
	5 – Emissions / energy efficiency	0	0
	6 – Biodiversity / Geodiversity	+	+
	7 – Historic environment	0	0
	8 – Flood risk	0	0
	9 – Traffic impacts	0	0
	10 – Air quality	0	0
	11 – Restoration / after use	?	?



SA Objective		Pre-Modification Policy WP13	Post-Modification Policy WP13
	12 – Mineral resources	0	0
	13 – Economic use of resources	+	+
	14 – Minerals supply	N/A	N/A
	15 – Waste	++	++
Social	16 – Public nuisance	0	0
	17 – Housing needs	N/A	N/A
	18 – Noise	0	0
	19 – Recreation & amenity	0	0
	20 – Health and well-being	+	+
Economic	21 – Economic growth / jobs	+	+
	22 - Infrastructure	+	+
	23 – Investment	0	0
	24 – Transport	0	0
Commentary	<p>SA Commentary at the Regulation 19 SMWLP stage</p> <p>The Policy will have significant positive outcomes through adhering to the waste hierarchy. There will also be minor positive impacts associated with the economic use of resources through the recovery of previously deposited materials. The alternative of not having a policy on such operations has been assessed as yielding uncertain impacts, however these can be considered comparably negative in comparison to the policy content. The alternative will have minor positive impacts in comparison to the policy in so far as restoration and after-use proposals would not be delayed or disrupted by landfill mining. A negative impact has been highlighted for landscapes, where the mining and excavation of waste used in previous restoration proposals could ensure negative outcomes and the material required to backfill these would not be identified through a plan-led system; as such schemes would largely be speculative.</p> <p>There will be positive impacts regarding human health through the policy essentially seeking to eradicate such risks posed by any existing landfill waste through its extraction. The alternative will have uncertain impacts in this regard.</p> <p>It should be noted that the policy itself would be unlikely to improve conditions without effective schemes coming forward, the viability of which can be expected to be uneconomic in many instances. Further, it is difficult to see how such operations, notably of those landfills containing municipal solid waste, could yield worthwhile revenue to offset the costs (including environmental</p>		



SA Objective		Pre-Modification Policy WP14	Post-Modification Policy WP14
	3 – Soils	0	0
	4 – Landscape / townscape	0	0
	5 – Emissions / energy efficiency	0	0
	6 – Biodiversity / Geodiversity	0	0
	7 – Historic environment	0	0
	8 – Flood risk	0	0
	9 – Traffic impacts	0	0
	10 – Air quality	0	0
	11 – Restoration / after use	0	0
	12 – Mineral resources	0	0
	13 – Economic use of resources	0	+
	14 – Minerals supply	N/A	N/A
	15 – Waste	+	+
Social	16 – Public nuisance	0	0
	17 – Housing needs	N/A	N/A
	18 – Noise	0	0
	19 – Recreation & amenity	N/A	N/A
	20 – Health and well-being	+	+
Economic	21 – Economic growth / jobs	N/A	+
	22 - Infrastructure	0	+
	23 – Investment	N/A	N/A
	24 – Transport	N/A	N/A
Commentary		SA Commentary at the Regulation 19 SMWLP stage There will be no impact on the majority of the Sustainability Objectives. Minor positive impacts are predicted related to water quality, based on the purpose of the Policy and also associated with the	



SA Objective		Pre-Modification Policy WP14	Post-Modification Policy WP14
	<p>treatment of waste.</p> <p>Updated effects in response to the Policy modification</p> <p>The proposed modifications add further clarity on appropriate development at water recycling centres, where previously the Policy only regarded new or extended facilities. The modifications can be considered to now address a number of other sustainability factors as a result. This includes objectives related to infrastructure provision, economic growth and also the economic use of resources as a result of proposals relating to the role, function and operation of water recycling centres including the provision of additional sewage treatment capacity and supporting infrastructure (including renewable energy) being supported in principle where it is required to meet the wider growth proposals identified in the Development Plan.</p>		

4.4.2 Consideration of alternatives

No new alternatives to the Policy post-modification have been identified as reasonable and considered necessary for exploration at this stage.

4.5 Modification (MM29) to Policy WP18

The table below sets out the sustainability implications of this modification, and the changes in effect predicted from the initial SA of the SMWLP at the Regulation 19 stage.

Table 5: Impact on Sustainability Objectives: Policy WP18

SA Objective		Pre-Modification Policy WP18	Post-Modification Policy WP18
Environmental	1 – Surface water / groundwater	0	0
	2 – Water use	0	0
	3 – Soils	0	0
	4 – Landscape / townscape	0	0
	5 – Emissions / energy efficiency	0	0
	6 – Biodiversity / Geodiversity	0	0
	7 – Historic environment	0	0
	8 – Flood risk	0	0
	9 – Traffic impacts	0	0



SA Objective		Pre-Modification Policy WP18	Post-Modification Policy WP18
	10 – Air quality	0	0
	11 – Restoration / after use	0	0
	12 – Mineral resources	0	0
	13 – Economic use of resources	0	0
	14 – Minerals supply	N/A	N/A
	15 – Waste	++	++
Social	16 – Public nuisance	++	++
	17 – Housing needs	?	0
	18 – Noise	++	++
	19 – Recreation & amenity	0	0
	20 – Health and well-being	++	++
Economic	21 – Economic growth / jobs	?	0
	22 - Infrastructure	++	++
	23 – Investment	0	0
	24 – Transport	++	++
Commentary		SA Commentary at the Regulation 19 SMWLP stage It can be considered that there would be no direct impact on the majority of the environmental criteria as they can be considered only relevant on a site by site basis. Regarding impacts associated with the management of waste however there will be significant positive impacts associated with the Policy's safeguarding position. This will ensure the effective operation of all waste management facilities. The alternative of only safeguarding permitted sites could conflict with other speculative development proposals that could come forward in close proximity to allocations throughout the plan making process and until such allocations are granted planning permission or are operational. To only safeguard strategic permitted and allocated sites would have more positive impacts than Alternative 1, however does not factor in the important function of smaller waste management facilities, which are not only integral to the function of waste management in the Plan area, but could also be considered of strategic importance in their local context or type regardless of their size. The notion of safeguarding can arguably be considered contrary to other development needs, such as housing and employment. For that reason, the Policy and all alternatives will have uncertain impacts associated with such growth. Safeguarding, as a consultation mechanism, can help prevent incompatible development proposals in close proximity to waste management facilities	



SA Objective	Pre-Modification Policy WP18	Post-Modification Policy WP18
	<p>which could otherwise give rise to a number of negative cumulative impacts on local infrastructure and the local road network should other development types be permitted in close proximity. For these reasons, the Policy approach will have more positive impacts than the alternatives.</p> <p>Updated effects in response to the Policy modification</p> <p>The assessment of Policy WP18 within the SMWLP SA stated that, <i>'the notion of safeguarding can arguably be considered contrary to other development needs, such as housing and employment. For that reason, the Policy and all alternatives will have uncertain impacts associated with such growth.'</i></p> <p>It could be expected that this strengthened stance on protecting the function of waste management facilities could have secondary potentially negative implications for District-level Local Plan allocations and thus growth in the County and for that reason the previous Policy stance (pre-modification) was assessed as having uncertain effects on housing and employment based Sustainability Objectives (objectives 17 and 21 respectively) . However the inclusion of the text <i>'where existing business or other use could have a significant adverse effect in any proposed new development, the applicant must provide suitable mitigation before the development is completed so that the existing use is not disadvantaged by new development'</i> allows a pragmatic balance between the function of waste management facilities and other development to be ensured. This additional text in the final paragraph of the Policy seeks to ensure that any new / proposed waste management development will not have any negative effects on existing business (or other) uses within the safeguarding zones of waste management sites.</p>	

4.5.2 Consideration of alternatives

No new alternatives to the Policy post-modification have been identified as reasonable and considered necessary for exploration at this stage.



4.6 Updated Cumulative and Synergistic Impacts of the Minerals & Waste Policies

4.6.1 Introduction and implications of modifications

The modifications have led to some change on the effects of Policies within the SA. These have been identified earlier in this section individually; however the identification of cumulative and synergistic effects is required of the SEA Directive.

The table below updates the incidences of individual effects predicted within the policy appraisals, and also explores whether there are any additional cumulative effects that arise as a result of the proposed modifications.

Table 6: Cumulative Impacts of the Plan's General Policies

SA Objective		Incidences of specific impacts within the policy appraisals					Cumulative Impact
		++	+	?	-	--	
Environmental	1 – Surface water / groundwater	0	5	3	0	0	0
	2 – Water use	1	1	1	0	0	0
	3 – Soils	0	3	2	0	0	0
	4 – Landscape / townscape	3	12	5	1	0	+
	5 – Emissions / energy efficiency	1	2	1	0	0	0
	6 – Biodiversity / Geodiversity	2	8	3	0	0	+
	7 – Historic environment	1	11	4	0	0	0
	8 – Flood risk	1	4	1	0	0	0
	9 – Traffic impacts	1	13	4	0	0	0
	10 – Air quality	0	4	10	0	0	?
	11 – Restoration / after use	2	9	4	0	0	+
	12 – Mineral resources	1	0	1	0	0	0
	13 – Economic use of resources	3	5	1	0	0	+
	14 – Minerals supply	4	2	3	0	0	++



5. Modifications regarding Site Allocations

5.1 Modification (MM32) to Policy MS1

The table below sets out the sustainability implications of this modification, and the changes in effect predicted from the initial SA of the SMWLP at the Regulation 19 stage.

Table 7: Impact on Sustainability Objectives: Policy MS1

SA Objective		Pre-Modification Policy MS1	Post-Modification Policy MS1
Environmental	1 – Surface water / groundwater	+	+
	2 – Water use	0	0
	3 – Soils	0	0
	4 – Landscape / townscape	+	+
	5 – Emissions / energy efficiency	0	0
	6 – Biodiversity / Geodiversity	+	+
	7 – Historic environment	?/+	+
	8 – Flood risk	0	0
	9 – Traffic impacts	0	0
	10 – Air quality	0	0
	11 – Restoration / after use	0	0
	12 – Mineral resources	0	0
	13 – Economic use of resources	0	0
	14 – Minerals supply	0	0
	15 – Waste	0	0
Social	16 – Public nuisance	+	+
	17 – Housing needs	0	0
	18 – Noise	0	0



SA Objective		Pre-Modification Policy MS1	Post-Modification Policy MS1
	19 – Recreation & amenity	+	+
	20 – Health and well-being	+	+
Economic	21 – Economic growth / jobs	0	0
	22 - Infrastructure	0	0
	23 – Investment	0	0
	24 – Transport	0	0
Commentary	<p>SA Commentary at the Regulation 19 SMWLP stage</p> <p>The appraisal of this site within Section 10 of this Report indicates negative or possible negative impacts surrounding groundwater, landscape, the Sandy Lane Pit Barham SSSI and the Oak Wood / Broomwalk Covert CWS, protected species, archaeology and the proximity of a number of residential properties. The Policy can be seen to address all of these impacts suitably, with additional information and mitigation measures requested of any forthcoming planning applications.</p> <p>Despite this, the appraisal of the site indicates that a Grade I listed medieval church of St Mary is located approximately 350m south west of the site. The Council's site assessment states that 'there is considered to be no impact upon setting'; however at this stage it is uncertain whether any forthcoming planning application would be acceptable in this regard. 'Proximity testing' is unlikely to highlight issues at the project level. The Policy could therefore seek the submission of an appropriate impact assessment regarding this listed building.</p> <p>Updated effects in response to the Policy modification</p> <p>There will be no change to the effects highlighted within the appraisal of the Plan's Policy MS1 within the SMWLP SA (Section 9.2.1, Page 162) resulting from those proposed modifications regarding items (a) and (e).</p> <p>The assessment of this Policy in the SMWLP SA highlighted uncertainty regarding effects on the historic environment (Sustainability Objective 7). The SA of the Policy stated that, <i>'it is recommended that the Policy be expanded to seek the submission of an appropriate impact assessment regarding the Grade I listed medieval church of St Mary to accompany any planning application, with mitigation measures included where relevant.'</i> The modification regarding a new item (j), responds to this recommendation and as a result the potential effect highlighted can now be considered to be rectified within the Policy framework for this site allocation in so far as effects will need to be appropriately identified at the planning application stage.</p>		

5.2 Modification (MM33) to Policy MS2

The table below sets out the sustainability implications of this modification, and the changes in effect predicted from the initial SA of the SMWLP at the Regulation 19 stage.

Table 8: Impact on Sustainability Objectives: Policy MS2

SA Objective		Pre-Modification Policy MS2	Post-Modification Policy MS2
Environmental	1 – Surface water / groundwater	+	+
	2 – Water use	0	0
	3 – Soils	0	0
	4 – Landscape / townscape	+	+
	5 – Emissions / energy efficiency	0	0
	6 – Biodiversity / Geodiversity	+/?	+
	7 – Historic environment	+/?	+
	8 – Flood risk	?	?
	9 – Traffic impacts	+	+
	10 – Air quality	+	+
	11 – Restoration / after use	0	0
	12 – Mineral resources	0	0
	13 – Economic use of resources	0	0
	14 – Minerals supply	0	0
	15 – Waste	0	0
Social	16 – Public nuisance	+	+
	17 – Housing needs	0	0
	18 – Noise	+	+
	19 – Recreation & amenity	+	+
	20 – Health and well-being	0	0



SA Objective		Pre-Modification Policy MS2	Post-Modification Policy MS2
Economic	21 – Economic growth / jobs	0	0
	22 - Infrastructure	0	0
	23 – Investment	0	0
	24 – Transport	+	+
Commentary	<p>SA Commentary at the Regulation 19 SMWLP stage</p> <p>The appraisal of this site within Section 10 of this Report indicates negative or possible negative impacts surrounding groundwater, landscape, the Breckland SPA, Breckland SAC, Breckland Farmland/Little Heath/Thetford Heaths SSSI, Gorse Grassland CWS, and Thetford Heath NNR, protected species, historic buildings, archaeology, flood risk, a PRoW, highways access / safety and the proximity of a number of residential properties. The Policy can be seen to address the majority of these impacts suitably, with additional information and mitigation measures requested of any forthcoming planning applications.</p> <p>Despite this, the appraisal of the site indicates that a number of Listed Buildings are in close proximity to the site; the nearest (Meadow Cottage and Carine Cottage) are located approximately 600m to the east. The Council's site assessment states that 'no historic buildings have been identified as being affected'; however at this stage it is uncertain whether any forthcoming planning application would be acceptable in this regard. 'Proximity testing' is unlikely to highlight issues at the project level. The Policy could therefore seek the submission of an appropriate impact assessment regarding listed buildings.</p> <p>At the time of writing, a number of comments were made on the HRA work undertaken to accompany the Plan by Natural England. In consideration of the potential impacts highlighted for the site within Section 10 regarding Natura 2000 sites, it is recommended that the Policy add further detail regarding the specific assessment requirements of work related to 'natural history interests', for instance whether there is a need for a project-level HRA to be undertaken to accompany any forthcoming planning application.</p> <p>Additionally, there exists an uncertainty surrounding the impacts of flood risk on site, with the site lying within an area of Flood Risk Zone 3 to the eastern boundary; although it should be noted that this area is very small and represents a small percentage of the total site area. Whereas the Policy does not specifically include this as an impact to be addressed, it should be noted that Policy GP4 ensures suitable requirements that are applicable to all proposals.</p> <p>Updated effects in response to the Policy modification</p> <p>There will be no change to the effects highlighted within the appraisal of the Plan's Policy MS2 within the SMWLP SA (Section 9.2.2, Page 164) resulting from those proposed modifications regarding items (c), (d), (e), (f) and (q).</p> <p>The assessment of this Policy in the SMWLP SA highlighted uncertainty regarding effects on biodiversity (Sustainability Objective 6) and the historic environment (Sustainability Objective 7). The</p>		



SA Objective	Pre-Modification Policy MS2	Post-Modification Policy MS2
	<p>SA of the Policy stated that, regarding the historic environment, <i>'the appraisal of the site indicates that a number of Listed Buildings are in close proximity to the site; the nearest (Meadow Cottage and Carine Cottage) are located approximately 600m to the east. The Council's site assessment states that 'no historic buildings have been identified as being affected'; however at this stage it is uncertain whether any forthcoming planning application would be acceptable in this regard. 'Proximity testing' is unlikely to highlight issues at the project level. The Policy could therefore seek the submission of an appropriate impact assessment regarding listed buildings.'</i></p> <p>Regarding biodiversity, the SA of the SMWLP stated that, <i>'at the time of writing, a number of comments were made on the HRA work undertaken to accompany the Plan by Natural England. In consideration of the potential impacts highlighted for the site within Section 10 regarding Natura 2000 sites, it is recommended that the Policy add further detail regarding the specific assessment requirements of work related to 'natural history interests', for instance whether there is a need for a project-level HRA to be undertaken to accompany any forthcoming planning application.'</i></p> <p>The modifications to items (i) factor in the previous SA recommendation regarding the historic environment, and can be seen to remove the previous uncertainty in a positive manner. This is also the case regarding the biodiversity recommendation in the SA of the SMLWP, with positive outcomes sought through those modifications to items (g), (j) and (k). Those potential effects highlighted can now be considered to be rectified within the Policy framework for this site allocation in so far as effects will need to be appropriately identified at the planning application stage.</p>	

5.3 Modification (MM35) to Policy MS4

The table below sets out the sustainability implications of this modification, and the changes in effect predicted from the initial SA of the SMWLP at the Regulation 19 stage.

Table 9: Impact on Sustainability Objectives: Policy MS4

SA Objective	Pre-Modification Policy MS4	Post-Modification Policy MS4
Environmental	1 – Surface water / groundwater	+
	2 – Water use	0
	3 – Soils	0
	4 – Landscape / townscape	+
	5 – Emissions / energy efficiency	0
	6 – Biodiversity / Geodiversity	+/?
	7 – Historic environment	+



SA Objective		Pre-Modification Policy MS4	Post-Modification Policy MS4
	8 – Flood risk	?	?
	9 – Traffic impacts	+	+
	10 – Air quality	0	0
	11 – Restoration / after use	0	0
	12 – Mineral resources	0	0
	13 – Economic use of resources	0	0
	14 – Minerals supply	0	0
	15 – Waste	0	0
Social	16 – Public nuisance	+	+
	17 – Housing needs	0	0
	18 – Noise	+	+
	19 – Recreation & amenity	+	+
	20 – Health and well-being	0	0
Economic	21 – Economic growth / jobs	0	0
	22 - Infrastructure	0	0
	23 – Investment	0	0
	24 – Transport	0	0
Commentary	<p>SA Commentary at the Regulation 19 SMWLP stage</p> <p>The appraisal of this site within Section 10 of this Report indicates negative or possible negative impacts surrounding groundwater, landscape, Breckland SPA, Breckland SAC, Breckland Farmland SSSI, Ancient Woodland CWS, Cavenham Heath NNR, protected species, archaeology, flood risk, a PRoW, highways access / safety, noise, a byway, and the proximity of a number of residential properties. The Policy can be seen to address the majority of these impacts suitably, with additional information and mitigation measures requested of any forthcoming planning applications.</p> <p>At the time of writing, a number of comments were made on the HRA work undertaken to accompany the Plan by Natural England. In consideration of the potential impacts highlighted for the site within Section 10 regarding Natura 2000 sites, it is recommended that the Policy add further detail regarding the specific assessment requirements of work related to 'nature conservation interest', for instance whether there is a need for a project-level HRA to be undertaken to accompany any</p>		



SA Objective	Pre-Modification Policy MS4	Post-Modification Policy MS4
	<p>forthcoming planning application.</p> <p>Additionally, there exists an uncertainty surrounding the impacts of flood risk on site with areas of Flood Risk Zone 2 and 3 existing on and in close proximity to the site. This includes some significant water bodies (reservoirs for agricultural irrigation), however the total area is large and operational activity is not intended to be located in these specific areas. Whereas the Policy does not specifically include this as an impact to be addressed, it should be noted that Policy GP4 ensures suitable requirements that are applicable to all proposals.</p> <p>Updated effects in response to the Policy modification</p> <p>There will be no change to the effects highlighted within the appraisal of the Plan's Policy MS4 within the SMWLP SA (Section 9.2.4, Page 169) resulting from the proposed modification regarding item (i).</p> <p>The assessment of this Policy in the SMWLP SA highlighted uncertainty regarding effects on biodiversity (Sustainability Objective 6). The SA of the Policy stated that, <i>'at the time of writing, a number of comments were made on the HRA work undertaken to accompany the Plan by Natural England. In consideration of the potential impacts highlighted for the site within Section 10 regarding Natura 2000 sites, it is recommended that the Policy add further detail regarding the specific assessment requirements of work related to 'natural history interests', for instance whether there is a need for a project-level HRA to be undertaken to accompany any forthcoming planning application.'</i></p> <p>The modifications to items (b), (e) and (f) factor in the previous SA recommendation regarding biodiversity. The potential effect highlighted within the SA of the SMWLP can now be considered to be rectified within the Policy framework for this site allocation in so far as effects will need to be appropriately identified at the planning application stage.</p>	

5.4 Modification (MM37) to Policy MS6

The table below sets out the sustainability implications of this modification, and the changes in effect predicted from the initial SA of the SMWLP at the Regulation 19 stage.

Table 10: Impact on Sustainability Objectives: Policy MS6

SA Objective	Pre-Modification Policy MS6	Post-Modification Policy MS6
Environmental	1 – Surface water / groundwater	+
	2 – Water use	0
	3 – Soils	0
	4 – Landscape / townscape	+



SA Objective		Pre-Modification Policy MS6	Post-Modification Policy MS6
	5 – Emissions / energy efficiency	0	0
	6 – Biodiversity / Geodiversity	+/?	+
	7 – Historic environment	+	+
	8 – Flood risk	0	0
	9 – Traffic impacts	0	0
	10 – Air quality	+	+
	11 – Restoration / after use	0	0
	12 – Mineral resources	0	0
	13 – Economic use of resources	0	0
	14 – Minerals supply	0	0
	15 – Waste	0	0
Social	16 – Public nuisance	+	+
	17 – Housing needs	0	0
	18 – Noise	+	+
	19 – Recreation & amenity	+	+
	20 – Health and well-being	0	0
Economic	21 – Economic growth / jobs	0	0
	22 - Infrastructure	0	0
	23 – Investment	0	0
	24 – Transport	0	0
Commentary	SA Commentary at the Regulation 19 SMWLP stage The appraisal of this site within Section 10 of this Report indicates negative or possible negative impacts surrounding landscape, Stour & Orwell SPA, Stour Estuary SSSI, Brantham Bridge Meadows CWS, protected species, archaeology, a bridleway / PRoW, and the proximity of a number of residential properties. The Policy can be seen to address the majority of these impacts suitably, with additional information and mitigation measures requested of any forthcoming planning		



SA Objective	Pre-Modification Policy MS6	Post-Modification Policy MS6
	<p>applications.</p> <p>At the time of writing, a number of comments were made on the HRA work undertaken to accompany the Plan by Natural England. In consideration of the potential impacts highlighted for the site within Section 10 regarding Natura 2000 sites, it is recommended that the Policy add further detail regarding the specific assessment requirements of work related to 'nature conservation interests', for instance whether there is a need for a project-level HRA to be undertaken to accompany any forthcoming planning application.</p> <p>Updated effects in response to the Policy modification</p> <p>The assessment of this Policy in the SMWLP SA highlighted uncertainty regarding effects on biodiversity (Sustainability Objective 6). The SA stated that, <i>'at the time of writing, a number of comments were made on the HRA work undertaken to accompany the Plan by Natural England. In consideration of the potential impacts highlighted for the site within Section 10 regarding Natura 2000 sites, it is recommended that the Policy add further detail regarding the specific assessment requirements of work related to 'nature conservation interests', for instance whether there is a need for a project-level HRA to be undertaken to accompany any forthcoming planning application.'</i></p> <p>The modification to item (d) partly factors in the previous SA recommendation regarding biodiversity, however does not reflect the recommendation for a project-level HRA as other policy modifications propose. Procedurally though, a requirement for proposals to adequately address the potential impacts on the Stour & Orwell SPA will likely be in the form of HRA Screening, or Appropriate Assessment if needed. The potential effect highlighted within the SA of the SMWLP can now be considered to be partly rectified within the Policy framework for this site allocation in so far as effects will need to be appropriately identified at the planning application stage.</p>	

5.5 Modification (MM38) to Policy MS7

5.5.1 The removal of previous Policy MS7

The table below sets out the sustainability implications of this modification, and the changes in effect predicted from the initial SA of the SMWLP at the Regulation 19 stage.

Table 11: Impact on Sustainability Objectives: Policy MS7

SA Objective		Pre-Modification Policy MS7	Post-Modification
Environmental	1 – Surface water / groundwater	+	N/A – Policy removed
	2 – Water use	+	N/A – Policy removed
	3 – Soils	0	N/A – Policy removed



SA Objective		Pre-Modification Policy MS7	Post-Modification
	4 – Landscape / townscape	+	N/A – Policy removed
	5 – Emissions / energy efficiency	0	N/A – Policy removed
	6 – Biodiversity / Geodiversity	+/?	N/A – Policy removed
	7 – Historic environment	+	N/A – Policy removed
	8 – Flood risk	0	N/A – Policy removed
	9 – Traffic impacts	0	N/A – Policy removed
	10 – Air quality	0	N/A – Policy removed
	11 – Restoration / after use	0	N/A – Policy removed
	12 – Mineral resources	0	N/A – Policy removed
	13 – Economic use of resources	0	N/A – Policy removed
	14 – Minerals supply	0	N/A – Policy removed
	15 – Waste	0	N/A – Policy removed
Social	16 – Public nuisance	+	N/A – Policy removed
	17 – Housing needs	0	N/A – Policy removed
	18 – Noise	+	N/A – Policy removed
	19 – Recreation & amenity	0	N/A – Policy removed
	20 – Health and well-being	0	N/A – Policy removed
Economic	21 – Economic growth / jobs	0	N/A – Policy removed
	22 - Infrastructure	0	N/A – Policy removed
	23 – Investment	0	N/A – Policy removed
	24 – Transport	0	N/A – Policy removed
Commentary	SA Commentary at the Regulation 19 SMWLP stage The appraisal of this site within Section 10 of this Report indicates negative or possible negative impacts surrounding groundwater, landscape, Minsmere-Walberswick SPA, Minsmere-Walberswick Heaths & Marshes SSSI, Wangford Marshes CWS, Suffolk Coast NNR, Hen Reedbeds (SWT Site), Reydon Wood (SWT Site), protected species, archaeology, and the proximity of a number of		



SA Objective	Pre-Modification Policy MS7	Post-Modification
	<p>residential properties. The Policy can be seen to address the majority of these impacts suitably, with additional information and mitigation measures requested of any forthcoming planning applications.</p> <p>At the time of writing, a number of comments were made on the HRA work undertaken to accompany the Plan by Natural England. In consideration of the potential impacts highlighted for the site within Section 10 regarding Natura 2000 sites, it is recommended that the Policy add further detail regarding the specific assessment requirements of work related to 'nature conservation interest', for instance whether there is a need for a project-level HRA to be undertaken to accompany any forthcoming planning application.</p> <p>Updated effects in response to the Policy modification</p> <p>The 'policy-on' assessment of Policy MS7 in the SA of the SMLWP did not highlight any landscape effects due to the presence of item (d) within the Policy which sought proposals to address the potential for direct and indirect impacts upon nature conservation interest including Suffolk Coast & Heaths AONB. The 'policy-off' assessment of the site at Wangford indicated negative effects on landscape with supporting commentary reiterating Plan evidence that <i>'the proposal is inside AONB but could be considered capable of mitigation if overriding need case exists.'</i></p> <p>The independent examiner of the Plan at EiP has issued correspondence that outlines that there is no overriding need for extraction of sand and gravel within Wangford, and that no 'special circumstances' can be demonstrated that would warrant extraction within the AONB acceptable in planning terms.</p>	

5.5.2 Implications of other elements of the SA

In light of the independent examiner's findings in the EiP hearing sessions, the subsequent removal of the site allocation at Wangford requires a few further procedural amendments to the SA of the SMLWP at the Regulation 19 stage. These correspond to:

- The cumulative effects of site policies (Section 11 of the SA of the SMLWP, page 275)
- The 'policy-off' site assessment of the Wangford site (Section 10.2.7 of the SA of the SMWLP, page 217)
- The reasons for the rejection of Wangford as a site allocation (Appendix II of the SA of the SMWLP, page 317)

These are dealt with below in individual sub-sections.



The cumulative effects of site policies

In the SA of the SMWLP at the Regulation 19 stage, the SA explored grouped sites for cumulative effects in broad geographic areas. The SA, in Section 11.2 (page 275), stated that,

'The preferred site allocations are broadly sufficiently distanced in line with the Spatial Strategy of Policy GP3. Despite this, there are two broad areas which experience more than a single site allocation in relatively close proximity that may give rise to cumulative impacts. These are:

- The north / north-west of the County: Allocations for mineral extraction at WO1 - Worlington (quarry extensions), CA1, CA2, CA3 - Cavenham (quarry extensions / waste management) and WS1 - Sizewell A Nuclear Power Station (management of waste arising from the decommissioning of Sizewell A together with other waste from sister stations); and*
- South west of Ipswich: Allocations for mineral extraction at BS1 - Belstead (land at Brockley Wood), TA1 - Tattingstone (Folly Farm) and WH1 - Wherstead (Pannington Hall Quarry).'*

The previously allocated site at Wangford was not considered within the scope of cumulative and synergistic effects within the SA, as it was suitably distanced from other site allocations. As such, there will be no change in the cumulative and synergistic effects of site policies resulting from proposed modifications regarding the omission of Wangford.

The 'policy-off' site assessment of the Wangford site

The table below sets out the revised site assessment of the Wangford site post-examination.

Table 12: Site appraisal for Wangford site submission

SA Objectives	Sustainability Impact (Pre-EiP)	Sustainability Impact (Post-modification)	Commentary (replacement text in <i>bold italics</i> where necessary)
Environmental			
1. To maintain or improve quality of surface water and groundwater	-	-	The site is at a high risk of groundwater flooding and is underlain by a minor aquifer. There are areas of predicted surface water flooding for the sites. The sites also fall within SPZ Zones.
2. To maximise the efficient use of water	N/A	N/A	N/A
3. To maintain/improve soil quality/resources	?	?	The agricultural land classification is Grade 3b or lower.
4. To maintain/improve the quality	-	--	The proposal is inside AONB but could be considered capable of mitigation if overriding need case exists.

SA Objectives	Sustainability Impact (Pre-EiP)	Sustainability Impact (Post-modification)	Commentary (replacement text in <i>bold italics</i> where necessary)
and local distinctiveness of landscapes/townscapes			<i>Replace above text with: The site is within an AONB with mitigation unlikely to be suitable.</i>
5. To reduce greenhouse gas emissions and enhance energy efficiency	0	0	No impact identified at this stage. Impacts would only be identifiable at the planning application stage and in adherence to relevant Plan policies.
6. To conserve/enhance biodiversity or geodiversity	-	-	Potential impacts upon nature conservation interest including Suffolk Coast & Heaths AONB, Minsmere-Walberswick SPA, Minsmere-Walberswick Heaths & Marshes SSSI, Wangford Marshes CWS, Suffolk Coast NNR, Hen Reedbeds (SWT Site), Reydon Wood (SWT Site), Groundwater Source Protection Zone (River Wang, Wolsey's creek, River Blyth), European Protected Species (Otters, Bats), Priority Species (Bittern, Water Vole, Barn Owl), other protected Species (Badger), Priority Habitats (Reedbeds, Grazing Marshes) need to be adequately assessed and where necessary mitigation proposed. The Site Assessment Report does not identify any significant concerns however regarding the above impacts from the County Council's Ecology specialists.
7. To preserve or enhance historical buildings/sites, archaeological sites and other culturally important buildings	?	?	No historic buildings are in proximity to the site that can be identified as being affected. The site occupies a favourable topographic location for early occupation and ritual activity. Extensive cropmarks of linear and curvilinear ditches and enclosures (REY 077, REY 76, REY 075) and finds of Roman and Medieval date (REY 026, REY 028) are recorded on the County Historic Environment Record (HER) in the vicinity. Archaeological investigations associated with previous phases of extraction lying immediately west of the proposed site identified a range of features of prehistoric and Medieval date (WNF 023, WNF 018, WNF 021).
8. To minimise flood risk	0	0	The site is within Flood Risk Zone 1.
9. To minimise effects of traffic on the environment	0	0	Traffic generation is anticipated to be the same as for the existing Wangford Quarry.
10. To maintain / improve air quality	+	+	Air Quality at the site is currently good; Waveney District Council has not declared any Air Quality Management Areas.



SA Objectives	Sustainability Impact (Pre-EiP)	Sustainability Impact (Post-modification)	Commentary (replacement text in <i>bold italics</i> where necessary)
11. Promote effective restoration and appropriate after-use of sites	?	?	No restoration proposals submitted.
12. Avoid sterilisation of minerals resources	N/A	N/A	N/A
13. Promote sustainable economic use of natural resources	++	++	The site is intended for mineral extraction.
14. Ensure a steady and adequate supply of minerals to meet the needs of the society	++	++	The site is intended for mineral extraction.
15. To move treatment of waste up the waste hierarchy	?	?	Silt and reject minerals would be used in restoration. This can be seen to move the treatment of waste up the waste hierarchy in line with the proximity principle.

Social

16. To minimise the impacts arising from the minerals and waste developments on where people live	?/-	?/-	There are a number of residential properties within 250m of the site; Lime Kiln Farm lies within approximately 50m of the Southern boundary of the site. Reydon Grange, Toad Hall and Wangford Farm lies within 250 of the northern boundary of the site.
17. To meet the housing needs of the population	+	+	There are no adopted or draft plan proposals that conflict with the proposed sites. At the time of writing there are no known planning applications which affect the site.
18. To minimise production of noise at quarries	+	+	The proposal will require standard mitigation measures such as the use of earth screening bunds.
19. To maintain and improve recreation and amenity	+	+	No public rights of way or bridleways are affected.
20. To protect and enhance human health and wellbeing	+	+	Aside from those impacts identified above (Sustainability Objective 16), there are no additional identified impacts on human health and well-being.



SA Objective	Site Allocation											Alternatives										
	BA1	BN1	BS1	CA1	LA1	TA1	WE1	WH1	WO1(a)	WO1(b)	WO1 (c)	HE1(a)	HE1(b)	HE1(c)	HG1	HO1	ME1	ST1	WA1	WA2	WA3	WD1
3	?	+	?/ -	?/ +	+	+	?/ -	?	+	+	+	?	?	?	?/ -	?/ -	+	?	?	?	?	+
4	-	-	?	?	-	-	?	-	?	?	?	--	--	-	-	--	--	-	--	--	--	--
5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	-	-	?	-	?	-	?	-	-	-	-	-	--	-	-	-	--	-	--	--	-	--
7	-	-	-	-	?	?	?	?	?	?	?	-	-	-	-	-	--	-	-	?	?	--
8	?	-	?	-	0	0	0	0	?	0	0	0	-	?	0	0	-	-	-	-	0	-
9	?	0	0	0/ ?	0	0	0	?/ -	0	0	0	0	0	0	0	0	0	?/ -	0	0	0	0
10	+	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
11	+	?/ +	+	++	++	++	++	+	+	+	+	+	++	?	++	?/ +	?	++	?	++	?	-
12	N/A																					
13	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
14	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
15	-	?	?/-	-	?/ -	?/ -	?	?/ -	?/ -	?/ -	?/ -	?	?	?	?	?/ -	?/ -	?	?	?	?	?
16	?	?	?/-	?/ -	?	?	?	+	+	+	+	?/ -	?/ -	?/ -	?/ -	?/ -	?/ -	-	?/ -	?	?/ -	?/ -
17	?	+	+	+	?	?	?	+	+	+	+	+	+	+	+	+	+	?	+	+	+	+
18	+	?	?	?	+	+	?	+	+	+	+	?	?	?	?	?	?	?	?	+	+	?
19	?/ +	?/ -	+	?/ -	?/ -	?/ -	?/ -	-	+	+	+	?	+	--	+	-	--	--	+	+	+	--

SA Objective	Site Allocation											Alternatives											
	BA1	BN1	BS1	CA1	LA1	TA1	WE1	WH1	WO1(a)	WO1(b)	WO1 (c)	HE1(a)	HE1(b)	HE1(c)	HG1	HO1	ME1	ST1	WA1	WA2	WA3	WD1	
20	+	?	+	+	+	+	?	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
21	+	+	+	+	0	0	0	+	0	0	0	+	+	+	+	+	+	?	0	0	0	+	
22	N/A																						
23	0	0	0	0	0	0	0	0	?	?	?	0	0	0	0	0	0	0	0	0	0	0	
24	?	?	?	+	?	?	+	+	?/ -	?/ -	?/ -	?/ -	?/ -	--	--	?	--	?/ -	?	?	?	?	

Table 14: Reasons for selecting / rejecting site options

Site	Preferred / Rejected?	Reasons for Selection / Rejection
WA3	Rejected	<p>Pre-Modification reason for selection</p> <p>Although located within an AONB, the NPPF provides guidance in respect of development within the AONB:</p> <p>b) NPPF paragraph 116 indicates that planning permission for major development (which would include sand and gravel extraction) should be refused except in exceptional circumstances and where it can be demonstrated that it is in the Public Interest.</p> <p>The Site Assessment Report states that, 'having appraised the proposed site within the context of the NPPF and other material considerations it was considered justified to include the Lime Kiln Farm within the Plan because of the following exceptional reasons:</p> <p>a) a) the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy;</p> <p>b) there is a shortage of gravel in the market area served by this quarry and the proposed extension contains an unusually high percentage of gravel compared to most other quarries;</p> <p>c) the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area;</p> <p>d) processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds;</p> <p>e) there are no other acceptable proposed sites within the north-east area of Suffolk;</p> <p>f) alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability; and</p>



- g) it is considered that in the impact upon the wider AONB, recreation within the area, and the nearby residential properties and ecological designations could be moderated to an acceptable extent.'

Post-Modification reason for rejection

There is an overriding constraint to the site in the form of an unacceptable impact upon an AONB. NPPF paragraph 116 indicates that planning permission for major development (which would include sand and gravel extraction) should be refused except in exceptional circumstances and where it can be demonstrated that it is in the Public Interest. No overriding need case exists as determined at EiP and no exceptional circumstances for extraction in the AONB were considered applicable.



6. Considerations for SA Conclusions

6.1 Introduction

The Plan's modifications do not lead to any newly identified negative effects. As a result, 'whole Plan' effects, i.e. the overall impacts of the Plan's policy content and site allocations together, will not change aside from reference to the Wangford allocation being located within the Suffolk Coast and Heaths AONB.

For the purposes of thoroughness, the conclusions of the SA are reiterated below, with the removal of the reference to the previously proposed minerals extraction allocation at Wangford.

6.1.1 Surface water and groundwater

- The Plan has been identified as having **negative impacts** on groundwater associated with the allocation of a number of sites within Source Protection Zones. Impacts are not significant however, through such requirements to address such impacts being prevalent in relevant site allocation policies.

6.1.2 Water use

- There are **no impacts** emanating from the Plan regarding the sustainable use of water resources. It is considered that this issue is more relevant to the operation of permanent facilities and the detailed planning applications submitted to the Minerals and Waste Planning Authority.

6.1.3 Soil quality

- The Plan does not make any significant commitments to the protection of the best and most versatile agricultural land and as such there will be **uncertain impacts** at this stage. This is understandable however, where mineral deposits lie where they exist and in consideration of the constraints within the County surrounding ecological designations such as SSSIs and inland Natura 2000 sites.

6.1.4 Landscapes

- The Plan's policies will have **positive long term outcomes** regarding landscapes and biodiversity, due to the enhancements that are encouraged through such activities in the long term associated with aspirations regarding restoration.
- A number of negative impacts are associated with the Plan's site allocations regarding Special Landscape Areas. For this reason, **negative effects** can not be ruled out at this stage. It should be noted however that a number of the site allocation policies include specific measures as to the mitigation measures needed for each allocation, where relevant.



6.1.5 Energy efficiency

- There are **no impacts** emanating from the Plan regarding energy efficiency. It is considered that this issue is more relevant to the operation of permanent facilities and detailed planning applications submitted to the Minerals and Waste Planning Authority.

6.1.6 Biodiversity / geodiversity

- In the absence of any specific policy regarding biodiversity that sets out the requirements for forthcoming applications, **uncertain impacts** arise from the Plan's policies in general. Regarding sites, **negative impacts** can not be ruled out cumulatively following a precautionary approach adopted in this SA regarding the assessment of such environmental effects. The Plan's Habitats Regulation Assessment (HRA) does not highlight any likely significant effects on Natura 2000 sites, provided that project-level HRA is undertaken on a number of qualifying sites. This is pertinent in additional consideration of high growth in the County in line with the need for district level development plans to objectively assess their housing needs; there could be some significant in-combination effects as a result.

6.1.7 The historic environment

- The protection of the historic environment is sought within the Plan's general environmental criteria policy (GP4) and is a key consideration in the selection of sites as demonstrated in a series of Site Assessment Reports that form part of the Plan's evidence base. The SA identifies a number of positive impacts within the assessment of the Plan's policies, however many of these can be considered secondary. The Plan at this stage introduces a number of site allocation specific requirements regarding archaeology, however further work might be required of developers in submitting planning applications that identifying and where relevant mitigate impacts on historic assets and their settings. As such there are **uncertain impacts** as a result of the Plan as a whole.

6.1.8 Flood risk

- The Plan does not specifically include a policy regarding flood risk, and as such the impacts are not considered to be significantly positive. Despite this, flood risk is included within the general environmental criteria policy (GP4) and national policy further includes a planning context as to what is and what is not acceptable. The Plan's site assessment methodology, as evidenced by Site Assessment Reports for all allocated and non-allocated sites submitted for consideration includes flood risk as a key consideration. General **positive impacts** have been highlighted for the Plan as a whole regarding minimising flood risk.

6.1.9 Traffic impacts on the environment

- The Plan seeks to minimise traffic impacts on the environment and the SA identifies a number of positive impacts regarding this Sustainability Objective in the assessment of the Plan's policies. The Plan's site assessment methodology factors in expected HGV movements and the traffic impacts of each individual proposal / allocation. Further sustainable transport modes are promoted and safeguarded where necessary. There will be **positive impacts** resulting



from the Plan as a whole on the minimisation of traffic impacts on the environment.

6.1.10 Air quality

- The Plan's policies have been identified as having **uncertain impacts** regarding air quality. It should be noted that this SA identifies such impacts, related to vehicle emissions specifically, as predominantly associated with the cumulative effects of co-locating waste management facilities in industrial areas, landfill sites during restoration or existing mineral extraction sites. This may see increases in HGV movements in those areas that already experience HGV movements; however these impacts should be balanced with a requirement to minimise impacts throughout the Plan and utilise existing infrastructure.

6.1.11 Restoration and after-use

- The Plan will have **significant positive impacts** on restoration and after-use by encouraging biodiversity gain and where this is not viable a return to agriculture. The Plan's allocations can be seen as having broadly positive impacts regarding aspirations surrounding restoration and after-use.

6.1.12 Avoiding the sterilisation of mineral resources

- The Plan includes mechanisms to safeguard deposits and includes safeguarded existing facilities within the policy map. Policy exists to further safeguard the Plan's allocations. There will be **significantly positive impacts** regarding avoiding the sterilisation of mineral resources.

6.1.13 Economic use of natural resources

- **Positive impacts** have been identified throughout the Plan regarding the economic use of resources both in the nature of mineral planning and also waste, associated with a high-level focus on recycling and re-use and moving the treatment of waste up the waste hierarchy.

6.1.14 Minerals supply

- There will be **significant positive impacts** regarding increasing minerals supply. This is in line with the County's growth needs through a number of flexible and pragmatic policies regarding extraction. Forecasts in supply over the plan period are in alignment with the required methodologies of national guidance. The Plan's site allocations adhere to ensuring a consistent supply of minerals over the Plan period in line with the supply figure identified in Policy MP1 including a sufficient buffer or 'safety margin' of 31%.

6.1.15 The waste hierarchy

- Only a single new waste management facility (Sizewell A Nuclear Power Station) is identified within the Plan in line with there being no identified capacity gap for the treatment of many wastes in the plan area. Despite this, co-located facilities with are supported in many instances in line with the lifetime of minerals operations, including allocated waste



management facilities at Cavenham. Impacts on this Sustainability Objective are not significantly positive regarding the Plan's waste management policies due to the inherent need to backfill mineral voids to restore landscapes, although it should be noted that the Plan's waste policies do seek to minimise disposal in favour of recycling and re-use in the first instance. There will be **positive impacts** on this objective overall.

6.1.16 Impacts on the public

- The policy appraisals in this SA indicate that there will be **no impacts** on the majority of the social objectives in line with a desire to minimise impacts in the first instance, and also promote effective co-location through a series of Policy approaches for different facility types and minerals and waste development in general. This stance on minimisation rather than avoidance reflects the fact that much mineral and waste development is likely to have some degree of perceived negative impact on where people live, is carried forward within the Plan's site allocations, with no negative impacts highlighted within this SA and the ease of effective mitigation factored into the site selection process.

6.1.17 Meeting housing needs

- The Plan rightly focuses on the interests of waste management and ensuring minerals supply throughout the Plan period. This primarily supports the development industry by nature, however mechanisms are included within the Plan to ensure that planned development, either minerals and waste or housing, do not significantly conflict. Whereas any minerals or waste Plan is always likely to conflict to some degree with some housing schemes due to the sustainability benefits of co-location, adherence to the proximity principle and a need to ensure effective transport movements, the Plan's allocations can be seen to not conflict with any housing proposals in any district development plans or pending / committed applications at the time of writing. Policy MP1 ensures a suitable 'safety margin' of 31% to ensure that there is a sufficient supply of sand and gravel to support any unplanned growth; this is particularly important in regard to the proposed change to the NPPF in the form of a standardised methodology for calculating housing needs in the County and nationally, which is likely to see a significant increase in housing requirements. There will be **positive impacts** on this Sustainability Objective at the 'whole Plan' level.

6.1.18 Noise

- **Positive impacts** have been highlighted in the assessment of the Plan's policies regarding the minimisation of noise; however it should be noted that such impacts are predominantly associated with the cumulative effects of co-locating waste management facilities in industrial areas, landfill sites during restoration or existing mineral extraction sites. This is an approach that enables positive social and economic impacts by ensuring development that requires HGV movements are concentrated and can utilise existing infrastructure. Noise impacts can be considered more relevant to specific sites on a case by case basis and such impacts are identified in all relevant site allocation policies. It should also be noted that noise impacts have been a key consideration throughout the site selection process. As a result, more positive impacts can be seen to emanate from the consideration of the site allocations against the Plan's relevant policy criteria and this 'two pronged' approach to minimising noise impacts at



the site selection and eventual planning application stages ensures that negative impacts are unlikely to occur through the operation of facilities or extraction activities.

6.1.19 Recreation and amenity

- Policy GP4 requires applicants to demonstrate that there would be no significantly adverse impacts on Public Rights of Way or neighbouring land-uses. This goes some way to ensuring that recreation and amenity is protected throughout the Plan area from mineral and waste activities. The Plan's allocations have numerous impacts on Public Rights of Way, bridleways and by-ways that are identified on or in close proximity to any of the sites. Despite this, the Plan's site assessment methodology, as evidenced in a number of Site Assessment Reports (for all allocated and non-allocated sites) identifies such impacts and assesses the ease of specific mitigation needed with criteria existing in site allocation policies within the Plan. There will therefore be **no impact** on recreation and amenity relevant to the context of the Plan and resulting from the Plan as a whole.

6.1.20 Human health and well-being

- The assessment of the Plan's policies identifies a number of minor positive impacts regarding human health and well-being; however this is in consideration of less focused impacts due to separate Sustainability Objectives regarding air quality, noise, traffic impacts and general public nuisance. The Plan's site assessment methodology, as evidenced in an individual Site Assessment Report for each site submitted for consideration explores a number of site specific impacts that can fall within this objective on a case-by-case basis, such as the impacts of mud on road that can be caused by operations and the suitability of local access roads in terms of accident histories. Such considerations are reiterated within the Plan's site allocation policies. This approach, in addition to the list of criteria included within Policy GP4, ensures that there will be **no impact** on this Sustainability Objective.

6.1.21 Economic and employment growth

- Ensuring a supply of minerals throughout the plan period significantly supports economic growth throughout the plan area. In addition, the minerals and waste industries provide a number of employment opportunities. Specifically relevant to the Plan content, there will be generally **uncertain impacts** regarding economic growth and investment in the County; there is a possibility that the prevalence of co-locating new waste management facilities in employment areas would make investment in them less attractive for more traditional employment uses, however this is not a criticism of the Plan's general approach in line with national guidance. This is an inherent secondary reality associated with the benefits of co-locating new facilities however **positive impacts** can be associated with the Plan's allocations (and policies) that seek to locate temporary waste management facilities at mineral extraction sites and those that are being backfilled through phased restoration.

6.1.22 Maintain / improve existing infrastructure

- The Plan as a whole will not have significant impacts on maintaining and improving existing infrastructure. Whereas the Plan seeks to sustainably utilise existing infrastructure in the first



instance (through co-location and directing sites to existing Strategic Lorry Routes in accordance with the Spatial Strategy of Policy GP3), and Policy exists to support infrastructure projects in the Plan area. There will be **positive impacts** on this Sustainability Objective resulting from the Plan as a whole.

6.1.23 Sustainable investment

- As stated in the conclusions regarding Sustainability Objective 21, there will be generally **uncertain impacts** regarding investment in the County. This is related to the possibility that the prevalence of co-locating new waste management facilities in employment areas would make investment in them less attractive for more traditional employment uses. This is not a criticism of the Plan's general approach in line with national guidance and is an inherent secondary reality associated with the benefits of co-locating new facilities.

6.1.24 Efficient / sustainable movement patterns

- The Plan's Spatial Strategy (GP3) seeks to allocate and permit mineral extraction and waste management facilities that are well related to the Suffolk Lorry Route Network (or rail network or navigation). This can be seen as a commitment that has influenced the selection of sites with allocations responding well to being in close proximity to this network. The Plan's allocations therefore relate well to this element of the Spatial Strategy and the Plan will have generally **significant positive** impacts as a result.



7. Next Steps

This Addendum SA and the Suffolk Minerals & Waste Local Plan Modifications September 2019 will be subject to consultation. There are three statutory consultees that are required to be consulted for all Sustainability Appraisal and Strategic Environmental Assessment documents. These are:

- The Environment Agency;
- Natural England; and
- Historic England.

In addition to these, consultation will seek to engage the wider community in order to encompass comprehensive public engagement. Suffolk County Council may additionally wish to invite comments from focussed groups, relevant stakeholders and interested parties.

Please check the Council's website for more information, and direction to the relevant consultation portal.



8. Monitoring

The significant sustainability effects of implementing a Local Plan must be monitored in order to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. The Sustainability Framework contained in the SMWLP at the Regulation 19 stage includes suggested indicators in order to monitor each of the Sustainability Objectives, however these may not all be collected due to limited resources and difficulty in data availability or collection.

Guidance stipulates that it is not necessary to monitor everything included within the Sustainability Framework, but that monitoring should focus on significant sustainability effects, e.g. those that indicate a likely breach of international, national or local legislation, that may give rise to irreversible damage or where there is uncertainty and monitoring would enable preventative or mitigation measures to be taken.

Upon adoption Local Plans will be accompanied by an Adoption Statement which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.

If you need help to understand this information in another language please call 03456 066 067.

Se precisar de ajuda para ler estas informações em outra língua, por favor telefone para o número abaixo. 03456 066 067

Portuguese

Jeżeli potrzebujesz pomocy w zrozumieniu tych informacji w swoim języku zadzwoń na podany poniżej numer. 03456 066 067

Polish

এই লেখাটি যদি অন্য ভাষাতে বুঝতে চান তাহলে নিচের নম্বরে ফোন করুন 03456 066 067

Bengali

Jeigu jums reikia šios informacijos kita kalba, paskambinkite 03456 066 067

Lithuanian

Dacă aveți nevoie de ajutor pentru a înțelege această informație într-o altă limbă, vă rugăm să telefonați la numărul 03456 066 067

Romanian

Если для того чтобы понять эту информацию Вам нужна помощь на другом языке, позвоните, пожалуйста, по телефону 03456 066 067

Russian

If you would like this information in another format, including audio or large print, please call 03456 066 067.