Habitats Regulations Assessment

West Suffolk Local Plan (Consolidated Adoption HRA)

West Suffolk District Council

Project number: 60598646

July 2025

Quality information

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Revision History

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2	November 2023	Updated R19 draft following client review	JR	James Riley	Technical Director
3	December 2023	Final updates	JR	James Riley	Technical Director
4	September 2024	Update for air quality, water quality and recreational pressure	JR	James Riley	Technical Director
5	July 2025	Consolidated HRA combining Regulation 19 HRA with responses to residual comments and Main Modifications HRA	JR	James Riley	Technical Director

Distribution List

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1. Introduction

Background to the Project

1.1 AECOM was appointed by West Suffolk District Council to assist in producing a report to inform the councils Habitats Regulations Assessment (HRA) of the potential effects of West Suffolk Local Plan on the National Site Network. The objectives of the assessment are to:

- Identify any aspects of the Local Plan that would cause an adverse effect on the integrity of Habitat sites (Special Areas of Conservation (SACs), proposed SACs (pSACs), Special Protection Areas (SPAs), potential SPAs (pSPAs) and, as a matter of Government policy, Ramsar sites and areas of formal compensatory habitat), either alone or in combination with other plans and projects; and

- To advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.

1.2 The HRA of the West Suffolk Local Plan is required to determine if there are any realistic linking pathways present between a Habitat site and the Local Plan and where Likely Significant Effects cannot be screened out, an analysis to inform Appropriate Assessment to be undertaken to determine if adverse effects on the integrity of the Habitat sites will occur as a result of the Local Plan alone or in combination.

1.3 HRA work on the Local Plan commenced with the Issues and Options version. An HRA was not undertaken at the preferred option stage but was undertaken for the Regulation 19 Local Plan. Following Examination, a further HRA was undertaken of the Main Modifications. Although there is no legal requirement to produce a final HRA for Local Plan adoption, this consolidated HRA has been produced to bring together the Reg 19 HRA and Main Modifications HRA. Note that this consolidated HRA does not introduce any new assessment except regarding some changes to Main Modifications from the Inspectors' July 2025 report on the examination of the West Suffolk Local Plan that do not affect the HRA. There is information about the previous stages at Welcome to the West Suffolk Council Planning Policy consultation system - West Suffolk Planning Policy Consultations (inconsult.uk).

Legislation

1.4 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 as amended. Regulation 105 states that:

1.5 “Where a land use plan is likely to have a significant effect on a European [Habitat] site … the plan-making authority for that plan must, before the plan is given effect. make an appropriate assessment of the implications for the site in view of that site’s conservation objectives… The plan-making authority must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European [Habitat] site.”

1.6 Habitat sites can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy (set out in the National Planning Policy Framework) for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Habitat sites.

1.7 The Habitats Regulations applies the precautionary principle to Habitat sites (SAC and SPA). For the purposes of this assessment candidate SACs (cSACs), proposed SPAs (pSPAs) and proposed Ramsar (pRamsar) sites are all treated as fully designated sites. In this report we use the term “Habitat sites” to refer collectively to the sites listed in this paragraph.

1.8 Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

1.9 The United Kingdom (UK) left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). The Withdrawal Act retains the body of existing EU-derived law within our domestic law. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – make it clear that the need for HRA continues post-Brexit.

1.10 In 2018, the 'People Over Wind' ECJ ruling[1] determined that 'mitigation' (i.e. measures that are specifically introduced to avoid or reduce the harmful effects of a plan or project on Habitat sites) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the appropriate assessment stage. Appropriate assessment is not a technical term: it simply means 'an assessment that is appropriate' for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case-by-case basis by the competent authority[2]. However, an appropriate assessment must contain complete, precise and definitive findings and conclusions to ensure that there is no reasonable scientific doubt as to the effects of the proposed plan or project.

1.11 Over the years the phrase 'Habitats Regulations Assessment' has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

Report Layout

1.12 **Chapter 2** of this report explains the process by which the HRA has been carried out and sources of evidence used. **Chapter 3** explores the relevant pathways of impact. **Chapter 4** summarises the Test of Likely Significant Effects of the policies and site allocations of the Plan considered 'alone' and 'in-combination. (The Test of Likely Significant Effects itself is undertaken in **Appendix B**). **Chapter 5** contains the Appropriate Assessment. The Regulation 19 Consultation Comments are shown within Appendix E with the residual comments listed in Appendix F. The Main Modifications HRA is presented in Appendix G.

[1] Case C-323/17

[2] '*appropriate indicates no more than that the assessment should be appropriate to the task in hand, that task being to satisfy the responsible authority that the project will not adversely affect the integrity of the site concerned. It requires a high standard of investigation, but the issue ultimately rests on the judgment of the authority*': R (Champion) v North Norfolk District Council [2015] 1 WLR 3710, para 41 per Lord Carnwath JSC.

2. Methodology

Introduction

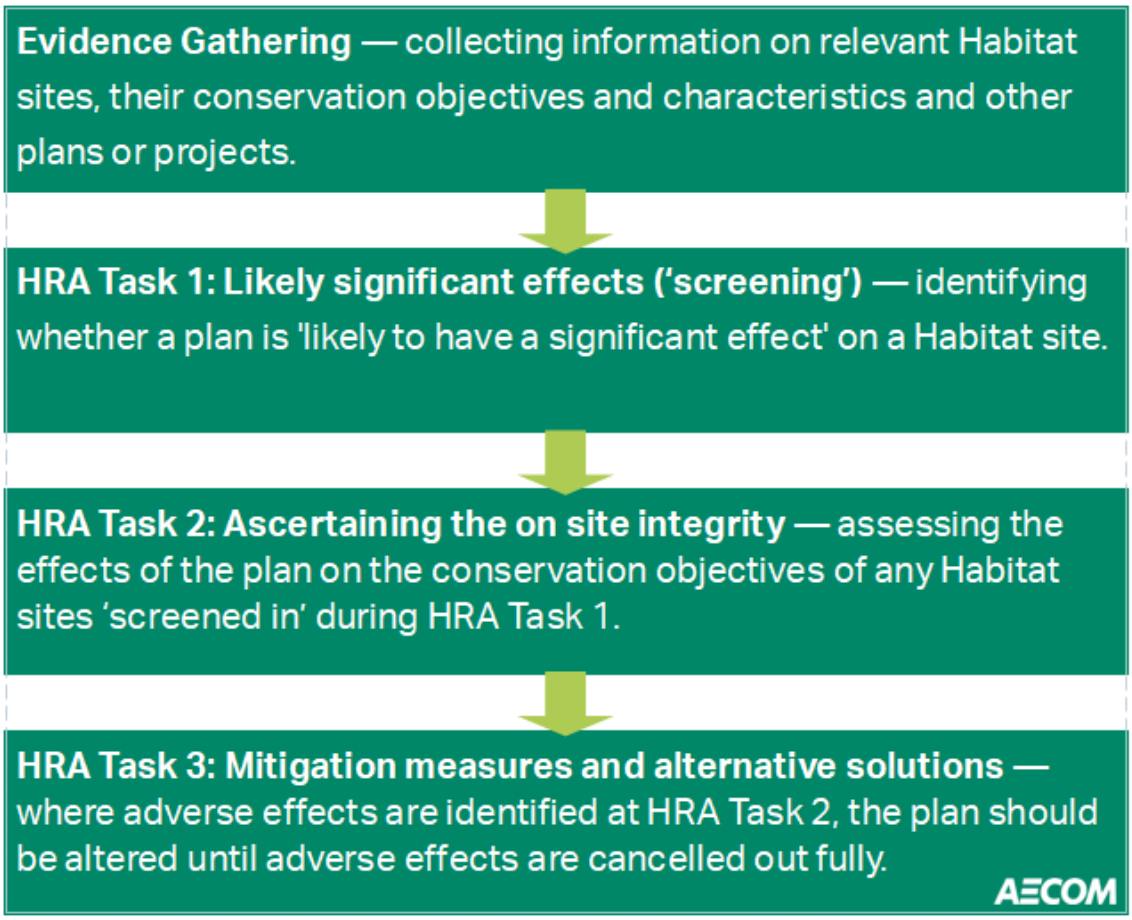
2.1 This section sets out the approach and methodology for undertaking the Habitats Regulations Assessment (HRA).

The Process of HRA

2.2 The former DCLG (now DLUHC) released a consultation paper on AA of Plans in 2006 [REF 1]. As yet, no further formal guidance has emerged from DLUHC on the assessment of plans. However, central government has released general guidance on HRA and appropriate assessment [REF 2].

2.3 **Box 1** outlines the stages of HRA. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no likely adverse effects on integrity remain.

Box 1: Four-Stage Approach to Habitats Regulations Assessment



2.4 The following process has been adopted for carrying out the subsequent stages of the HRA.

Evidence Gathering

2.5 Before commencing the formal HRA process an evidence gathering exercise has been undertaken. Evidence used in this HRA include:

- Citations, Conservation Objectives and Supplementary Advice on Conservation Objectives for Habitats sites (note the term Habitats sites is used throughout this report as that is the terminology used in the National Planning Policy Framework);
- The UK Air Pollution Information System;
- Traffic and air quality modelling undertaken for the West Suffolk Local Plan HRA;
- The Water Resource Management Plan for Anglian Water and its HRA;

- Local Plans for adjacent local authorities and their HRAs;
- The results of visitor survey work undertaken for West Suffolk Council covering a range of European sites (Devils Dyke SAC and Breckland SAC/SPA);
- An associated strategic recreational pressure mitigation strategy being developed by West Suffolk Council; and
- Data on stone curlew nesting attempts in West Suffolk and the zone of influence for impacts of development on stone curlew including a series of supporting reports produced by Footprint Ecology.

Task One: Test of Likely Significant Effect

2.6 The first stage of any Habitats Regulations Assessment is a test of Likely Significant Effect - essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

2.7 “Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?”

2.8 In evaluating significance, AECOM have relied on the best available evidence, professional judgment, and experience of working with the other local authorities on similar issues. The level of detail concerning developments that will be permitted under land use plans is rarely sufficient to make a detailed quantification of effects. Therefore, a precautionary approach has been taken (in the absence of more precise data) assuming as the default position that if a likely significant effect (LSE) cannot be confidently ruled out, then the assessment must be taken to the next level of assessment Task Two: Appropriate Assessment. This is in line with the April 2018 court ruling relating to ‘People Over Wind’ where mitigation and avoidance measures are to be included at the next stage of assessment.

Task Two: Appropriate Assessment

2.9 Habitat Site(s) which have been ‘screened in’ during the previous Task have a detailed assessment undertaken on the effect of the policies on the Habitat site(s) site integrity, in view the site’s conservation objectives. Avoidance and mitigation measures to avoid adverse significant effects are taken into account or recommended where necessary.

2.10 As established by case law, 'appropriate assessment' is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse effects on the integrity of any Habitat sites that have not been dismissed at screening. Case law has established that an appropriate assessment must contain complete, precise and definitive findings and conclusions to ensure that there is no reasonable scientific doubt as to the effects of the proposed plan or project. Since appropriate assessment is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage, but to a greater level of detail on a smaller number of policies and sites, this time with a view to determining if there would be adverse effects on integrity.

2.11 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment takes any policies or allocations that could not be dismissed following the high-level Screening analysis and analyses the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the Habitat site(s)).

A Proportionate Assessment

2.12 The draft DLUHC guidance mentioned earlier makes it clear that when implementing HRA of land-use plans, the Appropriate Assessment (AA) should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:

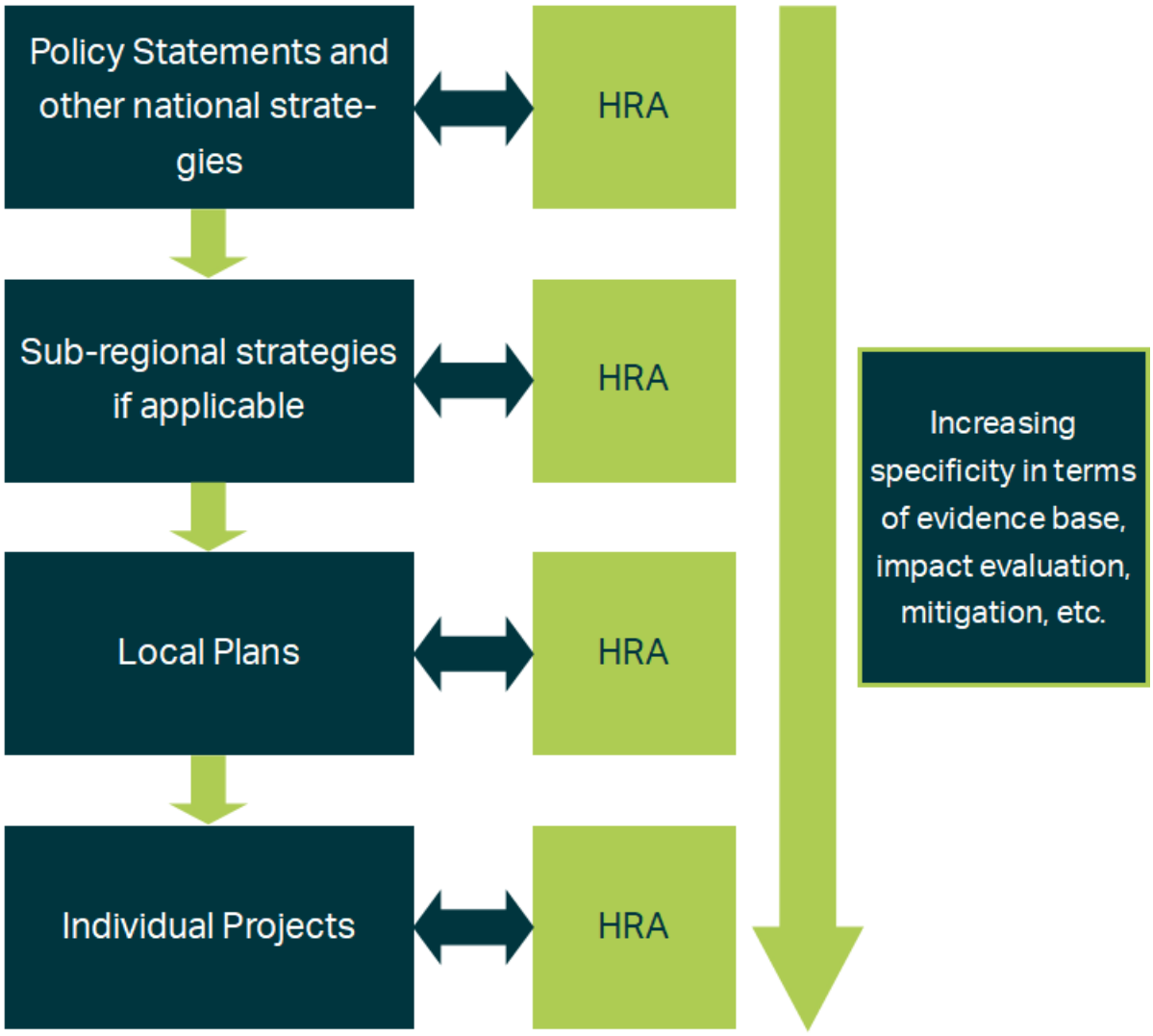
2.13 "The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project."

2.14 More recently, the Court of Appeal [Ref 3] ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be "*achieved in practice"* then this would suffice to meet the requirements of the Habitat Regulations. This ruling has since been applied to a planning

permission (rather than a Plan document) [Ref 4]. In this case the High Court ruled that for "*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations"*.

2.15 In other words, there is a tacit acceptance that AA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers as illustrated in **Box 2**.

Box 2: Tiering in HRA of Land Use Plans



2.16 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt (within the limits of reasonableness); it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon an internationally designated site unless it can be clearly established otherwise.

The Scope

2.17 There is no guidance that dictates the physical scope of an HRA of a plan based on a single general distance. Therefore, in considering the physical

scope of the assessment we were guided primarily by the identified impact pathways, i.e. a source-pathway-receptor approach. Current guidance suggests that the following Habitat sites be included in the scope of assessment:

- All sites within the Local Plan boundary; and
- Other sites shown to be linked to development within the Local Plan boundary through a known "pathway" (discussed below).

2.18 Briefly defined, pathways are routes by which a change in activity within the plan area can lead to an effect upon a Habitat site. In terms of the second category of Habitat site listed above, MHCLG guidance states that the AA should be "*proportionate to the geographical scope of the* [plan policy]" and that "*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*" (MHCLG, 2006, p.6).

2.19 Full details of all Habitat sites discussed in this document can be found in **Appendix B**. specifying their qualifying features, conservation objectives and threats to integrity. Table 1 below lists all those Habitat sites included in this HRA.

2.20 **Note** that the inclusion of a Habitat site or pressure/threat below does not indicate that an effect is expected but rather that pathways linking to these threats/pressures will be investigated.

Table 1: Physical Scope of the HRA

Habitat Site	Location	Reason for Inclusion (pressures/ threats[3] associated with the Habitat site that could link to the Plan.)
Breckland SPA	Within District	- Water pollution - Changes in species distributions - Public access & disturbance - Planning permission[4]
Breckland SAC	Within District	- Water pollution - Changes in species distributions - Air pollution

[3] As identified in the Site Improvement Plans or RAMS for Habitat sites.
[4] Planning permission is a catch all term that has been used in the SIP to capture a range of effects. The description of the impact states; *development, especially housing, roads and solar farms can impact on SPA species. Detailed, robust information submitted by applicants is required to enable Competent Authorities and statutory consultees to assess planning applications both for their impact and mitigation*. In essence, this is requiring a robust HRA to be submitted to ensure all impacts on the SPA and mitigation are captured with regards to the development.

Habitat Site	Location	Reason for Inclusion (pressures/ threats[3] associated with the Habitat site that could link to the Plan.)
		- Public access & disturbance
Rex Graham Reserve SAC	Within District	- Air pollution - Public access & disturbance
Waveney and Little Ouse Valley Fens SAC	Within District	- Inappropriate water levels - Air pollution - Water pollution
Devil's Dyke SAC	Immediately adjacent (west)	- Air pollution - Public access and disturbance[Error! Bookmark not defined.]
Fenland SAC	0.8 km north-west	- Water pollution - Hydrological changes - Air pollution - Public access and disturbance (Wicken Fen SSSI)
Chippenham Fens Ramsar	0.8 km west	- Water pollution - Hydrological changes - Air pollution
Redgrave and South Lopham Fens Ramsar	1.9 km east	- Inappropriate water levels - Air pollution - Water pollution
Wicken Fen Ramsar	3.9 km west	- Water pollution - Hydrological changes - Air pollution - Public access and disturbance

The 'in Combination' Scope

2.21 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European designated site(s) in question.

2.22 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its

individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee case [REF 5].

2.23 For the purposes of this HRA, we have determined that the key other documents with a potential for in-combination effects are:

- East Cambridgeshire Local Plan 2015 (Adopted) – delivery of 11.500 dwellings and 179ha of employment land to 2031;
- South Cambridgeshire Local Plan 2018 (Adopted) – 19,500 dwellings and 22,000 additional jobs to 2031;
- Greater Cambridge Local Plan (currently being produced) – 66,000 jobs and 51,723 dwellings to 2041;
- Braintree District Local Plan 2022 (Adopted) – 14,320 dwellings and 54.9-93.3ha of employment land to 2033;
- Babergh and Mid Suffolk Joint Local Plan (expected to be adopted November 2023) – 10,165 dwellings in Mid-Suffolk to 2037;
- Breckland District Local Plan (Adopted) – 15,298 dwellings and 64ha of employment land to 2036;
- Kings Lynn and West Norfolk Borough Core Strategy 2011 (Adopted) – 16.500 dwellings and 66ha of employment land to 2026;
- Kings Lynn and West Norfolk Borough Site Allocations and Development Management Policies Plan 2016 (Adopted) – allocates sites to meet the Core Strategy requirements.
- Anglian Water's Water Resource Management Plan 2019 (Adopted)

2.24 Most of these are Local Plans for the authorities surrounding West Suffolk or the European sites discussed in this report (such as those within the zone of influence of each impact pathway). These therefore strategically influence the quantum and distribution of housing and employment growth around the European sites. Others (the Anglian Water WRMP) are strategic plans that determine how pan-regional matters such as potable water supply will be managed.

2.25 There are also some particularly notable projects beyond the scope of Local Plans that may have effects on the same European sites as the West Suffolk Local Plan over the same timescale. Notable among these is the Sunnica Energy Farm project, currently going through DCO Examination [REF 6].The Sunnica project would involve the installation of solar photovoltaic generating panels and electrical battery storage technology on Sunnica East and Sunnica

West, and associated infrastructure for connection to the national grid, including an extension to the Burwell National Grid Substation. The Scheme would allow for the delivery of over 50 megawatts of renewable energy. Another example is the Garden Village extension to Kennett in East Cambridgeshire, application 18/00752/ESO'

2.26 It should be noted that, while the broad potential impacts of the above plans will be considered, this document does not carry out a full HRA of these other Plans. Instead it draws upon existing HRAs that have been carried out on the Plan.

3. Pathways of Impact

Introduction

3.1 The following pathways of impact are considered relevant to the HRA of the Plan:

- Urbanisation (changes in species distribution)
- Recreational pressure
- Loss of functionally linked land
- Hydrological changes and water pollution
- Atmospheric Pollution (atmospheric nitrogen deposition)

Urbanisation of European sites

3.2 Urbanisation impacts result from increased populations within close proximity to sensitive Habitat sites and causes a change in species distributions within the Habitat sites. The list of urbanisation impacts can be extensive, but core impacts can be singled out:

- Increased fly-tipping;
- Noise and visual disturbance during construction and operation;
- Displacement of stone curlew and reduction in nesting success;
- Cat predation; and
- Uncontrolled fires.

3.3 An English Nature Research Report summarizes the key urban effects on heathland as habitat fragmentation, human disturbance, disturbance by animals linked to human presence (i.e. dogs and cats), increased risk of fires and trampling damage [REF 7]:

- Increased fly-tipping - Rubbish tipping is unsightly but the principle adverse ecological effect of tipping is the introduction of invasive non-native species with garden waste. Non-native species can in some situations, lead to negative interactions with habitats or species for which European sites may be designated. Garden waste results in the introduction of invasive non-native species precisely because it is the 'troublesome and over-exuberant' garden plants that are typically thrown out [REF 8]. Non-native species may also be introduced deliberately or may be bird-sown from local gardens.

- Cat predation - A survey performed in 1997 estimated that nine million British cats brought home 92 million prey items over a five-month period [REF9]. A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation. A study in Dorset [REF 10] has shown that 16% of Dartford warbler fledglings were predated by cats within two to four weeks of leaving the nest. It has been shown that 60% of forays by cats are over a distance of less than 400m [REF 11], and that the mean distance of hunting excursions is 371m from home [REF12].

- Uncontrolled fires – Research in Dorset [REF 13] has indicated that a high proportion of heathland fires appear to be started by children and are more likely to occur outside school time. The study identified a high frequency of wildfires associated with urban areas and were more likely to be reported from SSSIs that had densely developed areas within 500m of their boundaries.

3.4 Development can result in noise or visual disturbance of qualifying species in European sites, during the construction, operational (including maintenance) and decommissioning phases. For example, noise and visual disturbance arising from construction or decommissioning may result in temporary behavioural changes in qualifying birds (e.g., interruption or cessation foraging, minor and major flight responses). During the operational period, noise emitted from industrial developments may permanently affect site usage of foraging and roosting birds. Disturbance from site usage by operational site staff, road traffic and operational lighting might also arise. Three of the most important factors determining the magnitude of disturbance from proposed developments on ecological receptors are considered to be individual species sensitivity, proximity of the disturbance source and timing/duration of the disturbance.

3.5 Both noise and visual stimuli may elicit disturbance responses, potentially affecting the fitness and survival of qualifying birds. Noise is a complex disturbance parameter requiring the consideration of multiple factors, including its non-linear scale, non-additive effect and source-receptor distance. Professional judgment suggests that a high level of noise disturbance constitutes a sudden noise event of over 60dB (decibels) or prolonged noise of over 72dB. Bird responses to high noise levels include major flight or the cessation of feeding, both of which might affect the survival of birds, particularly if other stressors are also present (e.g., cold weather, food scarcity).

3.6 Generally, research has shown that above noise levels of 84dB waterfowl show a flight response, while at levels below 55dB there is no effect on their behaviour [REF 14]. Therefore, these two thresholds are considered useful as defining two extremes. The same authors have advised that regular noise levels should remain below 70dB at bird receptors, which will habituate to noise levels below this level [REF 15]. Generally, noise is attenuated by 6dB with every doubling of distance from the source. Impact piling, the noisiest construction activity (approx. 110dB at 0.67m from source) will thus reduce to 67-68dB by 100m away from the source. This implies that the loudest construction noise should have fallen to below disturbing levels by 100m, and certainly by 200m, away from the source even without mitigation. Note that this is a rule of thumb and does not necessarily obviate the need for application-level noise modelling. Comparison with baseline noise levels will also be important in any assessment rather than purely using comparison with the 70dB metric. However, habituation (animals becoming used to a stimulus) also need considering, along with the nature of the sound. For example, the surviving populations of stone curlew persist largely due to the preservation of their habitat around military operations in both Suffolk and Wiltshire. This can involve the use of noisy equipment (such as fighter jets and tanks) relatively close to their nests without any apparent effect on nesting success. Generally, visual stimuli are considered to have a higher disturbance potential than noise stimuli as, in most instances, visual stimuli will elicit a disturbance response at much greater distances than noise [REF 16].

3.7 The most detailed consideration of the link between relative proximity of development to Habitat sites and damage to interest features has been carried out with regard to the Thames Basin Heaths SPA; a site designated for nightjar and woodlark, like parts of Breckland SPA. After extensive research on edge effects, Natural England and its partners produced the Thames Basin Heaths Special Protection Area Delivery Framework which made recommendations for accommodating development while also protecting the interest features of the Habitat site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development. Concerning aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats) was determined at 400m from the SPA

boundary. The delivery plan concluded that the adverse effects of any development located within 400m of the SPA boundary could not be mitigated in part because this was the range over which cats and people could be expected to roam as a matter of routine and there was no realistic way of restricting their movements, and as such, no new housing should be located within this zone with regards to the Thames Basin Heaths.

3.8 The findings of the Thames Basin Heaths research are relevant to the heathland and rotationally managed plantation woodland areas of Breckland, which are likely to suffer similar urban edge effects. Breckland SPA is designated for two of the same species (nightjar and woodlark). Brandon, Mildenhall and RAF Lakenheath are the only West Suffolk towns/settlements within 400m of the SPA, there are also a number of small villages, although much of the boundary to the SPA is rural, and therefore the SPA will have considerably less pressure exerted on it by urbanisation than felt by the fragmented urban Thames Basin Heaths. Nonetheless, it has been demonstrated to be a relevant impact pathway and urbanisation will also need to be looked at in combination with other districts such as Breckland, in which the major town of Thetford lies within 400m of the SPA. As with Thames Basin Heaths SPA the Brecks authorities (West Suffolk District Council, Breckland District Council and the Borough of Kings Lynn & West Norfolk) have included a policy introducing a similar 400m buffer around those parts of Breckland SPA supporting nightjar and woodlark. This is in line with Natural England advice in the Supplementary Advice on the Conservation Objectives for the SPA.

3.9 Breckland SPA is also designated for stone curlew which are impacted by urbanisation at much greater distances. Research undertaken by Footprint Ecology for the Breckland District Local Plan has shown that the density of stone curlew nests on arable land is affected by distance from settlements. For example, Sharp *et. al.*, 2008 [REF 17] revealed that the average density of nests per year on arable land of suitable soil type increased with distance up to 2.5 km from any settlement. The research also revealed a similar pattern with roads and was observed overall years of the study (1988 – 2006). Therefore, it can be seen that stone curlews are negatively impacted by the presence of both build development and roads. The work concluded that new housing development may need to be at least 1,500m from any arable land suitable for stone curlew to avoid negative impacts on nesting density.

3.10 Further research undertaken (Clark, R. & Liley, D, 2013) [REF 18] strongly evidenced the continuation of the 1,500m zone. There was a consistent pattern of lower densities on arable land around settlements out to the 1,000 – 1,500m band. With the estimated median reduction in relative nesting density in the 0 - 500m and 500 – 1000m bands at nearly 90% and just over 50% respectively. The research went further to say that "*where there is existing development close to suitable stone curlew habitat, or high levels of development already, then further development has relatively little additional impact. This would*

suggest that 'infill' developments in larger settlements will have much less impact than equivalent sized developments in undeveloped areas." Effects of different building types were considered within the 2013 modelling. Correlations were strongest with residential development. Residential and 'other/unassigned' had a consistent negative effect within the models. By contrast there is no detectable effect of commercial buildings and stone curlew nest densities are relatively higher around agricultural buildings. However, the mechanism for avoidance is not clear. A range of possible mechanisms could be involved, for example the birds may simply be selecting 'open' habitats in which to nest, or the avoidance may be linked to high levels of people (and therefore disturbance) in the landscape around buildings, obstruction of sight lines (of birds wary of potential predators or disturbers), increased predator abundance, presence of pets (such as cats), increase noise and increased light levels (the birds are active at night).

3.11 The research suggests expansion of housing developments and trunk roads encroaching towards land used by stone curlew is likely to create a change in species distribution within the SPA through avoidance of areas within 1,500m of the new developments (particularly residential development) and increased competition for nesting[5]. This may decrease successful nesting attempts in the remaining suitable areas of habitat within the SPA. This research has led to the inclusion within planning policy of a mitigating 1,500m buffer around the SPA [REF 19]. Although the purpose of the buffer is to trigger the need for HRA to consider the impacts and it is recognised that the buffer is not a 100% exclusion zone, by prohibiting net new development within 1500m of the SPA unless it can demonstrate it won't affect the SPA stone curlew, the buffer does effectively serve a mitigating purpose.

3.12 In October 2022, Natural England issued a technical note to West Suffolk Council and the other Brecks authorities confirming that they have amended the physical extent of the 1500m SPA buffer, removing the buffer from some SSSIs. Within this zone there is the precautionary presumption that any development will result in a likely significant effect on the SPA and therefore development within the buffer zone should only be permitted if it can show no adverse effect on the integrity of the SPA.

3.13 Note that the secondary SPA buffer, which has been introduced to protect stone curlew nesting territories outside the SPA from displacement effects from new housing development, is discussed below under 'functionally-linked land'.

[5] Page 5 of the summary of REF 19 on page 5 indicates that for trunk roads only (A11, A14 or A47), regardless of the level of buildings, the density of breeding attempts was always lowest in the subset of areas within 0.5 km of the nearest trunk road and highest in the areas furthest from the nearest trunk road, indicating effects of both trunk roads and buildings.

Recreational Pressure

3.14 Recreational use of a Habitat site has the potential to:

- Cause disturbance to sensitive species, particularly ground-nesting birds
- Cause damage through erosion and fragmentation;
- Cause eutrophication as a result of dog fouling; and
- Prevent appropriate management (i.e. disruption of grazing) or exacerbate existing management difficulties.

3.15 Different types of Habitat sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

3.16 It should be emphasised that recreational use is not inevitably a problem. Many Habitat sites also contain nature reserves managed for conservation and public appreciation of nature.

3.17 HRAs of Local Plans tend to focus on recreational sources of disturbance as a result of new residents[6].

Breeding birds (March to September)

3.18 Breckland Forest SSSI is part of the national SSSI designations that make up the Breckland SPA European designation and lies between Bury St. Edmunds in Suffolk and Swaffham in Norfolk. The forest is part of Thetford Forest Park, the largest commercial forest in lowland England. Its climate is described as semi-continental, being the driest region of the British Isles and subject to great extremes of temperature. The soils are complex, but typically sandy free-draining mixes of chalk, sand, silt, clay and flints.

[6] The RTPI report 'Planning for an Ageing Population '(2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

3.19 The area of Breckland Forest SSSI within West Suffolk District and extending north and east into Norfolk, consists of a rotation of clear fell and plantation areas in addition to areas of heathland (also designated as SAC and SSSI) which all provide suitable breeding habitat for woodlark (*Lullula arborea*) and nightjar (*Caprimulgus europaeus*), depending on the stage of plantation development. Breckland Farmland SSSI constitutes the main other area of the SPA. This consists of extensive areas of arable land which provide suitable breeding habitat for stone curlew (*Burhinus oedicnemus*). All three bird species occur within the SPA at internationally important levels (according to the SPA citation it supports 60% of the UK stone curlew population, 29% of the UK woodlark population and 12% of the UK nightjar population) and are principal reasons for the SPA designation. There are also numerous heathland SSSIs that form part of the SPA including: Barnham Heath SSSI, Barnhamcross Common SSSI, Berner's Heath SSSI; Bridgham & Brettenham Heaths SSSI, Cavenham - Icklingham Heaths SSSI, Cranberry Rough Hockham SSSI, Cranwich Camp SSSI, Deadman's Grave SSSI, East Wretham Heath SSSI, Eriswell Low Warren SSSI, Field Barn Heaths SSSI, Foxhole Heath SSSI, Gooderstone Warren SSSI, Grime's Graves SSSI, How Hill Track SSSI, Lakenheath Warren SSSI, Little Heath SSSI, Old Bodney Camp SSSI, Rex Graham Reserve SSSI, Stanford Training Area SSSI, Thetford Golf Course & Marsh SSSI, Thetford Heaths SSSI, Wangford Warren and Carr SSSI, Weather and Horn Heaths SSSI, Eriswell SSSI, Weeting Heath SSSI and West Stow Heath SSSI.

3.20 A study of nightjars by Murison (2002) [REF 20] noted that nightjar breeding success differed between heavily visited sites and those with little public access. Breeding success and nest density was lower on sites with higher levels of use. The proximity of paths to the nest also correlated strongly with nest failure, up to 225m from the path edge. Murison also noted that the study appeared to show a strong link between increased site disturbance, higher predator numbers such as corvids on disturbed sites, and subsequent high predation rates of nightjar nests.

3.21 Woodlark also appears to be sensitive to disturbance. A study by Mallord (2005) [REF 21], referenced by Liley (2005) [REF 22], on sixteen heathland sites in southern England found that density of woodlarks appeared to be correlated to disturbance levels, with lower densities where disturbance levels were higher. Overall Mallord estimated that if there was no disturbance on any of the sites, 34% more woodlark chicks would be raised (Liley, 2005).

3.22 Mallord et al (2007) [REF 23] assessed the impacts of recreational disturbance on woodlark at a population scale. They found that across all sites studied, woodlark density (per hectare of suitable habitat) was lower in sites with higher

levels of disturbance. Within sites with recreational access, the probability of suitable habitat being colonized was lower in those areas with greater disturbance; this was reduced to below 50% at around eight disturbance events per hour.

3.23 Dogs have been recorded preying on ground nesting birds and studies have shown nightjars to have been flushed from their nest by dogs. Studies have also shown birds to be warier of dogs and people with dogs than people alone, with birds flushing (flying away) more readily, more frequently and at greater distances and staying longer off the nest when disturbed (Langston et al., 2007) [REF 24].

3.24 The SPA is also designated for stone curlew. Human presence at up to 500m away, if accompanied by a dog, (Taylor 2007) [REF 25] has been shown to result in some disturbance effects on stone curlew, which may include the bird flying from its nest, leaving eggs exposed.

3.25 Stone curlew, nightjar and woodlark are therefore all known to be vulnerable to disturbance from recreational activity, particularly walking and the presence of dogs. There is recreational access available across Breckland SPA through a network of footpaths and significant areas of open access land.

Mechanical/abrasive damage and nutrient enrichment

3.26 Most types of aquatic or terrestrial Habitat site can be affected by trampling, which in turn causes soil compaction and erosion, and the emerging West Suffolk Council Recreational Avoidance and Mitigation SPD identifies trampling is a concern for both Breckland SAC and Devils Dyke SAC:

- Wilson & Seney (1994) [REF 26] examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.

- Cole et al (1995a, b) [REF 27] conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each tramped between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity

was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

- Cole (1995c) [REF 28] conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier tramplers caused a greater reduction in vegetation height than lighter tramplers, but there was no difference in effect on cover.

- Cole & Spildie (1998) [REF 29] experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Higher trampling intensities caused more disturbance.

- In heathland sites, while some limited disturbance of ground is important for establishing germination niches and habitat for invertebrates, trampling damage caused by excessive trampling can affect the value of a site to wildlife. For example, heavy use of sandy tracks loosens and continuously disturbs sand particles, reducing the habitat's suitability for invertebrates [REF 30]. Species that burrow into flat surfaces such as the centres of paths, are likely to be particularly vulnerable, as the loose sediment can no longer maintain their burrow. In some instances, nature conservation bodies and local authorities resort to hardening paths to prevent further erosion. However, this is concomitant with the loss of habitat used by wildlife, such as sand lizards and burrowing invertebrates.

3.27 A major concern for nutrient-poor terrestrial habitats, such as heathland, is nutrient enrichment associated with dog fouling (addressed in various reviews [REF 31]). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur

within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more spread-out distribution of nutrients from urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually [REF 32]. While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components [REF 33]. Nutrient availability is the major determinant of plant community composition and the effect of dog defecation in sensitive habitats may be comparable to a high-level application of fertiliser, potentially resulting in a shift towards plant communities that are more typical of improved grasslands.

3.28 Motorcycle scrambling and off-road vehicle use can cause more serious erosion, as well as disturbance to sensitive species, although motorbike scrambling is not identified as a specific issue in the Brecks.

Zones of Influence

3.29 The area over which net new residential development can cause a recreational impact to a Habitat site i.e. the 'zone of influence' or core catchment can vary between sites. Survey work undertaken for the Suffolk and Norfolk Councils has identified that Breckland SPA/SAC (components designated for nightjar/woodlark i.e. excluding Breckland Farmland SSSI) has a core recreational catchment (defined as the zone within which 75% of visitors derive) of 26.3m [REF 34]. This is a significant increase from the previous recreational core catchment of 7.5km. That 7.5km figure was derived from visitor surveys undertaken in 2010 while the 26.3km figure is from more recent data, with surveys undertaken in 2015 and 2016. For the more recent surveys, more locations were covered and the surveys were timed to coincide with the bird breeding season (covering a period from March – July) rather than the early July focus in 2010. In the more recent surveys, there were marked differences between survey locations in the distances interviewees had travelled. The large catchment is probably a reflection of the dispersed population around the Brecks.

3.30 Survey work also identified that Devils Dyke SAC has a recreational catchment of 5.5km (effectively the Newmarket area within West Suffolk) [REF 35], while Wicken Fen Ramsar (Fenland SAC) has a recreational catchment of 10.3km (also effectively capturing the Newmarket area of West Suffolk) [REF 36]. Therefore, any development within these zones of influence or core catchments could cause an impact in-combination with all other development within the relevant zones of influence and therefore, likely require mitigation for recreational pressure.

Disturbance or Loss of Functionally Linked Land

3.31 Stone curlew breed on short acid grassland, but in the Breckland SPA nest primarily within arable (vegetable) fields. As well as nesting within the SPA, it is known that a significant proportion of the Breckland SPA population of stone curlew nest in arable land outside the SPA boundaries. The land outside of the SPA which supports the SPA population of stone curlew e.g. nesting/roosting can be defined as 'functionally linked land' in that its preservation is integral to the SPA achieving its conservation objectives even though it lies outside the SPA boundary, and must be taken into consideration when assessing if an adverse impact will occur upon the SPA.

3.32 To take account of this population and the potential for disturbance of stone curlew nesting outside the SPA a 1,500m buffer was introduced in 2009-10 around any 1 km grid square with equal to or greater than five stone curlew nesting attempts since 1995 which were associated with the Breckland SPA population (e.g. within 3 km of the SPA boundary) was established in order to capture additional functionally linked land outside of the SPA. These buffers were reviewed in 2016 using nesting attempt data from between 2011 and 2015.

3.33 Loss and disturbance of functionally linked land through development or where development causes disturbance of a level which causes avoidance of land, will reduce the area of land outside the SPA which is available to stone curlew for breeding, not only via direct land take but also through increased competition in the areas remaining and then through greater urbanisation effects, e.g. the increased disturbance of adjacent suitable functionally linked land.

Hydrological Changes

3.34 Increased amounts of housing or business development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on Habitat sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has been identified during an Environment Agency Review of Consents process and a joint Environment Agency and Natural England evidence review, as being a major factor in causing unfavourable condition of Habitat sites.

3.35 The quality of the water that feeds Habitat sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour. Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen;
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life; and
- Increased discharge of treated sewage effluent can result both in high levels of macroalgal growth, which can smother the mudflats of value to SPA birds and in greater scour (as a result of greater flow volumes).

3.36 At sewage treatment works, additional residential development increases the risk of effluent escape into aquatic environments in addition to consented discharges to the catchment. In many urban areas, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk.

3.37 An increase in amounts of housing or business development can also lead to an increased demand for water resources. Part of the way this increase in water supply is achieved can be through increased abstraction of water from rivers in the catchment. Water abstraction reduces the flow in rivers and streams, lowers groundwater levels and potentially depletes aquifers. The Site Improvement Plan for Chippenham Fen reveals the site is already under pressure from public water supply abstraction and the increase in development within the West Suffolk District has the potential to compound this issue.

Atmospheric Pollution

3.38 The main pollutants of concern for Habitat sites are oxides of nitrogen (NO_x), ammonia (NH_3) and sulphur dioxide (SO_2). NO_x can have a directly toxic effect upon vegetation. In addition, greater NO_x or ammonia concentrations within the

atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

Table 2: Main sources and effects of air pollutants on habitats and species

Pollutant	Source	Effects on habitats and species
Acid deposition	SO_2, NO_x and ammonia all contribute to acid deposition. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased nitrogen emissions may cancel out any gains produced by reduced sulphur levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH_3)	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO_2 and NO_X emissions to produce fine ammonium (NH_4^+) containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue.)	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH_3 is rapidly deposited, some of the most acute problems of NH_3 deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides NO_x	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations.	Deposition of nitrogen compounds (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) can lead to both soil and freshwater acidification. In addition, NO_x can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen (N) deposition	The pollutants that contribute to nitrogen deposition derive mainly	Species-rich plant communities with relatively

	from NO_X and NH_3 emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O_3)	A secondary pollutant generated by photochemical reactions from NO_x and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O_3 above 40 ppb can be toxic to humans and wildlife and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.
Sulphur Dioxide SO_2	Main sources of SO_2 emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO_2 emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO_2 acidifies soils and freshwater and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.

3.39 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes and vehicle exhausts also making notable contributions. As such, it is unlikely that material increases in SO_2 emissions will be associated with Local Plans, although ammonia emissions may be associated with petrol cars and vans and their catalytic converters. NO_x emissions are dominated by the output of vehicle exhausts. Within a 'typical' housing development, by far the largest contribution to NO_x (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison

[REF 37]. Emissions of NO_x and ammonia could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the Local Plan.

3.40 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 μgm^{-3}; that for ammonia is either 3 μgm^{-3} (for general vegetation) or 1 μgm^{-3} (for lichens and bryophytes), and the threshold for sulphur dioxide is 20 μgm^{-3}. In addition, ecological studies have determined 'Critical Loads'[7] of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH_3) for key habitats within Habitat sites.

3.41 According to the Department of Transport's Transport Analysis Guidance, "Beyond 200 m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant" [REF 38].

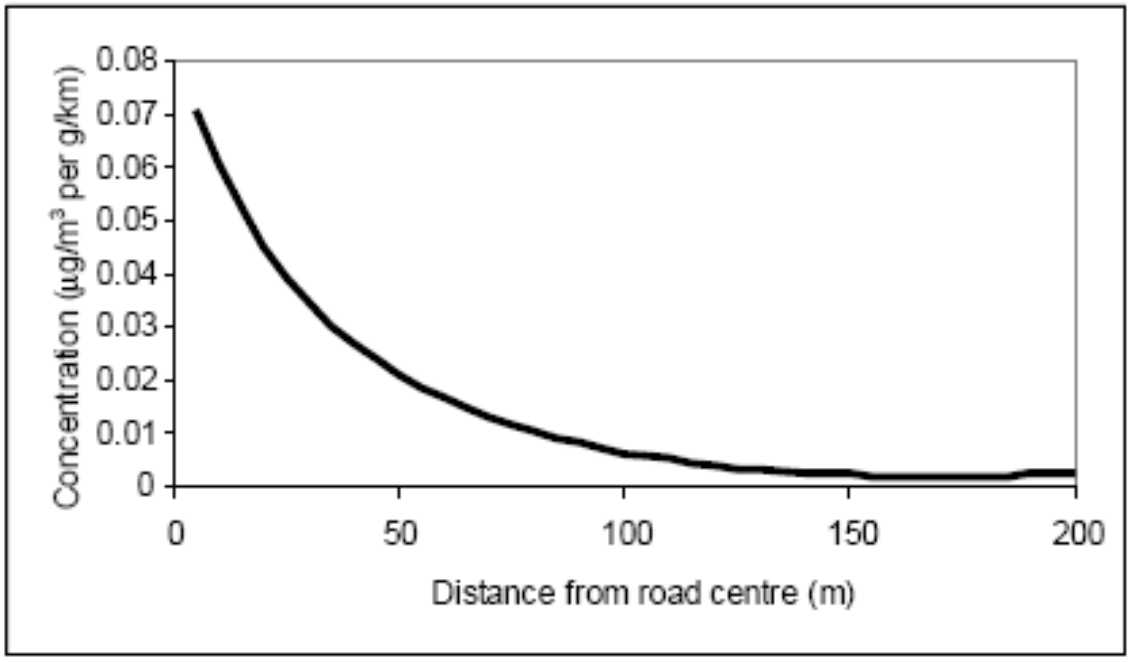


Plate 1. Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)

[7] The Critical Load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

3.42 This is therefore the distance that is used throughout the HRA process in order to determine whether a Habitat site is likely to be significantly affected by development under a Plan.

3.43 The average UK car journey is approximately 10.6km [REF 39]. At a 10km distance between the development site and any road within 200m of a vulnerable Habitat site, the traffic generated from that development is likely to have dispersed across the network such that it is unlikely to contribute to a statistically significant difference in annual average daily traffic. A 10km buffer is therefore utilised within this report to identify sites which may have a potential likely significant impact. Being within this 10km buffer does not necessarily mean there will be a likely significant effect, just that they will be assessed within the report to ascertain if they will contribute to a likely significant effect in combination.

4. Test of Likely Significance (Screening)

Introduction

4.1 West Suffolk District Council are currently preparing a new Local Plan (LP) that will shape the growth within the District between 2024 and 2041 (MM2 post-examination modification moved the plan period on by one year). The Local Plan is crucial to meeting housing needs, so the district's communities have somewhere to live, that homes are built to good quality and are adaptable to support people's changing health needs as they get older. It is also key to ensuring land is allocated for different types of businesses, supporting their ambitions and with it jobs and the future of our communities. West Suffolk District is a largely rural district covering 1,035 km² with a range of settlements. The major services are found in the districts five largest towns with some of those services found in the larger settlements. There are also a range of smaller settlements that have a limited range to no services that collectively make up the population of approximately 179,928 (2021 mid-year estimate)., Neighbouring authorities that will be developing their own Local Plans include Suffolk districts; Mid-Suffolk and Babergh to the east, Norfolk districts; Breckland and King's Lynn and West Norfolk to the north, Cambridgeshire districts; East Cambridgeshire and South Cambridgeshire in the East and Essex district; Braintree in the south.

4.2 West Suffolk has five market towns; Brandon, Bury St. Edmunds, Haverhill, Mildenhall and Newmarket. Bury St. Edmunds is the largest settlement in West Suffolk with an approximate population of 41,332. Bury St. Edmunds and the other four market towns are the main focus for housing, employment and other local facilities within the District which is well connected by road with direct access to the A14, A11, A134, A1307 and A143 connecting the towns and villages across and out of the District.

4.3 The national standard methodology of assessing housing need currently gives the West Suffolk District a minimum figure of housing need at 13,702 new homes within the Plan period (up to 2041). In seeking to address the overall identified housing need, provision has been made for an approximate ten per cent contingency to the housing need, thereby making provision for some 15,486 homes, this is to ensure there is choice in the market and a continuous supply coming forward over the plan period to 2041.

4.4 The West Suffolk Local Plan contains policies and site allocations that will guide and manage where new housing and employment growth is delivered to meet the growing needs of the districts communities from now until the year 2041. The plan also contains the council's vision for West Suffolk and its objectives. Policies in the plan set out how West Suffolk aims to deliver housing, employment, retail, community, cultural and leisure activities and protect and enhance the environment. There is a focus on the climate emergency, health and well-being, biodiversity, green infrastructure and protection of the environment.

4.5 Current impacts to Habitat sites within the zones of influence of West Suffolk Local Plan as identified in Chapter 3 of this HRA require analysis regarding the potential for exacerbation due to increased development within West Suffolk. These pathways of impact have been identified by each Habitat site's "Site Improvement Plan" documents and Supplementary Advice on Conservation Objectives produced by Natural England and the research discussed in Chapter 3 of this report. The full test of Likely Significant Effects for the allocated sites is presented in Appendix B with that for policies in Appendix C. A discussion of the Test of Likely Significant Effects for each impact pathway in Chapter 3 is discussed below. A summary of the allocations and policies for which Likely Significant Effects cannot be dismissed is added at the end of this section.

Urbanisation of Habitats sites

4.6 The natural environment is complex; organisms exist in a web of interactions that make up ecosystems [REF 40]. Urban encroachment onto Habitat sites

can interfere with these interactions and lead to likely significant effects [REF 41] [REF 42]. Considering the proximity to Habitat sites there is a strong impact pathway present between increased development within West Suffolk and adjacent Habitat sites. For the purpose of this HRA a zone of 400m beyond areas of the Breckland SPA designated for woodlark and nightjar, 1.5 km beyond areas of the Breckland SPA which is designated for stone curlew, and 1.5 km from locations outside the SPA where stone curlew have made at least 5 nesting attempts, was used to identify development sites/areas that may particularly contribute to this pathway. Note that displacement of nesting stone curlew outside the SPA is discussed below under 'functionally linked land'.

4.7 **All allocated sites within these zones of influence around Breckland SPA were therefore screened in for Appropriate Assessment, as are the strategic policies that they are delivering (SP9 Spatial Strategy, Policy SP12 – Strategic Employment, and SP10 Housing Need). Similarly, development that is not specifically allocated but which comes forward under the following individual Local Plan polices could have a likely significant effect through this impact pathway: Policy SP11 – Neighbourhood Plans, Policy LP39 – Tourism Development and Policy SP15 – Existing Special Operational Uses.**

Recreational pressure

4.8 Recreational pressure is identified on the Site Improvement Plans as a conservation concern for Breckland SPA and Breckland SAC and Rex Graham Reserve SAC. For Breckland SPA this is primarily due to the potential for disturbance of breeding birds rather than physical damage to habitats, but for Breckland SAC habitat damage is the main concern. There is a risk that increased residential development in the West Suffolk District may increase the number of visitors to these Habitat sites. Generally speaking, recreational pressure for the SACs [REF 43] is likely to arise from habitats destruction via abrasion and vegetation trampling as identified in the emerging West Suffolk Recreational Disturbance Avoidance and Mitigation Strategy. In addition the Breckland SPA features (i.e. breeding birds) are easily disturbed by human presence; reducing SPA capabilities of supporting said features [REF 44] [REF 45].

4.9 There has been much research and it is well established that nightjar and woodlark and stone curlew are all sensitive to disturbance through recreational pressure (as discussed in Chapter 3). Although recreational pressure is highlighted as a threat/pressure within the Breckland SPA/SAC on the Site Improvement Plan the pressure currently relates only to the nightjar and woodlark elements of the SPA, rather than the habitats designated as part of the SAC. However, the SIP does mention that SAC features may be affected

through eutrophication (dog fouling, unauthorised fires) and disturbance of soils, in particular on commons and heaths and therefore the SAC is included in this HRA for purposes of future-proofing against Local Plan development.

4.10 As discussed in Chapter 3, survey work undertaken for the Suffolk and Norfolk Councils has identified that Breckland SAC, and those parts of Breckland SPA designated for nightjar and woodlark (i.e. excluding Breckland Farmland SSSI) has a core recreational catchment of 26.3km. This encompasses almost the whole of West Suffolk with the notable exception of most of Haverhill. As there is a likely to be an effect on recreational pressure within this catchment zone from new dwellings, mitigation will be required to ensure no adverse impact upon the integrity of Breckland SPA and SAC and therefore cannot be scoped out at this stage of the HRA. **Therefore, the effects of District growth on recreation within the Breckland SPA and SAC will be investigated further in the Appropriate Assessment, related to all allocations within the recreational catchment and the strategic policies that they are delivering (SP9 Spatial Strategy and SP10 Housing Need). Similarly, development that is not specifically allocated but which comes forward under the following individual Local Plan polices could have a likely significant effect through this impact pathway: Policy SP11 – Neighbourhood Plans and Policy LP39 – Tourism Development.**

4.11 In a letter dated 1 July 2016 [REF 46] Natural England also consider that recreational pressure will be felt by stone curlews which utilise heathland sites, however, many (but not all) of the heathlands in the SPA are closed to public access during the breeding season (summer). Additionally, recreational pressure may also be felt by stone curlew on farmland SSSI units although the farmland units have less of a draw than the forest and heathland SSSI units. As such the 26.3 km recreational buffer distance does not apply to Breckland Farmland SSSI units, as there is already a 1.5km restriction on net new development around areas used by stone curlew which will be used to screen for recreational disturbance on stone curlew.

4.12 Rex Graham Reserve SAC is located within Thetford Forest east of Mildenhall. It is a disused chalk pit and its main interest is the population of Military Orchids. The Site Improvement Plan lists Public Access/Disturbance as a vulnerability for the site. The site is managed by The Suffolk Trust for Nature Conservation and to maintain suitable conditions for the military orchid public access must be strictly controlled [REF 47]. In addition, there is rabbit and deer-proof fencing around the pit. As public access is so strictly controlled, an increase in recreational pressure from the Local Plan is unlikely to cause a likely significant effect upon the SAC. **Therefore, recreational pressure can be screened out of the HRA at this point for Rex Graham Reserve SAC on the basis that there are no likely significant effects from West Suffolk Local Plan growth.**

4.13 Although the Site Improvement Plan for the following sites do not highlight vulnerability to recreational pressure, Natural England wrote to relevant local authorities on 12th July 2019 identifying a range of SSSIs and Habitats sites where recreational pressure was considered a concern, and the visitor surveys undertaken by Footprint Ecology suggest that these areas are under pressure from recreation.

4.14 Wicken Fen Ramsar and SSSI, also part of Fenland SAC is owned and managed by the National Trust as a nature reserve designed for visitors with a visitor centre and café and nature walks. The reserve has a boardwalk through one of the fens and several other gravelled pathways around the edges of the other fens on site. The emerging RAMS SPD suggests that recreational pressure at Wicken Fen is causing a likely significant effect such as through dog-fowling, disruption of grazing, and increased fire risk. The emerging SPD identifies that it has a core recreational pressure zone of 10.3 km and will require mitigation. **Impacts on this site therefore cannot be screened out and will be subject to appropriate assessment, related to all allocations within the recreational catchment and the strategic policies that they are delivering (SP9 Spatial Strategy and SP10 Housing Need). Similarly, development that is not specifically allocated but which comes forward under the following individual Local Plan polices could have a likely significant effect through this impact pathway: Policy SP11 – Neighbourhood Plans and Policy LP39 – Tourism Development.**

4.15 Lastly, Devils Dyke SAC is one of the best surviving examples of Anglo-Saxon earthworks in Britain. The interest features of the SAC are chalk grassland. A public right of way runs along the top of the embankment. Although, the Site Improvement Plan for the SAC only lists inappropriate scrub control and air pollution as vulnerabilities of the SAC, the emerging RAMS SPD suggests recreational pressure at Devil's Dyke SAC as causing a likely significant effect and has a core recreational pressure zone of 5.5 km and required mitigation. **Therefore this site is screened in for appropriate assessment, related to all allocations within the recreational catchment and the strategic policies that they are delivering (SP9 Spatial Strategy and SP10 Housing Need). Similarly, development that is not specifically allocated but which comes forward under the following individual Local Plan polices could have a likely significant effect through this impact pathway: Policy SP11 – Neighbourhood Plans and Policy LP39 – Tourism Development.**

4.16 Although the Site Improvement Plans for the following sites do not highlight a vulnerability to recreational pressure they are discussed further below for context:

- Redgrave & Lopham Fen National Nature Reserve forms part of the Waveney & Little Ouse Valley Fens SAC and is also designated as the Redgrave and South Lopham Fens Ramsar. The site is owned and managed by Suffolk Wildlife Trust as a tourist attraction with nature walks and workshops and events at the education centre on site. The nature of the SAC/Ramsar habitats e.g. fen mean that recreational pressure is low as the designated habitats are not suitable for the public to walk on and therefore not vulnerable to recreational pressure through mechanical abrasion. The site has designated walkways ensuring that the majority of the site is not traversed or disturbed by the public. As the designated features are not vulnerable to recreational pressure and there is very little development pressure in the vicinity, an increase in recreational pressure from the Local Plan is unlikely to cause a likely significant effect upon the SAC/Ramsar.

- Blo' Norton Fen I (part of the Waveney and Little Ouse Valley Fens SAC) is managed by the Little Ouse Headwaters Project, which is working to improve the habitats within the SSSI. Although there are no public rights of way through the Fen, the management group have installed boardwalks over waterlogged areas and other pathways strengthened to be used be as permissive pathways by the general public, this has created a circular walk that goes throughout the SSSI. However, to limit the effects of recreation horses and bicycles are not permitted within the SSSI and dog walkers are asked to keep their dogs under close control and remove their waste. Thelnetham Fen and Weston Fen are owned and managed by Suffolk Wildlife Trust. Both reserves are open to the public, with a circular walk in Thelnetham Fen and a short pathway with small loop in Weston Fen for pedestrians. The fen is grazed by ponies and cattle and therefore dogs must be kept on a lead, which reduces the likelihood of disturbance of wildlife. Given the nature of the designated features (e.g. fenland habitat) are not vulnerable to recreational pressure as they are difficult to walk on, and there is very little development pressure in the vicinity, an increase in recreational pressure from the Local Plan is unlikely to cause a likely significant effect upon the SAC/Ramsar.

- Chippenham Fen Ramsar / Chippenham Fen and Snailwell Poor's SSSI component of Fenland SAC was leased to the National Trust in 1946 and was then transferred to Natural England. The lease on the site includes a legal covenant that access away from the public right of way through the reserve, is restricted to visitors and students undertaking research projects on the site [REF 48]. The majority of the reserve is only accessible by permit and therefore pressure on the site from public access is very low and unlikely to increase with regards to increased residential growth in the District.

4.17 **It is therefore considered that the focus of investigations of this pathway for the Appropriate Assessment should be on Breckland SPA, Fenland SAC (Wicken Fen SSSI) and Wicken Fen Ramsar, Breckland SAC, and Devils Dyke SAC.**

Functionally linked land

4.18 Breckland SPA is partially located within the West Suffolk District boundary. Stone curlew make use of land outside of the SPA boundary for foraging and breeding. As identified in Section 3 of this HRA there are a series of 1km grid squares identified outside the SPA which have had five or more breeding attempts by stone curlew between 2011 and 2015 according to RSPB surveys. The birds nesting in these areas are considered linked to the SPA population [REF 49] [REF 50]. Loss of locations outside the SPA where stone curlew have been recorded nesting, either through displacement of stone curlew through encroachment of housing, or direct loss of nesting habitat, could therefore adversely affect the population within the SPA through (for example) increased competition for resources and nesting sites within the SPA.

4.19 **It is therefore considered that the focus of investigations of this pathway for the Appropriate Assessment should be on the Breckland SPA and stone curlew, related to all allocations within the 1.5km secondary buffer and the strategic policies that they are delivering (SP9 Spatial Strategy and SP10 Housing Need). Similarly, development that is not specifically allocated but which comes forward under the following individual Local Plan polices could have a likely significant effect through this impact pathway: Policy SP11 – Neighbourhood Plans and Policy LP39 – Tourism Development.**

Hydrology

4.20 Increased residential development within West Suffolk District could lead to the conversion of previously undeveloped land to hardstanding and therefore increased surface water runoff, which could reach nearby Habitat sites.

4.21 West Suffolk District is drained by rivers including but not limited to; the River Lark, River Linnet, River Kennet, River Stour and New River. These rivers run the valley floors within the District and connect to the fenlands some of which are designated as Habitat sites. An increase in surface water run-off into these rivers upstream of the designation could potentially present likely significant effects to the water quality vulnerable habitats within the Habitat sites.

4.22 The interest features of Rex Graham Reserve SAC, Devils Dyke SAC and the Breckland SPA are not listed as vulnerable to water pollution effects within their respective Site Improvement Plans as they are not linked to watercourses and/or their interest features are not water quality dependent.

4.23 Sections of the Breckland SAC are adjacent to the Little Ouse River. The River's source is outside the district to the north east and flows along the northern boundary of the district before flowing north and west through Thetford (outside of district) and back into the district through Breckland. The habitat which is listed as vulnerable to surface water run-off is 'naturally nutrient-rich lakes or lochs which are often dominated by pond weed'. The measure which corresponds to the pressure highlights the need to reduce nutrients through agri-environment/diffuse water pollution plans and through the river basin management plans. Both lakes/lochs described to have vulnerability to water quality impacts are north east of Thetford, and therefore outside of the District. They will not be affected from run-off from development sites within the District boundaries; therefore, Breckland SAC will not be discussed further with regards to water quality (run-off).

4.24 Cavenham Heath National Nature Reserve is part of the SAC and also constitutes part of both Breckland Farmland SSSI and Cavenham-Icklingham Heaths SSSI. It is located in West Suffolk District east of Mildenhall and is immediately south of the River Lark. The River Lark flows east to west and is a tributary of the Great Ouse in Cambridgeshire. Management Unit 6 of Cavenham-Icklingham Heaths SSSI east of Mildenhall, known as Icklingham Fen, is designated for its alder woodland and this is the only SAC feature adjacent to River Lark in this SSSI that could be affected by changes in hydrology or water quality. This is therefore discussed in the section of the AA.

4.25 The Snail River passes south to north adjacent to Chippenham Fen where the water drains out of the fen and into the Snail River. The source of the Snail River is within Newmarket which is within the District and one of the market towns for development. The SIP for Fenland SAC states that "*Chippenham Fen is affected by high nutrient water reaching the fen from a mixture of groundwater, rainfall and run off. In periods of low flow, poor quality water may have a more dramatic effect on the site's vascular plant assemblages. There is uncertainty of the current water quality within Chippenham Fen at present*". This highlights that there is potential for an impact on water quality from run off at this location and will be discussed further within the AA.

4.26 The New River drains through Wicken Fen Ramsar (part of the Fenland SAC). The source of the river is situated just south of Exning and north west of Newmarket both of which may take some of the district's growth. The SIP does not specifically mention the Wicken Fen component of the SAC; however, the fen is designated for fen habitats, which are vulnerable to water pollution and therefore will be discussed further within the AA.

4.27 The source of the Little Ouse River and the Waveney River resides within the South Lopham and Redgrave Fen Ramsar (Part of the Waveney and Little Ouse SAC) the Waveney flows east out of the Ramsar and the Little Ouse flows out west. South Lopham and Redgrave Fen Ramsar is outside of the district and as it is the source of both rivers unlikely to be affected by surface water run off upstream of the Ramsar.

4.28 Weston Fen SSSI (part of Waveney and Little Ouse Valley Fens SAC) is south and upstream of the Little Ouse River and therefore drains into the main river. It runs along Fen Street and Nethergate Street south-west of the village of Hopton in the north east of the District. Upstream of Weston Fen are a few drains between Barningham, and Coney Weston which drain into the SAC. Development within these two villages could potentially impact water quality within the SAC and therefore, it will be discussed further within the AA.

4.29 The Little Ouse River flows through the Blo' Norton and Thelnetham SSSI (part of the Waveney and Little Ouse Fens SAC) and marks the boundary of West Suffolk. Only the southern section is within the District and the river flows into the SAC from outside the district. Therefore, growth within the district will not affect water pollution within the Little Ouse River at this point and therefore will not affect water quality within the SAC.

4.30 **Allocations within West Suffolk in Newmarket (4 sites AP19 - AP23), Exning (0 sites), Coney Weston (0 sites), Hopton (1 site AP46) and Barningham (1 site AP43), along with any windfall in these settlements, were therefore screened into Appropriate Assessment with regard to impacts on Chippenham Fen Ramsar (Fenland SAC), Wicken Fen Ramsar (Fenland SAC), and Waveney and Little Ouse Fens SAC (Weston Fen SSSI) as these sites are all hydrologically sensitive. Allocations AP6 (South-East Bury St Edmunds) and AP16 (Land West of Mildenhall) are both also screened into Appropriate Assessment as they are effectively adjacent to the River Lark upstream of the riverside wet woodland of Icklingham Heath[8]. The strategic policies that they are delivering (SP9 Spatial Strategy and SP10 Housing Need) were also screened in. Similarly, development that is not specifically allocated but which comes**

[8] Allocation AP9 (Land West of Rougham) is 12m from the River Lark upstream of Icklingham Heath but is designated solely for greenspace

forward under the following individual Local Plan polices could have a likely significant effect through this impact pathway: Policy SP11 – Neighbourhood Plans, Policy SP12 – Strategic Employment, and Policy LP39 – Tourism Development.

4.31 Increased housing development within West Suffolk District will lead to increased sewage production. There is therefore a risk that an increase in the volume of treated sewage effluent from the wastewater treatment works that serve West Suffolk District could degrade water quality (i.e. through increased phosphorus discharge) of riverine Habitat sites when in the absence of environmental mitigation and adequate wastewater treatment work permits [REF 51].

4.32 **All allocations within West Suffolk were therefore screened into Appropriate Assessment with regard to impacts on Chippenham Fen Ramsar (Fenland SAC), Wicken Fen Ramsar (Fenland SAC), and Waveney and Little Ouse Fens SAC (Weston Fen SSSI) as these are all sites sensitive to changes in water quality. All allocated sites within these zones of influence around Breckland SPA were therefore screened in for Appropriate Assessment, as are the strategic policies that they are delivering (SP9 Spatial Strategy and SP10 Housing Need). Similarly, development that is not specifically allocated but which comes forward under the following individual Local Plan polices could have a likely significant effect through this impact pathway: Policy SP11 – Neighbourhood Plans, Policy SP12 – Strategic Employment, Policy LP39 – Tourism Development, and Policy SP15 – Existing Special Operational Uses.**

4.33 Increased residential development within the West Suffolk District will lead to increased water use within the area and potentially increase water abstraction. Increased water abstraction could degrade the habitat structures of Habitat sites susceptible to hydrological changes. The majority of extraction within the District is managed through the Cam Ely and Ouse Catchment Abstraction Management Plan (CAMS). In terms of future abstraction, much of the district is either classed as Restricted Water Available for Abstraction or Water Not Available for Licencing in terms of surface water and Water Not Available for Licencing in terms of ground water abstraction. However, there may be water available in the South Level area north and west of Mildenhall and Lakenheath at high flows subject to a Hands-Off Flow condition at AP17 (Denver Sluice) [REF 52]. The east of England is so water-stressed the Draft Water Resource Management Plan 2024 includes transfer schemes to pipe water from elsewhere. Consequently additional public water supply may not necessarily be abstracted from the West Suffolk area. The Habitats Regulations Assessment undertaken for the Anglian Water Draft Water Resources Management Plan 2024 (WRMP) (August 2023) concluded that "*It is considered that at the plan level there is confidence adverse effects can be avoided or fully mitigated*

through adjustments to the detailed design of the scheme and the application of measures described in the individual assessments… At the plan level, it is concluded that there will be no adverse effect on the integrity of any Habitats Site" Since the purpose of the WRMP is to set out how the water company intends to meet public water supply requirements up to 2045 it covers the period of the West Suffolk District Local Plan.

4.34 As such a conclusion of no likely significant effect of the Local Plan through the pathway of abstraction for public water supply can be drawn.

Air quality

4.35 Increased residential development within the District is likely to increase the number of vehicles operating within the District. As a result, increased air pollution is expected from vehicle emissions relative to a situation without growth [REF 53]. Pollutants released form vehicles may be carried directly by wind currents and deposited to Habitat sites or pollutants may become soluble and taken up during evaporation and deposited to Habitat sites at precipitation. This generally occurs within 200m of significant roads, so the potential for development to contribute to traffic on roads within 200m of Habitat sites alone and in combination with neighbouring authorities is of relevance [REF 54].

4.36 Natural England have identified that air quality is a current threat to Breckland SAC and SPA, Rex Graham Reserve SAC, Waveney and Little Ouse Valley Fens SAC, Devil's Dyke SAC and Fenland SAC (and therefore associated Ramsars). This is based on the fact that all of these sites currently exceed their critical loads for nitrogen deposition for at least one of their habitats, although it should be noted that road traffic will only be one contributory source to total nitrogen deposition on a site and the relative importance of local traffic will be related to the number of significant roads within 200m of each site. It should also be noted that while roads can elevate local nitrogen deposition up to 200m from the roadside, the degree to which they do so drops off sharply with distance, the greatest elevation being within a few tens of metres of the road.

4.37 Devils Dyke SAC is within 200m of the A14 between Great Abingdon and Newmarket. The designated habitat of the site, calcareous grassland is located approximately 138m from the road; however, there is a buffer of low-density deciduous woodland between the grassland and the road. Calcareous grassland has a nitrogen critical load range of 10 – 20 kgN/ha/yr. Effects of District growth on traffic flows along the A14 are investigated further in the Appropriate Assessment as likely significant effects cannot be dismissed.

4.38 Redgrave and South Lopham Fens Ramsar/Waveney and Little Ouse Valley Fens SAC (Redgrave and Lopham Fens SSSI component) is more than 200m from the nearest significant road the A1066 which is the west-east route between Thetford and Diss. As the SAC and Ramsar is outside of the District and well over 200m from any significant road or through route likely to carry anything other than small volumes of traffic it is unlikely that any increase in traffic arising from the Local Plan will affect NOx concentrations or nitrogen deposition rates at this site**.** Therefore a conclusion of no likely significant effect is drawn for West Suffolk Local Plan.

4.39 Waveney and Little Ouse Valley Fens SAC (Weston Fen SSSI and Blo' Norton and Thelnetham Fens SSSI components) are more than 200m away from a significant road. Blo' Norton and Thelnetham Fens SSSI component is located along Fen Road and Fen Lane, just north of the small village of Thelnetham and south of Blo' Norton in the very north-east of the District. The Weston Fen SSSI component of the SAC runs along Fen Street and Nethergate Street south-west of the village of Hopton also in the very north east of the District. The roads surrounding these components of the SAC are minor local access roads and would not be considered a major journey to work route. As the SAC components are well over 200m from any significant road or through route likely to carry anything other than small volumes of traffic it is unlikely that any increase in traffic arising from the Local Plan will affect NOx concentrations or nitrogen deposition rates at this site. Therefore a conclusion of no likely significant effect is drawn for West Suffolk Local Plan.

4.40 Chippenham Fen Ramsar / Chippenham Fen and Snailwell Poor's Fen SSSI component of Fenland SAC is situated less than 1km outside of the district north-east of Newmarket. The site is not within 200m of any significant A road. An 80 m section of the Ramsar is located immediately adjacent to Palace Road a rural access road west of Chippenham village. However, the habitat within 200m of this road is semi-improved grassland and not a designated feature of the Ramsar/SAC. The next closest minor road is over 200m from the boundary of the site. As the SAC or designated habitats are well over 200m from any significant road or through route likely to carry anything other than small volumes of traffic it is unlikely that any increase in traffic arising from the Local Plan will affect NOx concentrations or nitrogen deposition rates at this site. Therefore a conclusion of no likely significant effect is drawn for West Suffolk Local Plan.

4.41 Wicken Fen Ramsar / Wicken Fen SSSI component of Fenland SAC is situated less than 1 km outside of the district north-west of Newmarket. The site is over 200 m from the A1123 south of Wicken village and over 200m from Upware Road east of the village of Upware. As the SAC or designated habitats are well over 200m from any significant road or through route likely to carry anything other than small volumes of traffic it is unlikely that any increase in traffic arising from the Local Plan will affect NOx concentrations or nitrogen deposition rates

at this site. Therefore a conclusion of no likely significant effect is drawn for West Suffolk Local Plan.

4.42 Rex Graham Reserve SAC is within 200m of the A11 between Mildenhall and Thetford. The designated habitat of the site, calcareous grassland is located within 200m of the road, although there is a buffer of deciduous woodland between the grassland and the road. Nonetheless, effects of District growth on traffic flows along the A14 are investigated further in the Appropriate Assessment as likely significant effects cannot be dismissed.

4.43 Breckland SAC and SPA are within 200m of a number of major A roads including the A11 between Mildenhall and Thetford, the A14 close to Risby, and the A1065 between Mildenhall and Brandon. The SPA is also bisected by several B roads including but not limited to the B1106 north-south from Brandon to Brockley Corner and SAC and SPA are bisected by the B1112 between Icklingham and Eriswell and the A1101 between Lackford and Mildenhall. Habitats and species within the SAC and SPA that have been highlighted as potentially vulnerable include stone curlew (when nesting in grassland rather than arable land), woodlark (when nesting in heathland, but less so when nesting in rotational forestry), open grassland with grey-hair grass and common bent grass of inland dunes, European dry heaths, dry grassland and scrublands on chalk or limestone (important orchid sites). There are areas of European dry heathland and calcareous grassland within 200m of these major roads. Therefore, effects of District growth on traffic flows along the A14 are investigated further in the Appropriate Assessment as likely significant effects cannot be dismissed.

4.44 **The focus of Appropriate Assessment is therefore on the Rex Graham Reserve SAC, Devils Dyke SAC and Breckland SAC and SPA. All growth within West Suffolk within 10km of these sites can contribute cumulatively to a likely significant effect through atmospheric pollution, along with the strategic policies that they are delivering (SP9 Spatial Strategy, SP10 Housing Need and SP12 Strategic Employment). Similarly, development that is not specifically allocated but which comes forward under the following individual Local Plan polices could have a likely significant effect through this impact pathway: Policy SP11 – Neighbourhood Plans, Policy LP39 – Tourism Development and Policy SP15 – Existing Special Operational Uses.**

Summary of Test of Likely Significance of the West Suffolk Local Plan ‘Alone’

4.45 Of the 66 site allocations within the Local Plan, only seven could be concluded to pose no likely significant effect on a Habitats site:

- Policy AP9 – Land West of Rougham (a greenspace allocation)
- Policy AP13 – North-west Haverhill (a small part of this mixed use site lies within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) but net new housing is to be delivered outside this zone)
- Policy AP14 – North-east Haverhill (a small part of this mixed use site lies within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) but housing within this area has already been subject to planning approval and no further planning applications are required for development in the relevant area. Coupled with the distance of this site from the SPA (on the periphery of the catchment), this development is therefore considered to be baseline for the purposes of Local Plan HRA)
- Policy AP15 - Wisdom Toothbrush Factory, Colne Valley Road (although a mixed use site, it lies beyond the 26.3 km recreational pressure catchment for woodlark/nightjar Breckland SPA habitat and Breckland SAC)
- Policy AP26 – Land North of Barrow Primary School (a school expansion at Barrrow)
- Policy AP49 – Land north of Moulton Primary School (primary school expansion)
- Policy AP52 – Land west of West Row Primary School (a school expansion at West Row)

4.46 Of the remaining 59 sites, the following sixteen sites potentially have an ‘alone’ effect for the reasons stated:

- Policy AP1 – Land at Warren Close, Brandon – site lies partly within 1.5km of stone curlew Breckland SPA habitat;
- Policy AP2 – Brandon Cemetery - site lies within 1.5km of stone curlew Breckland SPA habitat;
- Policy AP18 – Mildenhall Academy - site lies within 1.5km of stone curlew Breckland SPA habitat and within 400m of nightjar/woodlark Breckland SPA habitat;
- Policy AP33 – Land West of Eriswell Road, Lakenheath – site lies within 1.5km of stone curlew habitat outside Breckland SPA;
- Policy AP34 – Land at Rabbithill Covert, Lakenheath - site lies partly within 1.5km of stone curlew habitat outside Breckland SPA;
- Policy AP35 – Land North of Station Road, Lakenheath - site lies partly within 1.5km of stone curlew habitat outside Breckland SPA;

- Policy AP38 – Land North of Acorn Way, Red Lodge - site lies partly within 1.5km of stone curlew Breckland SPA habitat;
- Policy AP39 – Land East of Warren Road, Red Lodge - site lies partly within 1.5km of stone curlew Breckland SPA habitat;
- Policy AP40 – Secondary School Site, Red Lodge – site has not yet been identified by Suffolk County Council but could lie within 1.5km of stone curlew Breckland SPA habitat, or within 400m of nightjar/woodlark Breckland SPA habitat; and
- Policy AP46 – Land off Bury Road – a drain on the southern edge of the development site flows into Waveney & Little Ouse Valley Fens SAC approximately 450m to the west of the development, such that a potential water quality effect could arise.
- Policy AP19 – Land at Hatchfield Farm, Fordham Road, Policy AP20 – Pinewood Stud, Policy AP21 – Land off High Street, Black Bear Lane and Rowley Drive, Policy AP22 – Former St Felix Middle School site, and Policy AP23 Land adjacent to Laureate Community Primary Academy, are all in Newmarket which is hydrologically connected to Chippenham and Wicken Fen (Fenland SAC).
- Policy AP43 – Land South of Hopton Road is in Barningham, which is hydrologically connected to Waveney & Little Ouse Valley Fens SAC (water quality).

4.47 Each of these pathways will be discussed further within the Appropriate Assessment.

Summary of Test of Likely Significance ‘In Combination’

4.48 Of the remaining 43 allocated sites, likely significant effects are unlikely to arise from the sites alone due to the modest scale of growth on each site and/or the distance from sensitive Habitats sites. However, likely significant effects do arise in combination with other allocations in the Local Plan, and with allocations in other Local Plans. In addition to site allocations, a total of six policies may result in likely significant effects on European sites, because these are the policies in the Local Plan (other than the site allocation policies) that specifically seek to promote or deliver development:

- Policy SP9 – The Spatial Strategy
- Policy SP10 – Housing Need
- Policy SP11 – Neighbourhood Plans

- Policy SP12 – Strategic Employment
- Policy LP39 – Tourism Development
- Policy SP15 – Existing Special Operational Uses

4.49 The potential for likely significant effects in combination with other projects or plans is particularly due to the large recreational catchment that has been identified for Breckland SPA/SAC which encompasses all of West Suffolk, Kings Lynn & West Norfolk, Breckland, and parts of North Norfolk and South Norfolk, as well as parts of East Cambridgeshire, South Cambridgeshire, Mid Suffolk and Babergh. The recreational catchments for Devils Dyke SAC and Wicken Fen (Fenland SAC), while smaller, also encompass areas of both West Suffolk and East Cambridgeshire.

4.50 Development in Breckland District or East Cambridgeshire may also work in combination with development in West Suffolk if it is located within 400m of parts of Breckland SPA that support nightjar/woodlark, or within 1.5km of areas of habitat within or outside the SPA that support nesting stone curlew. All Local Plans that put additional traffic on the road network within 10km of a Habitats site may contribute cumulatively to atmospheric pollution. Similarly, sites hydrologically connected to Chippenham and Wicken Fens (Fenland SAC) or Waveney & Little Ouse Valley Fens SAC may have an in combination water quality effect along with development in Newmarket, Barningham and Hopton.

4.51 Each of these pathways will be discussed further within the Appropriate Assessment.

5. Appropriate Assessment

Introduction

5.1 The previous section contained a Screening Assessment (Test of Likely Significant Effects) of the policies and allocations within the West Suffolk Local Plan.

5.2 The European designated sites and impact pathways that could not be screened out at the screening stage are set out in Table 3.

Table 3: Impact pathways taken forward to appropriate assessment are marked with a tick

	Impact pathway taken forward to appropriate assessment				
Habitats site	**Urbanisation**	**Recreational Pressure**	**Loss and Disturbance of Functionally Linked Land**	**Water Quality (runoff and sewage effluent)**	**Air Quality**
Breckland SPA	✓	✓	✓		✓
Breckland SAC		✓			✓
Rex Graham Reserve SAC					✓
Devils Dyke SAC		✓			✓
Fenland SAC including Chippenham Fen Ramsar, and Wicken Fen Ramsar		✓		✓	
Waveney & Little Ouse Valley Fens SAC				✓	

5.3 There are several policies under which development proposals could be brought forward that might have an adverse effect on the integrity of European sites. However, because no actual allocations are made it is not possible to assess them in detail at the Local Plan level. This relates to the following policies in the Local Plan and allocations specifically identified in the following sections: SP9 (The Spatial Strategy), SP10 (Housing Need), SP11 (Neighbourhood Plans), SP12 (Strategic Employment), LP39 (Tourism Development), and SP15 (Existing Special Operational Uses). Some of these policies (notable SP9, SP10 and SP12) are assessed as far as possible based on current data through the analysis of the housing and employment allocations in the Local Plan in the following sections of the appropriate assessment. Other sites (un-allocated windfall, or sites in Neighbourhood Plans in accordance with Policy SP11) may come forward under those policies but it is impossible to assess them without knowing where they might be located, or for how much development. However, residential and employment windfall or Neighbourhood Plan sites could give rise to any of the impacts discussed in this appropriate assessment for allocated sites, particularly recreational pressure or

urbanisation impacts. Other policies (LP39 and SP15) cannot be assessed in detail at the Local Plan stage as (by design) the actual development involved will be identified for individual planning applications.

5.4 In these circumstances the law accepts that HRA can be tiered. Advocate-General Kokott [REF 55] commented that *'It would also hardly be proper to require a greater level of detail in preceding plans* [than lower tier plans or planning applications] *or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure'*.

5.5 With specific regard to Policy SP15 Existing Special Operational Uses, it is not possible to undertake a detailed appropriate assessment without individual proposals being identified. However, impacts could particularly arise through urbanisation (encompassing noise and visual disturbance of Breckland SPA birds) and impacts on functionally linked land for stone curlew associated with Breckland SPA. Since RAF Lakenheath includes areas of Breckland SAC within its boundary, proposals for that site could also result in direct loss of habitat for which the SAC is designated, although it should be noted that one of the reasons that habitat has been preserved until now is its presence within a military establishment.

5.6 Although the identified policies cannot be assessed in further detail for this HRA, the Local Plan deals with situations such as this, where down-the-line assessment is particularly important, via Policy SP7 Special Protection Areas and Special Areas of Conservation. This policy states that *'A project level habitats regulations assessment (HRA) will be undertaken for all development proposals that are likely to have a significant effect on a Special Protection Area (SPA) or Special Area of Conservation (SAC). Development will only be permitted where it can be demonstrated that the proposals will not adversely affect the integrity of the designated site, either alone or in combination with other plans or projects. Where a project level HRA is required, the developer is required to submit information to inform the HRA. The information must address the impact of the proposals alone and in-combination with other relevant plans and projects within the whole SPA or SAC and its relevant constraint zones where appropriate..'.* Similarly, where recreational pressure is an issue for windfall or Neighbourhood Plan housing sites, Policy SP8 would apply. This states that '*All new development which would result in a net increase in dwellings and therefore likely to increase recreational pressure on any European or nationally designated site, will be required to demonstrate that adequate measures are put in place to avoid or mitigate potential adverse effects'*. It then sets out the strategic approach to mitigation including contributions to the emerging RAMS delivery. For Neighbourhood Plans,

Regulation 106 of the Conservation of Habitats and Species Regulations 2017 (as amended) sets out the specific legal requirement for every Neighbourhood Plan to be subject to its own HRA.

5.7 Policy LP46 of the Local Plan (Horse Racing Industry Development) sets out the criteria that horse racing development must meet in order to be consented. It does not allocate specific sites or a particular quantum of development. Individual horse racing developments may result in likely significant effects on European sites but this will need to be assessed for each planning application as they are developed. Similarly, policies such as LP17, LP18, LP19, LP22, LP24, LP26, LP27, LP28, LP37 and LP38 have been screened out because they are all criteria-based policies that do not actively promote development but set out criteria to manage circumstances in which that development may arise. Therefore, while (for example) development in the countryside, reuse of farm buildings and development of gypsy/traveller plots could all have impacts on European sites these would be impacts of relevant housing applications rather than of the Local Plan. They would moreover be captured by down-the-line assessment in line with Policy SP7.

Urbanisation

5.8 The Local Plan makes a single allocation within 400m of components of Breckland SPA which support woodlark and nightjar. This is Policy AP18 (Mildenhall Academy and Dome Leisure Centre site) which is located adjacent to the SPA. This proximity is reflected in the text for Policy AP18 which states that '*Redevelopment of site would need to have regard to the site's location adjacent to Breckland Special Protection Area (SPA) which may limit the type of employment use that would be acceptable. A project level Habitats Regulations Assessment (HRA) will be required'*. Since the site was previously a leisure centre and academy, its use for employment is unlikely to constitute a negative change in terms of scope for impacts on the SPA. However, since the site is situated adjacent to the SPA in the north (separated from the SPA by approximately 250 m of open land to the south) it will be necessary for construction/operation to take account of the sensitive features of the SPA. The following requirements are likely to apply:

- Noise modelling is likely to be needed if construction or demolition works will occur during the nesting season (March to August inclusive). This will need to compare construction/demolition LAeq and LAmax levels against either the commonly used disturbance threshold of 70dB, or baseline noise levels, to be agreed with West Suffolk Council and Natural England;
- If construction noise levels are likely to be disturbing (either exceeding the 70dB threshold or being 5dB or more above baseline levels whichever metric is agreed) then noise mitigation may be required;

- Depending on the proposed use, operational noise modelling may also be required;
- Visual screening may be required to separate works from the SPA. This visual screening will, if in the form of close-boarded fencing, also serve a noise mitigation role, typically reducing noise levels by 10dB. Such fencing can also control dispersal of dust;
- Construction/demolition works should be avoided at night and any site office or compound lighting, or operational lighting, must be careful not to illuminate areas within the SPA used by nesting nightjar or woodlark; and
- Works with the greatest potential for disturbance should be timed to occur outside the nesting season (i.e. take place during September to February inclusive) if there is no method of otherwise controlling any noise or visual disturbance to acceptable levels.

5.9 These are identified as part of the assessment but due to the level of detail they are not recommended for addition to the Local Plan policy.

5.10 The Local Plan includes five allocations which are located within 1,500m of components of Breckland SPA which support stone curlew. These are Policy AP1 (Land at Warren Close, Brandon), Policy AP2 (Brandon Cemetery), Policy AP18 (Mildenhall Academy and Dome Leisure Centre site), Policy AP38 (Land North of Acorn Way, Red Lodge) and Policy AP39 (Land East of Warren Road, Red Lodge). Three of these (Policy AP1, and both allocation policies in Red Lodge) are for residential development, with the others being for a cemetery and employment use. An application has been submitted for Land at Warren Close, Brandon and for Land North of Acorn Way, Red Lodge. There is also an existing planning permission for Land East of Warren Road, Red Lodge.

5.11 The area within the 1500m zone for Policy AP1 (Land at Warren Close, Brandon) which is less than 0.1 ha, currently forms the narrow access to the site.The built development will be outside of the 1500m buffer for stone curlew and is fully surrounded by previously developed residential land. It was previously the site of the library in Brandon which was demolished. It is therefore unlikely to have an adverse impact on stone curlew nesting or on the integrity of the SPA.

5.12 Policy AP2 (Brandon Cemetery) is fully within the 1500m buffer for stone curlew, within habitat that, from aerial mapping, appears to be grassland/pasture with built development on the eastern and southern boundaries. To the north and west of the proposed cemetery there is further grassland/pasture, with no built development north for 155m to what appears to

be a car breakers yard and a sewage treatment plant and east for 165m to properties along Manor Road. The site itself is unlikely to be suitable for stone curlew given its location, and there is no built development proposed. There have been a number of permissions on this site - the most recent being DC/18/2490/FUL which has lapsed.

5.13 Policy AP18 (Mildenhall Academy and Dome Leisure Centre site) also sits fully within the 1500m buffer for stone curlew. South of the site boundaries are recreational playing fields and then woodland, which is part of the Breckland SPA. The Policy AP18 site is directly adjacent to woodland components of the Breckland SPA on its eastern boundary. Directly adjacent west and north is previously developed residential land and south-west is grassland/pasture down to the River Lark. Stone curlew nest in areas of the SPA which have low height arable crops such as vegetable, rather than within woodland parts of the SPA. The site already has built development (a school and leisure centre) and the proposed re-use for B1 development (as restricted by the policy) may not significantly alter the degree of development of the site. There is no residential element. The site is further than 500m from components of the SPA which support stone curlew and separated by the A11 and therefore construction impacts are unlikely. Given this, and the fact the site is surrounded by previously developed land and woodland, the development is unlikely to have an adverse impact on stone curlew nesting and thus on the integrity of the SPA.

5.14 Policy AP38 (Land North of Acorn Way, Red Lodge) only has 0.22 ha of the 27.4 ha site within the 1.5 km buffer for stone curlew. In addition, the nearest part of the SPA (to the south east of the site allocation) was examined as part of the project level HRA for Land east of Red Lodge (north and south), and found to be suboptimal for stone curlew given the existing environmental factors. Given the size of the site and the area within the 1.5 km buffer for stone curlew it is assumed that all built development will be outside of the buffer and therefore unlikely to have an adverse impact on stone curlew nesting, and thus on the integrity of the SPA. Finally, any small residual risk can be avoided via the allocation policy's requirement that "*The masterplan and any future planning applications will require a project level Habitats Regulations Assessment.*"

5.15 Lastly Policy AP39 (Land east of Warren Road), approximately 3.8 ha of the 5.5 ha proposed site is within the 1.5 km buffer for stone curlew. The site is bordered on the west by built development (residential), to the north is a primary school and warehouse sat within arable land which is part of Policy AP38 (Land north of Acorn Way) and outside of the 1.5 km buffer for stone curlew, to the south is built development (new residential/construction) and to the east is a strip of woodland around arable land. Information prepared to inform a project level HRA (application DC/19/2347/FUL) indicates that the portion of the SPA within 1,200-1,300 m of the development site does not

function as a potential nesting resource for stone curlew due to residential development within 1,500 m at Herringswell and Red Lodge, recreational disturbance from nearby Public Rights of Way and residential gardens, and enclosure by nearby mature woodland and hedgerows. This conclusion was supported by an absence of any stone curlew nest records in the area concerned. Given the relatively permanent nature of these environmental factors there is no realistic prospect of this part of the SPA supporting stone curlew. The development is therefore unlikely to have an adverse impact on stone curlew nesting or the integrity of the SPA.

5.16 In addition to sites allocated in the Local Plan, Policy AP40 identifies the need for a new secondary school site at Red Lodge. Although the need has been identified no site has yet been identified by Suffolk County Council. However, the policy text identifies that '*If the site falls within Breckland Special Protection Area (SPA), Special Area of Conservation (SAC), or Site of Special Scientific Interest (SSSI) impact pressure zone of influence, appropriate measures to mitigate impacts from the proposed development will be required. Any planning application will require a project level habitats regulations assessment (HRA) should the site fall within the Breckland SPA or associated buffer'.*

5.17 In the Regulation 18 Local Plan HRA it was recommended that a policy is included within the Local Plan for the protection of Breckland SPA through the continued retention of the 1,500m constraint buffer around areas of the SPA designated for stone curlew, and 400m around parts of the SPA designated for woodlark and nightjar. This has been reflected in Policy SP7 (Special Protection Areas and Special Areas of Conservation), which states that '…*All development that leads to a net increase in built development within Breckland SPA or within a 1.5 kilometre (primary) buffer of component parts of Breckland SPA which support or are capable of supporting stone curlew, as shown on the policies map, has the potential for likely significant effects on Breckland SPA alone or in-combination with other developments, and as such will require a project level HRA*.. It also states that '*Large developments adjacent to, or just outside the primary or secondary buffer are likely to also require project level HRA*' and that '*All development that leads to a net increase in residential development within 400 metres of components of the SPA that support or are capable of supporting Woodlark and/or Nightjar as shown on the policies map, has the potential for likely significant effects on Breckland SPA alone or in-combination with other developments, and as such will require project level HRA*... '*The developer is required to submit information to inform the HRA. The information must address the impact of the proposals alone and in-combination with other relevant plans and projects within the whole SPA and its relevant constraint zones where appropriate'.*

5.18 With this wording included in the Local Plan Policy it is concluded that the Local Plan contains a sufficient policy framework to ensure no adverse effect on the integrity of Breckland SPA arises from growth in West Suffolk.

In Combination Effects

5.19 Two other local authorities could potentially see development coming forward within 1.5km of Breckland SPA: the Borough of Kings Lynn & West Norfolk, and Breckland District.

5.20 Two settlements in Kings Lynn & West Norfolk lie within 1.5km of the SPA: Feltwell and Hockwold cum Wilton. The adopted Site Allocations and Development Management Policies Plan (2016) made three allocations at Feltwell and one at Hockwold cum Wilton. The area of the SPA within 400m of this settlement is not suitable for nightjar and woodlark, being farmland. However, it is suitable for stone curlew. The SADMP notes that '*site allocations for development in these settlements are each subject to a project level habitats regulations assessment to consider this in more detail in relation to the specific development proposals and the up-to-date situation in the neighbouring districts'*. The document also notes for all four sites that '*The site is situated within the Special Protection Area "buffer zone," for stone curlews but it is well screened on all sides by single and two storey development and therefore development at this location is likely to have minimal impact on the visual amenity of the surrounding landscape and the SPA, although a project level habitats regulations assessment will be required'*. In the Local Plan Review (going through Examination) two sites are also allocated at Feltwell. The same argument (that the allocations are entirely surrounded by development) is given in the HRA of the Local Plan Review as was used in the SADMP.

5.21 The HRA of the Breckland Local Plan (adopted 2023) notes that numerous settlements in Breckland district lie within 1500m of parts of the SPA that support stone curlew, such as Swaffham, Watton and Weeting but also notes that either allocations are not made within the 1500m zone (Weeting) or the Local Plan '*does not support development outside settlement boundaries within the 1500m buffer zone. Outside this, there may be a need for project level HRA to ensure that there any effects on functionally linked land can be effectively mitigated for'*. The HRA also notes that growth at Thetford is covered by the adopted Thetford Area Action Plan and that '*Thetford SUE has outline permission but S106 not yet agreed, partly due to outstanding mitigation requirements for Breckland SPA'*.

Functionally linked land

5.22 The Local Plan allocates three sites at Lakenheath, that lie within 1.5km of areas outside the SPA that have been identified where there are concentrations

of nesting stone curlew (most recently using data from 2011-2015) , (the secondary buffer). These are:

- Policy AP35 - Land north of Station Road, Lakenheath. Approximately 10.5 ha of the 22.4 ha site is within the 1.5 km secondary stone curlew buffer. The site is proposed for mixed use and includes 375 dwellings. There is built development to the east (farm buildings) and west (residential) as well as several other planning applications. North and south of the site the land use is currently arable/pasture. Hybrid planning approval was granted in 2020 (DC/14/2096/HYB).
- Policy AP34 – Land at Rabbithill Covert, Lakenheath. Approximately 2.1 ha of the 3.45 ha site is within the 1.5 km secondary stone curlew buffer. The site is proposed for residential with a capacity of 81 dwellings. South of the site is a woodland, east and north is grassland/arable which is the above Policy AP35 – Land north of Station Road proposed development and west is built development (residential). Outline planning was granted in 2018 (F/2018/0345/OUT) and reserve matters application was approved in 2022 (DC/20/2066/RM).
- Policy AP33 - Land west of Eriswell Road, Lakenheath. All of the 5.45 ha site is within the secondary buffer. The site is bordered to the east by build development (residential). North, south and west of the proposed site is arable/pasture. The site is for residential development and is proposed for 140 dwellings. Outline planning was approved in 2018 and reserved matters is pending a decision.

5.23 These will therefore require project-level HRA before they can be consented, or before reserved matters applications can be consented, and may need to deliver offsetting for displacement of stone curlew from nesting habitat outside the SPA boundary. In the Regulation 18 Local Plan HRA, it was recommended that within the Local Plan a policy is included for the protection of Breckland SPA through the continued retention of the 1,500m constraint buffer around the areas of the SPA designated for stone curlew and any 1 km grid square where there are 5 or more attempts at breeding by stone curlew.

5.24 This has been reflected in Policy SP7 (Breckland Special Protection Area and Special Area of Conservation), which states that '…*All development that leads to a net increase in built development within the 1.5 kilometre (secondary) buffer around areas outside the SPA that have been identified where there are concentrations of stone curlew (most recently using data from 2011-2015), as shown on the policies map may also require project level HRA. Within this zone, where it can be shown that adverse effects can be prevented, for example where alternative land outside the SPA can be secured to adequately mitigate the potential effects, planning permission may be granted provided the local planning authority is satisfied that there is sufficient certainty that the proposed measures will be effective and deliverable.* The same policy would apply to any windfall development that may come forward as a consequence of other policies in the Local Plan.

5.25 With this wording included in the Local Plan Policy it is concluded that the Local Plan contains a sufficient policy framework to ensure no adverse effect on the integrity of Breckland SPA arises.

In Combination Effects

5.26 Three other local authorities could potentially see development coming forward within 1.5km of stone curlew regular nesting attempt locations outside the SPA boundary: East Cambridgeshire, the Borough of Kings Lynn & West Norfolk, and Breckland District.

5.27 Within East Cambridgeshire there is a Garden Village extension to Kennett that is not in their Local Plan but is an 'incomplete or non-implemented parts of plans or projects that have already commenced', although no homes have been provided to date. The site is in the secondary buffer within 1.5km of a location with 5 or more nesting attempts by stone curlew. It is covered by outline permission 18/00752/ESO and was accompanied by an HRA screening report. The applicant undertook breeding bird surveys and concluded that although within a grid square where insufficient knowledge existed at a Local Plan level about stone curlew nesting, the species did not in fact nest in the area. Nightjar and woodlark were also not located nesting near the site.

5.28 The adopted Kings Lynn & West Norfolk Site Allocations and Development Management Policies Plan (2016)(SADMP) does not specifically discuss the SPA secondary buffer. However, the HRA of the Local Plan Review (going through Examination) does do so, noting that '*In order to avoid impacts of built development on Stone Curlews, the Local Plan Policy LP27 includes the following wording: New built development will be restricted within 1,500m of the Breckland SPA. Development will be restricted to the re-use of existing buildings or where existing development completely masks the new proposal from the Breckland SPA. Beyond the SPA, a 1,500m buffer will also be applied to areas where the qualifying features are known to exist, or where nesting attempts have been made. In this area, development may be acceptable where suitable alternative habitat (outside the SPA) can be secured'*. The HRA also notes that '*checks beyond the buffer indicate no allocations at sites in a wider arc where birds may be present outside the SPA boundary'*.

5.29 The HRA of the Breckland Local Plan (adopted 2023) notes that numerous settlements in Breckland district lie within 1500m of parts of the SPA that support stone curlew, or within 1500m of historic nesting attempts beyond the SPA, such as Swaffham, Watton and Weeting but also notes the existence of the 1500m secondary buffer and notes that the Local Plan (Policy ENV03)

'*does not support development outside settlement boundaries within the 1500m buffer zone. Outside this, there may be a need for project level HRA to ensure that there any effects on functionally linked land can be effectively mitigated for'*. The HRA also notes that growth at Thetford is covered by the adopted Thetford Area Action Plan and that '*Thetford SUE has outline permission but S106 not yet agreed, partly due to outstanding mitigation requirements for Breckland SPA'*.

5.30 According to the applicant's HRA report for the Development Consent Order application submitted for the Sunnica Energy Farm project, impacts on Breckland SPA were identified through loss of stone curlew nesting and foraging habitat outside the SPA boundary, and construction noise and visual disturbance to stone curlew occurring within or outside the designated site boundary during construction. To address these issues the applicant proposes a Construction Environment Management Plan and a Decommissioning Environment Management Plan containing mitigation measures for construction disturbance, and the delivery of habitat to offset the loss of breeding habitat for stone curlew. The DCO is currently pending the Secretary of State's decision.

Recreational pressure

5.31 Visitor survey work undertaken to inform the development of the Local Plan identified four Habitats sites that have recreational pressure sensitivity: Breckland SPA and SAC (core catchment of 26.3km, effectively covering the entirety of West Suffolk, with the notable exception of the majority of Haverhill in the south of the district), Devil's Dyke SAC (core catchment of 5.5km) and Fenland SAC (specifically, Wicken Fen), with a core catchment of 10.3km. These catchments mean that all residential allocations in West Suffolk Local Plan lie within the recreational zone of influence of Breckland SPA/SAC with the exception of sites AP13, AP14 and AP15. With regard to the other European sites, the Local Plan allocates the following sites within their core recreational catchments:

- Within 5.5km of Devils Dyke SAC (at least 988 dwellings):
  - Policy AP20 – Pinewood Stud (415 dwellings)
  - Policy AP22 – Former St Felix Middle School site (50 dwellings)
  - Policy AP19 – Land at Hatchfield Farm, Fordham Road (400 dwellings)
  - Policy AP21 – Land of High Street, Black Bear Land and Rowley Drive (123 dwellings)

Note, however, that only one of these sites (AP20) does not currently (September 2024) have planning consent.

- Within 10.3km of Fenland SAC (at least 988 dwellings):
  - Policy AP20 – Pinewood Stud (415 dwellings)
  - Policy AP22 – Former St Felix Middle School site (50 dwellings)
  - Policy AP19 – Land at Hatchfield Farm, Fordham Road (400 dwellings)
  - Policy AP21 – Land of High Street, Black Bear Land and Rowley Drive (123 dwellings)

Note, however, that only one of these sites (AP20) does not currently (September 2024) have planning consent

5.32 With regards to the Breckland SAC, increased pressures due to growth in the district may present an adverse effect in the future. Visitor survey work undertaken to prepare the emerging RAMS Study confirms that contamination (from dogs in particular and including dog fouling and contamination of water bodies from dogs entering the water), trampling, increased fire risk, spread of non-native species and disease, and disturbance to rabbits are all current issues that are likely to get worse without mitigation. Large residential sites located within easy walking distance of the SAC are disproportionately likely to contribute to recreational pressure effects.

5.33 Therefore, a 1km buffer (this being a common zone for easy walking distance) has been used in this HRA around the components of the Breckland SAC to identify potential development sites with 50 or more dwellings. It should be noted that all areas of the SAC (except Lakenheath Airfield – not accessible to the public) are also part of the SPA and therefore any residential development in the district within 1km of the SAC will also be within 26.3km of the SPA. Therefore, it is entirely possible that any mitigation measures devised for residential developments within the SPA buffer will also mitigate against any recreational impacts to the SAC without the need for further measures. There is a single development within 1 km of Brecklands SAC. This is Policy AP33 – Land West of Eriswell Road and is allocated for 140 dwellings. It is located 425m from the SAC at its closest point. However, this area of the SAC is located within Lakenheath Airfield which is inaccessible to the general public.

5.34 Impacts were apparent from recreation use at Devil's Dyke based on visitor survey undertaken in April 2023 [REF 56] as documented in the emerging RAMS Study. The key cause of concern from current recreation use relates to direct damage and contamination. It was concluded that the site has very limited scope for absorbing more recreational pressure. The postcode data suggest that Devil's Dyke SAC/SSSI is used primarily by residents from Newmarket and for dog walking. However, there is only one development without consent within the ZoI, which is AP20 Pinewood Stud. This development will also be delivering a 29ha country park alongside the development which will address recreational pressure concerns arising from

this particular allocation. Measures that would primarily address the issues associated with dog fouling are included in a dedicated section of the RAMS report and could be provided should additional windfall development come forward within the Devils Dyke SAC ZoI.

5.35 Key issues for Breckland SPA are identified in the emerging RAMS Study are disturbance to ground-nesting birds, impacts on rabbits affecting habitat, increased fire risk, and nutrient enrichment impacting habitat quality. Disturbance to birds has been discussed in the impact pathway section of this HRA including the evidence of high susceptibility to disturbance of nightjar, woodlark and stone curlew. Nutrient enrichment due to dogs was also discussed in that section, including a study into the amount of nitrogen entering Burnham Beeches in south-east England from dogs. Rabbits are key to maintaining short sward and bare ground patches and a decline in rabbit population as a result of disease has had marked impact on the vegetation within Breckland. Access, particularly dogs, is identified in the emerging RAMS report as potentially part of the problem.

5.36 Key issues for Wicken Fen Ramsar are similar to those raised for Breckland SPA including nutrient contamination (from dogs in particular) and increased fire risk, but also include disruption of grazing. Grazing is essential to most non-woodland sites with vascular plants and that can be disrupted through the presence of recreational visitors and (particularly) dogs, especially if those dogs are off lead and can worry or even attack livestock. However, there is only one non-consented development within the ZoI (AP20 Pinewood Stud). The developer will be required to provide a 29ha countryside park alongside the development which will address recreational pressure concerns arising from this particular allocation. The Local Plan policies are considered to provide a suitable framework to ensure no adverse effects at this site. Wicken Fen has been retained within a dedicated section of the RAMS report to inform the case-by-case assessment of any future windfall development should it come forward .

5.37 Mitigation for recreational impacts on Habitats sites has a long precedent and usually consists of the following:

- Delivery of alternative natural greenspace, specifically intended to attract people away from the Habitats sites in question by replicating recreationally-attractive qualities of the Habitats sites (though not necessarily the same habitats) and providing a tranquil and well publicised alternative recreational experience. The most formalised approach is commonly known as Suitable Alternative Natural Greenspace (SANG) and consists of a series of precise criteria (such as a set amount of greenspace per 1000 population) that must be created. However, this is not the only approach available and less rigidly defined forms of alternative greenspace have also been used. It is common for

large sites to deliver their own alternative greenspace while small sites make financial payments to a central body (such as West Suffolk Council) based on agreed per dwelling tariff, and the central body delivers the greenspace or projects to enhance access provision. The tariff must be sufficient to manage the site in perpetuity); and

- Direct input to access management of the Habitats sites in question, on the basis that there is still likely to be some increase in recreational visits over the plan period, and improved site management can improve the resilience of the site to recreation. Actual measures cover a wide range but can include improved wardening, signage, community engagement, specific on-site infrastructure (e.g., formalising car parking where informal car parking is causing damage), improving board walks, creating hides, closing footpaths or adding dog waste bins. This is usually achieved by the developer paying an agreed per dwelling tariff to the delivery body (such as West Suffolk Council) who then supervise the measures. The tariff must be sufficient to manage the site in perpetuity.

5.38 As can be seen from the list of allocated sites within each zone of influence or core catchment above, growth that will require mitigating consists of a range of very large sites (100 dwellings or above) but also a number of smaller sites (down to 10 dwellings). Although not allocated in the Local Plan windfall development will also arise within each core catchment. While very large sites might be able to deliver their own bespoke mitigation strategies this is very unlikely to be possible for smaller developments. Moreover, the sheer number of sites within each core catchment (particularly that around Breckland SPA) means that a consistent approach is important. The visitor survey work that underpins strategic SPDs such as Thames Basin Heaths SPA as well as survey work in West Suffolk indicate that recreational pressure issues are not likely to stem purely from a small number of large developments, which are able to provide bespoke solutions, but are a diffuse issue across all developments within the catchment of the Habitats sites. With this in mind, it is common practise for a strategic mitigation solution to be devised by the local authority (and clearer for both the Councils and developers) than seeking to devise a bespoke solution for each relevant site allocation at the Local Plan stage or planning application at the Development Management stage.. West Suffolk Council is currently producing a Recreational Avoidance and Mitigation framework (title still to be fixed), assisted by specialist consultancy Footprint Ecology. This approach is consistent with the approach being taken for The Brecks by the adjacent Norfolk authorities such as Breckland Council.

5.39 The measures in the RAMS report in summary include:

- Alternative green infrastructure
    - SANGS on development sites
    - Improvements to access routes

- New public rights of way
- Dedicated facilities for dogs and dog walking
- Promotion of alternative facilities

- European site specific projects
  - Signage and interpretation panels
  - Dog bins at Cavenham Heath
  - Ranger coverage
  - Review of footpaths

5.40 The need for recreational pressure mitigation at a strategic level is covered in the Local Plan by Policy SP8 (Recreational effects of development). This states that '*All new development which would result in a net increase in dwellings that would be likely to increase recreational pressure on any European or nationally designated site, will be required to demonstrate that adequate measures are put in place to avoid or mitigate potential adverse effects.*

5.41 In all instances where recreational mitigation measures are applicable, as set out in the West Suffolk Recreational Avoidance and Mitigation, the following standards will apply, unless an evidence-based alternative strategy has been agreed with Natural England and the council:

- *Provide measures for influencing recreation at, or close to the development site. Measures could include delivery of sufficient quantity and quality of alternative accessible natural green space and/or enhancement and promotion of dog friendly access routes within or in the immediate vicinity of the development or other measures to be agreed. For small developments, a financial contribution towards strategic measures may be accepted; and,*
- *An appropriate financial contribution towards recreational access management and monitoring of visitor pressure at sensitive nature conservation sites.*

5.42 A project level Habitats Regulations Assessment (HRA) will be required. The developer is required to submit information that clearly demonstrates that the above measures would result in no adverse effects on the integrity of the relevant European site'.

5.43 All relevant policies that allocate development within the Brecks, Devils Dyke and Wicken Fen ZoI include policy wording which states:

- *The development must mitigate for its recreational effects on designated sites of nature conservation interest in accordance with Policy SP8 Recreational effects of development. Information to inform a project-level appropriate assessment will be required.*

5.44 Additionally, Policy SP4 Green Infrastructure states that '*All major residential development of 50 homes or more located on greenfield sites should provide around 40 per cent green infrastructure within the site'*. When calculated (based on 40% of site area) it generally exceeds the SANG requirement (based on 2.4 persons pre home allocated) although it does not apply to brownfield or to greenfield sites under 50 dwellings.

5.45 With this wording included in the Local Plan Policy, and with the addition of the guidance in the West Suffolk Recreational Avoidance and Mitigation Study, it is concluded that the Local Plan contains a sufficient policy framework to ensure that its contribution to in combination recreational pressure on these European sites is addressed and that no adverse effect on the integrity of Breckland SPA/SAC, Fenland SAC/Wicken Fen Ramsar, or Devil's Dyke SAC arises.

In Combination Effects

5.46 A visitor survey across Norfolk was undertaken by Footprint Ecology during 2015 and 2016[9]. The results highlighted how an increase in recreational pressure (particularly at the North Coast, the Brecks, the Broads and the Valley Fens) is predicted to be linked with residential development across multiple local authorities. The result was a recreational pressure Zone of Influence covering the whole of Norfolk. As a result they have prepared a GIRAMS (Green Infrastructure (GI) and Recreational Impact Avoidance and Mitigation Strategy). The Breckland SPA/SAC catchment in Norfolk is set at 26km in Table 6 of the GIRAMS and is identified to cover the entirety of Kings Lynn & West Norfolk, Breckland, and parts of North Norfolk and South Norfolk. This therefore covers at least 23,000 new dwellings within the catchment of the SPA/SAC in addition to that planned for West Suffolk.

5.47 The Norfolk GIRAMS sets out a strategic, cross-boundary approach to mitigating the in-combination effects of development on these designated areas and allows strategic mitigation to be delivered across Norfolk. The avoidance and mitigation measures will be funded via developer contributions as part of planning permissions given for new residential and other development as follows: All new dwellings of 1+ units in current site allocations and windfall (excludes replacement dwellings and extensions)

- Houses in Multiple Occupancy e.g. hotels, guest houses and lodges

[9] https://www.north-norfolk.gov.uk/media/3382/visitor-surveys-at-european-protection-sites-2015-16.pdf

- Student accommodation
- Residential care homes and residential institutions (excludes nursing homes)
- Residential caravan sites/mobile homes/park homes
- Gypsies, travellers and travelling show people plots
- Residential moorings, holiday caravans, touring pitches and campsites

5.48 There is also growth within 26.3 km of Breckland SPA/SAC in parts of East Cambridgeshire, South Cambridgeshire, Mid Suffolk and Babergh. As yet these Local Plans have no specific policy regarding the SAC/SPA and recreational pressure because the catchment has only recently been increased to 23.6km.

5.49 Devils Dyke SAC and Wicken Fen are both in East Cambridgeshire. The HRA for the East Cambridgeshire Local Plan Single Issue Review (2022) does not identify any likely significant effects on either Habitats site because '*It is demonstrated in the SIR that the quantum of housing proposed (the new housing requirement figure) is lower than the quantum of housing already committed (i.e. housing that is anticipated to be delivered with or without the SIR progressing to adoption). It is therefore proposed in the SIR that no further new site allocations be proposed, meaning no additional growth will arise as a consequence of the SIR'.* Therefore, the only in combination effects identified are with regard to developments that already have planning consent.

Water quality (runoff)

5.50 Eight allocated sites are located close to vulnerable sites with potential to cause issue through chemical etc. runoff. These are:

- Policy AP46 - Land off Bury Road (WS110) for 37 dwellings is identified as being hydrologically connected to Waveney and Little Ouse Valley Fens. A drain on southern edge of the development flows into the Fen (SAC) 450m to the west of the development. However, this site already has planning consent.
- Policy AP19 – Land at Hatchfield Farm, Fordham Road, Policy AP20 – Pinewood Stud, Policy AP21 – Land off High Street, Black Bear Lane and Rowley Drive, Policy AP22 – Former St Felix Middle School site, and Policy AP23 Land adjacent to Laureate Community Primary Academy, are all in Newmarket which is hydrologically connected to Chippenham and Wicken Fens (Fenland SAC).
- Policy AP43 – Land South of Hopton Road is in Barningham, which is hydrologically connected to Waveney & Little Ouse Valley Fens SAC (water quality).

- Allocations AP6 (South-East Bury St Edmunds) and AP16 (Land West of Mildenhall) are all also screened into Appropriate Assessment as they are all adjacent (or effectively) adjacent to the River Lark upstream of the riverside wet woodland of Icklingham Heath.

5.51 With regards specifically to AP20 (Pinewood Stud) in relation to Fenland SAC, it is noted that there are concerns with water quality issues arising from this development, including increased sedimentation, and eutrophication, due to the highly porous soils and geology of Newmarket. There is hydrological connectivity between this site and the groundwater fed chalk springs on the adjacent Seven Springs site. These springs feed the New River chalk stream, which passes through Exning and continues on to Wicken Fen (SSSI, SAC, NNR, Ramsar) via the Monks Lode. Depending on the details of the development proposals there is therefore potential for reducing the quality of water on which Wicken Fen's 'Sedge Fen' relies. This concern has been expressed by Natural England, Suffolk Wildlife Trust, The National Trust and the Exning New River Association. The potential for impact depends on the details of the proposals devised for any planning application and cannot be explored in detail at the Local Plan level. Natural England in their consultation response on the submitted Local Plan HRA also consider this is an issue to be fully explored in a planning application HRA. Therefore, it is recommended a project-level HRA is undertaken at the planning application stage, to ensure full consideration of impacts on water quality from the development on Fenland SAC (Wicken Fen and Chippenham Fen SSSI) have been explored. It is also recommended that the project-level HRA consider *'independent water quality surveys be carried out within the Seven Springs for a minimum of 12 months prior to work starting, so that mitigation installations can be assessed and monitored',* based on advice from Exning New River Association in their consultation response on the submitted Local Plan HRA.

5.52 It is, however, an offence under the Environmental Damage (Prevention and Remediation) (England) Regulations 2015 and the Environmental Permitting (England and Wales) Regulations 2016 to pollute waterbodies and natural habitats irrespective of whether they hold designated status. Therefore, irrespective of any HRA issues all planning applications for development in West Suffolk will need to include appropriate measures for protecting water quality.

5.53 Nonetheless, for the Regulation 18 Local Plan it was recommended that a policy or wording within the policies for any new allocations is added to ensure that appropriate construction protocols are undertaken on site for the storage of fuels/chemicals (especially in flood zones) and the prevention of leaks and spillages to surface and/or groundwater through the creation and implementation of a site-specific Construction Environment Management Plan (CEMP). In addition, wording should also be included to ensure appropriate measures are demonstrated by each Allocation site to ensure no run-off during operation through the appropriate design and implementation of SUDs etc. This

requirement is effectively captured by Policy LP7 (Water quality and resources). Given this, the addition of a recommendation for Policy AP20 to include a project-level HRA for application stage and the fact that it is in any event illegal to pollute watercourses, it is considered that the Local Plan provides a sufficient policy framework to ensure no adverse effects on the integrity of Habitats sites either alone or in combination with other plans and projects.

In Combination Effects

5.54 Development in Breckland District, South Norfolk and Mid Suffolk could all be located in an area that is hydrologically connected to Waveney & Little Ouse Valley Fens SAC. However, as discussed for West Suffolk, it is an offence under the Environmental Damage (Prevention and Remediation) (England) Regulations 2015 and the Environmental Permitting (England and Wales) Regulations 2016 to pollute waterbodies and natural habitats irrespective of whether they hold designated status. Therefore, irrespective of any HRA issues all planning applications for development in all these authorities will need to include appropriate measures for protecting water quality.

Water quality (sewage effluent)

5.55 In the Regulation 18 Local Plan HRA, it was recommended that assurance is obtained from Anglian Water that the Water Recycling Centres that serve the West Suffolk District can handle the additional wastewater without an increase in phosphate loading to Habitat sites. It is also recommended that a Policy is written and included within the Plan that specifies development will only be supported where wastewater treatment infrastructure is delivered in advance of the development it is intended to serve. Since that recommendation was made West Suffolk Council have been liaising with Anglian Water Services (AWS). This process has identified issues with three Water Recycling Centres (WRC) at Haverhill, Tuddenham (for Red Lodge) and Withersfield. These will fail their Dry Weather Flow (DWF) consents in the plan period based on the current development trajectory, although all three WRC can accommodate at least 50% of planned growth within the plan period before they fall within 10% of the DWF consent limit. Anglian Water Services (AWS) have been consulted and provided some potential solutions including:

- Haverhill WRC - AWS has identified a process optimisation project for the medium term. In the long term, AWS would need to work with the Environment Agency (EA) to find a suitable solution to address the risk and this will be identified in the next Drainage and Wastewater Management Plan (DWMP) produced by the company.
- Tuddenham WRC - AWS would need to work with the Environment Agency (EA) to find a suitable solution to address the risk. AWS are

currently working through potential solutions to address the risk of growth in the Tuddenham WRC catchment. Potential options may be pumping flows to a nearby WRC catchment or moving the discharge point to a more appropriate watercourse.

- Withersfield WRC - If growth occurs as noted in the water cycle study AWS would need to consider the options available. It is likely, that for the Environment Agency to consent to an increase in volumetric discharge (dry weather flow) as mentioned above, tighter physio-chemical standards would also be required for the effluent. This includes a new ammonia limit.

5.56 For all three catchments, West Suffolk could also phase the developments in the Local Plan to allow the required interventions to be implemented by AWS before development happens. The need to ensure phasing of infrastructure delivery in line with delivery of development is captured on Policy SP14 (Infrastructure). Moreover, none of the three identified WRC are connected to downstream water quality sensitive Habitats sites. It is therefore concluded that there will be no adverse effects on the integrity of any Habitats sites, either alone or in combination with other plans or projects.

In Combination Effects

5.57 The Anglian Water Drainage and Wastewater Management Plan (DWMP) adopted in 2023 sets out the long-term wastewater treatment requirements (to 2050) within the Anglian Water supply area based on robust population projections. While the HRA for the DWMP has not been made public it was undertaken as a statutory requirement prior to adoption of the DWMP. That includes taking account of nutrient neutrality considerations for Habitats sites (explicitly discussed in the DWMP). Since the DWMP cannot be adopted unless it demonstrates that it will not have an adverse effect on the integrity of Habitats sites, it can be concluded that no in combination treated wastewater issues arise in combination with West Suffolk Local Plan.

Air quality

5.58 In the Test of Likely Significant Effects, it was identified that allocated sites within 10km of air quality vulnerable SACs that are within 200m of a major road could collectively have a likely significant effect. Windfall (unallocated) development may also arise within 10km of a major road and this will operate cumulatively with sites allocated in the Local Plan to influence traffic growth on the road network. In the Test of Likely Significant Effects it was identified that areas of the Breckland SPA/SAC, Rex Graham SAC and Devil's Dyke SAC lie within 200m of roads that could constitute significant journey to work routes for

residents of new development (or employees at new development) and are vulnerable to reduced air quality. Traffic modelling and an air quality impact assessment have been undertaken to inform this appropriate assessment in line with standard Design Manual for Roads and Bridges (DMRB) methodology, which will compare the predicted change in vehicle flows on roads within 200m of Breckland SAC and SPA as a result of the Local Plan development and in combination with neighbouring Local Plans, with that which would be expected to occur over time due to background population growth. The results are reported in this section and presented in full in Appendix D along with the detailed air quality modelling methodology.

5.59 In undertaking air quality impact assessment reference was made to the critical loads and critical levels for relevant pollutants (nitrogen, NOx and ammonia). These represent the deposition rates or concentrations of pollutants below which there is a high degree of confidence significant effects will not arise. In addition to nitrogen deposition, ammonia pollution can also lead to direct damage of sensitive species, including lichens, mosses and heather. Furthermore, deposition of excessive ammonia can lead to changes in ground flora community assemblages, particularly bryophytes and lichens. An ammonia Critical Level of 1 ug/m^3 has been established for these plant groups using field observations and using a statistical technique to identify a no-effects level.

5.60 Note that paragraph 5.26 of Natural England guidance [REF 57] with regard to critical loads states that '*An exceedance alone is insufficient to determine the acceptability (or otherwise) of a project'*. Where an exceedance of the Critical Load is expected, it is also necessary to consider whether the forecast dose will be imperceptible. As per paragraph 4.25 of same guidance '…*1% of critical load/level are considered by Natural England's air quality specialists (and by industry, regulators and other statutory nature conservation bodies) to be suitably precautionary, as any emissions below this level are widely considered to be imperceptible…There can therefore be a high degree of confidence in its application to screen for risks of an effect'*.

5.61 Even when the forecast dose (contribution of the plan alone or in combination with other plans and projects) exceeds 1% of the critical load or critical level, that does not necessarily mean that an adverse effect on integrity will arise, simply that Appropriate Assessment is required. Paragraph 5.28 of Natural England's guidance states '*In practice, where a site is already exceeding a relevant benchmark, the extent to which additional increments from plans and projects would undermine a conservation objective to 'restore' will involve further consideration of whether there is credible evidence that the emissions represent a real risk that the ability of other national or local measures and initiatives to otherwise reduce background levels will be compromised in a meaningful manner'*. Factors of relevance in making this judgment include the conservation objectives of the Habitats Site, location and extent of the affected area, the role that affected area plays in supporting the interest features of the

Habitats site, the role pollution might have on the ability of the affected area to support the birds or other species for which the Habitats site is designated, the relative importance of road traffic as a source of pollution in the area, and the expected pollutant trends in the future.

5.62 Each pollutant is discussed in turn below. The full results are provided in Appendix D, to assess the following three growth scenarios:

- Scenario 1: 2019 Baseline;
- Scenario 2: 2040 Do Minimum (includes growth in authorities adjoining West Suffolk, but excluding development due to the West Suffolk Local Plan); and
- Scenario 3: 2040 Do Something (includes growth in authorities adjoining West Suffolk and that allocated in the West Suffolk Local Plan).
- In addition, a hypothetical '2040 future baseline' scenario was modelled. This used the traffic data for Scenario 1 but applied appropriate improvements in emission factors and vehicle fleet changes expected to 2040. This is the expected air quality at each modelled transect in the absence of any growth.

5.63 Scenario 3 is therefore the Scenario of greatest relevance as this represents the 'in combination' scenario including both growth due to West Suffolk Local Plan and that due to all other expected traffic growth sources (including other Local Plans) over the period to 2040. The difference between Scenario 2 and Scenario 3 shows the contribution of West Suffolk Local Plan alone, while the difference between Scenario 3 and the 2040 Future Baseline shows the in combination effect of all traffic growth.

5.64 The air quality modelling undertaken for the West Suffolk Local Plan modelled a series of 200m long transects perpendicular to the road:

- A14 S1 and A304 N2 – these two transects are into Devil's Dyke SAC, one from each of the two major roads into the SAC (A14 and A304);
- A11 NE S – this transect is representative of flows on the A11 past Rex Graham Reserve SAC;
- A5 WE N, A5 WES, A1065 Eris N E, A1065 Wang N W, A1065 Wang S W and A1065 Wang S E – these transects are representative of Mildenhall Road (A1101) and the A1065 past Breckland SAC;
- A series of 19 transects (including some of those already mentioned) into Breckland SPA, representing the A1065, B1112, A11 and the various arms of the traffic island at Barton Mills Service area east of Mildenhall.

5.65 These transects are shown on mapping in Appendix D. The results are presented in full in Appendix D but are summarised for each pollutant below.

Oxides of nitrogen (NOx)

5.66 The results for NOx are presented in Table D.2.1 of Appendix D. In many instances total NOx concentrations are already below the critical level of 30 μgm^{-3}, which reflects the fact that the setting of these Habitats sites is generally rural. Under the Do Something scenario (i.e. when all expected future growth is taken into account) NOx concentrations are forecast to be well below the critical level at every point on all transects. This is because the improvements in NOx emissions between 2019 and 2040 (due to a combination of improvements in NOx emissions technology and an increasing shift to Ultra-Low Emission Vehicles such as electric vehicles in the latter part of the plan period) more than offset the increase in traffic over the same time period.

5.67 Therefore, it is considered that there will be no adverse effect on the integrity of any Habitats sites due to changes in NOx concentrations, either alone or in combination with other projects or plans.

Ammonia

5.68 The results for ammonia are presented in Table D.2.2 of Appendix D. At all points on all transects, ammonia levels exceed the lowest critical level of 1 μgm^{-3} (that established for lichens and bryophytes). This is not unusual given the rural setting of the Habitats sites (much atmospheric ammonia deriving from agriculture) and the fact that background ammonia concentrations are known to fluctuate greatly due to meteorology. Scrutiny of ammonia data from the UKEAP national ammonia monitoring network for a range of sites covering 2010-2019 shows that the normal variation in ammonia concentrations throughout a year can be as high as 3-4 $\mu g/m^3$, and even at rural sites like this one, concentrations generally fluctuate by more than 1 $\mu g/m^3$ (100% of the critical level) throughout the year. Therefore, care should be taken not to read too much into very small forecast changes in average ammonia concentration.

5.69 At Devil's Dyke SAC the 'in combination' effect from all traffic growth exceeds 1% of the lowest critical level up to 40m from the A304 and throughout the 200m transect from the A14. However, Devil's Dyke SAC is designated for its calcareous grassland sward rather than for its lichen assemblage. As such the higher critical level applicable to general vegetation (3 $\mu g/m^3$) is more appropriate and this is not exceeded beyond 15m from the A14. Moreover, the boundary of the SAC lies 130m from the A14, by which point the contribution of

West Suffolk Local Plan growth has fallen to an imperceptible < 0.008 µg/m^3, effectively zero.

5.70 For Rex Graham Reserve (transect A11 NE S), the upper critical level applicable to general vegetation (such as calcareous grassland) is not exceeded anywhere within the SAC. Moreover, the boundary of the SAC lies typically 25m from the A11, by which point the contribution of West Suffolk Local Plan growth has fallen to an imperceptible < 0.009 µg/m^3 or below, effectively zero.

5.71 For Breckland SAC (transects A5 WE N, A5 WES, A1065 Eris N E, A1065 Wang N W, A1065 Wang S W and A1065 Wang S E), a series of areas were modelled. Mildenhall Road (A1101) has significant areas of acid grassland either side of the road, which are part of Cavenham & Icklingham Heaths. For this SAC the lowest part of the critical level range is appropriate (1 µg/m^3). The in combination ammonia contribution exceeds 1% of the critical level up to 20m from the roadside, after which it becomes imperceptible[10]. As such, ammonia is forecast to be barely different with or without growth (2.01 µg/m^3 by 2040 with no traffic growth and 2.03 µg/m^3 with all forecast traffic growth) and is forecast to be lower than the baseline ammonia concentrations of 2.08 µg/m^3 (i.e. a net improvement).

5.72 The A1065 has several areas of acid grassland and/or heathland alongside it, including Wangford Warren & Carr, RAF Lakenheath, Lakenheath Warren, and Foxhole Heath. These were all modelled. Foxhole Heath lies 190m from the A1065 at its closest and at this distance no impact alone or in combination is forecast. Areas of acid grassland and heathland at RAF Lakenheath, Lakenheath Warren and Wangford Warren & Carr lie much closer to the road but at no point in the modelled transect is 'in combination' ammonia forecast to exceed 1% of the critical level.

5.73 The areas of Breckland SPA not already covered by SAC designations discussed above were also subject to modelling, particularly along the A1065 north of Mildenhall and the arms of the roundabout at Barton Mills Service Area. In these areas the upper part of the critical level range is appropriate since

[10] In other words, falls to or below 1% of the critical level. In interpreting these data reference has been made to Institute of Air Quality Management Guidance which states (paragraph 5.5.2.6) that '*In the IAQM's opinion, the 1% and 10% screening criteria should not be used rigidly and, not to a numerical precision greater than the expression of the criteria themselves. Whilst it is straightforward to generate model results for the PC to any level of precision required, the accuracy of the result is much less certain and it is unwise to place too much emphasis on whether the PC is 0.9% or 1.1%, for example'*. Therefore, results up to 1.4% of the critical level/load have been interpreted as meeting the '1% of the critical level/load threshold'.

lichens and bryophytes are not relevant to the ability of the SPA to support nightjar, woodlark, or stone curlew. In all cases, total ammonia concentrations are not forecast to exceed the critical level of 3 μg/m^3, except in a few locations immediately adjacent to the roadside. Areas immediately adjacent to the roadside are not expected to be used by any of the SPA species for nesting, and habitat structure will be of greater significance to these species than subtle changes in botanical species richness.

5.74 Therefore, it is considered that there will be no adverse effect on the integrity of any Habitats sites due to changes in ammonia concentrations, either alone or in combination with other projects or plans.

Nitrogen deposition

5.75 The results for nitrogen deposition are presented in Appendix D.2.3 of Appendix D. At all points on all transects, nitrogen deposition exceeds the critical load due to existing sources including both the road network and agriculture. This is common across much of the UK and as noted in Natural England guidance the simple fact that the critical load is already exceeded is not a basis to conclude that additional nitrogen will lead to an adverse effect on the integrity of the SACs or SPA.

5.76 The way in which the SPA birds utilise the modelled habitats, and the principal influences on habitat structure in those habitats are key to interpreting whether nitrogen deposition at Breckland SPA would affect its conservation objectives for stone curlew, nightjar or woodlark. Stone curlew in the Breckland SPA lives mainly in arable fields and in areas of short acid grassland. The former of these habitats (arable land) is not vulnerable to atmospheric nitrogen deposition since it is an artificial fertilised habitat. Two qualifying bird species in the Breckland SPA, the European nightjar and woodlark, partly depend on coniferous woodland in their life cycle. APIS identifies coniferous woodland has having a nitrogen critical load of 5-15 kg N/ha/yr but notes that the lowest part of the critical load range is only appropriate for native conifer woodland designated for its diverse lichen flora. In other circumstances, a critical load of 10kgN/ha/yr is appropriate.

5.77 The main habitat used by nightjar and woodlark in Breckland SPA is rotationally-managed conifer plantation. Nightjar and woodlark do not nest in mature permanent woodland. This is relevant because much roadside habitat within this SPA (the roadside habitat being that which will be most affected by nitrogen deposition) constitutes permanent woodland. Nightjar probably will forage within permanent woodland, and it is possible that any net increase in

nitrogen deposition might somewhat reduce the abundance of some invertebrates (such as moths) in that belt. However, nightjar do not have highly specialised foraging requirements, foraging in a wide range of common and widespread habitats well beyond the SPA wherever they can obtain a supply of insects of sufficient size including heathland, plantation woodland, deciduous woodland, rough pasture, arable field margins and gardens.

5.78 Research in Breckland Forest[11] has identified that, with regard to rotationally-managed plantation, the amount of plantation in each growth stage and (for woodlark) the planting and restock period management regime (such as whether the area was de-stumped or ploughed, and factors such as brash cover and weed control) explain the vast majority of the recorded spatial and temporal variation in nightjar and woodlark abundance. Provided these aspects of management are appropriate, other factors such as nitrogen deposition are therefore less likely to influence the achievement of biodiversity objectives for these species in rotational forestry than they do in more natural habitats. Therefore, impacts on heathland/acid grassland are most relevant to consideration of whether the ability of the SPA to achieve its Conservation Objectives will be compromised by nitrogen deposition.

5.79 Mildenhall Road (A1101) has significant areas of acid grassland either side of the road, which are part of Cavenham & Icklingham Heaths and part of both Breckland SAC and Breckland SPA. In combination nitrogen deposition is forecast to exceed 1% of the critical load throughout the 200m transect, being typically 2-3% of the critical load. However, the contribution of West Suffolk Local Plan is negligible, being 0.009 kgN/ha/yr (effectively zero) even at the roadside.

5.80 The A1065 has several areas of acid grassland and/or heathland alongside it which are all part of Breckland SAC and SPA, including Wangford Warren & Carr, RAF Lakenheath, Lakenheath Warren, and Foxhole Heath. These were all modelled. Foxhole Heath lies 190m from the A1065 at its closest and at this distance no impact alone or in combination is forecast. Areas of acid grassland and heathland at RAF Lakenheath, Lakenheath Warren and Wangford Warren & Carr lie much closer to the road but at no point in the modelled transect is ‘in combination’ nitrogen deposition forecast to exceed 1% of the critical load.

5.81 With regard to other Habitats sites, at Devil’s Dyke SAC the ‘in combination’ effect from all traffic growth on the A304 does not exceed 1% of the critical load for calcareous grassland except immediately adjacent to the roadside. For the

[11] Probably the largest commercial plantation in England. Reference: Dolman, P. and Morrison, C. (2012). *Temporal change in territory density and habitat quality for Breckland Forest SSSI woodlark and nightjar populations*. Report to Forestry Commission and Natural England, number ENV103/11/19.

A14 it does exceed 1% of the critical load throughout the 200m transect. However, by 130m from the roadside, where the SAC boundary lies, the contribution of West Suffolk Local Plan is 0.04 kgN/ha/yr (0.4% of the critical load) and a large net improvement in nitrogen deposition (more than 2.4 kgN/ha/yr) is still forecast at the SAC to 2040 even allowing for traffic growth. Without growth an improvement of 2.67 kgN/ha/yr is forecast. Therefore, the West Suffolk Local Plan would slow this rate of improvement by just 4 months, which will not materially interfere with the ability of the site to achieve its conservation objectives.

5.82 For Rex Graham Reserve (transect A11 NE S), the 'in combination' effect exceeds 1% of the critical load throughout the SAC, being a maximum of 5.8% of the critical load at the closest point to the road. However, even at the closest point to the road, the contribution of West Suffolk Local Plan growth is below 1% of the critical load. A large net improvement in nitrogen deposition (more than 4 kgN/ha/yr) is still forecast at the SAC to 2040 even allowing for traffic growth. Without growth an improvement of 4.67 kgN/ha/yr is forecast. Therefore, the West Suffolk Local Plan would slow this rate of improvement by just 5 months, which will not materially interfere with the ability of the site to achieve its conservation objectives.

5.83 Therefore, it is considered that there will be no adverse effect on the integrity of any Habitats sites due to changes in nitrogen deposition, either alone or in combination with other projects or plans.

Acid deposition

5.84 The results for acid deposition are presented in Appendix D.2.3 of Appendix D. At all points on all transects, acid deposition exceeds the critical load due to existing sources including both the road network and agriculture. This is common across much of the UK and as noted in Natural England guidance the simple fact that the critical load is already exceeded is not a basis to conclude that additional nitrogen will lead to an adverse effect on the integrity of the SACs or SPA.

5.85 The way in which the SPA birds utilise the modelled habitats, and the principal influences on habitat structure in those habitats are key to interpreting whether acid deposition at Breckland SPA would affect its conservation objectives for stone curlew, nightjar or woodlark. Stone curlew in the Breckland SPA lives mainly in arable fields and in areas of short acid grassland. The former of these habitats (arable land) is not vulnerable to atmospheric nitrogen deposition since it is an artificial fertilised habitat. As noted for nitrogen deposition, the main habitat used by nightjar and woodlark in Breckland SPA is rotationally-managed conifer plantation.

5.86 As already discussed for nitrogen deposition, the amount of plantation in each growth stage and (for woodlark) the planting and restock period management regime (such as whether the area was de-stumped or ploughed, and factors such as brash cover and weed control) explain the vast majority of the recorded spatial and temporal variation in nightjar and woodlark abundance. Provided these aspects of management are appropriate, other factors such as nitrogen deposition are therefore less likely to influence the achievement of biodiversity objectives for these species in rotational forestry than they do in more natural habitats. Therefore, atmospheric pollution impacts on heathland/acid grassland rather than rotational plantation are most relevant to consideration of whether the ability of the SPA to achieve its Conservation Objectives will be compromised by nitrogen deposition.

5.87 Mildenhall Road (A1101) has significant areas of acid grassland either side of the road, which are part of Cavenham & Icklingham Heaths and part of both Breckland SAC and Breckland SPA. In combination acid deposition is forecast to exceed 1% of the critical load throughout the 200m transect. However, the contribution of West Suffolk Local Plan is not visible in the modelling, beyond 5m from the roadside.

5.88 The A1065 has several areas of acid grassland and/or heathland alongside it which are all part of Breckland SAC and SPA, including Wangford Warren & Carr, RAF Lakenheath, Lakenheath Warren, and Foxhole Heath. These were all modelled. Foxhole Heath lies 190m from the A1065 at its closest and at this distance no impact alone or in combination is forecast. Areas of acid grassland and heathland at RAF Lakenheath, Lakenheath Warren and Wangford Warren & Carr lie much closer to the road but at no point in the modelled transect is ‘in combination’ acid deposition forecast to exceed 1% of the critical load.

5.89 With regard to other Habitats sites, at Devil’s Dyke SAC the ‘in combination’ effect from all traffic growth on the A304 does not exceed 1% of the critical load for calcareous grassland except immediately adjacent to the roadside. For the A11 it does exceed 1% of the critical load throughout the 200m transect. However, by 130m from the roadside, where the SAC boundary lies, the contribution of West Suffolk Local Plan is not visible in the modelling.

5.90 For Rex Graham Reserve (transect A11 NE S), the boundary of the SAC lies typically 25m from the A11, by which point the contribution of West Suffolk Local Plan is not visible in the modelling.

5.91 Therefore, it is considered that there will be no adverse effect on the integrity of any Habitats sites due to changes in nitrogen deposition, either alone or in combination with other projects or plans.

In Combination Assessment

5.92 Due to the nature of traffic and air quality modelling, the analysis reported above includes consideration of in combination traffic growth from other sources on the modelled road network over the Local Plan period.

Conclusion of Appropriate Assessment

5.93 It is concluded that with the mitigation included within the West Suffolk Local Plan and the commitment to produce and implement a Recreational Disturbance Avoidance and Mitigation Supplementary Planning Document or equivalent there will be no adverse effect on the integrity of any Habitats sites, either alone or in combination with other plans or projects.

Reg 19 Consultation Comments and Main Modifications

5.94 Comments were received from Natural England and other stakeholders in September and October 2024. These comments and responses are located within Appendix E and Appendix F. Where necessary this HRA report has been updated to reflect the changes required.

5.95 Additionally, AECOM undertook a Main Modifications HRA post examination in March 2025. The conclusions of this HRA stated *"Following the analysis of the proposed Main Modifications to the WSLP it can be concluded that they will not lead to likely significant effects on Habitats sites, alone or in combination with other plans and projects, and do not undermine the conclusions of the HRA of the WSLP."* Some further changes to Main Modifications were made by the Inspectors in July 2025. These have also been included. From an HRA point of view, all the modifications were minor wording changes which did not change the purpose of the policies or the conclusions of the original HRA. This HRA has been appended in Appendix G.

6. References

REF 1 - MHCLG. 2006. Planning for the Protection of European sites, Consultation Paper. Now withdrawn and archived.

REF 2 - See websites https://www.gov.uk/guidance/appropriate-assessment and https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site

REF 3 - No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

REF 4 - High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

REF 5 - Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

REF 6 - All documents available on the Planning Inspectorate website at https://infrastructure.planninginspectorate.gov.uk/projects/eastern/sunnica-energy-farm/

REF 7 - Underhill-Day, J. 2005. A literature review of urban effects on lowland heaths and their wildlife. English Nature Research Reports 623. 56pp.

REF 8 - Gilbert, O. & Bevan, D. 1997. The effect of urbanisation on ancient woodlands. *British Wildlife* 8: 213-218.

REF 9 - Woods, M. et al. 2003. Predation of wildlife by domestic cats *Felis catus* in Great Britain. *Mammal Review* 33, 2 174-188

REF 10 - Murison, G. 2007. The impact of human disturbance, urbanisation and habitat type on a Datford warbler *Sylvia undata* population. PhD Thesis, University of East Anglia.

REF 11 - Barratt, D.G. 1997. Home range size, habitat utilisation and movement patterns of suburban and farm cats *Felis catus*. *Ecography* 20 271-280.

REF 12 - Turner, D.C. & Meister, O. 1988. Hunting behaviour of the domestic cat. In: The Domestic Cat: The Biology of Its Behaviour. Ed. Turner, D.C. and Bateson, P. Cambridge University Press.

REF 13 - Kirby, J.S. & Tantrum, D.A.S. 1999. Monitoring heathland fires in Dorset: Phase 1. Terra Environmental Consultancy, Northampton.

REF 14 - Cutts, N. & Allan, J. 1999. Avifaunal Disturbance Assessment. Flood Defence Works: Saltend. Report to Environment Agency.

REF 15 - Cutts, N., Phelps, A. & Burdon, D. 2009. Construction and waterfowl: Defining sensitivity, response, impacts and guidance. Report to Humber INCA, Institute of Estuarine and Coastal Studies, University of Hull.

REF 16 - Institute of Estuarine & Costal Studies, University of Hull. 2013. Waterbird Disturbance Mitigation Toolkit – Informing estuarine planning & construction projects. 36pp.

REF 17 - Sharp, J., Clarke, R. T., Liley, D. & & Green, R. E. 2008. The effect of housing development and roads on the distribution of stone curlews in the Brecks. Unpublished report, Footprint Ecology, Wareham, Dorset.

REF 18 - Clarke, R., & Liley, D. 2013. Further assessments of the relationship between buildings and stone curlew distribution. Unpublished report by Footprint Ecology for Breckland Council

REF 19 - Liley D. 2016. Stone Curlew Buffers in the Brecks. Stone-Curlew-Buffers-in-the-Brecks-document-210716.pdf (westsuffolk.gov.uk)

REF 20 - Murison, G. 2002. The impact of human disturbance on the breeding success of nightjar Caprimulgus europaeus on heathlands in south Dorset, England. English Nature, Peterborough

REF 21 - Mallord J. 2005. Predicting the consequences of human disturbance, urbanisation and fragmentation for a woodlark Lullula arborea population. PhD Thesis, University of East Anglia, Norwich, UK.

REF 22 - Liley, D. 2005. A summary of the evidence base for disturbance effects to Annex 1 bird species on the Thames Basin Heaths & research on human access patterns to heathlands in southern England. Footprint Ecology / English Nature.

REF 23 - Mallord J.W., Dolman P.M, Brown A.F., & Sutherland W.J., 2007. Linking recreational disturbance to population size in a ground-nesting passerine. Journal of Applied Ecology, Volume 44, Issue 1

REF 24 - Langston R.H.W, Liley D., Murison G., Woodfield E. & Clarke R.T., 2007. What effects do walkers and dogs have on the distribution and productivity of breeding European Nightjar Caprimulgus europaeus? Ibis, Volume 149, Issue s1.

REF 25 - Taylor, E. C., Green, R. E. & Perrins, J. 2007. Stone-curlews Burhinus oedicnemus and recreational disturbance: developing a management tool for access. Ibis, 149, 37-44. https://cms.wiltshire.gov.uk/documents/s149212/BIO37TaylorE2006StonecurlewsBurhinusoedicnemusandhumandisturbanceeffectsonbehaviourdistributionandbr

REF 26 - Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. Mountain Research and Development 14:77-88

REF 27 - Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. Journal of Applied Ecology 32: 203-214 and Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. Journal of Applied Ecology 32: 215-224

REF 28 - Cole, D.N. 1995c. Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

REF 29 - Cole, D.N., Spildie, D.R. 1998. Hiker, horse and llama trampling effects on native vegetation in Montana, USA. Journal of Environmental Management 53: 61-71

REF 30 - Taylor K., Anderson P., Liley D. & Underhill-Day J.C. 2006. Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

REF 31 - Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. 2005. Dogs, access and nature conservation. English Nature Research Report, Peterborough.

REF 32 - Barnard A. 2003. Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* **11**:16-19.

REF 33 - Taylor K., Anderson P., Liley D. & Underhill-Day J.C. 2006. Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

REF 34- Panter, C., Liley, D., & Lowen, S. 2017. Visitor surveys at European Protected Sites across Norfolk in 2015 and 2016. Unpublished report by Footprint Ecology for Norfolk County Council.

REF 35 - Caals, Z., Shellswell, C., & Liley, D. 2023. Visitor Surveys and recreation impact assessments at selected SAC and SSSI sites in West Suffolk (726). Footprint Ecology / West Suffolk Council.

REF 36 - Saunders, P., Lake, S., Liley, D., & Panter, C. 2019. Visitor Survey of the National Trust's Wicken Fen 100 Year Vision Area (Unpublished Report 543). Footprint Ecology / National Trust.

REF 37 - Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. http://www.airquality.co.uk/archive/index.php

REF 38 - Available at TAG unit A3 environmental impact appraisal (publishing.service.gov.uk)

REF 39 - GOV.UK 2019. *Average number of trips made and distance travelled*. https://www.gov.uk/government/statistical-data-sets/nts01-average-number-of-trips-made-and-distance-travelled

REF 40 - Carlson, T.N. and Arthur, S.T., 2000. The impact of land use—land cover changes due to urbanization on surface microclimate and hydrology: a satellite perspective. Global and planetary change, 25(1-2), pp.49-65.

REF 41 - Booth, D.B., 1991. Urbanization and the natural drainage system--impacts, solutions, and prognoses.

REF 42 - Liddle, B. and Lung, S., 2010. Age-structure, urbanization, and climate change in developed countries: revisiting STIRPAT for disaggregated population and consumption-related environmental impacts. *Population and Environment*, *31*(5), pp.317-343.

REF 43 - Liddle, M.J., 1975. A selective review of the ecological effects of human trampling on natural ecosystems. *Biological Conservation*, *7*(1), pp.17-36.

REF 44 - Vangansbeke, P., Blondeel, H., Landuyt, D., De Frenne, P., Gorissen, L. and Verheyen, K., 2017. Spatially combining wood production and recreation with biodiversity conservation. *Biodiversity and conservation*, *26*(13), pp.3213-3239.

REF 45 - Morris, A., Burges, D., Fuller, R.J., Evans, A.D. and Smith, K.W., 1994. The status and distribution of Nightjars Caprimulgus europaeus in Britain in 1992. A report to the British Trust for Ornithology. *Bird study*, *41*(3), pp.181-191.

REF 46 - Natural England. 2016. Forest Heath District Council Habitats Regulations Screening Documents of the Site Allocations – Consultation Reponses Letter from Natural England.

REF 47 - Available at https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002531.pdf

REF 48 - Available at https://webarchive.nationalarchives.gov.uk/20140712233626/http://www.naturalengland.org.uk/Images/chippenham-fen-permit_tcm6-36398.pdf

REF 49 - Available at http://publications.naturalengland.org.uk/publication/4572292419944448

REF 50 - Liley D. (2016) Stone Curlew Buffers in the Brecks. https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/Stone-Curlew-Buffers-in-the-Brecks-document-210716.pdf

REF 51 - Jarvie, H. P., Neal, C., & Withers, P. J. (2006). Sewage-effluent phosphorus: a greater risk to river eutrophication than agricultural phosphorus? *Science of the total environment*, *360*(1-3), 246-253.

REF 52 - Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/637563/ALS_2017_Cam_and_Ely_Ouse.pdf

REF 53 - Litman, T. and Colman, S.B. 2001. Generated traffic: Implications for transport planning. *ITE journal*, *71*(4), pp.38-46.

REF 54 - Natural England. 2016. The ecological effects of air pollution from road transport: an updated review. Didcot: Oxfordshire

REF 55 - Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49. http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN

REF 56 - Caals Z, Shellswell C, Liley D. 2023. Visitor surveys and recreation impact assessments at selected SAC and SSSI sites in West Suffolk. Report by Footprint Ecology

REF 57 - Available at http://publications.naturalengland.org.uk/publication/4720542048845824

REF 58 - Available at http://publications.naturalengland.org.uk/publication/4749900759695360

REF 59 - Available at https://sac.jncc.gov.uk/site/UK0012882

REF 60 - Available at http://publications.naturalengland.org.uk/publication/5465193064693760

REF 61 - Available at http://publications.naturalengland.org.uk/publication/4749900759695360

REF 62 - Available at http://archive.jncc.gov.uk/pdf/RIS/UK11056.pdf

REF 63 - Available at http://publications.naturalengland.org.uk/publication/5465193064693760

REF 64 - Available at http://publications.naturalengland.org.uk/publication/6712672527581184

REF 65 - Available at https://sac.jncc.gov.uk/site/UK0014782

REF 66 - Available at http://publications.naturalengland.org.uk/publication/6024783481274368

REF 67 - Available at https://jncc.gov.uk/jncc-assets/RIS/UK11014.pdf

REF 68 - Available at http://publications.naturalengland.org.uk/publication/5870018029944832

REF 69 - Available at http://publications.naturalengland.org.uk/publication/6031209599598592

REF 70 - Available at http://publications.naturalengland.org.uk/publication/5320741566283776

REF 71 - Available at https://sac.jncc.gov.uk/site/UK0019866

REF 72 - Available at http://publications.naturalengland.org.uk/publication/5988120809963520

REF 73 - Available at http://publications.naturalengland.org.uk/publication/6145904885104640

REF 74 - Available at https://sac.jncc.gov.uk/site/UK0019865

REF 75 - Available at http://publications.naturalengland.org.uk/publication/5075188492271616

REF 76 - Available at http://publications.naturalengland.org.uk/publication/4572292419944448

REF 77 - Available at https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9009201.pdf

REF 78 - Available at http://publications.naturalengland.org.uk/publication/5075188492271616

REF 79 - Available at https://laqm.defra.gov.uk/

REF 80 - Available at https://www.aqconsultants.co.uk/resources/ammonia-emissions-from-roads-for-assessing-impacts

REF 81 - Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

REF 82 - Available at https://www.gov.uk/government/publications/transport-decarbonisation-plan/additional-information-on-assumptions-used-to-develop-decarbonising-transport-scenarios

REF 83 - DfT and DVLA. August 2023. Data and statistics about the number of licensed vehicles, new vehicle registrations and roadworthiness testing (including MOTs) https://www.gov.uk/government/collections/vehicles-statistics

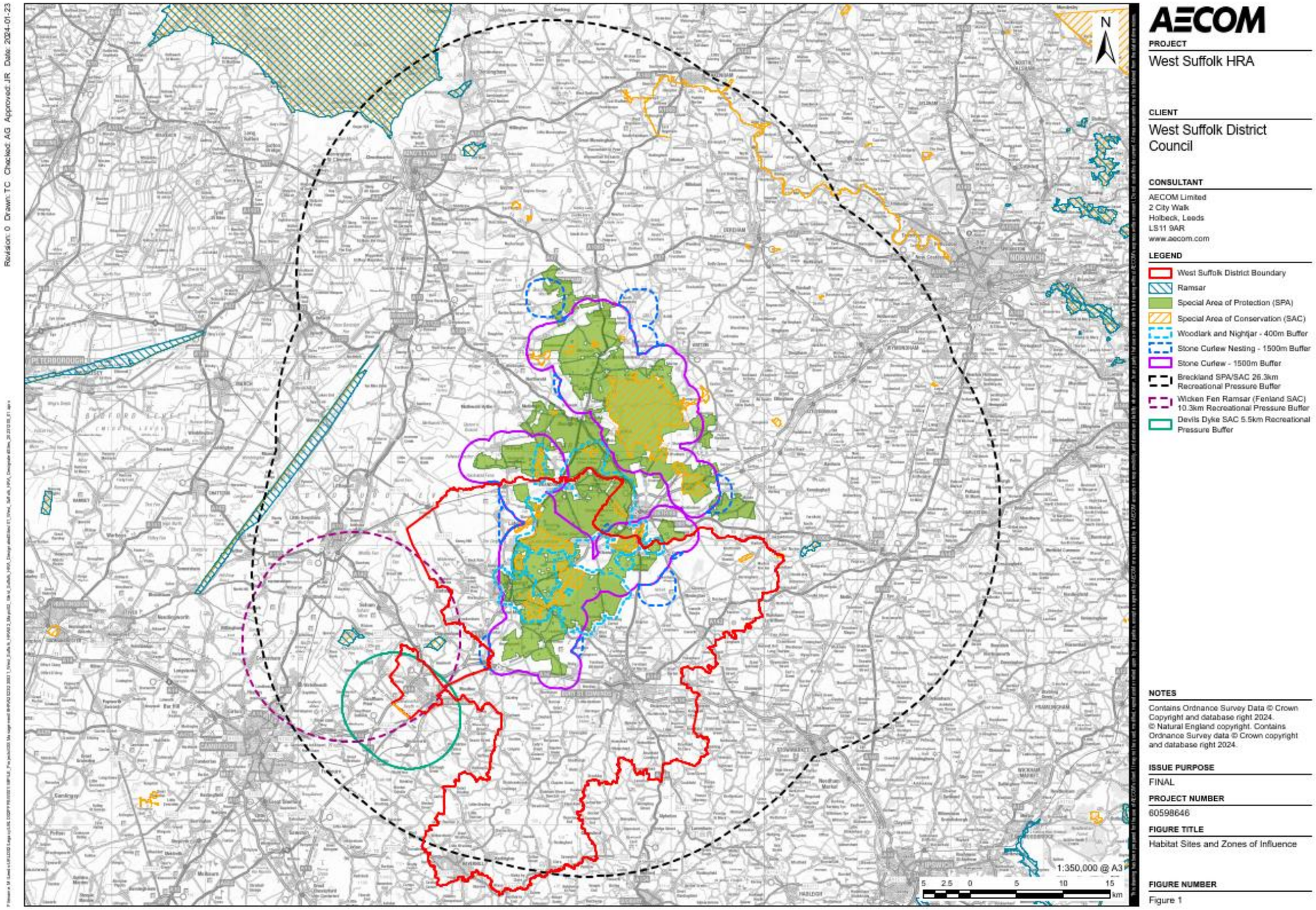
REF 84 - RAC. 2020. Average new car driven 28 miles per day https://www.racfoundation.org/media-centre/average-new-car-driven-28-miles-per-day#:~:text=Pure%20battery%20electric%20cars%20are%20driven,an%20average%20of%209%2C435%20miles%20per%20year.

REF 85 - Average Car Mileage UK. 2023. https://www.nimblefins.co.uk/cheap-car-insurance/average-car-mileage-uk

REF 86 - Available at http://www.apis.ac.uk/

REF 87 - Available at https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf

Appendix A Habitat Site Background Information



A.1 Waveney & Little Ouse Valley Fen SAC

Introduction

The Waveney and Little Ouse Valley Fens SAC consists of extensive areas of valley fens in the headwaters of both rivers on the Norfolk-Suffolk county boundary. It includes the Redgrave and South Lopham Fens Ramsar site. The SAC is composed of three component SSSIs and supports two Annex I habitats: purple moor-grass meadows, and calcium-rich fen dominated by great fen sedge (saw sedge). Weston Fen SSSI also supports the Annex II species Desmoulin's whorl snail *Vertigo moulinsiana*. The diverse geology and hydrology of the sites contributes to the diverse nature of the habitats.

Conservation Objectives [REF 58]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying Features [REF 59]

Annex I habitats that are a primary reason for selection of this site:

- Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae); and,
- Calcareous fens with Cladium mariscus and species of the Caricion davallianae (* Priority Feature).

Annex II species that are a primary reason for selection of this site:

- Desmoulin's whorl snail *Vertigo moulinsiana*.

Environmental Vulnerabilities [REF 60]

- Inappropriate scrub control
- Inappropriate water levels
- Air pollution: impact of atmospheric nitrogen deposition
- Water pollution

A.2 Redgrave and South Lopham Fens Ramsar (Part of Waveney and Little Ouse Valley Fens SAC)

Introduction

An excellent example of spring-fed lowland valley fen, exhibiting several distinct vegetation communities, supporting a diverse and well-studied invertebrate fauna. The site is one of only two British localities for the spider *Dolomedes plantarius*. Intensive arable agriculture extends to the site boundary. There is a boardwalk and a network of footpaths for visitors.

Conservation Objectives [REF 61]

Based on its designation as a part of the Waveney and Little Ouse Valley Fens SAC the conservation objectives are as follows;
With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and,

- The distribution of qualifying species within the site.

Qualifying Features [REF 62]

With regards to the site's qualification as a Ramsar it is designated under the following criterion:

Criterion 1
The site is an extensive example of spring-fed lowland base-rich valley, remarkable for its lack of fragmentation.

Criterion 2
The site supports many rare and scarce invertebrates, including a population of fen raft spider *Dolomedes plantarius.*

Criterion 3
The site supports many rare and scarce invertebrates, including a population of fen raft spider *Dolomedes plantarius.* The diversity of the site is due to the lateral and longitudinal zonation of the vegetation types characteristic of valley mires.

Environmental Vulnerabilities [REF 63]

The Ramsar site is part of the Waveney and Little Ouse Valley Fens SAC which has the following vulnerabilities:

- Inappropriate scrub control
- Inappropriate water levels
- Air pollution: impact of atmospheric nitrogen deposition
- Water pollution

A.3 Fenland SAC

Introduction

The Fenland SAC is comprised of three fenland Sites of Special Scientific Interest: Woodwalton Fen, Wicken Fen and Chippenham Fen. Each site generally consists of standing water bodies, ditch systems, bogs, marshes and broad-leaved woodland carr. The primary qualifying Fenland SAC features are the extensive examples of the tall herb-rich East Anglian type of M24 *Molinia caerulea - Cirsium dissectum* fen-meadow and the calcium-rich fen dominated by great fen-sedge *Cladium mariscus* and species of the *Caricion davallianae*. Other qualifying features, although not the primary reason of the site's SAC selection, are the presence of Annex II species; great crested newt *Triturus cristatus* and spined loach *Cobitis taenia*.

Conservation Objectives [REF 64]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying Features [REF 65]

Annex I habitats that are a primary reason for selection of this site:

- Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)
- Calcareous fens with Cladium mariscus and species of the Caricion davallianae

Annex II species present as a qualifying feature, but not a primary reason for site selection

- Spined loach *Cobitis taenia*
- Great crested newt *Triturus cristatus*

Environmental Vulnerabilities [REF 66]

- Water pollution
- Hydrological Changes
- Air pollution: impact of atmospheric nitrogen deposition

A.4 Chippenham Fens Ramsar (Part of Fenland SAC)

Introduction

The site is of international importance for its wide range of wetland habitats and associated flora, birds and insects. Areas of tall and often rich fen, fen grassland and basic flush have developed over shallow peat soils. The site also contains calcareous grassland, neutral grassland, woodland, mixed scrub and open water.

Conservation Objectives

Based on its designation as a part of the Fenland SAC the conservation objectives are as follows;

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying Features [REF 67]

With regards to the site's qualification as a Ramsar it is designated under the following criterion:

Criterion 1
A spring-fed calcareous basin mire with a long history of management, which is partly reflected in the diversity of present-day vegetation

Criterion 2
The invertebrate fauna is very rich, partly due to its transitional position between Fenland and Breckland. The species list is very long, including many rare and scarce invertebrates, characteristic of ancient fenland sites in Britain.

Criterion 3
The site supports diverse vegetation types, rare and scarce plants. The site is a strong hold of Cambridge milk parsley *Selinum carvifolia*.

Environmental Vulnerabilities

The Ramsar site is part of the Fenlands SAC which has the following vulnerabilities:

- Water pollution
- Hydrological Changes
- Air pollution: impact of atmospheric nitrogen deposition

A.5 Wicken Fen Ramsar (Part of Fenland SAC)

Introduction

This site is a marginal remnant of the original peat fenland of the East Anglian basin. It has been preserved as a flood catchment area and its water level is controlled by sluice gates. The vegetation has a strongly mosaic character due to extensive peat-cutting and different systems of crop exploitation. Areas of the site subjected to frequent cutting have a greater species diversity including many sedges, rushes, spike rushes and marsh orchids with corresponding insect associations. Vegetation invasion by bushes resulting in closed Frangula carr, has occurred in the absence of mowing. The dykes abandoned clay pits and the main lode support many aquatic angiosperms. Wildfowl interests include, mallard, teal, wigeon, shoveler, pochards and tufted duck.

Conservation Objectives

Based on its designation as a part of the Fenland SAC the conservation objectives are as follows;

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying Features

With regards to the site's qualification as a Ramsar it is designated under the following criterion:

Criterion 1

One of the most outstanding remnants of the East Anglian peat fens. The area is one of the few which has not been drained. Traditional management has created a mosaic of habitats from open water to sedge and litter fields.

Criterion 2

The site supports one species of British Red Data Book plant, fen violet *Viola persicifolia*, which survives at only two other sites in Britain. It also contains eight nationally scarce plants and 121 British Red Data Book invertebrates.

Environmental Vulnerabilities

The Ramsar site is part of the Fenlands SAC which has the following vulnerabilities:

- Water pollution
- Hydrological Changes
- Air pollution: impact of atmospheric nitrogen deposition

A.6 Devils Dyke SAC

Introduction

Devil's Dyke holds one of the best and most extensive areas of species-rich chalk grassland in Cambridgeshire. The grassland is of a type characteristic to chalklands of south, central and eastern England and represents a habitat type now very restricted in distribution and extent throughout its British range. The Dyke is an ancient linear earthwork comprising a deep ditch and high bank, originally colonised by plants from adjacent calcareous grassland. For this reason, the Dyke is important as one of the few remaining areas still supporting these relict chalkland vegetation communities, once traditionally maintained by sheep grazing.

Conservation Objectives [REF 68]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

Qualifying Features

Annex I habitats that are a primary reason for selection of this site:

- Semi-natural dry grassland and scrubland facies on calcareous substrates (Festuco-Brometalia) (*Important orchid sites)

Environmental Vulnerabilities [REF 69]

- Inappropriate scrub control
- Air: pollution: risk of atmospheric nitrogen deposition

A.7 Rex Graham Reserve SAC

Introduction

Covering approximately 2.67 hectares and situated within the Brecks National Character Area, Rex Graham Reserve comprises a small disused chalk pit, together with surrounding grassland and woodland, which supports a large number of Military orchid *Orchis militaris*. Only two other wild populations of this plant are known in the UK and the Rex Graham Reserve population is by far the largest, comprising more than 95% of the current total UK population.

The SAC sits within Thetford Forest, the largest lowland conifer forest in England, in an area where light, sandy acid and calcareous soils overlie chalk, on a gently south-facing slope in the valley of the River Lark. The digging of the pit pre-dates the planting of Thetford Forest in the 1920s and 1930s, and probably ceased to be actively worked in the early Twentieth Century. Military orchids were first found in the pit in the 1950s, and since then conservation management has maintained a high population.

The open sides and floor of the pit are covered with a mixture of plants typical of calcareous grassland and scrub transitions such as mouse-ear hawkweed *Pilosella officinarum*, twayblade *Listera ovat*a, adder's-tongue fern *Ophioglossum vulgatum*, ploughman's spikenard *Inula conyza*, mullein *Verbascum thapsus*, and hemp agrimony *Eupatorium cannabinum*. The pit also contains a large number of bushes of mezereon *Daphne mezereum* which occurs here as a wild plant.

Conservation Objectives [REF 70]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats; and
- The supporting processes on which qualifying natural habitats

Qualifying Features [REF 71]

Annex I habitats that are a primary reason for selection of this site:

- Semi-natural dry grassland and scrubland facies on calcareous substrates (Festuco-Brometalia) (*Important orchid sites)

Environmental Vulnerabilities [REF 72]

- Changes in species distribution
- Air pollution: risk of atmospheric nitrogen deposition
- Habitat fragmentation
- Deer
- Invasive species
- Public Access/ Disturbance

A.8 Breckland SAC

Conservation Objectives [REF 73]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species; and,
- The distribution of qualifying species within the site

Qualifying Features [REF 74]

Annex I habitats that are a primary reason for selection of this site:

- Inland dunes with open Corynephorus and Agrostis grasslands
- Natural eutrophic lakes with Magnopotamion or Hydrocharition – type vegetation
- European dry heaths
- Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*Important orchid sites)

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)

Annex II species present as a qualifying feature, but not a primary reason for site selection

- Great crested newt *Triturus cristatus*

Environmental Vulnerabilities [REF 75]

- Lack of ground disturbance
- Under grazing
- Forestry and woodland management
- Water pollution
- Changes in species distributions
- Stone curlew monitoring and intervention
- Planning permission: general
- Monitoring
- Air pollution: risk of atmospheric nitrogen deposition
- Public access / disturbance
- Climate change
- Inappropriate scrub control
- Inappropriate management practices
- Habitat fragmentation
- Inappropriate weed control
- Inappropriate pest control
- Inappropriate cutting / mowing

A.9 Breckland SPA

Introduction

The Breckland SPA is characterised by an extensive area of grass heath (and some heather heath), large arable fields, and the largest coniferous forest in lowland England. Together, these support over 2000 priority species, many of which are confined to the area, or have their core UK distribution there.

The SPA holds internationally important populations of Stone Curlew, Nightjar and Woodlark. Stone Curlew establishes nests on open ground provided by arable cultivation in the spring, while Woodlark and Nightjar breed in recently felled areas and open heath areas within the conifer plantations.

Conservation Objectives [REF 76]

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

- Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features; and,
- The distribution of the qualifying features within the site

Qualifying Features [REF 77]

Article 4.1 qualification 979/409/EEC) during the breeding season the area regularly supports:

- Stone curlew *Burhinus oedicnemus* (western Europe -breeding) – 60.1% of the GB breeding population 5-year peak mean (1994 – 1998)

- European nightjar *Caprimulgus europaeus* – 12.2% of the GB breeding population count as at 1998.
- Woodlark *Lullula arborea* – 28.7% if the GB breeding population count as at 1997.

Environmental Vulnerabilities [REF 78]

- Lack of ground disturbance
- Under grazing
- Forestry and woodland management
- Water pollution
- Changes in species distributions
- Stone curlew monitoring and intervention
- Planning permission: general
- Monitoring
- Air pollution: risk of atmospheric nitrogen deposition
- Public access / disturbance
- Climate change
- Inappropriate scrub control
- Inappropriate management practices
- Habitat fragmentation
- Inappropriate weed control
- Inappropriate pest control
- Inappropriate cutting / mowing

Appendix B Allocated Site Screening: Likely Significant Effects

Town/Village	Site Name	Site Description	Likely Significant Effects
Brandon	Policy AP1 – Land at Warren Close	Proposed use: Residential 0.67 ha Former library and preschool/allocated SA2(a)/ Indicative capacity: 20 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Partially within 1.5 km of stone curlew Breckland SPA habitat (urbanisation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP2 – Brandon Cemetery	Proposed use: new cemetery 0.16 ha Planning approved 2019 (DC/10/2490/FUL)	Potential LSE • Within 1.5 km of stone curlew Breckland SPA habitat (urbanisation)
Bury St Edmunds	Policy AP3 – Land North of Rougham Tower Avenue	Proposed use: Mixed use 63 ha Former airfield Indicative capacity: 500 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP4 - West Bury St. Edmunds	Proposed use: Mixed use 54.2 ha Agricultural/ Indicative capacity: 600 dwellings	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 26.3 km of woodlark/nightjar Breckland SPA habitat (recreation)
	Policy AP5 - North-east Bury St. Edmunds	Proposed use: Residential (with neighbourhood centre) 89.5 ha Agricultural Indicative capacity: 1,375 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP6 - South-east Bury St. Edmunds	Proposed use: Mixed use 75 ha Agricultural Indicative capacity: 1,250 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)

Town/Village	Site Name	Site Description	Likely Significant Effects
			• 12m north of River Lark and therefore upstream of the riverside wet woodland of Icklingham Heath in Breckland SAC.
	Policy AP7 - Land to the north of Mount Road,	Proposed use: Residential 7.9 ha Agricultural Indicative capacity: 120 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP8 – Former railway sidings	Proposed use: Residential 3.3 ha Former railway sidings Indicative capacity: 200	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
	Policy AP9 – Land West of Rougham Road	Proposed use: open space/informal recreation 15 ha	No Likely Significant Effects This allocation is for green space for informal recreation, there will be no development on the site.
	Policy AP10 – West Suffolk Hospital	Proposed use: Health Care	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP11 – West Suffolk Operational Waste Hub and Reserved Land	Proposed use: waste and associated services hub 6.4 ha	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP12 – Suffolk Business Park Extension	Proposed use: employment 72 ha	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Haverhill	Policy AP13 – North-west Haverhill	Proposed use: Mixed use 47.4 ha	No Likely Significant Effects

Town/Village	Site Name	Site Description	Likely Significant Effects
		Agricultural Indicative capacity:980 dwellings	• Small part of the site lies within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) but net new housing is to be delivered outside this zone.
	Policy AP14 – North-east Haverhill	Proposed use: Mixed use 175 ha Agricultural/ Indicative capacity: 2,500 dwellings	No Likely Significant Effects • Small part of the site lies within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) but housing within this area has already been subject to planning approval and no further planning applications are required for development in the relevant area. Coupled with the distance of this site from the SPA (on the periphery of the catchment), this development is therefore considered to be baseline for the purposes of Local Plan HRA
	Policy AP15 – Wisdom Toothbrush Factory, Colne Valley Road	Proposed use: Mixed use 1.5 ha Factory Indicative capacity: 80 dwellings	No Likely Significant Effects • Site lies beyond the 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
Mildenhall	Policy AP16 – Land west of Mildenhall	Proposed use: Mixed use 81 ha Agricultural Indicative capacity: 1,300 dwellings	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Adjacent to River Lark and therefore upstream of the riverside wet woodland of Icklingham Heath in Breckland SAC.
	Policy AP17 – College Heath Road	Proposed use: Residential 2.14 ha Council offices and residential Indicative capacity: 53 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP18 - Mildenhall Academy and Dome Leisure Centre site	Proposed use: Employment 4 ha Indicative capacity: N/A	Potential LSE • Within 1.5 km of stone curlew Breckland SPA habitat (urbanisation)

Town/Village	Site Name	Site Description	Likely Significant Effects
			• Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution in-combination) • Within 400m of woodlark/nightjar Breckland SPA habitat (urbanisation)
Newmarket	Policy AP19 – Land at Hatchfield Farm, Fordham Road	Proposed use: Mixed use 26 ha Indicative capacity: 400 dwellings and 5 ha of employment land	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 5.5 km of Devil's Dyke SAC habitat (recreation) • Within 10.3 km of Fenland SAC (Wicken Fen SSSI) habitat (recreation) • Newmarket is hydrologically connected to Chippenham and Wicken Fens (Fenland SAC) (water quality).
	Policy AP20 – Pinewood Stud	Proposed use: Residential 20 ha Horse related industry Indicative capacity: 415 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 5.5 km of Devil's Dyke SAC habitat (recreation) • Within 10.3 km of Fenland SAC (Wicken Fen SSSI) habitat (recreation) • Newmarket is hydrologically connected to Chippenham and Wicken Fens (Fenland SAC) (water quality).
	Policy AP21 – Land off High Street, Black Bear Lane and Rowley Drive	Proposed use: Residential 3.57 ha Indicative capacity: 123 dwellings	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 5.5 km of Devil's Dyke SAC habitat (recreation) • Within 10.3 km of Fenland SAC (Wicken Fen SSSI) habitat (recreation) • Newmarket is hydrologically connected to Chippenham and Wicken Fens (Fenland SAC) (water quality).

Town/Village	Site Name	Site Description	Likely Significant Effects
	Policy AP22 – Former St Felix Middle School site	Proposed use: Residential 4.5 ha Former school Indicative capacity: 50 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 5.5 km of Devil's Dyke SAC habitat (recreation) • Within 10.3 km of Fenland SAC (Wicken Fen SSSI) habitat (recreation) • Newmarket is hydrologically connected to Chippenham and Wicken Fens (Fenland SAC) (water quality).
	Policy AP23 Land adjacent to Laureate Community Primary Academy	A site as shown on the policies map, is identified for the expansion of Laureate Community Primary Academy.	Potential LSE • Newmarket is hydrologically connected to Chippenham and Wicken Fens (Fenland SAC) (water quality). The development is reserved for a primary school expansion, there is currently no development proposed on the site, merely safeguarding the land. This location is outside of the 1,500m stone curlew and does not in itself create more recreational pressure or air quality impacts.
Barrow	Policy AP24 Land at Bury Road	Proposed use: Residential 10 ha Agricultural/none Indicative capacity: 150 dwellings	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
	Policy AP25 – Land off Denham Lane	Proposed use: Residential 0.7 ha Grazing land/none Indicative capacity: 15 dwellings	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
	Policy AP26 – Land North of Barrow Primary School	Proposed use: Primary School Expansion 1 ha	No Likely Significant Effects

Town/Village	Site Name	Site Description	Likely Significant Effects
		Agricultural	The development is reserved for a primary school expansion, there is currently no development proposed on the site, merely safeguarding the land. This location is outside of the 1,500m stone curlew and does not in itself create more recreational pressure or air quality impacts.
Clare	Policy AP27 - Land north of Cavendish Road	Proposed use: Residential 2.56 ha Agricultural (arable) Indicative capacity: 53 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
	Policy AP28 - Land South of Cavendish Road	Proposed use: Residential 5.36 ha Indicative capacity: 60 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
Ixworth	Policy AP29 - Land at Bardwell Road	Proposed use: Mixed use 9.6 ha Agricultural Indicative capacity: 145 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
	Policy AP30 - Land of Crown Lane, and west of A143	Proposed use: Residential 14 ha Agricultural Indicative capacity: 145 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
Keddington	Policy AP31 – Land at junction of Hall Road and Mill Road	Proposed use: Residential 1.8 ha Agricultural/Approved 2014 (DC/14/1751/OUT), reserved matters approved 2022. Indicative capacity: 40 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
Lakenheath	Policy AP32 - Matthews Nursery, High Street	Proposed use: Mixed use 1.86 ha Vacant nursery site Indicative capacity: 28 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)

Town/Village	Site Name	Site Description	Likely Significant Effects
	Policy AP33 - Land west of Eriswell Road	Proposed use: Residential 5.45 ha Grassland/allocated SA7b Indicative capacity: 140 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 1.5 km of stone curlew habitat outside Breckland SPA (where >5 breeding attempts have been made) (functionally linked land) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP34 – Land at Rabbithill Covert	Proposed use: Residential 3.45 ha Agricultural and grassland Indicative capacity: 81 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Partially within 1.5 km of stone curlew habitat outside Breckland SPA (where >5 breeding attempts have been made) (functionally linked land) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP35 - Land north of Station Road	Proposed use: Mixed use 22.4 ha Old nursery plantation Indicative capacity: 375 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Partially within 1.5 km of stone curlew habitat outside Breckland SPA (where >5 breeding attempts have been made) (functionally-linked land) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP36 - Land off Briscoe Way	Proposed use: Residential 2.78 ha Agricultural Indicative capacity: 67 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP37 - Land North of Burrow Drive and Briscoe Way	Proposed use: Residential 9.52 ha Agricultural/none Indicative capacity: 100 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)

Town/Village	Site Name	Site Description	Likely Significant Effects
Red Lodge	Policy AP38 - Land north of Acorn Way, Red Lodge	Proposed use: Mixed use (residential, employment and school) 27.4 ha Grassland and agricultural Indicative capacity: 300 dwellings, 8 ha employment	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Partially (approx. 2.5 ha) within 1.5 km of stone curlew Breckland SPA habitat (urbanisation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP39 - Land east of Warren Road	Proposed use: Residential 5.5 ha Agricultural Indicative capacity: 140 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Partially within (approx. 3.8 ha) 1.5 km of stone curlew Breckland SPA habitat (urbanisation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution in-combination)
	Policy AP40 - Secondary School site	To cater for the projected need, a site of around 9ha to provide a secondary school will be supported. If the site falls within Breckland Special Protection Area (SPA), Special Area of Conservation (SAC), or Site of Special Scientific Interest (SSSI) impact pressure zone of influence, appropriate measures to mitigate impacts from the proposed development will be required. Any planning application will require a project level habitats regulations assessment (HRA) should the site fall within the Breckland SPA or associated buffer.	Potential LSE if the site falls within 1.5km of stone curlew SPA habitat
Stanton	Policy AP41 – Land east of Bury Road	Proposed use: Residential 10.39 ha Agricultural 200 homes	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP42 – Shepherd's Grove	Proposed use: Employment 31 ha	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Barningham	Policy AP43 – Land South of Hopton Road	Proposed use: Residential	Potential LSE

Town/Village	Site Name	Site Description	Likely Significant Effects
		2.6 ha Agricultural Indicative capacity: 37 dwellings	• Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Barningham is hydrologically connected to Waveney & Little Ouse Valley Fens SAC (water quality)
Beck Row	Policy AP44 – Land at Lamble Close	Proposed use: Residential 2.33 ha Grazing land/ Indicative capacity: 60 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP45 - Land at Rookery Drove	Proposed use: Residential 5.3 ha Grassland/none Indicative capacity: 100 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Hopton	Policy AP46- Land off Bury Road (WS110)	Proposed use: Residential 3.25 ha Agricultural/ Indicative capacity: 37 dwellings	Potential LSE • Hydrologically connected to Waveney and Little Ouse Valley Fens (water quality) – drain on southern edge of development flows into the Fen (SAC) 450m to the west of the development. • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Hundon	Policy AP47 - Land at Mill Lane	Proposed use: Residential 0.53 ha Open space/none Indicative capacity: 10 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
Moulton	Policy AP48 – Land east of School Road	Proposed use: Residential 1.78 ha Agricultural Indicative capacity: 30 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)

Town/Village	Site Name	Site Description	Likely Significant Effects
	Policy AP49 – Land north of Moulton Primary School	Proposed use: primary school expansion 0.75 ha Pasture	No Likely Significant Effect The development is reserved for a primary school expansion, there is currently no development proposed on the site, merely safeguarding the land. This location is outside of the 1,500m stone curlew and does not in itself create more recreational pressure or air quality impacts.
Rougham	Policy AP50 - Land west of Kingshall Street	Proposed use: Residential 2.68 ha Agricultural Indicative capacity: 30 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
West Row	Policy AP51 – Land east of Beeches Road	Proposed use: Residential 9.37 ha Agriculture Indicative capacity: 161 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP52 – Land west of West Row Primary School	Proposed use: primary school extension 1.13 ha Pasture	No Likely Significant Effects The development is reserved for a primary school expansion, there is currently no development proposed on the site, merely safeguarding the land. This location is outside of the 1,500m stone curlew and does not in itself create more recreational pressure or air quality impacts.
Wickhambrook	Policy AP53 – Land west of Bunters Road	Proposed use: mixed use 2.85 ha Agricultural Indicative capacity: 40 dwellings, community facilities, retail, local employment.	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
Bardwell	Policy AP54 – Land at School Lane	Proposed use: Residential 0.7 ha Agricultural Indicative capacity: 15 dwellings	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)
Barton Mills	Policy AP55 – Land east of Church Lane	Proposed use: Residential 0.4 ha Agricultural	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)

Town/Village	Site Name	Site Description	Likely Significant Effects
		Indicative capacity: 12 dwellings	• Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Chedburgh	Policy AP56 – Land at Queens Lane	Proposed use: Residential 0.6 ha Agricultural Indicative capacity: 10 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP57 - Land west of Queens Lane	Proposed use: Residential 1.5 ha Agricultural/none Indicative capacity: 12 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Fornham All Saints	Policy AP58 – Land adjacent to Moseleys Farm	Proposed use: Mixed (residential & employment) 2.5 ha Agricultural/brownfield Indicative Capacity: 10 dwellings, 0.43 ha of employment, extension to village cemetery	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Fornham St Martin	Policy AP59 - Land fronting The Street (WS082)	Proposed use: Residential 0.4 ha Grazing land/none Indicative Capacity: 10 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Freckenham	Policy AP60 - Land at north of Village Hall	Proposed use: Residential 0.7 ha Pasture Indicative capacity: 10 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution) • Within 10.3 km of Fenland SAC (Wicken Fen SSSI) habitat (recreation)
Honington and Sapiston	Policy AP61 Land north of Troston Road	Proposed use: Residential 0.6 ha Agricultural	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation)

Town/Village	Site Name	Site Description	Likely Significant Effects
		Indicative capacity: 12 dwellings	• Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP62 – Land south of Bardwell Road	Proposed use: Residential 0.6 ha Agricultural Indicative capacity: 12 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Horringer	Policy AP63 - Land off Chevington Road	Proposed use: Residential 1 ha Pasture Indicative Capacity: 10 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Ingham	Policy AP64 – Land north of Griffin Gardens	Proposed use: Residential 0.47 ha Hardstanding Indicative capacity: 10 dwellings	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
Fornham St Genevieve	Policy AP65 – Land adjacent to Park Farm	Proposed use: Employment 4.4 ha	Potential LSE • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)
	Policy AP66 – Park Farm (St Genevieve Lakes)	Proposed use: Leisure and Tourism 86 ha Former sand and gravel quarry Indicative capacity: 100 holiday lodges	Potential LSE • Within 26.3 km of woodlark/nightjar Breckland SPA habitat and Breckland SAC (recreation) • Within 10 km of SPA/SAC that is within 200 m of a main road and is potentially vulnerable to air pollution (air pollution)

Appendix C Policy Screening: Likely Significant Effect

Policy Name	Policy Description	Likely Significant Effect
SP1 – The Climate and Environment Emergency and Sustainable Development	Sets out criteria to address climate and environment emergency and strive to achieve net zero.	No Likely Significant Effects This is a development management policy which aims to address the climate and environment emergency and to achieve net zero. The policy does not have a linking impact pathway.
LP1 – Sustainable Design and Construction	Sets out criteria to ensure proposals meet sustainable design and construction requirements commensurate with the scale and location of the proposal.	No Likely Significant Effects This is a development management policy which aims to create sustainable developments. The policy does not have a linking impact pathway.
LP2 – Promoting Water and Energy Efficiency in Show Homes	Sets out that proposals of 100 dwellings or more with one or more show homes or marketing suites must be equipped with or show environmentally sustainable alternatives and educational or explanatory material including purchase prices.	No Likely Significant Effects This is a development management policy which aims to educate buyers on and promote sustainable alternatives to standard options within their homes in order to assist with reducing energy requirements for the development and the district. The policy does not have linking impact pathways
LP3 – Electric Vehicle Charing Points in New Developments	Sets out the criteria for providing smart charging facilities for plug-in electric vehicles in safe, accessible and convenient locations for all dwellings in new developments.	No Likely Significant Effects This is a development management policy which aims to provide all new dwellings with the ability to charge electric cars in a safe, accessible and convenient manner. The policy does not have linking impact pathways.
LP4 – Reducing Waste and the Circular Economy	Sets out the criteria for all developments which incorporates buildings to submit a circular economy statement with the planning application and what targets they are committing to.	No Likely Significant Effects This is a development management policy which aims to reduce demolition of existing buildings, reuse existing materials, recycle materials on site etc. The policy does not have linking impact pathways.
LP5 – Flood Risk and Sustainable Drainage	Sets out that proposals for development must be directed to the lowest risk areas for all forms of flooding ensuring that the development is safe from flooding for the life of the development and prioritise the used of sustainable drainage systems to assist with the reducing of cause and impact of flooding.	No Likely Significant Effects This is a development management and mitigation policy which aims to ensure that new developments are in areas which have an acceptably low flood risk and to ensure that sustainable drainage is prioritised within the developments. The policy does not have any negative linking impact pathways
LP6 – Water Quality and Resources	Sets out that development including conversions, changes of use and retrofitting must demonstrate that the development will not have a negative impact on water quality through pollution of surface or groundwater and that the development must demonstrate that water efficiency measures have been employed.	No Likely Significant Effects This is a development management and mitigation policy which aims to ensure no negative impacts on water quality and a reduction in water usage at new developments. The policy does not have any negative linking impact pathways
LP7 – Renewable and Low Carbon Energy	Set out the criteria that will allow proposals for renewable energy technology or the integration of renewable technology on existing or proposed structures with any associated infrastructure to be supported.	No Likely Significant Effects This is a development management and mitigation policy which aims to ensure there is either no landscape is harm or that the benefits outweigh the

Policy Name	Policy Description	Likely Significant Effect
		disbenefits by being assessed through a landscape and visual impact assessment. The policy does not have any negative linking impact pathways.
LP8 – Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards	Sets out criteria that ensures that new developments will minimise all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality. It also safeguards developments from other hazards including such as unstable land, contaminated land and storage/use of hazardous materials.	No Likely Significant Effects This is a development management policy which aims to protect developments and the environment from all forms of pollution including light, noise, unstable land, contaminated land and hazardous substances. The policy does not have linking impact pathways.
SP2 – Health and Wellbeing	Sets out that the council will work towards tackling and reducing health inequalities to enable healthy lifestyles and foster healthy, safe and cohesive communities.	No Likely Significant Effects This is a development management policy which aims to promote health and wellbeing within the districts communities, The policy does not have linking impact pathways.
LP9 – Designing for Health and Wellbeing and Impacts of New Development	Sets out that proposals for major residential and non-residential development should demonstrate through the design and access statement or a separate health and wellbeing statement how the development has been designed to assist in delivering the elements described in Strategic Policy SP2 Health and wellbeing that contribute to improving the physical and mental wellbeing of people helping them to stay well.	No Likely Significant Effects This is a development management policy which aims to promote health and wellbeing within the districts communities. The policy does not have linking impact pathways.
SP3 – Design	Sets out criteria to ensure proposals for all new development, including extensions and alterations to existing buildings, create and contribute to a high quality, safe and sustainable environment through the design of the individual buildings and development as a whole.	No Likely Significant Effects This is a development management policy which aims to create sustainable environmentally friendly developments and communities. The policy does not have linking impact pathways.
LP10 – Well-designed Places	Sets out criteria to ensure that proposals maintain or create a sense of place, have a regard to local context, be laid out to optimise amenity within streets and parking facilities and ensure that new dwellings are of high architectural quality.	No Likely Significant Effects This is a development management policy which aims to create well designed developments and communities. The policy does not have linking impact pathways.
LP11 - Masterplans	Sets out masterplan requirements for proposals where it has been identified in a site allocation policy within the Local Plan and on any site by virtue of size, location or proposed mix of uses justified by the Local Planning Authority.	No Likely Significant Effects This is a development management policy which aims to create well designed developments and communities. The policy does not have linking impact pathways.
LP12 – Design Codes	Sets out when design codes should accompany planning applications	No Likely Significant Effects This is a development management policy which aims to create well designed developments and communities. The policy does not have linking impact pathways.
SP4 – Green Infrastructure	Sets out that development should not impact the quality or quantity of existing green infrastructure, should have regard to priority areas and pursue opportunities to extend the coverage and connectivity of the strategic green	No Likely Significant Effects

Policy Name	Policy Description	Likely Significant Effect
	infrastructure network as well as providing green infrastructure within the site where dwelling numbers are over 50 or if they are if lower than 50, if they are located on greenfield sites, as well as retaining existing green features such as hedgerows and trees.	This is a development management policy which aims to protect the strategic green infrastructure network as well as promoting expansion of the network both on site and off site, improving connections to green infrastructure and protecting on site green features such as trees and hedgerows. The policy does not have linking impact pathway.
LP13 – Trees	Sets out that to conserve and enhance local distinctiveness in the landscape, trees, veteran trees, woodland, ancient woodland, and hedgerows must be protected and retained, unless it can be demonstrated that removal cannot be avoided, and appropriate mitigation or compensation can be achieved.	No Likely Significant Effects This is a development management policy which aims to protect trees, woodland and hedgerow from removal and damage where they are within the development site or within the development sites zone of influence. The policy does not have a linking impact pathway.
SP5 – Locally Valued Landscapes (LVL)	Sets out where council identified locally valued landscapes are within the district and sets out criteria to ensure the avoidance of loss of key characteristics, legibility, quality, and significance of the landscape character of these areas.	No Likely Significant Effects This is a development management policy to ensure that locally valued landscapes are not degraded by development. The policy does not have linking impact pathways.
LP14 – Landscape	Sets out that development must be informed by and sympathetic to the character of the landscape. Additionally soft landscaping proposals must respond to the challenge of biodiversity loss and climate change.	No Likely Significant Effects This is a development management policy to ensure that landscape character is protected, and landscaping promotes biodiversity, enhances biosecurity and provide resilience. This policy does not have linking impact pathways.
SP6 – Biodiversity Net Gain	Sets out that qualifying development proposals are required to achieve a biodiversity net gain of at least 10 percent, calculated using the statutory biodiversity metric.	No Likely Significant Effects This is a development management policy to ensure that there is no biodiversity loss due to developments and that there is a gain of at least 10 percent for each proposal. This policy does not have linking impact pathways.
LP15 – Biodiversity and Geodiversity	Sets out that all development must seek to protect sites designated for their biodiversity and geodiversity value, and conserve, restore and enhance important habitats (including priority habitats) and other important biodiversity features on sites or affected by developments. It also states that proposals which do not conserve and enhance biodiversity, having appropriate regard to the 'mitigation hierarchy', will be refused.	No Likely Significant Effects This is a development management policy to ensure that international, national and local sites designed for their biodiversity or geodiversity would not encounter any negative effects to the integrity of the sites. It is key to delivering the Local Plan mitigation strategy for impacts on Habitats sites. Proposals likely to cause an effect are required to undertake a Habitats Regulations Assessment to ensure that any effects are appropriately avoided or mitigated. This policy does not have any negative linking impact pathways.
LP16 – Protected Species	Sets out that development which would have an adverse impact on protected or priority species will not be permitted unless there is no alternative, and the local planning authority is satisfied suitable mitigation and/or compensation measures have been undertaken which will need to be supported by appropriate protected species surveys and ecological impact assessments.	No Likely Significant Effects This is a development management policy to ensure the protection of priority and protected species and ensure any mitigation measures are suitable to mitigate any potential impact. This policy does not have linking impact pathways.

Policy Name	Policy Description	Likely Significant Effect
SP7 – Breckland Special Protection Area and Special Area of Conservation	Sets out that a project level habitats regulations assessment (HRA) will be undertaken for all development proposals that are likely to have a significant effect on Breckland Special Protection Area (SPA) and Special Area of Conservation (SAC). Development will only be permitted where it can be demonstrated that the proposals will not adversely affect the integrity of the SPA or the SAC, either alone or in combination with other plans or projects or exceptionally where the tests set out in the Conservation of Habitats and Species Regulations (2017) (as amended) are met.	No Likely Significant Effects This is a development management and mitigation policy which requires any development within the zone of impact of the SAC and SPA to produce a HRA to ensure that there are no adverse impacts on these designated sites. It is a key part of the Local Plan mitigation strategy for Habitats sites. This policy does not have any negative linking impact pathways.
SP8 – Recreational Effects of Development	Sets out that all new development which would result in a net increase in dwellings and is likely to increase recreational pressure on any European or nationally designated site, will be required to demonstrate that adequate measures are put in place to avoid or mitigate potential adverse effects. Additionally sets out that mitigation measures are described within the West Suffolk Recreational Avoidance and Mitigation Study.	No Likely Significant Effects This is a development management and mitigation policy which aims to protect and mitigate any impacts on SPAs and SACs from increased recreational pressure through new development. It is a key part of the Local Plan mitigation strategy for Habitats sites. This policy does not have any negative linking impact pathways.
SP9 – The Spatial Strategy	Makes provision for at least 13,702 homes to be developed by 2041 needs and supporting infrastructure for the district to 2041. Sets out a hierarchy of settlements based on size and distributes this housing provision accordingly. Makes provision for 84ha of employment land. Identifies many strategic allocations for housing and employment use.	Potential Likely Significant Effects This policy makes provision for 13,702 homes, 84 ha of employment land. Without mitigation and depending on location there is potential for significant adverse effects on Habitat sites within and adjacent to the district with regards to: • Recreational pressure • Loss of functionally linked land for stone curlew, woodlark, and nightjar • Disturbance of stone curlew, woodlark, and nightjar • Air Quality • Water Quality
LP17 – Housing Settlement Boundaries	Sets out the boundaries of housing settlement areas to distinguish the extent to which residential development proposals will be supported. Residential development, conversion and replacement projects with the site boundaries will tend to be supported unless contravening other policies.	No Likely Significant Effects This policy defines the boundaries of certain settlements and does not allocate any land for development. This policy does not have linking impact pathways.
LP18 – Development in the countryside	Sets out that countryside development should be on previously developed land or land near existing settlements, be of a suitable scale to be integrated into the landscape, not have a negative impact on access without appropriate mitigation, have appropriate sustainable transport links, and maintain the distinctive character of the settlement. Policy also lists suitable purposes of countryside development.	No Likely Significant Effects This is a development management policy which seeks to protect countryside areas from and mitigate any impacts on SPAs and SACs from increased recreational pressure through new development. This policy does not have linking impact pathways.
LP19 – Business and Domestic Equine	Sets out requirements for equine developments to be supported. They must not have a negative effect on the appearance or character of the area, result in the loss of high-quality agricultural land where possible or negatively impact residential amenity. They should reuse existing builds, include appropriate landscape mitigation measures. Development should be suitable for purpose	No Likely Significant Effects

Policy Name	Policy Description	Likely Significant Effect
	including having adequate grazing and exercise land, a scheme for waste removal and have animal supervision and welfare arrangements.	This is a development management policy that seeks to ensure equine developments do not have a negative impact on other land uses. This policy does not have linking impact pathways.
SP10 – Housing Need	Policy states the housing needs of certain groups. There is an overall housing need of at least 13,702 net new homes. The affordable rental property requirement is 409 rented home per annum. A need for 36 gypsy and traveller pitches has been identified. There is a need for 30 self and custom-build plots per annum.	Potential Likely Significant Effects This policy sets out the need for at least 13,702 net new homes, as well as 36 gypsy and traveller pitches within the district over the plan period. Without mitigation and depending on location there is potential for significant adverse effects on Habitat sites within and adjacent to the district with regards to: • Recreational pressure • Loss of functionally linked land for stone curlew, woodlark, and nightjar • Disturbance of stone curlew, woodlark, and nightjar • Air Quality • Water Quality
LP20 – Affordable housing	Sets out requirements for the proportion of affordable housing available in different types of developments. Affordable housing requirements are weighted by the size of the development, the type of development and whether the development is on a greenfield or brownfield site.	No Likely Significant Effects This is a development management policy with the goal of ensuring sufficient affordable housing within the area. This policy does not have linking impact pathways.
LP21 – Housing Type and Tenure	Sets out the housing mix of affordable rental, affordable for purchase and market housing. States that all housing must meet national standards, and in line with building regulations including a share in line with ‘wheelchair user’ specifications.	No Likely Significant Effects This is a development management policy that seeks to ensure a suitable mix of affordable properties within the local plan area. This policy does not have linking impact pathways.
LP22 – Rural Exception Sites	Sets out that under specific requirements, affordable housing developments will be permitted outside of housing settlement boundaries and built-up areas. The development must adjoin the area, meet specific local needs that could not be met otherwise, be suitably sized and have adequate transport links. Occupation of the dwellings should be restricted to those who have a need for local affordable housing.	No Likely Significant Effects This is a development management policy that allows an exemption from certain other policies when there is an unmet need for local affordable housing that cannot otherwise be met. This policy does not have linking impact pathways.
LP23 – Housing Needs for Specific Groups	Sets out conditions under which housing for elderly or vulnerable groups may be constructed in areas. These include being suitably designed, having suitable amenity space, being served by sustainable transport routes and/or suitable public transport and facilities, and doesn’t lead to an overconcentration of similar accommodation in one area.	No Likely Significant Effects This is a development management policy that outline requirements for properties built to be suitable for certain vulnerable groups. This policy does not have linking impact pathways.
LP24 – Provision for Gypsies, Travellers and Travelling Show people	Sets out requirements for Gypsy and Traveller sites and sites for travelling show people. Sites must have suitable access, must be within or adjacent to a settlement, must have access to local services, proposal meets identified needs, pitches have utilities, must be safe and free of environmental hazards.	No Likely Significant Effects This is a development management policy that specifies requirements for gypsy and traveller plots. This policy does not make a specific allocation for plots. Any plots identified to be required through this policy will be required to undertake a project level HRA to determine no adverse impacts on the integrity of habitat

Policy Name	Policy Description	Likely Significant Effect
		sites prior to planning consent for the site. This policy, worded as it is, does not have linking impact pathways.
LP25 – Custom and Self Build	Sets out that self and custom build houses will be encouraged within individual plots and as part of larger developments. Councils will consider the register of people interested in self and custom builds. Sites over 100 dwellings should include 10% custom and self-build plots.	No Likely Significant Effects This is a development management policy that sets out requirements for developments and councils to make allowances for self and custom builds. This policy does not have linking impact pathways.
LP26 – Housing in the Countryside	Sets out requirements for buildings in the countryside. Developments should be within a small group of properties by an existing highway, should be small and have access to sustainable transport links. Developments must not harm the character, environment, or impact highway safety.	No Likely Significant Effects This is a development management policy that limits the ability to develop land outside of settlements in certain ways. This policy does not have linking impact pathways.
LP27 – Agricultural and Essential Workers Dwellings	Sets out requirements for new countryside developments in the vicinity of rural enterprise. There must be a business need for a full-time worker at that location, a lack of available housing, the business must be stable, the dwelling must be well designed and a suitable scale. Such dwelling should initially be covered by temporary means until proven a permanent residence is necessary.	No Likely Significant Effects This is a development management policy that controls the construction of residential property near agricultural and other rural enterprises. This policy does not have linking impact pathways.
LP28 – Residential Use of Redundant Buildings in the Countryside	Sets out requirements for the conversion of disused buildings in the countryside for residential use. Alternative uses must have been fully explored, the building must be structurally sound without need for extension of major reconstruction, the dwelling must be safe from flooding and conserve the local character.	No Likely Significant Effects This is a development management policy regarding the circumstances under which it is suitable to convert disused farm buildings into residential dwellings. This policy does not have linking impact pathways.
LP29 – Alterations and extensions to dwellings and residential annexes	Sets out conditions for alterations and extensions to dwellings and residential annexes to be constructed. Residential annexes must be of an appropriate size, have a strong connection to the main dwelling, and not negatively impact other nearby dwellings. Alterations and extensions must respect the local character, and not negatively impact other dwellings.	No Likely Significant Effects This is a development management policy regarding extensions and ancillary development of residential properties. This policy does not have linking impact pathways.
LP30 – Extensions to domestic gardens in the countryside	Sets out that domestic garden extensions will not typically be supported in the countryside. Small extensions that don't affect the character or rural amenity may be allowed if they don't lead to a loss of the best agricultural land, and don't lead to the loss of hedgerow and boundaries.	No Likely Significant Effects This is a development management policy that limits extension of gardens within the countryside. This policy does not have linking impact pathways.
SP11 – Neighbourhood plans	Sets out that neighbourhoods should produce neighbourhood plans. Additionally sets out the minimum housing requirement for each neighbourhood area.	Potential Likely Significant Effects This policy sets out the minimum required housing allocated within neighbourhood planning areas over the plan period. There is, without mitigation, dependant on location the potential for significant effects on Habitat sites with regards to: • Recreational pressure • Loss of functionally linked land for stone curlew, woodlark and nightjar • Disturbance of stone curlew, woodlark and nightjar • Air Quality

Policy Name	Policy Description	Likely Significant Effect
		• Water Quality
LP31 – Community Facilities and Services	Sets out support for community facilities and services that contribute to the quality and sustainability of communities. Proposals resulting in the loss of a community facility must demonstrate that the current use is not economically viable. It must also demonstrate that either; there is no local demand and no need for the site for alternative social or community use, or alternative facilities are available. Developers of residential schemes may be required to enhance or contribute to community services and facilities.	No Likely Significant Effects This is a development management policy that protects and enhances the provision on community services within the local plan area. This policy does not have linking impact pathways.
LP32 – Leisure and Cultural Facilities	Sets out conditions under which the development of cultural and leisure facilities will be supported. Proposals associated with existing facilities, with suitable vehicle access that are in keeping with the area will be supported. If the facilities are in the countryside, they should reuse existing buildings where possible.	No Likely Significant Effects This is a development management policy that encourages development of leisure facilities to be appropriate for purpose. This policy does not have linking impact pathways.
LP33 – Open space, sport, play and recreation facilities	Sets out support for local recreation and sports space. Development that removes recreation and sports space will not be allowed unless they prove the area is no longer required or replacement facilities and space are provided in a suitable area and of a sufficient size.	No Likely Significant Effects This is a development management policy that protects the provision of local green space and sports facilities. This policy does not have linking impact pathways.
LP34 – Allotments	Sets out that developments must preserve allotments unless they can demonstrate that there is no local demand for allotments or suitable alternative allotment provision can be identified and made available. Some developments may be required to provide additional allotments.	No Likely Significant Effects This is a development management property that ensures the continued provision of allotments to the local communities. This policy does not have linking impact pathways.
LP35 – Local Green Spaces	Sets out that green spaces identified in this local plan or in neighbourhood plans will be protected from development in line with the national planning policy framework.	No Likely Significant Effects This is a development management property which will prevent development on local green spaces. This policy does not have linking impact pathways.
SP12 – Strategic Employment	Sets out the provision of 63 ha of land for employment. The provision will be in defined general and rural employment areas and developed through proposed strategic and non-strategic site allocations. The policy lists strategic allocations of land for employment and lists the policy with specific considerations for each site. The strategic allocations allow for 84 ha of employment land to ensure the need for 63 ha can be met. Proposals for non-employment uses, will only be permitted following a review of the allocation in a subsequent local plan. The policy also protects existing general and rural employment areas from non-employment uses.	Potential Likely Significant Effects This policy sets out the need for 63 ha of employment land and allocates up to 84 ha of employment land to ensure this need is met. Dependent on the location of the employment land there is, without mitigation, a potentially significant effect with regards to: • Loss of functionally linked land for stone curlew, woodlark and nightjar • Disturbance of stone curlew, woodlark, and nightjar • Air quality
LP36 – Safeguarding Employment	Sets out that employment land and existing businesses will be safeguarded. Proposals that lose employment land will not be supported unless, the land cannot be sold for business use, sufficient other land is available for employment	No Likely Significant Effects

Policy Name	Policy Description	Likely Significant Effect
	use, existing use leads to negative environmental problems, the alternative use assists in urban regeneration, or the site is for an appropriate support facility.	This is a development management policy preventing the use of land in certain areas from non-employment uses. This policy does not have linking impact pathways.
LP37 – Farm Diversification	Sets out the criteria under which farm diversification developments will be supported. They must be a subsidiary component of the main agricultural business, be of appropriate scale and nature, re-use or adapt existing farm buildings where suitable, and have suitable road access without compromising existing highway safety.	No Likely Significant Effects This is a development management policy that sets out criteria for support for farm diversification projects. This policy does not have linking impact pathways.
LP38 – Re-use or Replacement of Buildings in the Countryside	Sets out criteria for the re-use and alteration of buildings in the countryside. The following will be permitted; appropriate office and general industrial, tourist accommodation and recreational or community facilities, where criteria are satisfied.	No Likely Significant Effects This is a development management policy that outline criteria for the development and replacement of existing buildings within the countryside. This policy has no linking impact pathways.
LP39 – Tourism Development	Sets out the criteria for tourism development. Developments must have good transport links, not negatively impact the character or appearance of the area and have sufficient vehicle parking. Larger tourist developments should focus on the larger towns. Tourism proposals within smaller settlements and the countryside must have good access to existing local community services and facilities, have no significant adverse impact on the area, and be of an appropriate scale.	Potential Likely Significant Effects Although this policy does not specify a quantum of tourism development or a location for tourism, due to the setting of the district and the zones of impact from the designated sites within and adjacent to the district, tourism facilities located in the majority of the district, especially overnight accommodation, without mitigation, could have a potential significant effect on Habitat sites on recreational pressure. This will be discussed further within the Appropriate Assessment.
SP13 – Retail and Other Complimentary Town Centre Uses	This policy defines town centres and primary shopping areas within the plan area. The policy also lists local centres and suggests area which could be new local centres. The policy sets out the core goals of several of the following local policies	No Likely Significant Effects This policy defines certain areas and does not allocate land for development. This policy does not have any linking impact pathways.
S14 – Historic Environment	Explains how the Council will balance the need for development with the proper conservation, enhancement and enjoyment of the historic environment through a positive strategy	No Likely Significant Effects This is a development management policy which presents no linking impact pathways.
LP40 – Town Centres	Set out criteria to which retail and complementary town centre uses must adhere to be supported.	No Likely Significant Effects This is a development management policy which aims to protect and enhance the vitality, viability, and overall attractiveness of the town centre. This policy does not have linking impact pathways.
LP41 – Local Centres	Sets out criteria to which retail and community services and facilities must adhere to be supported in local centres.	No Likely Significant Effects This is a development management policy which aims to protect and enhance the vitality, viability and overall attractiveness of local centres. This policy does not have linking impact pathways.

Policy Name	Policy Description	Likely Significant Effect
LP42 – Street Trading and Street Cafes	Sets out that where proposals for street trading and street cafes there must be no adverse impact on amenity, the movement and safety of pedestrians, prams wheelchairs, emergency, and any other vehicles.	No Likely Significant Effects This is a development management policy which aims to protect the amenity, safety and movement of pedestrians and vehicles where there is street trading and street cafes. This policy does not have linking impact pathways.
LP43 – Public Realm Improvements	Sets out that proposals for major development or redevelopment in the towns and key service centres will, where reasonable and necessary to the acceptability of the development, be required to provide or contribute towards public realm improvements appropriate to the scale and nature of the proposal.	No Likely Significant Effects This is a development management policy which aims to improve the public realm through contributions from developments within the area. This policy does not have linking impact pathways.
LP44 – Shop Fronts and Advertisements	Sets out that proposals to alter an existing shop front or create a new shop front, including the installation of external security measures, advertisements or canopies, or advertisements proposed in any other location, must preserve or enhance the character and appearance of the building or location of which it forms a part, and the street scene in which the proposal is located, and must not adversely affect amenity, public safety, or the character and appearance of a conservation area.	No Likely Significant Effects This is a development management policy which aims to preserve and enhance the character and appearance of buildings or locations within which they are located. This policy does not have linking impact pathways.
LP45 – Ancillary Retail Uses	Sets out criteria which extensions and/or change of use to provide ancillary retail sales facilities must adhere to.	No Likely Significant Effects This is a development management policy which aims to ensure that sale of goods at non-retail businesses remain related and subsidiary to the main activity. This policy does not have linking impact pathways.
LP46 – Horse Racing Industry Development	Sets out criteria which proposal for the development of related to the horse racing industry must adhere to.	No Likely Significant Effects This is a development management policy which aims to support the horse racing industry as well as enhancing the unique character of the surrounding landscape, while ensuring no adverse impact on local character such as loss of open space. The policy does not set out a quantum or location of development. This policy does not have linking impact pathways. Individual horse racing developments may result in likely significant effects on European sites but this will need to be assessed for each planning application as they are developed.
LP47 – Development Affecting the Horse Racing Industry	Sets out that any development within or around Newmarket which is likely to have a material adverse impact on the operational use of an existing site within the horse racing industry (such as noise, air quality, volume of traffic, loss of paddocks or other open space, horse movements, access and/or servicing requirements), or which would threaten the long term viability of the horse racing industry as a whole, will only be permitted in exceptional circumstances and where it is demonstrated the benefits would significantly outweigh the harm to the horse racing industry.	No Likely Significant Effects This is a development management policy which aims to protect existing horse racing industry development. This policy does not have linking impact pathways.
LP48 – Change of Use and Development of Horse Racing Industry Sites	Sets out conditions for the change of use of horse racing industry development to other related horse racing industry development and to uses not directly associated with the horse racing industry.	No Likely Significant Effects

Policy Name	Policy Description	Likely Significant Effect
		This is a development management policy which aims to protect existing horse racing industry development. This policy does not have linking impact pathways.
LP49 – Safeguarding Horse Walks and Crossings	Sets out that the council will prioritise the retention and improvement of existing horse walks and crossings, as shown on the proposals map, to safeguard horse movements in Newmarket.	No Likely Significant Effects This is a development management policy which aims to protect existing horse movement around horse racing related industry within Newmarket. This policy does not have linking impact pathways.
LP50 – Listed Buildings	Sets out the conditions to which proposals to alter extend or change the use of a listed building or a development which affects the listed building is affect must adhere.	No Likely Significant Effects This is a development management policy which aims to protect listed buildings. This policy does not have linking impact pathways.
LP51 – Built Non-Designated Heritage Assets	Sets out the conditions to which proposals for the alteration, extension or demolition of buildings, or structures identified (at application stage or otherwise) as being non-designated heritage assets, including those protected by an article 4 direction or subsequent legislation must adhere.	No Likely Significant Effects This is a development management policy which aims to protect non-designated heritage assets. This policy does not have linking impact pathways.
LP52 – New Uses for Historic Buildings	Sets out the conditions where proposals for the adaptation of a historic building to sustain a new use will be permitted where the proposals protect the significance of the building.	No Likely Significant Effects This is a development management policy which aims to protect historic buildings. This policy does not have linking impact pathways.
LP53 – Conservation Areas	Sets out the conditions for proposals for development within conservation areas to ensure the preservation and enhancement of the character and appearance of the conservation area	No Likely Significant Effects This is a development management policy which aims to protect conservation areas. This policy does not have linking impact pathways.
LP54 – Development Affecting Parks and Gardens of Special Historic or Design Interest	Sets out conditions where proposals for development which affect the character, or views into, within and/or out of parks and gardens of special historic or design interest must adhere.	No Likely Significant Effects This is a development management policy which aims to protect parks and gardens. This policy does not have linking impact pathways.
LP55 – Archaeology	Sets out that development will not be permitted where it is expected to have a material adverse effect on scheduled ancient monuments, designated heritage assets or other sites of similar archaeological importance, or their settings.	No Likely Significant Effects This is a development management policy which aims to protect ancient monuments or designated heritage assets or other archaeology. This policy does not have linking impact pathways.
LP56 – Conserving the Setting and Views from the Historic Core	Sets out that the council will seek to preserve or enhance the townscape and landscape setting of Bury St Edmunds Town Centre Conservation Area. Special care will be taken to ensure the setting, or views into, within and/or out of this historic centre remain unspoilt with particular regard to the vista along Abbeygate Street towards the Abbey precinct and beyond, and from the water meadows of the River Lark and River Linnet.	No Likely Significant Effects This is a development management policy which aims to protect townscape and landscape of Bury St. Edmunds Town Centre Conservation Area. This policy does not have linking impact pathways.

Policy Name	Policy Description	Likely Significant Effect
SP14 - Infrastructure	Sets out the conditions to which proposals for development will be required to retain, enhance, and provide additional infrastructure, as appropriate to the scale and location of the proposal, to mitigate the impact of development.	No Likely Significant Effects This is a development management and mitigation policy which aims to protect and improve infrastructure around the proposed development. This policy does not have negative linking impact pathways.
LP57 – Active and Sustainable Travel	Sets out that active and sustainable travel is required to be designed into development schemes from the outset and sets condition which must be adhered to.	No Likely Significant Effects This is a development management policy which aims to enhance active forms of travel, improving public transport and pedestrian links to reduce reliance on personal cars. This policy does not have linking impact pathways.
LP58 – Rights of Way	Sets out that developments must reduce the need for vehicular travel and facilitate shorter more regular trips by walking, wheeling and cycling or horse rider use, enabling sustainable modes of access, promoting access to the countryside for health and wellbeing enhancements etc.	No Likely Significant Effects This is a development management policy which aims to enhance active forms of travel, make the countryside more accessible and reduce the use of reliance on personal cars. This policy does not have linking impact pathways.
LP59 – Transport Assessments, Transport Statements and Travel Plans	Sets out that development where it is likely to have significant or complex transport implications applicants will need to submit transport assessments, or transport statements as well as a travel plan.	No Likely Significant Effects This is a development management policy which aims to reduce the disruption to existing travel infrastructure where new development is being built and ensuring the provision of sustainable transport solutions to facilitate the new and existing development. This policy does not have linking impact pathways.
LP60 – Parking Standards	Sets out that proposals will need to provide appropriately designed and sited car parking and secure cycle and two-wheeler parking as well as for visitor emergency and delivery vehicles.	No Likely Significant Effects This is a development management policy which aims to ensure appropriate parking for developments while seeking to reduce over-reliance on the car. This policy does not have linking impact pathways.
LP61 – Digital Infrastructure	Sets out condition by which developments must adhere in regard to enhancing digital infrastructure.	No Likely Significant Effects This is a development management policy which aims to ensure developments are improving digital infrastructure along with the development. This policy does not have a linking impact pathway.
SP15 – Existing Special Operational Uses	RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp military air bases are recognised for their strategic military importance to the UK. The policy identifies the sites and supports their expansion to meet their operational needs including necessary related facilities, taking into account existing constraints and statutory guidelines	Potential Likely Significant Effects Without mitigation there is the potential that expansion of the RAF bases in West Suffolk could have a significant effect on the Habitat sites within the district through • Loss of functionally linked land for stone curlew, nightjar and wood lark • Disturbance of stone curlew, nightjar and wood lark • Air quality • Water quality This will be discussed further within the Appropriate Assessment.

Appendix D Air Quality Modelling Methodology and Results

D.1 Transect maps

Figure 1 – Modelled Receptors, Road Links and Associated SAC's and SSSI's (1)

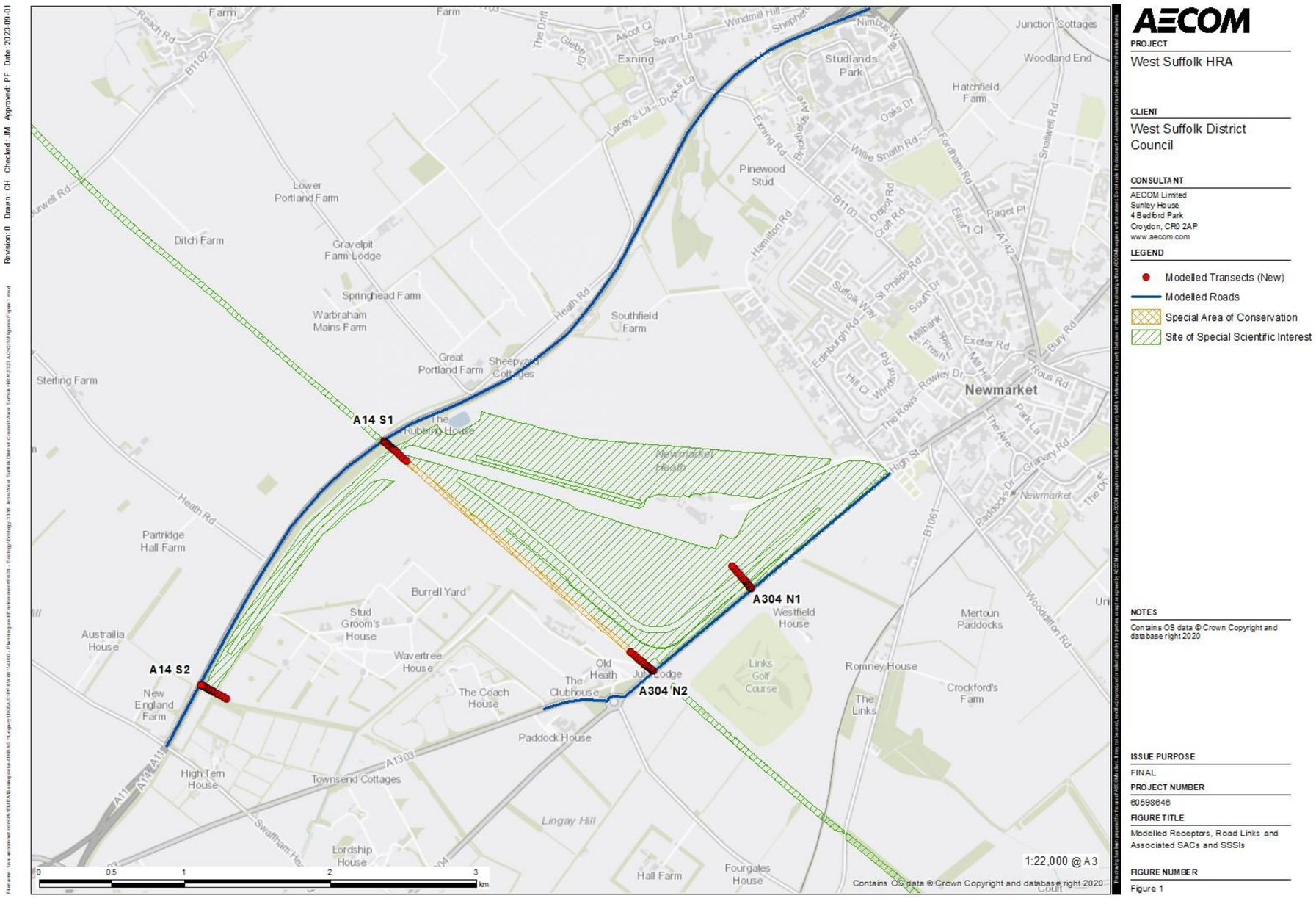


Figure 2 - Modelled Receptors, Road Links and Associated SAC's and SSSI's (2)

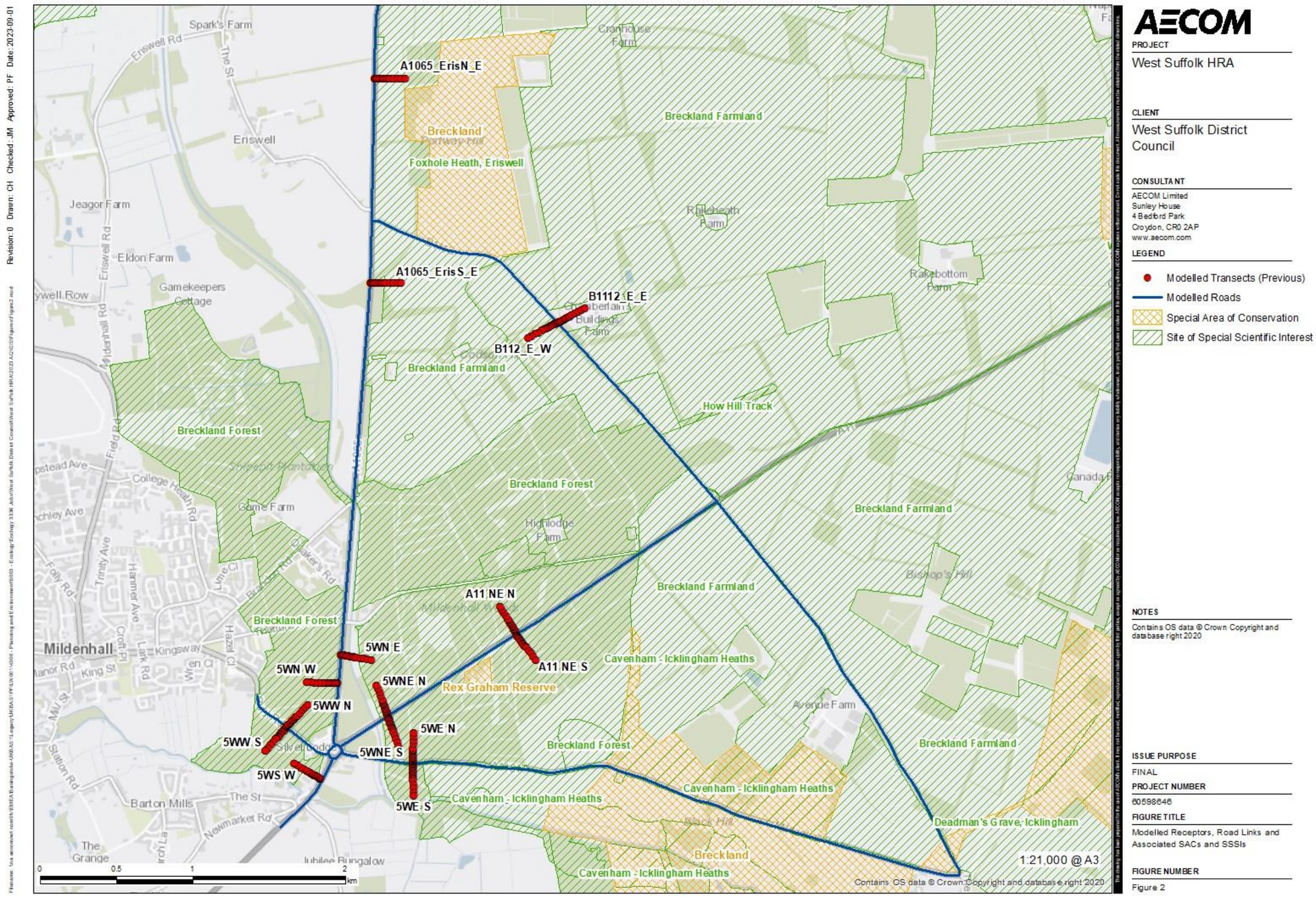
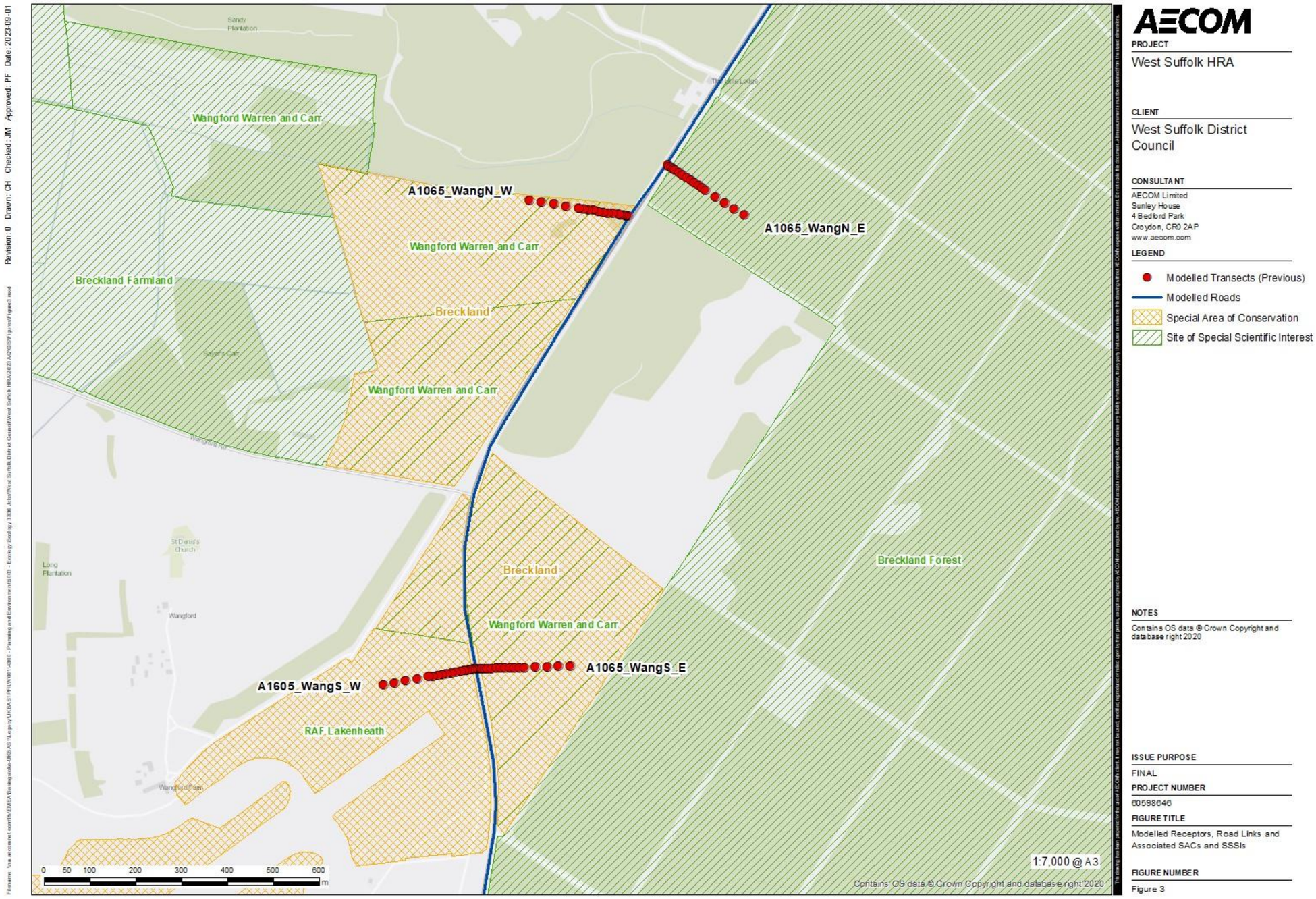


Figure 3 - Modelled Receptors, Road Links and Associated SAC's and SSSI's (3)



D.2 Modelling results

Table D.2.1 – NOx results

	Total Annual Mean NOx (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A14_S2_0	103.4	13.8	14.2	14.3	0.1	0.5
A14_S2_5	71.3	11.5	11.7	11.8	0.1	0.3
A14_S2_10	57.3	10.5	10.7	10.7	0.1	0.2
A14_S2_15	49.0	9.9	10.0	10.1	0.1	0.2
A14_S2_20	43.3	9.5	9.6	9.6	<0.1	0.2
A14_S2_30	36.0	9.0	9.0	9.1	<0.1	0.1
A14_S2_40	31.4	8.6	8.7	8.7	<0.1	0.1
A14_S2_50	28.3	8.4	8.5	8.5	<0.1	0.1
A14_S2_60	26.0	8.2	8.3	8.3	<0.1	0.1
A14_S2_70	24.2	8.1	8.2	8.2	<0.1	0.1
A14_S2_80	22.8	8.0	8.0	8.1	<0.1	0.1
A14_S2_90	21.7	7.9	8.0	8.0	<0.1	0.1
A14_S2_100	20.7	7.8	7.9	7.9	<0.1	0.1
A14_S2_125	18.9	7.7	7.8	7.8	<0.1	<0.1
A14_S2_150	17.7	7.6	7.7	7.7	<0.1	<0.1
A14_S2_175	16.7	7.6	7.6	7.6	<0.1	<0.1
A14_S2_200	16.0	7.5	7.5	7.5	<0.1	<0.1
A304_N2_0	27.5	7.8	8.0	8.0	<0.1	0.1
A304_N2_5	20.8	7.4	7.5	7.5	<0.1	0.1
A304_N2_10	17.9	7.2	7.2	7.2	<0.1	0.1
A304_N2_15	16.3	7.1	7.1	7.1	<0.1	0.1
A304_N2_20	15.2	7.0	7.0	7.0	<0.1	<0.1
A304_N2_30	13.9	6.9	6.9	6.9	<0.1	<0.1
A304_N2_40	13.1	6.8	6.9	6.9	<0.1	<0.1
A304_N2_50	12.6	6.8	6.8	6.8	<0.1	<0.1
A304_N2_60	12.2	6.8	6.8	6.8	<0.1	<0.1
A304_N2_70	11.9	6.8	6.8	6.8	<0.1	<0.1
A304_N2_80	11.7	6.7	6.8	6.8	<0.1	<0.1
A304_N2_90	11.6	6.7	6.7	6.7	<0.1	<0.1
A304_N2_100	11.4	6.7	6.7	6.7	<0.1	<0.1
A304_N2_125	11.2	6.7	6.7	6.7	<0.1	<0.1
A304_N2_150	11.0	6.7	6.7	6.7	<0.1	<0.1
A304_N2_175	10.9	6.7	6.7	6.7	<0.1	<0.1
A304_N2_200	10.8	6.7	6.7	6.7	<0.1	<0.1
A14_S1_0	97.5	13.3	13.7	13.8	0.1	0.4
A14_S1_5	69.0	11.3	11.5	11.6	0.1	0.3
A14_S1_10	56.5	10.4	10.5	10.6	0.1	0.2
A14_S1_15	48.8	9.8	10.0	10.0	0.1	0.2

	Total Annual Mean NOx (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A14_S1_20	43.4	9.4	9.6	9.6	<0.1	0.2
A14_S1_30	36.4	8.9	9.0	9.1	<0.1	0.1
A14_S1_40	32.0	8.6	8.7	8.7	<0.1	0.1
A14_S1_50	29.0	8.4	8.5	8.5	<0.1	0.1
A14_S1_60	26.8	8.2	8.3	8.3	<0.1	0.1
A14_S1_70	25.0	8.1	8.2	8.2	<0.1	0.1
A14_S1_80	23.7	8.0	8.1	8.1	<0.1	0.1
A14_S1_90	22.6	7.9	8.0	8.0	<0.1	0.1
A14_S1_100	21.6	7.9	7.9	7.9	<0.1	0.1
A14_S1_125	19.9	7.7	7.8	7.8	<0.1	0.1
A14_S1_150	18.6	7.6	7.7	7.7	<0.1	<0.1
A14_S1_175	17.7	7.6	7.6	7.6	<0.1	<0.1
A14_S1_200	16.9	7.5	7.5	7.6	<0.1	<0.1
A304_N1_0	30.0	8.1	8.2	8.2	<0.1	0.2
A304_N1_5	21.5	7.5	7.6	7.6	<0.1	0.1
A304_N1_10	18.3	7.2	7.3	7.3	<0.1	0.1
A304_N1_15	16.5	7.1	7.2	7.2	<0.1	0.1
A304_N1_20	15.3	7.0	7.1	7.1	<0.1	<0.1
A304_N1_30	14.0	6.9	7.0	7.0	<0.1	<0.1
A304_N1_40	13.2	6.9	6.9	6.9	<0.1	<0.1
A304_N1_50	12.6	6.8	6.9	6.9	<0.1	<0.1
A304_N1_60	12.3	6.8	6.8	6.8	<0.1	<0.1
A304_N1_70	12.0	6.8	6.8	6.8	<0.1	<0.1
A304_N1_80	11.8	6.8	6.8	6.8	<0.1	<0.1
A304_N1_90	11.6	6.8	6.8	6.8	<0.1	<0.1
A304_N1_100	11.5	6.8	6.8	6.8	<0.1	<0.1
A304_N1_125	11.2	6.7	6.8	6.8	<0.1	<0.1
A304_N1_150	11.0	6.7	6.7	6.7	<0.1	<0.1
A304_N1_175	10.9	6.7	6.7	6.7	<0.1	<0.1
A304_N1_200	10.8	6.7	6.7	6.7	<0.1	<0.1
5WS_W_0	50.6	9.7	10.0	10.0	0.1	0.3
5WS_W_5	36.6	8.7	8.9	8.9	<0.1	0.2
5WS_W_10	30.0	8.2	8.4	8.4	<0.1	0.1
5WS_W_15	26.4	8.0	8.1	8.1	<0.1	0.1
5WS_W_20	24.1	7.8	7.9	7.9	<0.1	0.1
5WS_W_30	20.8	7.6	7.6	7.7	<0.1	0.1
5WS_W_40	18.8	7.4	7.5	7.5	<0.1	0.1
5WS_W_50	17.6	7.4	7.4	7.4	<0.1	0.1
5WS_W_60	16.6	7.3	7.3	7.3	<0.1	0.1
5WS_W_70	15.9	7.2	7.3	7.3	<0.1	<0.1
5WS_W_80	15.3	7.2	7.2	7.2	<0.1	<0.1
5WS_W_90	14.8	7.2	7.2	7.2	<0.1	<0.1

	Total Annual Mean NOx (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WS_W_100	14.4	7.1	7.2	7.2	<0.1	<0.1
5WS_W_125	13.7	7.1	7.1	7.1	<0.1	<0.1
5WS_W_150	13.2	7.0	7.1	7.1	<0.1	<0.1
5WS_W_175	12.8	7.0	7.0	7.0	<0.1	<0.1
5WS_W_200	12.5	7.0	7.0	7.0	<0.1	<0.1
5WW_S_0	29.7	8.3	8.5	8.6	0.1	0.3
5WW_S_5	22.2	7.8	7.9	8.0	0.1	0.2
5WW_S_10	18.5	7.6	7.6	7.7	0.1	0.1
5WW_S_15	17.0	7.5	7.5	7.6	<0.1	0.1
5WW_S_20	15.9	7.4	7.4	7.5	<0.1	0.1
5WW_S_30	14.5	7.3	7.3	7.4	<0.1	0.1
5WW_S_40	13.8	7.3	7.3	7.3	<0.1	0.1
5WW_S_50	13.3	7.2	7.2	7.3	<0.1	<0.1
5WW_S_60	13.0	7.2	7.2	7.2	<0.1	<0.1
5WW_S_70	12.7	7.2	7.2	7.2	<0.1	<0.1
5WW_S_80	12.5	7.2	7.2	7.2	<0.1	<0.1
5WW_S_90	12.3	7.2	7.2	7.2	<0.1	<0.1
5WW_S_100	12.2	7.1	7.2	7.2	<0.1	<0.1
5WW_S_125	11.9	7.1	7.1	7.1	<0.1	<0.1
5WW_S_150	11.7	7.1	7.1	7.1	<0.1	<0.1
5WW_S_175	11.5	7.1	7.1	7.1	<0.1	<0.1
5WW_S_200	11.4	7.1	7.1	7.1	<0.1	<0.1
5WW_N_0	35.7	8.8	9.0	9.1	0.2	0.4
5WW_N_5	25.0	8.0	8.1	8.2	0.1	0.2
5WW_N_10	21.3	7.8	7.9	7.9	0.1	0.2
5WW_N_15	19.2	7.6	7.7	7.8	0.1	0.1
5WW_N_20	17.9	7.5	7.6	7.6	0.1	0.1
5WW_N_30	16.2	7.4	7.5	7.5	<0.1	0.1
5WW_N_40	15.2	7.4	7.4	7.4	<0.1	0.1
5WW_N_50	14.5	7.3	7.3	7.4	<0.1	0.1
5WW_N_60	14.1	7.3	7.3	7.3	<0.1	0.1
5WW_N_70	13.7	7.3	7.3	7.3	<0.1	<0.1
5WW_N_80	13.5	7.2	7.3	7.3	<0.1	<0.1
5WW_N_90	13.3	7.2	7.2	7.3	<0.1	<0.1
5WW_N_100	13.1	7.2	7.2	7.2	<0.1	<0.1
5WW_N_125	12.8	7.2	7.2	7.2	<0.1	<0.1
5WW_N_150	12.6	7.2	7.2	7.2	<0.1	<0.1
5WW_N_175	12.5	7.2	7.2	7.2	<0.1	<0.1
5WW_N_200	12.4	7.2	7.2	7.2	<0.1	<0.1
5WN_W_0	24.4	8.0	8.0	8.0	<0.1	-0.1
5WN_W_5	18.7	7.6	7.6	7.6	<0.1	<0.1
5WN_W_10	16.6	7.5	7.4	7.5	<0.1	<0.1

	Total Annual Mean NOx (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WN_W_15	15.5	7.4	7.4	7.4	<0.1	<0.1
5WN_W_20	14.7	7.3	7.3	7.3	<0.1	<0.1
5WN_W_30	13.9	7.3	7.3	7.3	<0.1	<0.1
5WN_W_40	13.3	7.2	7.2	7.2	<0.1	<0.1
5WN_W_50	13.0	7.2	7.2	7.2	<0.1	<0.1
5WN_W_60	12.8	7.2	7.2	7.2	<0.1	<0.1
5WN_W_70	12.6	7.2	7.2	7.2	<0.1	<0.1
5WN_W_80	12.4	7.2	7.2	7.2	<0.1	<0.1
5WN_W_90	12.3	7.2	7.2	7.2	<0.1	<0.1
5WN_W_100	12.2	7.1	7.2	7.2	<0.1	<0.1
5WN_W_125	12.0	7.1	7.1	7.1	<0.1	<0.1
5WN_W_150	11.9	7.1	7.1	7.1	<0.1	<0.1
5WN_W_175	11.8	7.1	7.1	7.1	<0.1	<0.1
5WN_W_200	11.7	7.1	7.1	7.1	<0.1	<0.1
5WE_N_0	16.0	7.0	7.1	7.1	<0.1	0.1
5WE_N_5	14.3	6.9	7.0	7.0	<0.1	<0.1
5WE_N_10	13.5	6.9	6.9	6.9	<0.1	<0.1
5WE_N_15	13.0	6.8	6.9	6.9	<0.1	<0.1
5WE_N_20	12.7	6.8	6.8	6.8	<0.1	<0.1
5WE_N_30	12.3	6.8	6.8	6.8	<0.1	<0.1
5WE_N_40	12.1	6.8	6.8	6.8	<0.1	<0.1
5WE_N_50	11.9	6.8	6.8	6.8	<0.1	<0.1
5WE_N_60	11.8	6.7	6.8	6.8	<0.1	<0.1
5WE_N_70	11.8	6.7	6.8	6.8	<0.1	<0.1
5WE_N_80	11.8	6.7	6.8	6.8	<0.1	<0.1
5WE_N_90	11.8	6.7	6.8	6.8	<0.1	<0.1
5WE_N_100	11.8	6.7	6.8	6.8	<0.1	<0.1
5WE_N_125	11.8	6.7	6.8	6.8	<0.1	<0.1
5WE_N_150	11.9	6.8	6.8	6.8	<0.1	<0.1
5WE_N_175	12.0	6.8	6.8	6.8	<0.1	<0.1
5WE_N_200	12.2	6.8	6.8	6.8	<0.1	<0.1
5WE_S_0	13.7	6.9	6.9	6.9	<0.1	<0.1
5WE_S_5	12.8	6.8	6.8	6.8	<0.1	<0.1
5WE_S_10	12.3	6.8	6.8	6.8	<0.1	<0.1
5WE_S_15	11.9	6.8	6.8	6.8	<0.1	<0.1
5WE_S_20	11.7	6.7	6.8	6.8	<0.1	<0.1
5WE_S_30	11.4	6.7	6.7	6.7	<0.1	<0.1
5WE_S_40	11.3	6.7	6.7	6.7	<0.1	<0.1
5WE_S_50	11.1	6.7	6.7	6.7	<0.1	<0.1
5WE_S_60	11.0	6.7	6.7	6.7	<0.1	<0.1
5WE_S_70	10.9	6.7	6.7	6.7	<0.1	<0.1
5WE_S_80	10.9	6.7	6.7	6.7	<0.1	<0.1

	Total Annual Mean NOx (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WE_S_90	10.8	6.7	6.7	6.7	<0.1	<0.1
5WE_S_100	10.8	6.7	6.7	6.7	<0.1	<0.1
5WE_S_125	10.7	6.7	6.7	6.7	<0.1	<0.1
5WE_S_150	10.6	6.7	6.7	6.7	<0.1	<0.1
5WE_S_175	10.5	6.7	6.7	6.7	<0.1	<0.1
5WE_S_200	10.4	6.7	6.7	6.7	<0.1	<0.1
A11_NE_N_0	49.3	9.1	9.5	9.6	0.1	0.4
A11_NE_N_5	35.9	8.3	8.5	8.6	<0.1	0.3
A11_NE_N_10	30.4	7.9	8.1	8.2	<0.1	0.2
A11_NE_N_15	26.0	7.6	7.8	7.8	<0.1	0.2
A11_NE_N_20	23.6	7.5	7.6	7.7	<0.1	0.2
A11_NE_N_30	20.4	7.3	7.4	7.4	<0.1	0.1
A11_NE_N_40	18.6	7.2	7.3	7.3	<0.1	0.1
A11_NE_N_50	17.2	7.1	7.2	7.2	<0.1	0.1
A11_NE_N_60	16.2	7.0	7.1	7.1	<0.1	0.1
A11_NE_N_70	15.4	7.0	7.0	7.0	<0.1	0.1
A11_NE_N_80	14.9	6.9	7.0	7.0	<0.1	0.1
A11_NE_N_90	14.4	6.9	6.9	7.0	<0.1	0.1
A11_NE_N_100	14.0	6.9	6.9	6.9	<0.1	0.1
A11_NE_N_125	13.2	6.8	6.9	6.9	<0.1	<0.1
A11_NE_N_150	12.7	6.8	6.8	6.8	<0.1	<0.1
A11_NE_N_175	12.3	6.8	6.8	6.8	<0.1	<0.1
A11_NE_N_200	12.0	6.7	6.8	6.8	<0.1	<0.1
A11_NE_S_0	44.3	8.8	9.1	9.2	0.1	0.4
A11_NE_S_5	33.7	8.1	8.4	8.4	<0.1	0.3
A11_NE_S_10	28.0	7.8	8.0	8.0	<0.1	0.2
A11_NE_S_15	24.7	7.6	7.7	7.7	<0.1	0.2
A11_NE_S_20	22.4	7.4	7.5	7.6	<0.1	0.1
A11_NE_S_30	19.5	7.2	7.3	7.3	<0.1	0.1
A11_NE_S_40	17.7	7.1	7.2	7.2	<0.1	0.1
A11_NE_S_50	16.4	7.0	7.1	7.1	<0.1	0.1
A11_NE_S_60	15.5	7.0	7.0	7.0	<0.1	0.1
A11_NE_S_70	14.8	6.9	7.0	7.0	<0.1	0.1
A11_NE_S_80	14.3	6.9	6.9	7.0	<0.1	0.1
A11_NE_S_90	13.9	6.9	6.9	6.9	<0.1	0.1
A11_NE_S_100	13.5	6.8	6.9	6.9	<0.1	<0.1
A11_NE_S_125	12.8	6.8	6.8	6.8	<0.1	<0.1
A11_NE_S_150	12.4	6.8	6.8	6.8	<0.1	<0.1
A11_NE_S_175	12.0	6.7	6.8	6.8	<0.1	<0.1
A11_NE_S_200	11.7	6.7	6.8	6.8	<0.1	<0.1
B1112_E_W_0	13.2	6.7	6.8	6.9	<0.1	0.1
B1112_E_W_5	11.6	6.6	6.7	6.7	<0.1	0.1

	Total Annual Mean NOx (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
B1112_E_W_10	10.9	6.6	6.6	6.6	<0.1	0.1
B1112_E_W_15	10.6	6.6	6.6	6.6	<0.1	<0.1
B1112_E_W_20	10.4	6.6	6.6	6.6	<0.1	<0.1
B1112_E_W_30	10.1	6.5	6.6	6.6	<0.1	<0.1
B1112_E_W_40	10.0	6.5	6.6	6.6	<0.1	<0.1
B1112_E_W_50	9.9	6.5	6.5	6.5	<0.1	<0.1
B1112_E_W_60	9.9	6.5	6.5	6.5	<0.1	<0.1
B1112_E_W_70	9.8	6.5	6.5	6.5	<0.1	<0.1
B1112_E_W_80	9.8	6.5	6.5	6.5	<0.1	<0.1
B1112_E_W_90	9.8	6.5	6.5	6.5	<0.1	<0.1
B1112_E_W_100	9.7	6.5	6.5	6.5	<0.1	<0.1
B1112_E_W_125	9.7	6.5	6.5	6.5	<0.1	<0.1
B1112_E_W_150	9.7	6.5	6.5	6.5	<0.1	<0.1
B1112_E_W_175	9.6	6.5	6.5	6.5	<0.1	<0.1
B1112_E_W_200	9.6	6.5	6.5	6.5	<0.1	<0.1
B1112_E_E_0	14.4	6.8	6.9	7.0	0.1	0.2
B1112_E_E_5	12.3	6.7	6.8	6.8	<0.1	0.1
B1112_E_E_10	11.5	6.6	6.7	6.7	<0.1	0.1
B1112_E_E_15	11.1	6.6	6.6	6.7	<0.1	0.1
B1112_E_E_20	10.8	6.6	6.6	6.6	<0.1	0.1
B1112_E_E_30	10.4	6.6	6.6	6.6	<0.1	<0.1
B1112_E_E_40	10.2	6.5	6.6	6.6	<0.1	<0.1
B1112_E_E_50	10.1	6.5	6.6	6.6	<0.1	<0.1
B1112_E_E_60	10.0	6.5	6.6	6.6	<0.1	<0.1
B1112_E_E_70	9.9	6.5	6.5	6.6	<0.1	<0.1
B1112_E_E_80	9.9	6.5	6.5	6.5	<0.1	<0.1
B1112_E_E_90	9.8	6.5	6.5	6.5	<0.1	<0.1
B1112_E_E_100	9.8	6.5	6.5	6.5	<0.1	<0.1
B1112_E_E_125	9.7	6.5	6.5	6.5	<0.1	<0.1
B1112_E_E_150	9.7	6.5	6.5	6.5	<0.1	<0.1
B1112_E_E_175	9.7	6.5	6.5	6.5	<0.1	<0.1
B1112_E_E_200	9.6	6.5	6.5	6.5	<0.1	<0.1
A1065_WangN_W_0	29.2	7.7	7.7	7.7	<0.1	<0.1
A1065_WangN_W_5	19.4	7.0	7.0	7.0	<0.1	<0.1
A1065_WangN_W_10	16.0	6.7	6.7	6.7	<0.1	<0.1
A1065_WangN_W_15	14.0	6.5	6.6	6.6	<0.1	<0.1
A1065_WangN_W_20	13.1	6.5	6.5	6.5	<0.1	<0.1
A1065_WangN_W_30	11.6	6.4	6.4	6.4	<0.1	<0.1
A1065_WangN_W_40	10.9	6.3	6.3	6.3	<0.1	<0.1
A1065_WangN_W_50	10.5	6.3	6.3	6.3	<0.1	<0.1
A1065_WangN_W_60	10.1	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_W_70	9.8	6.2	6.2	6.2	<0.1	<0.1

	Total Annual Mean NOx (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A1065_WangN_W_80	9.7	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_W_90	9.5	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_W_100	9.4	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_W_125	9.1	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_W_150	9.0	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_W_175	8.9	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_W_200	8.8	6.1	6.1	6.1	<0.1	<0.1
A1065_WangN_E_0	28.8	7.7	7.7	7.7	<0.1	<0.1
A1065_WangN_E_5	20.2	7.0	7.0	7.0	<0.1	<0.1
A1065_WangN_E_10	16.1	6.7	6.7	6.7	<0.1	<0.1
A1065_WangN_E_15	14.3	6.6	6.6	6.6	<0.1	<0.1
A1065_WangN_E_20	13.2	6.5	6.5	6.5	<0.1	<0.1
A1065_WangN_E_30	12.0	6.4	6.4	6.4	<0.1	<0.1
A1065_WangN_E_40	11.2	6.3	6.3	6.3	<0.1	<0.1
A1065_WangN_E_50	10.7	6.3	6.3	6.3	<0.1	<0.1
A1065_WangN_E_60	10.3	6.3	6.3	6.3	<0.1	<0.1
A1065_WangN_E_70	10.1	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_E_80	9.8	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_E_90	9.7	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_E_100	9.5	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_E_125	9.3	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_E_150	9.1	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_E_175	9.0	6.2	6.2	6.2	<0.1	<0.1
A1065_WangN_E_200	8.9	6.2	6.2	6.2	<0.1	<0.1
A1065_WangS_E_0	21.9	7.1	7.1	7.1	<0.1	<0.1
A1065_WangS_E_5	16.4	6.7	6.7	6.7	<0.1	<0.1
A1065_WangS_E_10	14.5	6.5	6.5	6.5	<0.1	<0.1
A1065_WangS_E_15	12.9	6.4	6.4	6.4	<0.1	<0.1
A1065_WangS_E_20	12.1	6.3	6.3	6.3	<0.1	<0.1
A1065_WangS_E_30	11.1	6.2	6.2	6.2	<0.1	<0.1
A1065_WangS_E_40	10.5	6.2	6.2	6.2	<0.1	<0.1
A1065_WangS_E_50	10.1	6.2	6.2	6.2	<0.1	<0.1
A1065_WangS_E_60	9.8	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_E_70	9.6	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_E_80	9.4	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_E_90	9.3	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_E_100	9.2	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_E_125	9.0	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_E_150	8.9	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_E_175	8.8	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_E_200	8.7	6.0	6.0	6.0	<0.1	<0.1
A1065_ErisN_E_0	27.8	7.6	7.6	7.6	<0.1	<0.1

	Total Annual Mean NOx (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A1065_ErisN_E_5	19.0	7.0	7.0	7.0	<0.1	<0.1
A1065_ErisN_E_10	16.0	6.8	6.8	6.8	<0.1	<0.1
A1065_ErisN_E_15	14.3	6.6	6.6	6.6	<0.1	<0.1
A1065_ErisN_E_20	13.3	6.6	6.6	6.6	<0.1	<0.1
A1065_ErisN_E_30	12.1	6.5	6.5	6.5	<0.1	<0.1
A1065_ErisN_E_40	11.4	6.4	6.4	6.4	<0.1	<0.1
A1065_ErisN_E_50	10.9	6.4	6.4	6.4	<0.1	<0.1
A1065_ErisN_E_60	10.6	6.4	6.4	6.4	<0.1	<0.1
A1065_ErisN_E_70	10.3	6.3	6.3	6.3	<0.1	<0.1
A1065_ErisN_E_80	10.1	6.3	6.3	6.3	<0.1	<0.1
A1065_ErisN_E_90	10.0	6.3	6.3	6.3	<0.1	<0.1
A1065_ErisN_E_100	9.9	6.3	6.3	6.3	<0.1	<0.1
A1065_ErisN_E_125	9.6	6.3	6.3	6.3	<0.1	<0.1
A1065_ErisN_E_150	9.5	6.3	6.3	6.3	<0.1	<0.1
A1065_ErisN_E_175	9.4	6.3	6.3	6.3	<0.1	<0.1
A1065_ErisN_E_200	9.3	6.3	6.3	6.3	<0.1	<0.1
A1065_ErisS_E_0	28.2	7.7	7.7	7.8	<0.1	<0.1
A1065_ErisS_E_5	19.9	7.1	7.1	7.2	<0.1	<0.1
A1065_ErisS_E_10	16.7	6.9	6.9	6.9	<0.1	<0.1
A1065_ErisS_E_15	15.0	6.8	6.8	6.8	<0.1	<0.1
A1065_ErisS_E_20	14.0	6.7	6.7	6.7	<0.1	<0.1
A1065_ErisS_E_30	12.7	6.6	6.6	6.6	<0.1	<0.1
A1065_ErisS_E_40	11.9	6.6	6.6	6.6	<0.1	<0.1
A1065_ErisS_E_50	11.4	6.5	6.5	6.5	<0.1	<0.1
A1065_ErisS_E_60	11.1	6.5	6.5	6.5	<0.1	<0.1
A1065_ErisS_E_70	10.8	6.5	6.5	6.5	<0.1	<0.1
A1065_ErisS_E_80	10.6	6.5	6.5	6.5	<0.1	<0.1
A1065_ErisS_E_90	10.5	6.5	6.5	6.5	<0.1	<0.1
A1065_ErisS_E_100	10.3	6.5	6.5	6.5	<0.1	<0.1
A1065_ErisS_E_125	10.1	6.4	6.4	6.4	<0.1	<0.1
A1065_ErisS_E_150	9.9	6.4	6.4	6.4	<0.1	<0.1
A1065_ErisS_E_175	9.8	6.4	6.4	6.4	<0.1	<0.1
A1065_ErisS_E_200	9.7	6.4	6.4	6.4	<0.1	<0.1
A1065_WangS_W_0	19.9	6.9	6.9	6.9	<0.1	<0.1
A1065_WangS_W_5	14.8	6.5	6.5	6.5	<0.1	<0.1
A1065_WangS_W_10	12.9	6.4	6.4	6.4	<0.1	<0.1
A1065_WangS_W_15	11.9	6.3	6.3	6.3	<0.1	<0.1
A1065_WangS_W_20	11.2	6.3	6.2	6.2	<0.1	<0.1
A1065_WangS_W_30	10.5	6.2	6.2	6.2	<0.1	<0.1
A1065_WangS_W_40	10.0	6.2	6.1	6.1	<0.1	<0.1
A1065_WangS_W_50	9.7	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_W_60	9.5	6.1	6.1	6.1	<0.1	<0.1

	Total Annual Mean NOx (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A1065_WangS_W_70	9.3	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_W_80	9.2	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_W_90	9.1	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_W_100	9.0	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_W_125	8.8	6.1	6.1	6.1	<0.1	<0.1
A1065_WangS_W_150	8.7	6.0	6.0	6.0	<0.1	<0.1
A1065_WangS_W_175	8.6	6.0	6.0	6.0	<0.1	<0.1
A1065_WangS_W_200	8.6	6.0	6.0	6.0	<0.1	<0.1
5WNE_N_0	44.8	9.0	9.3	9.4	0.1	0.4
5WNE_N_5	33.1	8.2	8.4	8.5	<0.1	0.3
5WNE_N_10	29.0	7.9	8.1	8.1	<0.1	0.2
5WNE_N_15	25.4	7.7	7.8	7.9	<0.1	0.2
5WNE_N_20	23.0	7.5	7.6	7.7	<0.1	0.2
5WNE_N_30	20.3	7.3	7.4	7.4	<0.1	0.1
5WNE_N_40	18.3	7.2	7.3	7.3	<0.1	0.1
5WNE_N_50	17.2	7.1	7.2	7.2	<0.1	0.1
5WNE_N_60	16.3	7.1	7.1	7.1	<0.1	0.1
5WNE_N_70	15.5	7.0	7.1	7.1	<0.1	0.1
5WNE_N_80	15.0	7.0	7.0	7.0	<0.1	0.1
5WNE_N_90	14.5	6.9	7.0	7.0	<0.1	0.1
5WNE_N_100	14.2	6.9	6.9	7.0	<0.1	<0.1
5WNE_N_125	13.5	6.9	6.9	6.9	<0.1	<0.1
5WNE_N_150	13.0	6.8	6.9	6.9	<0.1	<0.1
5WNE_N_175	12.6	6.8	6.8	6.8	<0.1	<0.1
5WNE_N_200	12.4	6.8	6.8	6.8	<0.1	<0.1
5WNE_S_0	41.5	8.8	9.1	9.1	0.1	0.4
5WNE_S_5	30.8	8.0	8.2	8.3	<0.1	0.2
5WNE_S_10	27.0	7.8	8.0	8.0	<0.1	0.2
5WNE_S_15	23.8	7.6	7.7	7.7	<0.1	0.2
5WNE_S_20	21.7	7.4	7.5	7.6	<0.1	0.1
5WNE_S_30	19.2	7.3	7.3	7.4	<0.1	0.1
5WNE_S_40	17.5	7.1	7.2	7.2	<0.1	0.1
5WNE_S_50	16.5	7.1	7.1	7.1	<0.1	0.1
5WNE_S_60	15.7	7.0	7.1	7.1	<0.1	0.1
5WNE_S_70	15.0	7.0	7.0	7.0	<0.1	0.1
5WNE_S_80	14.6	6.9	7.0	7.0	<0.1	0.1
5WNE_S_90	14.1	6.9	6.9	7.0	<0.1	<0.1
5WNE_S_100	13.8	6.9	6.9	6.9	<0.1	<0.1
5WNE_S_125	13.2	6.8	6.9	6.9	<0.1	<0.1
5WNE_S_150	12.8	6.8	6.8	6.8	<0.1	<0.1
5WNE_S_175	12.5	6.8	6.8	6.8	<0.1	<0.1
5WNE_S_200	12.3	6.8	6.8	6.8	<0.1	<0.1

	Total Annual Mean NOx (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WN_E_0	25.8	8.1	8.0	8.0	<0.1	-0.1
5WN_E_5	19.4	7.7	7.6	7.6	<0.1	<0.1
5WN_E_10	17.0	7.5	7.5	7.5	<0.1	<0.1
5WN_E_15	15.7	7.4	7.4	7.4	<0.1	<0.1
5WN_E_20	14.9	7.3	7.3	7.3	<0.1	<0.1
5WN_E_30	13.9	7.3	7.3	7.3	<0.1	<0.1
5WN_E_40	13.4	7.2	7.2	7.2	<0.1	<0.1
5WN_E_50	13.0	7.2	7.2	7.2	<0.1	<0.1
5WN_E_60	12.8	7.2	7.2	7.2	<0.1	<0.1
5WN_E_70	12.6	7.2	7.2	7.2	<0.1	<0.1
5WN_E_80	12.4	7.2	7.2	7.2	<0.1	<0.1
5WN_E_90	12.3	7.2	7.2	7.2	<0.1	<0.1
5WN_E_100	12.2	7.1	7.2	7.2	<0.1	<0.1
5WN_E_125	12.1	7.1	7.1	7.2	<0.1	<0.1
5WN_E_150	12.0	7.1	7.1	7.1	<0.1	<0.1
5WN_E_175	12.0	7.1	7.1	7.1	<0.1	<0.1
5WN_E_200	12.0	7.1	7.1	7.1	<0.1	<0.1

Table D.2.2 – Ammonia (NH_3) results

	Total Annual Mean NH_3 (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A14_S2_0	5.8	4.8	5.1	5.2	0.1	0.4
A14_S2_5	4.3	3.7	3.9	3.9	<0.1	0.3
A14_S2_10	3.7	3.2	3.4	3.4	<0.1	0.2
A14_S2_15	3.3	2.9	3.0	3.1	<0.1	0.2
A14_S2_20	3.0	2.7	2.8	2.9	<0.1	0.1
A14_S2_30	2.7	2.5	2.5	2.6	<0.1	0.1
A14_S2_40	2.5	2.3	2.4	2.4	<0.1	0.1
A14_S2_50	2.4	2.2	2.3	2.3	<0.1	0.1
A14_S2_60	2.3	2.1	2.2	2.2	<0.1	0.1
A14_S2_70	2.2	2.0	2.1	2.1	<0.1	0.1
A14_S2_80	2.1	2.0	2.0	2.1	<0.1	0.1
A14_S2_90	2.1	2.0	2.0	2.0	<0.1	<0.1
A14_S2_100	2.0	1.9	2.0	2.0	<0.1	<0.1
A14_S2_125	2.0	1.9	1.9	1.9	<0.1	<0.1
A14_S2_150	1.9	1.8	1.8	1.9	<0.1	<0.1
A14_S2_175	1.9	1.8	1.8	1.8	<0.1	<0.1
A14_S2_200	1.8	1.8	1.8	1.8	<0.1	<0.1
A304_N2_0	2.6	2.1	2.1	2.1	<0.1	<0.1
A304_N2_5	2.2	1.9	1.9	1.9	<0.1	<0.1

	Total Annual Mean NH_3 (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A304_N2_10	2.0	1.8	1.8	1.8	<0.1	<0.1
A304_N2_15	1.9	1.7	1.7	1.7	<0.1	<0.1
A304_N2_20	1.8	1.7	1.7	1.7	<0.1	<0.1
A304_N2_30	1.7	1.6	1.6	1.6	<0.1	<0.1
A304_N2_40	1.7	1.6	1.6	1.6	<0.1	<0.1
A304_N2_50	1.7	1.6	1.6	1.6	<0.1	<0.1
A304_N2_60	1.7	1.6	1.6	1.6	<0.1	<0.1
A304_N2_70	1.6	1.6	1.6	1.6	<0.1	<0.1
A304_N2_80	1.6	1.6	1.6	1.6	<0.1	<0.1
A304_N2_90	1.6	1.6	1.6	1.6	<0.1	<0.1
A304_N2_100	1.6	1.6	1.6	1.6	<0.1	<0.1
A304_N2_125	1.6	1.5	1.6	1.6	<0.1	<0.1
A304_N2_150	1.6	1.5	1.5	1.5	<0.1	<0.1
A304_N2_175	1.6	1.5	1.5	1.5	<0.1	<0.1
A304_N2_200	1.6	1.5	1.5	1.5	<0.1	<0.1
A14_S1_0	5.5	4.6	4.9	4.9	0.1	0.4
A14_S1_5	4.2	3.6	3.8	3.8	<0.1	0.2
A14_S1_10	3.6	3.2	3.3	3.3	<0.1	0.2
A14_S1_15	3.3	2.9	3.0	3.0	<0.1	0.2
A14_S1_20	3.0	2.7	2.8	2.8	<0.1	0.1
A14_S1_30	2.7	2.5	2.5	2.6	<0.1	0.1
A14_S1_40	2.5	2.3	2.4	2.4	<0.1	0.1
A14_S1_50	2.4	2.2	2.3	2.3	<0.1	0.1
A14_S1_60	2.3	2.1	2.2	2.2	<0.1	0.1
A14_S1_70	2.2	2.1	2.1	2.1	<0.1	0.1
A14_S1_80	2.1	2.0	2.1	2.1	<0.1	0.1
A14_S1_90	2.1	2.0	2.0	2.0	<0.1	0.1
A14_S1_100	2.1	1.9	2.0	2.0	<0.1	<0.1
A14_S1_125	2.0	1.9	1.9	1.9	<0.1	<0.1
A14_S1_150	1.9	1.8	1.9	1.9	<0.1	<0.1
A14_S1_175	1.9	1.8	1.8	1.8	<0.1	<0.1
A14_S1_200	1.8	1.8	1.8	1.8	<0.1	<0.1
A304_N1_0	2.7	2.1	2.2	2.2	<0.1	0.1
A304_N1_5	2.2	1.9	1.9	1.9	<0.1	<0.1
A304_N1_10	2.0	1.8	1.8	1.8	<0.1	<0.1
A304_N1_15	1.9	1.7	1.7	1.7	<0.1	<0.1
A304_N1_20	1.8	1.7	1.7	1.7	<0.1	<0.1
A304_N1_30	1.7	1.6	1.6	1.6	<0.1	<0.1
A304_N1_40	1.7	1.6	1.6	1.6	<0.1	<0.1
A304_N1_50	1.7	1.6	1.6	1.6	<0.1	<0.1
A304_N1_60	1.6	1.6	1.6	1.6	<0.1	<0.1
A304_N1_70	1.6	1.6	1.6	1.6	<0.1	<0.1

	Total Annual Mean NH_3 (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A304_N1_80	1.6	1.6	1.6	1.6	<0.1	<0.1
A304_N1_90	1.6	1.5	1.6	1.6	<0.1	<0.1
A304_N1_100	1.6	1.5	1.5	1.6	<0.1	<0.1
A304_N1_125	1.6	1.5	1.5	1.5	<0.1	<0.1
A304_N1_150	1.6	1.5	1.5	1.5	<0.1	<0.1
A304_N1_175	1.6	1.5	1.5	1.5	<0.1	<0.1
A304_N1_200	1.6	1.5	1.5	1.5	<0.1	<0.1
5WS_W_0	4.0	3.4	3.5	3.5	<0.1	0.2
5WS_W_5	3.3	2.9	3.0	3.0	<0.1	0.1
5WS_W_10	3.0	2.6	2.7	2.7	<0.1	0.1
5WS_W_15	2.8	2.5	2.6	2.6	<0.1	0.1
5WS_W_20	2.7	2.4	2.5	2.5	<0.1	0.1
5WS_W_30	2.5	2.3	2.4	2.4	<0.1	<0.1
5WS_W_40	2.4	2.3	2.3	2.3	<0.1	<0.1
5WS_W_50	2.3	2.2	2.2	2.2	<0.1	<0.1
5WS_W_60	2.3	2.2	2.2	2.2	<0.1	<0.1
5WS_W_70	2.3	2.2	2.2	2.2	<0.1	<0.1
5WS_W_80	2.2	2.1	2.2	2.2	<0.1	<0.1
5WS_W_90	2.2	2.1	2.1	2.1	<0.1	<0.1
5WS_W_100	2.2	2.1	2.1	2.1	<0.1	<0.1
5WS_W_125	2.2	2.1	2.1	2.1	<0.1	<0.1
5WS_W_150	2.1	2.1	2.1	2.1	<0.1	<0.1
5WS_W_175	2.1	2.0	2.1	2.1	<0.1	<0.1
5WS_W_200	2.1	2.0	2.0	2.1	<0.1	<0.1
5WW_S_0	3.1	2.6	2.7	2.7	0.1	0.1
5WW_S_5	2.7	2.4	2.4	2.4	<0.1	0.1
5WW_S_10	2.4	2.2	2.3	2.3	<0.1	0.1
5WW_S_15	2.4	2.2	2.2	2.2	<0.1	<0.1
5WW_S_20	2.3	2.2	2.2	2.2	<0.1	<0.1
5WW_S_30	2.2	2.1	2.1	2.1	<0.1	<0.1
5WW_S_40	2.2	2.1	2.1	2.1	<0.1	<0.1
5WW_S_50	2.1	2.1	2.1	2.1	<0.1	<0.1
5WW_S_60	2.1	2.1	2.1	2.1	<0.1	<0.1
5WW_S_70	2.1	2.1	2.1	2.1	<0.1	<0.1
5WW_S_80	2.1	2.0	2.1	2.1	<0.1	<0.1
5WW_S_90	2.1	2.0	2.0	2.1	<0.1	<0.1
5WW_S_100	2.1	2.0	2.0	2.0	<0.1	<0.1
5WW_S_125	2.1	2.0	2.0	2.0	<0.1	<0.1
5WW_S_150	2.1	2.0	2.0	2.0	<0.1	<0.1
5WW_S_175	2.0	2.0	2.0	2.0	<0.1	<0.1
5WW_S_200	2.0	2.0	2.0	2.0	<0.1	<0.1
5WW_N_0	3.4	2.8	2.9	2.9	0.1	0.2

	Total Annual Mean NH_3 (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WW_N_5	2.8	2.4	2.5	2.5	<0.1	0.1
5WW_N_10	2.6	2.3	2.4	2.4	<0.1	0.1
5WW_N_15	2.5	2.3	2.3	2.3	<0.1	0.1
5WW_N_20	2.4	2.2	2.2	2.3	<0.1	0.1
5WW_N_30	2.3	2.2	2.2	2.2	<0.1	<0.1
5WW_N_40	2.3	2.1	2.2	2.2	<0.1	<0.1
5WW_N_50	2.2	2.1	2.1	2.1	<0.1	<0.1
5WW_N_60	2.2	2.1	2.1	2.1	<0.1	<0.1
5WW_N_70	2.2	2.1	2.1	2.1	<0.1	<0.1
5WW_N_80	2.2	2.1	2.1	2.1	<0.1	<0.1
5WW_N_90	2.1	2.1	2.1	2.1	<0.1	<0.1
5WW_N_100	2.1	2.1	2.1	2.1	<0.1	<0.1
5WW_N_125	2.1	2.1	2.1	2.1	<0.1	<0.1
5WW_N_150	2.1	2.0	2.1	2.1	<0.1	<0.1
5WW_N_175	2.1	2.0	2.1	2.1	<0.1	<0.1
5WW_N_200	2.1	2.0	2.1	2.1	<0.1	<0.1
5WN_W_0	2.7	2.5	2.4	2.4	<0.1	<0.1
5WN_W_5	2.4	2.3	2.3	2.3	<0.1	<0.1
5WN_W_10	2.3	2.2	2.2	2.2	<0.1	<0.1
5WN_W_15	2.3	2.1	2.1	2.1	<0.1	<0.1
5WN_W_20	2.2	2.1	2.1	2.1	<0.1	<0.1
5WN_W_30	2.2	2.1	2.1	2.1	<0.1	<0.1
5WN_W_40	2.1	2.1	2.1	2.1	<0.1	<0.1
5WN_W_50	2.1	2.1	2.1	2.1	<0.1	<0.1
5WN_W_60	2.1	2.1	2.1	2.1	<0.1	<0.1
5WN_W_70	2.1	2.0	2.1	2.1	<0.1	<0.1
5WN_W_80	2.1	2.0	2.0	2.1	<0.1	<0.1
5WN_W_90	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_W_100	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_W_125	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_W_150	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_W_175	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_W_200	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_N_0	2.3	2.1	2.1	2.1	<0.1	<0.1
5WE_N_5	2.2	2.1	2.1	2.1	<0.1	<0.1
5WE_N_10	2.1	2.0	2.1	2.1	<0.1	<0.1
5WE_N_15	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_N_20	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_N_30	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_N_40	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_N_50	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_N_60	2.0	2.0	2.0	2.0	<0.1	<0.1

	Total Annual Mean NH_3 (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WE_N_70	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_N_80	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_N_90	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_N_100	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_N_125	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_N_150	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_N_175	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_N_200	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_S_0	2.1	2.0	2.1	2.1	<0.1	<0.1
5WE_S_5	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_10	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_15	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_S_20	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_S_30	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_S_40	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_S_50	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_S_60	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_S_70	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_S_80	2.0	2.0	2.0	2.0	<0.1	<0.1
5WE_S_90	2.0	1.9	2.0	2.0	<0.1	<0.1
5WE_S_100	2.0	1.9	2.0	2.0	<0.1	<0.1
5WE_S_125	2.0	1.9	1.9	2.0	<0.1	<0.1
5WE_S_150	2.0	1.9	1.9	1.9	<0.1	<0.1
5WE_S_175	2.0	1.9	1.9	1.9	<0.1	<0.1
5WE_S_200	2.0	1.9	1.9	1.9	<0.1	<0.1
A11_NE_N_0	3.6	3.1	3.3	3.3	<0.1	0.2
A11_NE_N_5	3.0	2.7	2.8	2.8	<0.1	0.1
A11_NE_N_10	2.8	2.5	2.6	2.6	<0.1	0.1
A11_NE_N_15	2.6	2.4	2.5	2.5	<0.1	0.1
A11_NE_N_20	2.5	2.3	2.4	2.4	<0.1	0.1
A11_NE_N_30	2.4	2.2	2.3	2.3	<0.1	0.1
A11_NE_N_40	2.3	2.2	2.2	2.2	<0.1	0.1
A11_NE_N_50	2.2	2.1	2.2	2.2	<0.1	<0.1
A11_NE_N_60	2.2	2.1	2.1	2.1	<0.1	<0.1
A11_NE_N_70	2.2	2.1	2.1	2.1	<0.1	<0.1
A11_NE_N_80	2.1	2.1	2.1	2.1	<0.1	<0.1
A11_NE_N_90	2.1	2.0	2.1	2.1	<0.1	<0.1
A11_NE_N_100	2.1	2.0	2.1	2.1	<0.1	<0.1
A11_NE_N_125	2.1	2.0	2.0	2.0	<0.1	<0.1
A11_NE_N_150	2.0	2.0	2.0	2.0	<0.1	<0.1
A11_NE_N_175	2.0	2.0	2.0	2.0	<0.1	<0.1
A11_NE_N_200	2.0	2.0	2.0	2.0	<0.1	<0.1

	Total Annual Mean NH_3 (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A11_NE_S_0	3.3	2.9	3.1	3.1	<0.1	0.2
A11_NE_S_5	2.9	2.6	2.7	2.7	<0.1	0.1
A11_NE_S_10	2.7	2.4	2.5	2.6	<0.1	0.1
A11_NE_S_15	2.5	2.3	2.4	2.4	<0.1	0.1
A11_NE_S_20	2.4	2.3	2.3	2.4	<0.1	0.1
A11_NE_S_30	2.3	2.2	2.2	2.3	<0.1	0.1
A11_NE_S_40	2.3	2.1	2.2	2.2	<0.1	<0.1
A11_NE_S_50	2.2	2.1	2.1	2.1	<0.1	<0.1
A11_NE_S_60	2.2	2.1	2.1	2.1	<0.1	<0.1
A11_NE_S_70	2.1	2.1	2.1	2.1	<0.1	<0.1
A11_NE_S_80	2.1	2.0	2.1	2.1	<0.1	<0.1
A11_NE_S_90	2.1	2.0	2.1	2.1	<0.1	<0.1
A11_NE_S_100	2.1	2.0	2.0	2.0	<0.1	<0.1
A11_NE_S_125	2.1	2.0	2.0	2.0	<0.1	<0.1
A11_NE_S_150	2.0	2.0	2.0	2.0	<0.1	<0.1
A11_NE_S_175	2.0	2.0	2.0	2.0	<0.1	<0.1
A11_NE_S_200	2.0	2.0	2.0	2.0	<0.1	<0.1
B1112_E_W_0	2.0	2.0	2.0	2.0	<0.1	0.1
B1112_E_W_5	2.0	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_10	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_15	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_20	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_30	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_40	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_50	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_60	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_70	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_80	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_90	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_100	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_125	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_W_150	1.9	1.8	1.9	1.9	<0.1	<0.1
B1112_E_W_175	1.9	1.8	1.9	1.9	<0.1	<0.1
B1112_E_W_200	1.9	1.8	1.9	1.9	<0.1	<0.1
B1112_E_E_0	2.1	2.0	2.0	2.1	<0.1	0.1
B1112_E_E_5	2.0	1.9	2.0	2.0	<0.1	0.1
B1112_E_E_10	2.0	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_15	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_20	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_30	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_40	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_50	1.9	1.9	1.9	1.9	<0.1	<0.1

	Total Annual Mean NH_3 (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
B1112_E_E_60	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_70	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_80	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_90	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_100	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_125	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_150	1.9	1.9	1.9	1.9	<0.1	<0.1
B1112_E_E_175	1.9	1.8	1.9	1.9	<0.1	<0.1
B1112_E_E_200	1.9	1.8	1.9	1.9	<0.1	<0.1
A1065_WangN_W_0	2.9	2.4	2.4	2.4	<0.1	<0.1
A1065_WangN_W_5	2.3	2.1	2.1	2.1	<0.1	<0.1
A1065_WangN_W_10	2.2	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_W_15	2.1	1.9	1.9	1.9	<0.1	<0.1
A1065_WangN_W_20	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_WangN_W_30	1.9	1.8	1.8	1.9	<0.1	<0.1
A1065_WangN_W_40	1.9	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_W_50	1.9	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_W_60	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_W_70	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_W_80	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_W_90	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_W_100	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_W_125	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_W_150	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_W_175	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_W_200	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_E_0	2.9	2.4	2.4	2.4	<0.1	<0.1
A1065_WangN_E_5	2.4	2.1	2.1	2.1	<0.1	<0.1
A1065_WangN_E_10	2.2	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_15	2.1	1.9	1.9	1.9	<0.1	<0.1
A1065_WangN_E_20	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_WangN_E_30	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_WangN_E_40	1.9	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_E_50	1.9	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_E_60	1.9	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_E_70	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_E_80	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_E_90	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_E_100	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_E_125	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_E_150	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangN_E_175	1.8	1.8	1.8	1.8	<0.1	<0.1

	Total Annual Mean NH_3 (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A1065_WangN_E_200	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_0	2.5	2.2	2.2	2.2	<0.1	<0.1
A1065_WangS_E_5	2.2	2.0	2.0	2.0	<0.1	<0.1
A1065_WangS_E_10	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_WangS_E_15	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_WangS_E_20	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_WangS_E_30	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_WangS_E_40	1.9	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_50	1.9	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_60	1.9	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_70	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_80	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_90	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_100	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_125	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_150	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_175	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_E_200	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_ErisN_E_0	2.9	2.5	2.5	2.5	<0.1	<0.1
A1065_ErisN_E_5	2.5	2.2	2.2	2.2	<0.1	<0.1
A1065_ErisN_E_10	2.3	2.1	2.1	2.1	<0.1	<0.1
A1065_ErisN_E_15	2.2	2.1	2.1	2.1	<0.1	<0.1
A1065_ErisN_E_20	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_ErisN_E_30	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_ErisN_E_40	2.0	2.0	2.0	2.0	<0.1	<0.1
A1065_ErisN_E_50	2.0	2.0	2.0	2.0	<0.1	<0.1
A1065_ErisN_E_60	2.0	2.0	2.0	2.0	<0.1	<0.1
A1065_ErisN_E_70	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisN_E_80	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisN_E_90	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisN_E_100	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisN_E_125	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisN_E_150	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisN_E_175	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisN_E_200	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisS_E_0	2.9	2.5	2.5	2.5	<0.1	<0.1
A1065_ErisS_E_5	2.5	2.2	2.2	2.2	<0.1	<0.1
A1065_ErisS_E_10	2.3	2.1	2.1	2.1	<0.1	<0.1
A1065_ErisS_E_15	2.2	2.0	2.0	2.1	<0.1	<0.1
A1065_ErisS_E_20	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_ErisS_E_30	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_ErisS_E_40	2.0	1.9	1.9	1.9	<0.1	<0.1

	Total Annual Mean NH_3 (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A1065_ErisS_E_50	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisS_E_60	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisS_E_70	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisS_E_80	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisS_E_90	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisS_E_100	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisS_E_125	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisS_E_150	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisS_E_175	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_ErisS_E_200	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_WangS_W_0	2.4	2.2	2.2	2.1	<0.1	<0.1
A1065_WangS_W_5	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_WangS_W_10	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_WangS_W_15	2.0	1.9	1.9	1.9	<0.1	<0.1
A1065_WangS_W_20	1.9	1.9	1.9	1.9	<0.1	<0.1
A1065_WangS_W_30	1.9	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_40	1.9	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_50	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_60	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_70	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_80	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_90	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_100	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_125	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_150	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_175	1.8	1.8	1.8	1.8	<0.1	<0.1
A1065_WangS_W_200	1.8	1.8	1.8	1.8	<0.1	<0.1
5WNE_N_0	3.7	3.0	3.2	3.2	<0.1	0.2
5WNE_N_5	3.1	2.6	2.8	2.8	<0.1	0.1
5WNE_N_10	2.9	2.5	2.6	2.6	<0.1	0.1
5WNE_N_15	2.7	2.4	2.5	2.5	<0.1	0.1
5WNE_N_20	2.6	2.3	2.4	2.4	<0.1	0.1
5WNE_N_30	2.4	2.2	2.3	2.3	<0.1	0.1
5WNE_N_40	2.3	2.2	2.2	2.2	<0.1	0.1
5WNE_N_50	2.3	2.1	2.2	2.2	<0.1	<0.1
5WNE_N_60	2.2	2.1	2.2	2.2	<0.1	<0.1
5WNE_N_70	2.2	2.1	2.1	2.1	<0.1	<0.1
5WNE_N_80	2.2	2.1	2.1	2.1	<0.1	<0.1
5WNE_N_90	2.2	2.1	2.1	2.1	<0.1	<0.1
5WNE_N_100	2.1	2.1	2.1	2.1	<0.1	<0.1
5WNE_N_125	2.1	2.0	2.0	2.1	<0.1	<0.1
5WNE_N_150	2.1	2.0	2.0	2.0	<0.1	<0.1

	Total Annual Mean NH_3 (µg/m^3)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WNE_N_175	2.1	2.0	2.0	2.0	<0.1	<0.1
5WNE_N_200	2.1	2.0	2.0	2.0	<0.1	<0.1
5WNE_S_0	3.5	2.9	3.1	3.1	<0.1	0.2
5WNE_S_5	3.0	2.6	2.7	2.7	<0.1	0.1
5WNE_S_10	2.8	2.5	2.5	2.6	<0.1	0.1
5WNE_S_15	2.6	2.4	2.4	2.4	<0.1	0.1
5WNE_S_20	2.5	2.3	2.3	2.4	<0.1	0.1
5WNE_S_30	2.4	2.2	2.3	2.3	<0.1	0.1
5WNE_S_40	2.3	2.2	2.2	2.2	<0.1	<0.1
5WNE_S_50	2.3	2.1	2.2	2.2	<0.1	<0.1
5WNE_S_60	2.2	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_70	2.2	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_80	2.2	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_90	2.1	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_100	2.1	2.0	2.1	2.1	<0.1	<0.1
5WNE_S_125	2.1	2.0	2.0	2.0	<0.1	<0.1
5WNE_S_150	2.1	2.0	2.0	2.0	<0.1	<0.1
5WNE_S_175	2.1	2.0	2.0	2.0	<0.1	<0.1
5WNE_S_200	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_E_0	2.8	2.5	2.5	2.5	<0.1	<0.1
5WN_E_5	2.5	2.3	2.3	2.3	<0.1	<0.1
5WN_E_10	2.3	2.2	2.2	2.2	<0.1	<0.1
5WN_E_15	2.3	2.2	2.2	2.2	<0.1	<0.1
5WN_E_20	2.2	2.1	2.1	2.1	<0.1	<0.1
5WN_E_30	2.2	2.1	2.1	2.1	<0.1	<0.1
5WN_E_40	2.1	2.1	2.1	2.1	<0.1	<0.1
5WN_E_50	2.1	2.1	2.1	2.1	<0.1	<0.1
5WN_E_60	2.1	2.1	2.1	2.1	<0.1	<0.1
5WN_E_70	2.1	2.1	2.1	2.1	<0.1	<0.1
5WN_E_80	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_E_90	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_E_100	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_E_125	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_E_150	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_E_175	2.1	2.0	2.0	2.0	<0.1	<0.1
5WN_E_200	2.1	2.0	2.0	2.0	<0.1	<0.1

Table D.2.3 – Nitrogen deposition results

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A14_S2_0	42.6	30.7	32.4	32.8	0.4	2.0

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A14_S2_5	33.3	24.7	25.8	26.1	0.2	1.3
A14_S2_10	29.1	22.1	23.0	23.2	0.2	1.0
A14_S2_15	26.6	20.6	21.3	21.4	0.2	0.9
A14_S2_20	24.9	19.5	20.1	20.2	0.1	0.7
A14_S2_30	22.7	18.1	18.6	18.7	0.1	0.6
A14_S2_40	21.3	17.3	17.7	17.7	0.1	0.5
A14_S2_50	20.3	16.7	17.0	17.1	0.1	0.4
A14_S2_60	19.6	16.3	16.5	16.6	0.1	0.3
A14_S2_70	19.1	15.9	16.2	16.2	0.1	0.3
A14_S2_80	18.7	15.7	15.9	15.9	0.1	0.3
A14_S2_90	18.3	15.5	15.7	15.7	<0.1	0.3
A14_S2_100	18.0	15.3	15.5	15.5	<0.1	0.2
A14_S2_125	17.5	14.9	15.1	15.1	<0.1	0.2
A14_S2_150	17.1	14.7	14.8	14.9	<0.1	0.2
A14_S2_175	16.8	14.5	14.6	14.7	<0.1	0.1
A14_S2_200	16.5	14.4	14.5	14.5	<0.1	0.1
A304_N2_0	21.5	16.2	16.4	16.4	<0.1	0.3
A304_N2_5	18.9	15.0	15.2	15.2	<0.1	0.2
A304_N2_10	17.8	14.5	14.7	14.7	<0.1	0.1
A304_N2_15	17.2	14.3	14.4	14.4	<0.1	0.1
A304_N2_20	16.8	14.1	14.2	14.2	<0.1	0.1
A304_N2_30	16.3	13.9	13.9	13.9	<0.1	0.1
A304_N2_40	16.0	13.7	13.8	13.8	<0.1	0.1
A304_N2_50	15.8	13.6	13.7	13.7	<0.1	<0.1
A304_N2_60	15.6	13.6	13.6	13.6	<0.1	<0.1
A304_N2_70	15.5	13.5	13.6	13.6	<0.1	<0.1
A304_N2_80	15.4	13.5	13.5	13.5	<0.1	<0.1
A304_N2_90	15.4	13.5	13.5	13.5	<0.1	<0.1
A304_N2_100	15.3	13.4	13.5	13.5	<0.1	<0.1
A304_N2_125	15.2	13.4	13.4	13.4	<0.1	<0.1
A304_N2_150	15.1	13.4	13.4	13.4	<0.1	<0.1
A304_N2_175	15.1	13.4	13.4	13.4	<0.1	<0.1
A304_N2_200	15.1	13.3	13.4	13.4	<0.1	<0.1
A14_S1_0	40.8	29.5	31.0	31.4	0.3	1.9
A14_S1_5	32.5	24.1	25.2	25.4	0.2	1.3
A14_S1_10	28.8	21.8	22.6	22.8	0.2	1.0
A14_S1_15	26.4	20.4	21.1	21.2	0.2	0.9
A14_S1_20	24.8	19.4	20.0	20.1	0.1	0.7
A14_S1_30	22.7	18.1	18.5	18.6	0.1	0.6
A14_S1_40	21.4	17.2	17.6	17.7	0.1	0.5
A14_S1_50	20.4	16.7	17.0	17.1	0.1	0.4
A14_S1_60	19.7	16.2	16.5	16.6	0.1	0.4

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A14_S1_70	19.2	15.9	16.2	16.3	0.1	0.3
A14_S1_80	18.8	15.7	15.9	16.0	0.1	0.3
A14_S1_90	18.5	15.5	15.7	15.7	0.1	0.3
A14_S1_100	18.2	15.3	15.5	15.5	<0.1	0.3
A14_S1_125	17.6	15.0	15.1	15.2	<0.1	0.2
A14_S1_150	17.2	14.7	14.9	14.9	<0.1	0.2
A14_S1_175	16.9	14.6	14.7	14.7	<0.1	0.2
A14_S1_200	16.7	14.4	14.5	14.6	<0.1	0.1
A304_N1_0	22.2	16.4	16.7	16.7	<0.1	0.3
A304_N1_5	19.0	14.9	15.1	15.1	<0.1	0.2
A304_N1_10	17.7	14.4	14.5	14.5	<0.1	0.1
A304_N1_15	17.1	14.1	14.2	14.2	<0.1	0.1
A304_N1_20	16.6	13.9	14.0	14.0	<0.1	0.1
A304_N1_30	16.1	13.7	13.7	13.7	<0.1	0.1
A304_N1_40	15.8	13.5	13.6	13.6	<0.1	0.1
A304_N1_50	15.6	13.5	13.5	13.5	<0.1	<0.1
A304_N1_60	15.4	13.4	13.4	13.4	<0.1	<0.1
A304_N1_70	15.3	13.3	13.4	13.4	<0.1	<0.1
A304_N1_80	15.2	13.3	13.3	13.3	<0.1	<0.1
A304_N1_90	15.2	13.3	13.3	13.3	<0.1	<0.1
A304_N1_100	15.1	13.3	13.3	13.3	<0.1	<0.1
A304_N1_125	15.0	13.2	13.2	13.2	<0.1	<0.1
A304_N1_150	14.9	13.2	13.2	13.2	<0.1	<0.1
A304_N1_175	14.9	13.2	13.2	13.2	<0.1	<0.1
A304_N1_200	14.9	13.1	13.2	13.2	<0.1	<0.1
5WS_W_0	51.1	39.1	40.1	40.3	0.2	1.3
5WS_W_5	43.7	35.1	35.8	35.9	0.2	0.9
5WS_W_10	40.1	33.2	33.7	33.9	0.1	0.6
5WS_W_15	38.2	32.2	32.6	32.7	0.1	0.5
5WS_W_20	37.0	31.6	31.9	32.0	0.1	0.5
5WS_W_30	35.2	30.6	30.9	31.0	0.1	0.4
5WS_W_40	34.1	30.1	30.3	30.4	0.1	0.3
5WS_W_50	33.4	29.7	29.9	30.0	0.1	0.3
5WS_W_60	32.9	29.4	29.6	29.7	0.1	0.2
5WS_W_70	32.4	29.2	29.4	29.4	<0.1	0.2
5WS_W_80	32.2	29.1	29.2	29.3	<0.1	0.2
5WS_W_90	31.9	28.9	29.1	29.1	<0.1	0.2
5WS_W_100	31.7	28.8	29.0	29.0	<0.1	0.2
5WS_W_125	31.3	28.6	28.7	28.8	<0.1	0.2
5WS_W_150	31.0	28.5	28.6	28.6	<0.1	0.1
5WS_W_175	30.8	28.4	28.5	28.5	<0.1	0.1
5WS_W_200	30.6	28.3	28.4	28.4	<0.1	0.1

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WW_S_0	40.8	32.7	33.2	33.7	0.5	1.1
5WW_S_5	36.4	30.8	31.1	31.4	0.3	0.6
5WW_S_10	34.2	29.8	30.1	30.2	0.2	0.4
5WW_S_15	33.3	29.4	29.6	29.8	0.2	0.4
5WW_S_20	32.6	29.1	29.3	29.4	0.1	0.3
5WW_S_30	31.8	28.8	28.9	29.0	0.1	0.2
5WW_S_40	31.4	28.6	28.7	28.8	0.1	0.2
5WW_S_50	31.1	28.5	28.6	28.6	0.1	0.2
5WW_S_60	30.8	28.4	28.5	28.5	0.1	0.1
5WW_S_70	30.7	28.3	28.4	28.4	0.1	0.1
5WW_S_80	30.6	28.3	28.3	28.4	<0.1	0.1
5WW_S_90	30.5	28.2	28.3	28.3	<0.1	0.1
5WW_S_100	30.4	28.2	28.2	28.3	<0.1	0.1
5WW_S_125	30.2	28.1	28.2	28.2	<0.1	0.1
5WW_S_150	30.1	28.1	28.1	28.1	<0.1	0.1
5WW_S_175	30.0	28.0	28.1	28.1	<0.1	0.1
5WW_S_200	29.9	28.0	28.0	28.1	<0.1	0.1
5WW_N_0	44.4	34.2	34.9	35.6	0.6	1.4
5WW_N_5	38.1	31.5	31.9	32.3	0.4	0.8
5WW_N_10	35.9	30.5	30.8	31.1	0.3	0.6
5WW_N_15	34.6	30.0	30.3	30.5	0.2	0.5
5WW_N_20	33.8	29.6	29.9	30.0	0.2	0.4
5WW_N_30	32.8	29.2	29.4	29.5	0.1	0.3
5WW_N_40	32.2	29.0	29.1	29.2	0.1	0.3
5WW_N_50	31.8	28.8	28.9	29.0	0.1	0.2
5WW_N_60	31.5	28.7	28.8	28.9	0.1	0.2
5WW_N_70	31.3	28.6	28.7	28.8	0.1	0.2
5WW_N_80	31.2	28.5	28.6	28.7	0.1	0.2
5WW_N_90	31.0	28.5	28.6	28.6	0.1	0.2
5WW_N_100	30.9	28.4	28.5	28.6	0.1	0.1
5WW_N_125	30.7	28.3	28.4	28.5	<0.1	0.1
5WW_N_150	30.6	28.3	28.4	28.4	<0.1	0.1
5WW_N_175	30.5	28.3	28.3	28.4	<0.1	0.1
5WW_N_200	30.5	28.2	28.3	28.3	<0.1	0.1
5WN_W_0	37.5	31.6	31.4	31.4	<0.1	-0.2
5WN_W_5	34.2	30.0	29.9	29.9	<0.1	-0.1
5WN_W_10	32.9	29.4	29.4	29.4	<0.1	<0.1
5WN_W_15	32.3	29.1	29.1	29.1	<0.1	<0.1
5WN_W_20	31.9	28.9	28.9	28.9	<0.1	<0.1
5WN_W_30	31.3	28.6	28.7	28.7	<0.1	<0.1
5WN_W_40	31.0	28.5	28.5	28.5	<0.1	<0.1
5WN_W_50	30.8	28.4	28.4	28.5	<0.1	<0.1

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WN_W_60	30.7	28.3	28.4	28.4	<0.1	<0.1
5WN_W_70	30.6	28.3	28.3	28.3	<0.1	<0.1
5WN_W_80	30.5	28.2	28.3	28.3	<0.1	0.1
5WN_W_90	30.4	28.2	28.3	28.3	<0.1	0.1
5WN_W_100	30.4	28.2	28.2	28.2	<0.1	0.1
5WN_W_125	30.3	28.1	28.2	28.2	<0.1	0.1
5WN_W_150	30.2	28.1	28.1	28.2	<0.1	0.1
5WN_W_175	30.1	28.1	28.1	28.1	<0.1	0.1
5WN_W_200	30.1	28.0	28.1	28.1	<0.1	0.1
5WE_N_0	33.0	29.4	29.6	29.6	<0.1	0.2
5WE_N_5	32.0	28.9	29.1	29.1	<0.1	0.2
5WE_N_10	31.5	28.7	28.8	28.9	<0.1	0.2
5WE_N_15	31.2	28.6	28.7	28.7	<0.1	0.1
5WE_N_20	31.0	28.5	28.6	28.6	<0.1	0.1
5WE_N_30	30.8	28.4	28.5	28.5	<0.1	0.1
5WE_N_40	30.6	28.3	28.4	28.4	<0.1	0.1
5WE_N_50	30.5	28.3	28.4	28.4	<0.1	0.1
5WE_N_60	30.5	28.3	28.3	28.4	<0.1	0.1
5WE_N_70	30.5	28.2	28.3	28.3	<0.1	0.1
5WE_N_80	30.4	28.2	28.3	28.3	<0.1	0.1
5WE_N_90	30.4	28.2	28.3	28.3	<0.1	0.1
5WE_N_100	30.4	28.2	28.3	28.3	<0.1	0.1
5WE_N_125	30.4	28.2	28.3	28.3	<0.1	0.1
5WE_N_150	30.5	28.3	28.4	28.4	<0.1	0.1
5WE_N_175	30.6	28.3	28.4	28.4	<0.1	0.1
5WE_N_200	30.7	28.3	28.4	28.5	<0.1	0.1
5WE_S_0	31.7	28.8	28.9	28.9	<0.1	0.2
5WE_S_5	31.1	28.5	28.6	28.6	<0.1	0.1
5WE_S_10	30.8	28.4	28.5	28.5	<0.1	0.1
5WE_S_15	30.6	28.3	28.4	28.4	<0.1	0.1
5WE_S_20	30.4	28.2	28.3	28.3	<0.1	0.1
5WE_S_30	30.3	28.2	28.2	28.2	<0.1	0.1
5WE_S_40	30.2	28.1	28.2	28.2	<0.1	0.1
5WE_S_50	30.1	28.1	28.1	28.1	<0.1	0.1
5WE_S_60	30.0	28.0	28.1	28.1	<0.1	0.1
5WE_S_70	30.0	28.0	28.1	28.1	<0.1	0.1
5WE_S_80	29.9	28.0	28.1	28.1	<0.1	0.1
5WE_S_90	29.9	28.0	28.0	28.1	<0.1	0.1
5WE_S_100	29.9	28.0	28.0	28.0	<0.1	0.1
5WE_S_125	29.8	27.9	28.0	28.0	<0.1	0.1
5WE_S_150	29.8	27.9	28.0	28.0	<0.1	0.1
5WE_S_175	29.7	27.9	27.9	28.0	<0.1	<0.1

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WE_S_200	29.7	27.9	27.9	27.9	<0.1	<0.1
A11_NE_N_0	48.0	37.1	38.6	38.9	0.3	1.8
A11_NE_N_5	41.8	33.9	34.9	35.1	0.2	1.2
A11_NE_N_10	39.2	32.6	33.4	33.6	0.1	0.9
A11_NE_N_15	37.1	31.6	32.2	32.3	0.1	0.7
A11_NE_N_20	36.0	31.0	31.5	31.6	0.1	0.6
A11_NE_N_30	34.4	30.2	30.7	30.7	0.1	0.5
A11_NE_N_40	33.6	29.8	30.2	30.2	0.1	0.4
A11_NE_N_50	32.9	29.5	29.8	29.8	0.1	0.4
A11_NE_N_60	32.4	29.2	29.5	29.6	0.1	0.3
A11_NE_N_70	32.1	29.1	29.3	29.3	<0.1	0.3
A11_NE_N_80	31.8	28.9	29.1	29.2	<0.1	0.3
A11_NE_N_90	31.6	28.8	29.0	29.0	<0.1	0.2
A11_NE_N_100	31.4	28.7	28.9	28.9	<0.1	0.2
A11_NE_N_125	31.0	28.5	28.7	28.7	<0.1	0.2
A11_NE_N_150	30.8	28.4	28.5	28.6	<0.1	0.2
A11_NE_N_175	30.6	28.3	28.4	28.5	<0.1	0.1
A11_NE_N_200	30.4	28.3	28.4	28.4	<0.1	0.1
A11_NE_S_0	45.7	35.9	37.2	37.5	0.2	1.5
A11_NE_S_5	40.7	33.4	34.3	34.5	0.2	1.1
A11_NE_S_10	38.1	32.1	32.8	32.9	0.1	0.8
A11_NE_S_15	36.5	31.3	31.8	31.9	0.1	0.7
A11_NE_S_20	35.4	30.7	31.2	31.3	0.1	0.6
A11_NE_S_30	34.0	30.0	30.4	30.5	0.1	0.5
A11_NE_S_40	33.1	29.6	29.9	30.0	0.1	0.4
A11_NE_S_50	32.5	29.3	29.6	29.6	0.1	0.3
A11_NE_S_60	32.1	29.1	29.3	29.4	<0.1	0.3
A11_NE_S_70	31.8	28.9	29.1	29.2	<0.1	0.2
A11_NE_S_80	31.5	28.8	29.0	29.0	<0.1	0.2
A11_NE_S_90	31.3	28.7	28.9	28.9	<0.1	0.2
A11_NE_S_100	31.1	28.6	28.8	28.8	<0.1	0.2
A11_NE_S_125	30.8	28.4	28.6	28.6	<0.1	0.2
A11_NE_S_150	30.6	28.3	28.5	28.5	<0.1	0.1
A11_NE_S_175	30.4	28.3	28.4	28.4	<0.1	0.1
A11_NE_S_200	30.3	28.2	28.3	28.3	<0.1	0.1
B1112_E_W_0	17.8	15.6	15.8	16.0	0.1	0.4
B1112_E_W_5	17.3	15.4	15.5	15.6	0.1	0.2
B1112_E_W_10	17.1	15.2	15.3	15.4	<0.1	0.1
B1112_E_W_15	16.9	15.2	15.3	15.3	<0.1	0.1
B1112_E_W_20	16.9	15.2	15.2	15.3	<0.1	0.1
B1112_E_W_30	16.8	15.1	15.2	15.2	<0.1	0.1
B1112_E_W_40	16.7	15.1	15.1	15.2	<0.1	0.1

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
B1112_E_W_50	16.7	15.1	15.1	15.1	<0.1	0.1
B1112_E_W_60	16.7	15.1	15.1	15.1	<0.1	<0.1
B1112_E_W_70	16.7	15.1	15.1	15.1	<0.1	<0.1
B1112_E_W_80	16.7	15.1	15.1	15.1	<0.1	<0.1
B1112_E_W_90	16.7	15.1	15.1	15.1	<0.1	<0.1
B1112_E_W_100	16.6	15.1	15.1	15.1	<0.1	<0.1
B1112_E_W_125	16.6	15.0	15.1	15.1	<0.1	<0.1
B1112_E_W_150	16.6	15.0	15.1	15.1	<0.1	<0.1
B1112_E_W_175	16.6	15.0	15.1	15.1	<0.1	<0.1
B1112_E_W_200	16.6	15.0	15.1	15.1	<0.1	<0.1
B1112_E_E_0	18.3	15.8	16.1	16.3	0.2	0.5
B1112_E_E_5	17.6	15.5	15.6	15.7	0.1	0.3
B1112_E_E_10	17.3	15.3	15.5	15.5	0.1	0.2
B1112_E_E_15	17.1	15.3	15.4	15.4	0.1	0.2
B1112_E_E_20	17.0	15.2	15.3	15.4	<0.1	0.1
B1112_E_E_30	16.9	15.2	15.2	15.3	<0.1	0.1
B1112_E_E_40	16.8	15.1	15.2	15.2	<0.1	0.1
B1112_E_E_50	16.8	15.1	15.2	15.2	<0.1	0.1
B1112_E_E_60	16.7	15.1	15.1	15.2	<0.1	0.1
B1112_E_E_70	16.7	15.1	15.1	15.1	<0.1	0.1
B1112_E_E_80	16.7	15.1	15.1	15.1	<0.1	0.1
B1112_E_E_90	16.7	15.1	15.1	15.1	<0.1	<0.1
B1112_E_E_100	16.7	15.1	15.1	15.1	<0.1	<0.1
B1112_E_E_125	16.6	15.1	15.1	15.1	<0.1	<0.1
B1112_E_E_150	16.6	15.0	15.1	15.1	<0.1	<0.1
B1112_E_E_175	16.6	15.0	15.1	15.1	<0.1	<0.1
B1112_E_E_200	16.6	15.0	15.1	15.1	<0.1	<0.1
A1065_WangN_W_0	24.2	18.9	18.9	18.9	<0.1	<0.1
A1065_WangN_W_5	20.7	17.1	17.1	17.1	<0.1	<0.1
A1065_WangN_W_10	19.5	16.5	16.5	16.5	<0.1	<0.1
A1065_WangN_W_15	18.7	16.2	16.2	16.2	<0.1	<0.1
A1065_WangN_W_20	18.4	16.0	16.0	16.0	<0.1	<0.1
A1065_WangN_W_30	17.9	15.7	15.7	15.7	<0.1	<0.1
A1065_WangN_W_40	17.6	15.6	15.6	15.6	<0.1	<0.1
A1065_WangN_W_50	17.4	15.5	15.5	15.5	<0.1	<0.1
A1065_WangN_W_60	17.3	15.5	15.5	15.5	<0.1	<0.1
A1065_WangN_W_70	17.2	15.4	15.4	15.4	<0.1	<0.1
A1065_WangN_W_80	17.1	15.4	15.4	15.4	<0.1	<0.1
A1065_WangN_W_90	17.1	15.3	15.4	15.4	<0.1	<0.1
A1065_WangN_W_100	17.0	15.3	15.3	15.3	<0.1	<0.1
A1065_WangN_W_125	17.0	15.3	15.3	15.3	<0.1	<0.1
A1065_WangN_W_150	16.9	15.3	15.3	15.3	<0.1	<0.1

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A1065_WangN_W_175	16.8	15.2	15.2	15.2	<0.1	<0.1
A1065_WangN_W_200	16.8	15.2	15.2	15.2	<0.1	<0.1
A1065_WangN_E_0	41.0	33.1	33.1	33.1	<0.1	<0.1
A1065_WangN_E_5	36.0	30.7	30.7	30.8	<0.1	<0.1
A1065_WangN_E_10	33.6	29.6	29.6	29.6	<0.1	<0.1
A1065_WangN_E_15	32.6	29.1	29.1	29.2	<0.1	<0.1
A1065_WangN_E_20	31.9	28.8	28.8	28.9	<0.1	<0.1
A1065_WangN_E_30	31.2	28.5	28.5	28.5	<0.1	<0.1
A1065_WangN_E_40	30.7	28.3	28.3	28.3	<0.1	<0.1
A1065_WangN_E_50	30.5	28.2	28.2	28.2	<0.1	<0.1
A1065_WangN_E_60	30.2	28.1	28.1	28.1	<0.1	<0.1
A1065_WangN_E_70	30.1	28.0	28.0	28.0	<0.1	<0.1
A1065_WangN_E_80	30.0	27.9	27.9	27.9	<0.1	<0.1
A1065_WangN_E_90	29.9	27.9	27.9	27.9	<0.1	<0.1
A1065_WangN_E_100	29.8	27.8	27.8	27.8	<0.1	<0.1
A1065_WangN_E_125	29.6	27.8	27.8	27.8	<0.1	<0.1
A1065_WangN_E_150	29.5	27.7	27.7	27.7	<0.1	<0.1
A1065_WangN_E_175	29.5	27.7	27.7	27.7	<0.1	<0.1
A1065_WangN_E_200	29.4	27.7	27.7	27.7	<0.1	<0.1
A1065_WangS_E_0	21.6	17.7	17.6	17.6	<0.1	<0.1
A1065_WangS_E_5	19.7	16.7	16.6	16.6	<0.1	<0.1
A1065_WangS_E_10	19.0	16.3	16.3	16.3	<0.1	<0.1
A1065_WangS_E_15	18.4	16.0	16.0	16.0	<0.1	<0.1
A1065_WangS_E_20	18.1	15.9	15.9	15.9	<0.1	<0.1
A1065_WangS_E_30	17.7	15.7	15.7	15.7	<0.1	<0.1
A1065_WangS_E_40	17.5	15.6	15.6	15.6	<0.1	<0.1
A1065_WangS_E_50	17.4	15.5	15.5	15.5	<0.1	<0.1
A1065_WangS_E_60	17.2	15.4	15.4	15.4	<0.1	<0.1
A1065_WangS_E_70	17.2	15.4	15.4	15.4	<0.1	<0.1
A1065_WangS_E_80	17.1	15.4	15.4	15.4	<0.1	<0.1
A1065_WangS_E_90	17.1	15.4	15.4	15.4	<0.1	<0.1
A1065_WangS_E_100	17.0	15.3	15.3	15.3	<0.1	<0.1
A1065_WangS_E_125	17.0	15.3	15.3	15.3	<0.1	<0.1
A1065_WangS_E_150	16.9	15.3	15.3	15.3	<0.1	<0.1
A1065_WangS_E_175	16.9	15.3	15.3	15.3	<0.1	<0.1
A1065_WangS_E_200	16.8	15.2	15.2	15.2	<0.1	<0.1
A1065_ErisN_E_0	23.5	18.4	18.4	18.4	<0.1	<0.1
A1065_ErisN_E_5	20.3	16.8	16.8	16.8	<0.1	<0.1
A1065_ErisN_E_10	19.2	16.3	16.3	16.3	<0.1	<0.1
A1065_ErisN_E_15	18.6	16.0	16.0	16.0	<0.1	<0.1
A1065_ErisN_E_20	18.2	15.8	15.8	15.8	<0.1	<0.1
A1065_ErisN_E_30	17.8	15.6	15.6	15.6	<0.1	<0.1

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A1065_ErisN_E_40	17.5	15.5	15.5	15.5	<0.1	<0.1
A1065_ErisN_E_50	17.3	15.4	15.4	15.4	<0.1	<0.1
A1065_ErisN_E_60	17.2	15.3	15.3	15.4	<0.1	<0.1
A1065_ErisN_E_70	17.1	15.3	15.3	15.3	<0.1	<0.1
A1065_ErisN_E_80	17.1	15.3	15.3	15.3	<0.1	<0.1
A1065_ErisN_E_90	17.0	15.2	15.2	15.2	<0.1	<0.1
A1065_ErisN_E_100	17.0	15.2	15.2	15.2	<0.1	<0.1
A1065_ErisN_E_125	16.9	15.2	15.2	15.2	<0.1	<0.1
A1065_ErisN_E_150	16.8	15.2	15.2	15.2	<0.1	<0.1
A1065_ErisN_E_175	16.8	15.1	15.1	15.1	<0.1	<0.1
A1065_ErisN_E_200	16.7	15.1	15.1	15.1	<0.1	<0.1
A1065_ErisS_E_0	23.5	18.5	18.5	18.6	0.1	<0.1
A1065_ErisS_E_5	20.5	17.0	17.0	17.0	<0.1	<0.1
A1065_ErisS_E_10	19.4	16.4	16.4	16.5	<0.1	<0.1
A1065_ErisS_E_15	18.8	16.1	16.1	16.1	<0.1	<0.1
A1065_ErisS_E_20	18.4	15.9	15.9	15.9	<0.1	<0.1
A1065_ErisS_E_30	17.9	15.7	15.7	15.7	<0.1	<0.1
A1065_ErisS_E_40	17.6	15.5	15.5	15.6	<0.1	<0.1
A1065_ErisS_E_50	17.4	15.4	15.5	15.5	<0.1	<0.1
A1065_ErisS_E_60	17.3	15.4	15.4	15.4	<0.1	<0.1
A1065_ErisS_E_70	17.2	15.3	15.3	15.4	<0.1	<0.1
A1065_ErisS_E_80	17.1	15.3	15.3	15.3	<0.1	<0.1
A1065_ErisS_E_90	17.1	15.3	15.3	15.3	<0.1	<0.1
A1065_ErisS_E_100	17.0	15.2	15.3	15.3	<0.1	<0.1
A1065_ErisS_E_125	16.9	15.2	15.2	15.2	<0.1	<0.1
A1065_ErisS_E_150	16.9	15.2	15.2	15.2	<0.1	<0.1
A1065_ErisS_E_175	16.8	15.1	15.2	15.2	<0.1	<0.1
A1065_ErisS_E_200	16.8	15.1	15.1	15.1	<0.1	<0.1
A1065_WangS_W_0	20.9	17.3	17.3	17.3	<0.1	<0.1
A1065_WangS_W_5	19.1	16.4	16.3	16.3	<0.1	<0.1
A1065_WangS_W_10	18.4	16.0	16.0	16.0	<0.1	<0.1
A1065_WangS_W_15	18.0	15.8	15.8	15.8	<0.1	<0.1
A1065_WangS_W_20	17.8	15.7	15.7	15.7	<0.1	<0.1
A1065_WangS_W_30	17.5	15.6	15.6	15.6	<0.1	<0.1
A1065_WangS_W_40	17.3	15.5	15.5	15.5	<0.1	<0.1
A1065_WangS_W_50	17.2	15.4	15.4	15.4	<0.1	<0.1
A1065_WangS_W_60	17.1	15.4	15.4	15.4	<0.1	<0.1
A1065_WangS_W_70	17.1	15.4	15.4	15.4	<0.1	<0.1
A1065_WangS_W_80	17.0	15.3	15.3	15.3	<0.1	<0.1
A1065_WangS_W_90	17.0	15.3	15.3	15.3	<0.1	<0.1
A1065_WangS_W_100	16.9	15.3	15.3	15.3	<0.1	<0.1
A1065_WangS_W_125	16.9	15.3	15.3	15.3	<0.1	<0.1

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A1065_WangS_W_150	16.8	15.2	15.2	15.2	<0.1	<0.1
A1065_WangS_W_175	16.8	15.2	15.2	15.2	<0.1	<0.1
A1065_WangS_W_200	16.8	15.2	15.2	15.2	<0.1	<0.1
5WNE_N_0	48.3	36.6	38.0	38.2	0.3	1.7
5WNE_N_5	42.1	33.6	34.6	34.7	0.2	1.1
5WNE_N_10	39.8	32.6	33.3	33.5	0.1	0.9
5WNE_N_15	37.8	31.7	32.3	32.4	0.1	0.7
5WNE_N_20	36.5	31.1	31.6	31.7	0.1	0.6
5WNE_N_30	35.1	30.4	30.8	30.9	0.1	0.5
5WNE_N_40	34.0	29.9	30.2	30.3	0.1	0.4
5WNE_N_50	33.4	29.6	29.9	29.9	0.1	0.4
5WNE_N_60	32.9	29.4	29.6	29.7	0.1	0.3
5WNE_N_70	32.5	29.2	29.4	29.5	<0.1	0.3
5WNE_N_80	32.2	29.1	29.3	29.3	<0.1	0.2
5WNE_N_90	31.9	28.9	29.1	29.2	<0.1	0.2
5WNE_N_100	31.7	28.8	29.0	29.1	<0.1	0.2
5WNE_N_125	31.4	28.7	28.8	28.8	<0.1	0.2
5WNE_N_150	31.1	28.5	28.7	28.7	<0.1	0.2
5WNE_N_175	30.9	28.4	28.6	28.6	<0.1	0.1
5WNE_N_200	30.7	28.4	28.5	28.5	<0.1	0.1
5WNE_S_0	46.6	35.7	37.0	37.2	0.2	1.5
5WNE_S_5	40.8	33.0	33.9	34.0	0.2	1.0
5WNE_S_10	38.8	32.1	32.8	32.9	0.1	0.8
5WNE_S_15	37.0	31.3	31.8	31.9	0.1	0.7
5WNE_S_20	35.8	30.7	31.2	31.3	0.1	0.6
5WNE_S_30	34.5	30.1	30.5	30.6	0.1	0.5
5WNE_S_40	33.6	29.7	30.0	30.0	0.1	0.4
5WNE_S_50	33.0	29.4	29.7	29.7	0.1	0.3
5WNE_S_60	32.6	29.2	29.4	29.5	<0.1	0.3
5WNE_S_70	32.2	29.1	29.3	29.3	<0.1	0.3
5WNE_S_80	32.0	28.9	29.1	29.2	<0.1	0.2
5WNE_S_90	31.7	28.8	29.0	29.0	<0.1	0.2
5WNE_S_100	31.5	28.8	28.9	28.9	<0.1	0.2
5WNE_S_125	31.2	28.6	28.7	28.8	<0.1	0.2
5WNE_S_150	31.0	28.5	28.6	28.6	<0.1	0.1
5WNE_S_175	30.8	28.4	28.5	28.5	<0.1	0.1
5WNE_S_200	30.7	28.4	28.5	28.5	<0.1	0.1
5WN_E_0	38.3	32.0	31.7	31.7	<0.1	-0.2
5WN_E_5	34.6	30.2	30.1	30.1	<0.1	-0.1
5WN_E_10	33.2	29.5	29.5	29.5	<0.1	-0.1
5WN_E_15	32.4	29.2	29.1	29.1	<0.1	<0.1
5WN_E_20	32.0	28.9	28.9	28.9	<0.1	<0.1

	Total Annual Mean N deposition (kgN/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
5WN_E_30	31.4	28.7	28.7	28.7	<0.1	<0.1
5WN_E_40	31.1	28.5	28.5	28.5	<0.1	<0.1
5WN_E_50	30.9	28.4	28.4	28.4	<0.1	<0.1
5WN_E_60	30.7	28.3	28.4	28.4	<0.1	<0.1
5WN_E_70	30.6	28.3	28.3	28.3	<0.1	<0.1
5WN_E_80	30.5	28.3	28.3	28.3	<0.1	<0.1
5WN_E_90	30.4	28.2	28.3	28.3	<0.1	<0.1
5WN_E_100	30.4	28.2	28.2	28.2	<0.1	<0.1
5WN_E_125	30.3	28.2	28.2	28.2	<0.1	<0.1
5WN_E_150	30.2	28.1	28.2	28.2	<0.1	0.1
5WN_E_175	30.2	28.1	28.2	28.2	<0.1	0.1
5WN_E_200	30.2	28.1	28.2	28.2	<0.1	0.1

Acid Deposition

	Total Annual Mean N Acid deposition (keq/ha/yr)					
Road Link	**2019**	**2040 Future Base**	**2040 DM**	**2040 DS**	**DS-DM**	**DS-FB**
A14_S2_0	3.0	2.2	2.3	2.3	<0.1	0.1
A14_S2_5	2.4	1.8	1.8	1.9	<0.1	0.1
A14_S2_10	2.1	1.6	1.6	1.7	<0.1	0.1
A14_S2_15	1.9	1.5	1.5	1.5	<0.1	0.1
A14_S2_20	1.8	1.4	1.4	1.4	<0.1	0.1
A14_S2_30	1.6	1.3	1.3	1.3	<0.1	<0.1
A14_S2_40	1.5	1.2	1.3	1.3	<0.1	<0.1
A14_S2_50	1.5	1.2	1.2	1.2	<0.1	<0.1
A14_S2_60	1.4	1.2	1.2	1.2	<0.1	<0.1
A14_S2_70	1.4	1.1	1.2	1.2	<0.1	<0.1
A14_S2_80	1.3	1.1	1.1	1.1	<0.1	<0.1
A14_S2_90	1.3	1.1	1.1	1.1	<0.1	<0.1
A14_S2_100	1.3	1.1	1.1	1.1	<0.1	<0.1
A14_S2_125	1.2	1.1	1.1	1.1	<0.1	<0.1
A14_S2_150	1.2	1.1	1.1	1.1	<0.1	<0.1
A14_S2_175	1.2	1.0	1.0	1.0	<0.1	<0.1
A14_S2_200	1.2	1.0	1.0	1.0	<0.1	<0.1
A304_N2_0	1.5	1.2	1.2	1.2	<0.1	<0.1
A304_N2_5	1.4	1.1	1.1	1.1	<0.1	<0.1
A304_N2_10	1.3	1.0	1.0	1.0	<0.1	<0.1
A304_N2_15	1.2	1.0	1.0	1.0	<0.1	<0.1
A304_N2_20	1.2	1.0	1.0	1.0	<0.1	<0.1
A304_N2_30	1.2	1.0	1.0	1.0	<0.1	<0.1
A304_N2_40	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N2_50	1.1	1.0	1.0	1.0	<0.1	<0.1

A304_N2_60	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N2_70	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N2_80	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N2_90	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N2_100	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N2_125	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N2_150	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N2_175	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N2_200	1.1	1.0	1.0	1.0	<0.1	<0.1
A14_S1_0	2.9	2.1	2.2	2.2	<0.1	0.1
A14_S1_5	2.3	1.7	1.8	1.8	<0.1	0.1
A14_S1_10	2.1	1.6	1.6	1.6	<0.1	0.1
A14_S1_15	1.9	1.5	1.5	1.5	<0.1	0.1
A14_S1_20	1.8	1.4	1.4	1.4	<0.1	0.1
A14_S1_30	1.6	1.3	1.3	1.3	<0.1	<0.1
A14_S1_40	1.5	1.2	1.3	1.3	<0.1	<0.1
A14_S1_50	1.5	1.2	1.2	1.2	<0.1	<0.1
A14_S1_60	1.4	1.2	1.2	1.2	<0.1	<0.1
A14_S1_70	1.4	1.1	1.2	1.2	<0.1	<0.1
A14_S1_80	1.3	1.1	1.1	1.1	<0.1	<0.1
A14_S1_90	1.3	1.1	1.1	1.1	<0.1	<0.1
A14_S1_100	1.3	1.1	1.1	1.1	<0.1	<0.1
A14_S1_125	1.3	1.1	1.1	1.1	<0.1	<0.1
A14_S1_150	1.2	1.1	1.1	1.1	<0.1	<0.1
A14_S1_175	1.2	1.0	1.0	1.1	<0.1	<0.1
A14_S1_200	1.2	1.0	1.0	1.0	<0.1	<0.1
A304_N1_0	1.6	1.2	1.2	1.2	<0.1	<0.1
A304_N1_5	1.4	1.1	1.1	1.1	<0.1	<0.1
A304_N1_10	1.3	1.0	1.0	1.0	<0.1	<0.1
A304_N1_15	1.2	1.0	1.0	1.0	<0.1	<0.1
A304_N1_20	1.2	1.0	1.0	1.0	<0.1	<0.1
A304_N1_30	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N1_40	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N1_50	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N1_60	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N1_70	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N1_80	1.1	1.0	1.0	1.0	<0.1	<0.1
A304_N1_90	1.1	0.9	1.0	1.0	<0.1	<0.1
A304_N1_100	1.1	0.9	0.9	0.9	<0.1	<0.1
A304_N1_125	1.1	0.9	0.9	0.9	<0.1	<0.1
A304_N1_150	1.1	0.9	0.9	0.9	<0.1	<0.1
A304_N1_175	1.1	0.9	0.9	0.9	<0.1	<0.1
A304_N1_200	1.1	0.9	0.9	0.9	<0.1	<0.1
5WS_W_0	3.6	2.8	2.9	2.9	<0.1	0.1

5WS_W_5	3.1	2.5	2.6	2.6	<0.1	0.1
5WS_W_10	2.9	2.4	2.4	2.4	<0.1	<0.1
5WS_W_15	2.7	2.3	2.3	2.3	<0.1	<0.1
5WS_W_20	2.6	2.3	2.3	2.3	<0.1	<0.1
5WS_W_30	2.5	2.2	2.2	2.2	<0.1	<0.1
5WS_W_40	2.4	2.1	2.2	2.2	<0.1	<0.1
5WS_W_50	2.4	2.1	2.1	2.1	<0.1	<0.1
5WS_W_60	2.3	2.1	2.1	2.1	<0.1	<0.1
5WS_W_70	2.3	2.1	2.1	2.1	<0.1	<0.1
5WS_W_80	2.3	2.1	2.1	2.1	<0.1	<0.1
5WS_W_90	2.3	2.1	2.1	2.1	<0.1	<0.1
5WS_W_100	2.3	2.1	2.1	2.1	<0.1	<0.1
5WS_W_125	2.2	2.0	2.1	2.1	<0.1	<0.1
5WS_W_150	2.2	2.0	2.0	2.0	<0.1	<0.1
5WS_W_175	2.2	2.0	2.0	2.0	<0.1	<0.1
5WS_W_200	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_S_0	2.9	2.3	2.4	2.4	<0.1	0.1
5WW_S_5	2.6	2.2	2.2	2.2	<0.1	<0.1
5WW_S_10	2.4	2.1	2.1	2.2	<0.1	<0.1
5WW_S_15	2.4	2.1	2.1	2.1	<0.1	<0.1
5WW_S_20	2.3	2.1	2.1	2.1	<0.1	<0.1
5WW_S_30	2.3	2.1	2.1	2.1	<0.1	<0.1
5WW_S_40	2.2	2.0	2.1	2.1	<0.1	<0.1
5WW_S_50	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_S_60	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_S_70	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_S_80	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_S_90	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_S_100	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_S_125	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_S_150	2.1	2.0	2.0	2.0	<0.1	<0.1
5WW_S_175	2.1	2.0	2.0	2.0	<0.1	<0.1
5WW_S_200	2.1	2.0	2.0	2.0	<0.1	<0.1
5WW_N_0	3.2	2.4	2.5	2.5	<0.1	0.1
5WW_N_5	2.7	2.2	2.3	2.3	<0.1	0.1
5WW_N_10	2.6	2.2	2.2	2.2	<0.1	<0.1
5WW_N_15	2.5	2.1	2.2	2.2	<0.1	<0.1
5WW_N_20	2.4	2.1	2.1	2.1	<0.1	<0.1
5WW_N_30	2.3	2.1	2.1	2.1	<0.1	<0.1
5WW_N_40	2.3	2.1	2.1	2.1	<0.1	<0.1
5WW_N_50	2.3	2.1	2.1	2.1	<0.1	<0.1
5WW_N_60	2.3	2.0	2.1	2.1	<0.1	<0.1
5WW_N_70	2.2	2.0	2.0	2.1	<0.1	<0.1
5WW_N_80	2.2	2.0	2.0	2.0	<0.1	<0.1

5WW_N_90	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_N_100	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_N_125	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_N_150	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_N_175	2.2	2.0	2.0	2.0	<0.1	<0.1
5WW_N_200	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_0	2.7	2.3	2.2	2.2	<0.1	<0.1
5WN_W_5	2.4	2.1	2.1	2.1	<0.1	<0.1
5WN_W_10	2.4	2.1	2.1	2.1	<0.1	<0.1
5WN_W_15	2.3	2.1	2.1	2.1	<0.1	<0.1
5WN_W_20	2.3	2.1	2.1	2.1	<0.1	<0.1
5WN_W_30	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_40	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_50	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_60	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_70	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_80	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_90	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_100	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_125	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_150	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_175	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_W_200	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_N_0	2.4	2.1	2.1	2.1	<0.1	<0.1
5WE_N_5	2.3	2.1	2.1	2.1	<0.1	<0.1
5WE_N_10	2.3	2.1	2.1	2.1	<0.1	<0.1
5WE_N_15	2.2	2.0	2.0	2.1	<0.1	<0.1
5WE_N_20	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_30	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_40	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_50	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_60	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_70	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_80	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_90	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_100	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_125	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_150	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_175	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_N_200	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_S_0	2.3	2.1	2.1	2.1	<0.1	<0.1
5WE_S_5	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_S_10	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_S_15	2.2	2.0	2.0	2.0	<0.1	<0.1

5WE_S_20	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_S_30	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_S_40	2.2	2.0	2.0	2.0	<0.1	<0.1
5WE_S_50	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_60	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_70	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_80	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_90	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_100	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_125	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_150	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_175	2.1	2.0	2.0	2.0	<0.1	<0.1
5WE_S_200	2.1	2.0	2.0	2.0	<0.1	<0.1
A11_NE_N_0	3.4	2.7	2.8	2.8	<0.1	0.1
A11_NE_N_5	3.0	2.4	2.5	2.5	<0.1	0.1
A11_NE_N_10	2.8	2.3	2.4	2.4	<0.1	0.1
A11_NE_N_15	2.7	2.3	2.3	2.3	<0.1	0.1
A11_NE_N_20	2.6	2.2	2.3	2.3	<0.1	<0.1
A11_NE_N_30	2.5	2.2	2.2	2.2	<0.1	<0.1
A11_NE_N_40	2.4	2.1	2.2	2.2	<0.1	<0.1
A11_NE_N_50	2.4	2.1	2.1	2.1	<0.1	<0.1
A11_NE_N_60	2.3	2.1	2.1	2.1	<0.1	<0.1
A11_NE_N_70	2.3	2.1	2.1	2.1	<0.1	<0.1
A11_NE_N_80	2.3	2.1	2.1	2.1	<0.1	<0.1
A11_NE_N_90	2.3	2.1	2.1	2.1	<0.1	<0.1
A11_NE_N_100	2.2	2.1	2.1	2.1	<0.1	<0.1
A11_NE_N_125	2.2	2.0	2.0	2.1	<0.1	<0.1
A11_NE_N_150	2.2	2.0	2.0	2.0	<0.1	<0.1
A11_NE_N_175	2.2	2.0	2.0	2.0	<0.1	<0.1
A11_NE_N_200	2.2	2.0	2.0	2.0	<0.1	<0.1
A11_NE_S_0	3.3	2.6	2.7	2.7	<0.1	0.1
A11_NE_S_5	2.9	2.4	2.5	2.5	<0.1	0.1
A11_NE_S_10	2.7	2.3	2.3	2.3	<0.1	0.1
A11_NE_S_15	2.6	2.2	2.3	2.3	<0.1	<0.1
A11_NE_S_20	2.5	2.2	2.2	2.2	<0.1	<0.1
A11_NE_S_30	2.4	2.1	2.2	2.2	<0.1	<0.1
A11_NE_S_40	2.4	2.1	2.1	2.1	<0.1	<0.1
A11_NE_S_50	2.3	2.1	2.1	2.1	<0.1	<0.1
A11_NE_S_60	2.3	2.1	2.1	2.1	<0.1	<0.1
A11_NE_S_70	2.3	2.1	2.1	2.1	<0.1	<0.1
A11_NE_S_80	2.3	2.1	2.1	2.1	<0.1	<0.1
A11_NE_S_90	2.2	2.0	2.1	2.1	<0.1	<0.1
A11_NE_S_100	2.2	2.0	2.1	2.1	<0.1	<0.1
A11_NE_S_125	2.2	2.0	2.0	2.0	<0.1	<0.1

A11_NE_S_150	2.2	2.0	2.0	2.0	<0.1	<0.1
A11_NE_S_175	2.2	2.0	2.0	2.0	<0.1	<0.1
A11_NE_S_200	2.2	2.0	2.0	2.0	<0.1	<0.1
B1112_E_W_0	1.3	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_5	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_10	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_15	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_20	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_30	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_40	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_50	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_60	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_70	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_80	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_90	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_100	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_125	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_150	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_175	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_W_200	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_0	1.3	1.1	1.2	1.2	<0.1	<0.1
B1112_E_E_5	1.3	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_10	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_15	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_20	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_30	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_40	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_50	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_60	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_70	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_80	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_90	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_100	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_125	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_150	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_175	1.2	1.1	1.1	1.1	<0.1	<0.1
B1112_E_E_200	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_0	1.7	1.3	1.3	1.3	<0.1	<0.1
A1065_WangN_W_5	1.5	1.2	1.2	1.2	<0.1	<0.1
A1065_WangN_W_10	1.4	1.2	1.2	1.2	<0.1	<0.1
A1065_WangN_W_15	1.3	1.2	1.2	1.2	<0.1	<0.1
A1065_WangN_W_20	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_30	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_40	1.3	1.1	1.1	1.1	<0.1	<0.1

A1065_WangN_W_50	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_60	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_70	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_80	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_90	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_100	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_125	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_150	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_175	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_W_200	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangN_E_0	2.9	2.4	2.4	2.4	<0.1	<0.1
A1065_WangN_E_5	2.6	2.2	2.2	2.2	<0.1	<0.1
A1065_WangN_E_10	2.4	2.1	2.1	2.1	<0.1	<0.1
A1065_WangN_E_15	2.3	2.1	2.1	2.1	<0.1	<0.1
A1065_WangN_E_20	2.3	2.1	2.1	2.1	<0.1	<0.1
A1065_WangN_E_30	2.2	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_40	2.2	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_50	2.2	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_60	2.2	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_70	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_80	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_90	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_100	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_125	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_150	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_175	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_WangN_E_200	2.1	2.0	2.0	2.0	<0.1	<0.1
A1065_WangS_E_0	1.5	1.3	1.3	1.3	<0.1	<0.1
A1065_WangS_E_5	1.4	1.2	1.2	1.2	<0.1	<0.1
A1065_WangS_E_10	1.4	1.2	1.2	1.2	<0.1	<0.1
A1065_WangS_E_15	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_20	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_30	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_40	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_50	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_60	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_70	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_80	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_90	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_100	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_125	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_150	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_175	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_E_200	1.2	1.1	1.1	1.1	<0.1	<0.1

A1065_ErisN_E_0	1.7	1.3	1.3	1.3	<0.1	<0.1
A1065_ErisN_E_5	1.4	1.2	1.2	1.2	<0.1	<0.1
A1065_ErisN_E_10	1.4	1.2	1.2	1.2	<0.1	<0.1
A1065_ErisN_E_15	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_20	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_30	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_40	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_50	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_60	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_70	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_80	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_90	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_100	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_125	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_150	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_175	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisN_E_200	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_0	1.7	1.3	1.3	1.3	<0.1	<0.1
A1065_ErisS_E_5	1.5	1.2	1.2	1.2	<0.1	<0.1
A1065_ErisS_E_10	1.4	1.2	1.2	1.2	<0.1	<0.1
A1065_ErisS_E_15	1.3	1.2	1.2	1.2	<0.1	<0.1
A1065_ErisS_E_20	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_30	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_40	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_50	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_60	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_70	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_80	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_90	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_100	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_125	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_150	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_175	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_ErisS_E_200	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_0	1.5	1.2	1.2	1.2	<0.1	<0.1
A1065_WangS_W_5	1.4	1.2	1.2	1.2	<0.1	<0.1
A1065_WangS_W_10	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_15	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_20	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_30	1.3	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_40	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_50	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_60	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_70	1.2	1.1	1.1	1.1	<0.1	<0.1

A1065_WangS_W_80	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_90	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_100	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_125	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_150	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_175	1.2	1.1	1.1	1.1	<0.1	<0.1
A1065_WangS_W_200	1.2	1.1	1.1	1.1	<0.1	<0.1
5WNE_N_0	3.5	2.6	2.7	2.7	<0.1	0.1
5WNE_N_5	3.0	2.4	2.5	2.5	<0.1	0.1
5WNE_N_10	2.8	2.3	2.4	2.4	<0.1	0.1
5WNE_N_15	2.7	2.3	2.3	2.3	<0.1	0.1
5WNE_N_20	2.6	2.2	2.3	2.3	<0.1	<0.1
5WNE_N_30	2.5	2.2	2.2	2.2	<0.1	<0.1
5WNE_N_40	2.4	2.1	2.2	2.2	<0.1	<0.1
5WNE_N_50	2.4	2.1	2.1	2.1	<0.1	<0.1
5WNE_N_60	2.4	2.1	2.1	2.1	<0.1	<0.1
5WNE_N_70	2.3	2.1	2.1	2.1	<0.1	<0.1
5WNE_N_80	2.3	2.1	2.1	2.1	<0.1	<0.1
5WNE_N_90	2.3	2.1	2.1	2.1	<0.1	<0.1
5WNE_N_100	2.3	2.1	2.1	2.1	<0.1	<0.1
5WNE_N_125	2.2	2.0	2.1	2.1	<0.1	<0.1
5WNE_N_150	2.2	2.0	2.0	2.0	<0.1	<0.1
5WNE_N_175	2.2	2.0	2.0	2.0	<0.1	<0.1
5WNE_N_200	2.2	2.0	2.0	2.0	<0.1	<0.1
5WNE_S_0	3.3	2.6	2.6	2.7	<0.1	0.1
5WNE_S_5	2.9	2.4	2.4	2.4	<0.1	0.1
5WNE_S_10	2.8	2.3	2.3	2.3	<0.1	0.1
5WNE_S_15	2.6	2.2	2.3	2.3	<0.1	<0.1
5WNE_S_20	2.6	2.2	2.2	2.2	<0.1	<0.1
5WNE_S_30	2.5	2.2	2.2	2.2	<0.1	<0.1
5WNE_S_40	2.4	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_50	2.4	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_60	2.3	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_70	2.3	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_80	2.3	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_90	2.3	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_100	2.3	2.1	2.1	2.1	<0.1	<0.1
5WNE_S_125	2.2	2.0	2.1	2.1	<0.1	<0.1
5WNE_S_150	2.2	2.0	2.0	2.0	<0.1	<0.1
5WNE_S_175	2.2	2.0	2.0	2.0	<0.1	<0.1
5WNE_S_200	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_0	2.7	2.3	2.3	2.3	<0.1	<0.1
5WN_E_5	2.5	2.2	2.2	2.1	<0.1	<0.1
5WN_E_10	2.4	2.1	2.1	2.1	<0.1	<0.1

5WN_E_15	2.3	2.1	2.1	2.1	<0.1	<0.1
5WN_E_20	2.3	2.1	2.1	2.1	<0.1	<0.1
5WN_E_30	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_40	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_50	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_60	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_70	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_80	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_90	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_100	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_125	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_150	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_175	2.2	2.0	2.0	2.0	<0.1	<0.1
5WN_E_200	2.2	2.0	2.0	2.0	<0.1	<0.1

D.3 Modelling methodology

1.1.1.1 Overview

West Suffolk District Council has prepared a Local Plan setting out proposed development up to 2040. This project assesses the impact on air quality of the Local Plan on internationally designated ecological sites that require a Habitats Regulation Assessment (HRA).

This project considers the impact of changes in traffic flow on concentrations of nitrogen oxides (NOx), ammonia (NH_3) and nitrogen deposition at the closest ecological receptors, within Breckland Forest Site of Special Scientific Importance (SSSI), The Devils Dyke Special Area of Conservation (SAC), Newmarket Heath SSSI, Breckland Farmland SSSI and Breckland SAC due to the Local Plan. Figure 1 – Figure 3 in Appendix D1 shows the traffic network, ecological receptors and the SACs and SSSIs considered in this project.

1.1.1.2 Methodology

Traffic Data

The road network includes a link along the A1065 from Brandon to Mildenhall, the A1101 Mildenhall Road and the B1112, along the boundary of the Breckland SAC. Links are included for sections of the A11 and the A14 past Devils Dyke SAC, along with the A1304 Barbara Stradbroke Avenue. Traffic data in the form of 24-hour AADT (Annual Average Daily Traffic) based on 2019 data and forecast to 2040 are shown in Table 4. Traffic data were provided by West Suffolk Council.

The Base and Future Base (FB) scenarios used 2019 traffic data. The future year without Local Plan (2040 Do-Minimum; DM) and Do Something; DS (with Local Plan) used factored traffic data for 2040.

Table 4 Traffic Data

Road Link	2019 Base and FB AADT	2019 Base and FB HDV %	2019 Base and FB Average Speed (kph)	2040 DM AADT	2040 DM HDV %	2040 DM Average Speed (kph)	2040 DS AADT	2040 DS HDV %	2040 DS Average Speed (kph)
A304 (Barbara Stradbrook Avenue), south of Newmarket	6044	2%	68	6516	2%	63	6497	2%	63
A304 (Barbara Stradbrook Avenue), south of Newmarket	7000	2%	68	7772	2%	61	7767	2%	61
A14 south of Newmarket	35316	11%	106	40527	10%	96	41398	10%	96
A14 south of Newmarket	33390	14%	107	37264	13%	98	38590	13%	97
1 - Brandon Rd	4905	5%	62	4725	5%	62	4880	4%	62
1 - Brandon Rd	6088	4%	64	6127	5%	64	6288	5%	64
2 - Brandon Rd	3600	5%	66	3306	5%	66	3425	4%	66
2 - Brandon Rd	4341	6%	60	4270	6%	60	4386	6%	60
3 - Brandon Rd	5144	3%	66	4823	3%	66	5085	3%	66
3 - Brandon Rd	4512	5%	67	4449	6%	67	4595	6%	67
4 - Junction w/ A1065 & B1112	6913	4%	51	6994	4%	50	7504	3%	49
4 - Junction w/ A1065 & B1112	6175	5%	52	7002	5%	49	7634	4%	47
5 - A1065	5736	4%	74	5559	4%	74	5914	3%	74
5 - A1065	4826	6%	75	4765	7%	76	4920	6%	75
6 - B1112	1349	1%	80	2238	1%	74	2715	1%	74

Road Link	2019 Base and FB AADT	2019 Base and FB HDV %	2019 Base and FB Average Speed (kph)	2040 DM AADT	2040 DM HDV %	2040 DM Average Speed (kph)	2040 DS AADT	2040 DS HDV %	2040 DS Average Speed (kph)
6 - B1112	1177	3%	81	1435	3%	76	1589	3%	76
7 - A1065	3482	7%	84	2805	10%	84	3126	8%	84
7 - A1065	4420	5%	87	4102	5%	87	3956	5%	87
8 - A11	13904	6%	102	16409	6%	100	16704	6%	100
8 - A11	13629	7%	102	16148	7%	100	16734	7%	99
9 - A1101 Mildenhall Rd	2068	5%	86	2554	4%	86	2505	5%	86
9 - A1101 Mildenhall Rd	1482	5%	87	1475	5%	87	1477	5%	87
10 - A11	17212	7%	65	17657	7%	87	18343	7%	87
10 - A11	18140	6%	87	20664	6%	87	21076	6%	87
11 - Bury Rd	7502	3%	87	8857	3%	87	9286	3%	87
11 - Bury Rd	6271	4%	87	6808	4%	87	8129	3%	87

Receptors

Ecological receptors have been taken from the east and west of modelled road links, at locations which intersect Newmarket Heath SSSI, Devils Dyke SAC, Breckland Forest SSSI, Breckland Farmland SSSI and Breckland SAC. Receptors are located every 10 metres (m) at a height of 0 m, up to a distance of 200 m from the road. The ecological receptors relevant to this project are included in Table 5, and their locations presented in Figure 1 - Figure 3 of Appendix D1.

Table 5 Receptor locations, height and distance from road

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
A14_S2_0	558823.7	261350.492	0	**A11_NE_S_70**	574039	274853	70

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
A14_S2_5	558828.1	261348.109	5	**A11_NE_S_80**	574045	274845	80
A14_S2_10	558832.5	261345.725	10	**A11_NE_S_90**	574051	274837	90
A14_S2_15	558836.9	261343.341	15	**A11_NE_S_100**	574057	274829	100
A14_S2_20	558841.3	261340.957	20	**A11_NE_S_125**	574073	274809	125
A14_S2_30	558850.1	261336.189	30	**A11_NE_S_150**	574091	274791	150
A14_S2_40	558858.8	261331.421	40	**A11_NE_S_175**	574106	274771	175
A14_S2_50	558867.6	261326.653	50	**A11_NE_S_200**	574121	274750	200
A14_S2_60	558876.4	261321.885	60	**B1112_E_W_0**	574254	276957	0
A14_S2_70	558885.2	261317.117	70	**B1112_E_W_5**	574250	276955	5
A14_S2_80	558894	261312.35	80	**B1112_E_W_10**	574245	276952	10
A14_S2_90	558902.8	261307.582	90	**B1112_E_W_15**	574240	276950	15
A14_S2_100	558911.6	261302.814	100	**B1112_E_W_20**	574235	276948	20
A14_S2_125	558933.6	261290.894	125	**B1112_E_W_30**	574226	276943	30
A14_S2_150	558955.5	261278.975	150	**B1112_E_W_40**	574217	276938	40
A14_S2_175	558977.5	261267.055	175	**B1112_E_W_50**	574208	276933	50
A14_S2_200	558999.5	261255.135	200	**B1112_E_W_60**	574198	276928	60
A304_N2_0	561923	261445.497	0	**B1112_E_W_70**	574189	276924	70
A304_N2_5	561919.2	261448.717	5	**B1112_E_W_80**	574180	276919	80
A304_N2_10	561915.4	261451.937	10	**B1112_E_W_90**	574171	276914	90

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
A304_N2_15	561911.6	261455.157	15	**B1112_E_W_100**	574161	276909	100
A304_N2_20	561907.7	261458.376	20	**B1112_E_W_125**	574139	276896	125
A304_N2_30	561900.1	261464.816	30	**B1112_E_W_150**	574115	276886	150
A304_N2_40	561892.4	261471.256	40	**B1112_E_W_175**	574093	276874	175
A304_N2_50	561884.8	261477.695	50	**B1112_E_W_200**	574070	276861	200
A304_N2_60	561877.1	261484.135	60	**B1112_E_E_0**	574262	276958	0
A304_N2_70	561869.5	261490.575	70	**B1112_E_E_5**	574266	276961	5
A304_N2_80	561861.8	261497.014	80	**B1112_E_E_10**	574271	276963	10
A304_N2_90	561854.2	261503.454	90	**B1112_E_E_15**	574275	276965	15
A304_N2_100	561846.5	261509.894	100	**B1112_E_E_20**	574280	276968	20
A304_N2_125	561827.4	261525.993	125	**B1112_E_E_30**	574289	276973	30
A304_N2_150	561808.3	261542.092	150	**B1112_E_E_40**	574298	276978	40
A304_N2_175	561789.1	261558.191	175	**B1112_E_E_50**	574307	276983	50
A304_N2_200	561770	261574.291	200	**B1112_E_E_60**	574316	276988	60
A14_S1_0	560078.7	263019.557	0	**B1112_E_E_70**	574325	276993	70
A14_S1_5	560082.4	263016.256	5	**B1112_E_E_80**	574335	276997	80
A14_S1_10	560086.2	263012.955	10	**B1112_E_E_90**	574345	277001	90
A14_S1_15	560089.9	263009.654	15	**B1112_E_E_100**	574352	277008	100
A14_S1_20	560093.7	263006.353	20	**B1112_E_E_125**	574375	277020	125

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
A14_S1_30	560101.2	262999.751	30	**B1112_E_E_150**	574397	277031	150
A14_S1_40	560108.7	262993.149	40	**B1112_E_E_175**	574419	277044	175
A14_S1_50	560116.2	262986.547	50	**B1112_E_E_200**	574441	277056	200
A14_S1_60	560123.7	262979.945	60	**A1065_WangN_W_0**	576059	284227	0
A14_S1_70	560131.2	262973.343	70	**A1065_WangN_W_5**	576054	284228	5
A14_S1_80	560138.8	262966.741	80	**A1065_WangN_W_10**	576049	284229	10
A14_S1_90	560146.3	262960.139	90	**A1065_WangN_W_15**	576043	284230	15
A14_S1_100	560153.8	262953.537	100	**A1065_WangN_W_20**	576039	284231	20
A14_S1_125	560172.5	262937.032	125	**A1065_WangN_W_30**	576027	284233	30
A14_S1_150	560191.3	262920.527	150	**A1065_WangN_W_40**	576016	284234	40
A14_S1_175	560210.1	262904.022	175	**A1065_WangN_W_50**	576006	284236	50
A14_S1_200	560228.9	262887.517	200	**A1065_WangN_W_60**	575995	284238	60
A304_N1_0	562597.4	262010.634	0	**A1065_WangN_W_70**	575984	284240	70
A304_N1_5	562594.1	262014.466	5	**A1065_WangN_W_80**	575973	284241	80
A304_N1_10	562590.9	262018.299	10	**A1065_WangN_W_90**	575963	284243	90
A304_N1_15	562587.7	262022.131	15	**A1065_WangN_W_100**	575952	284245	100
A304_N1_20	562584.5	262025.963	20	**A1065_WangN_W_125**	575925	284249	125
A304_N1_30	562578.1	262033.628	30	**A1065_WangN_W_150**	575898	284253	150
A304_N1_40	562571.7	262041.293	40	**A1065_WangN_W_175**	575871	284258	175

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
A304_N1_50	562565.2	262048.958	50	**A1065_WangN_W_200**	575845	284262	200
A304_N1_60	562558.8	262056.623	60	**A1065_WangN_E_0**	576146	284339	0
A304_N1_70	562552.4	262064.288	70	**A1065_WangN_E_5**	576149	284336	5
A304_N1_80	562546	262071.953	80	**A1065_WangN_E_10**	576154	284333	10
A304_N1_90	562539.6	262079.618	90	**A1065_WangN_E_15**	576158	284330	15
A304_N1_100	562533.1	262087.283	100	**A1065_WangN_E_20**	576162	284327	20
A304_N1_125	562517.1	262106.445	125	**A1065_WangN_E_30**	576170	284322	30
A304_N1_150	562501	262125.607	150	**A1065_WangN_E_40**	576179	284316	40
A304_N1_175	562485	262144.769	175	**A1065_WangN_E_50**	576187	284311	50
A304_N1_200	562468.9	262163.931	200	**A1065_WangN_E_60**	576196	284305	60
5WS_W_0	572709	273970	0	**A1065_WangN_E_70**	576204	284300	70
5WS_W_5	572705	273973	5	**A1065_WangN_E_80**	576213	284294	80
5WS_W_10	572700	273975	10	**A1065_WangN_E_90**	576221	284289	90
5WS_W_15	572696	273978	15	**A1065_WangN_E_100**	576229	284283	100
5WS_W_20	572692	273980	20	**A1065_WangN_E_125**	576250	284269	125
5WS_W_30	572683	273985	30	**A1065_WangN_E_150**	576271	284256	150
5WS_W_40	572674	273990	40	**A1065_WangN_E_175**	576292	284242	175
5WS_W_50	572666	273995	50	**A1065_WangN_E_200**	576313	284229	200
5WS_W_60	572657	274000	60	**A1065_WangS_E_0**	575732	283241	0

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
5WS_W_70	572648	274005	70	**A1065_WangS_E_5**	575737	283241	5
5WS_W_80	572640	274010	80	**A1065_WangS_E_10**	575741	283241	10
5WS_W_90	572631	274015	90	**A1065_WangS_E_15**	575747	283241	15
5WS_W_100	572622	274020	100	**A1065_WangS_E_20**	575752	283241	20
5WS_W_125	572601	274033	125	**A1065_WangS_E_30**	575762	283241	30
5WS_W_150	572579	274045	150	**A1065_WangS_E_40**	575772	283242	40
5WS_W_175	572557	274058	175	**A1065_WangS_E_50**	575782	283242	50
5WS_W_200	572536	274070	200	**A1065_WangS_E_60**	575792	283242	60
5WW_S_0	572482	274303	0	**A1065_WangS_E_70**	575802	283242	70
5WW_S_5	572479	274300	5	**A1065_WangS_E_80**	575812	283243	80
5WW_S_10	572475	274296	10	**A1065_WangS_E_90**	575822	283243	90
5WW_S_15	572472	274293	15	**A1065_WangS_E_100**	575833	283243	100
5WW_S_20	572469	274289	20	**A1065_WangS_E_125**	575858	283244	125
5WW_S_30	572462	274281	30	**A1065_WangS_E_150**	575883	283244	150
5WW_S_40	572455	274274	40	**A1065_WangS_E_175**	575908	283246	175
5WW_S_50	572449	274266	50	**A1065_WangS_E_200**	575933	283247	200
5WW_S_60	572443	274258	60	**A1065_ErisN_E_0**	573062	278561	0
5WW_S_70	572435	274251	70	**A1065_ErisN_E_5**	573067	278561	5
5WW_S_80	572429	274243	80	**A1065_ErisN_E_10**	573072	278561	10

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
5WW_S_90	572422	274236	90	**A1065_ErisN_E_15**	573077	278561	15
5WW_S_100	572416	274229	100	**A1065_ErisN_E_20**	573082	278562	20
5WW_S_125	572400	274209	125	**A1065_ErisN_E_30**	573092	278561	30
5WW_S_150	572383	274191	150	**A1065_ErisN_E_40**	573102	278561	40
5WW_S_175	572366	274172	175	**A1065_ErisN_E_50**	573112	278562	50
5WW_S_200	572350	274153	200	**A1065_ErisN_E_60**	573122	278561	60
5WW_N_0	572485	274310	0	**A1065_ErisN_E_70**	573132	278562	70
5WW_N_5	572489	274314	5	**A1065_ErisN_E_80**	573142	278562	80
5WW_N_10	572492	274318	10	**A1065_ErisN_E_90**	573152	278562	90
5WW_N_15	572496	274321	15	**A1065_ErisN_E_100**	573162	278562	100
5WW_N_20	572499	274325	20	**A1065_ErisN_E_125**	573187	278562	125
5WW_N_30	572506	274332	30	**A1065_ErisN_E_150**	573212	278563	150
5WW_N_40	572513	274339	40	**A1065_ErisN_E_175**	573237	278563	175
5WW_N_50	572521	274346	50	**A1065_ErisN_E_200**	573262	278563	200
5WW_N_60	572527	274354	60	**A1065_ErisS_E_0**	573037	277220	0
5WW_N_70	572535	274361	70	**A1065_ErisS_E_5**	573042	277220	5
5WW_N_80	572542	274368	80	**A1065_ErisS_E_10**	573047	277220	10
5WW_N_90	572549	274375	90	**A1065_ErisS_E_15**	573052	277220	15
5WW_N_100	572556	274382	100	**A1065_ErisS_E_20**	573057	277220	20

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
5WW_N_125	572574	274400	125	**A1065_ErisS_E_30**	573067	277220	30
5WW_N_150	572591	274418	150	**A1065_ErisS_E_40**	573077	277220	40
5WW_N_175	572609	274436	175	**A1065_ErisS_E_50**	573087	277220	50
5WW_N_200	572626	274454	200	**A1065_ErisS_E_60**	573097	277220	60
5WN_W_0	572821	274597	0	**A1065_ErisS_E_70**	573107	277220	70
5WN_W_5	572816	274597	5	**A1065_ErisS_E_80**	573117	277219	80
5WN_W_10	572811	274597	10	**A1065_ErisS_E_90**	573127	277219	90
5WN_W_15	572806	274597	15	**A1065_ErisS_E_100**	573137	277220	100
5WN_W_20	572801	274597	20	**A1065_ErisS_E_125**	573162	277220	125
5WN_W_30	572791	274597	30	**A1065_ErisS_E_150**	573187	277219	150
5WN_W_40	572781	274598	40	**A1065_ErisS_E_175**	573212	277220	175
5WN_W_50	572771	274598	50	**A1065_ErisS_E_200**	573237	277220	200
5WN_W_60	572761	274599	60	**A1065_WangS_W_0**	575723	283240	0
5WN_W_70	572751	274598	70	**A1065_WangS_W_5**	575718	283239	5
5WN_W_80	572741	274599	80	**A1065_WangS_W_10**	575713	283238	10
5WN_W_90	572731	274599	90	**A1065_WangS_W_15**	575708	283237	15
5WN_W_100	572721	274599	100	**A1065_WangS_W_20**	575703	283237	20
5WN_W_125	572696	274600	125	**A1065_WangS_W_30**	575694	283235	30
5WN_W_150	572671	274601	150	**A1065_WangS_W_40**	575684	283233	40

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
5WN_W_175	572646	274602	175	**A1065_WangS_W_50**	575674	283231	50
5WN_W_200	572621	274602	200	**A1065_WangS_W_60**	575664	283230	60
5WE_N_0	573312	274072	0	**A1065_WangS_W_70**	575654	283228	70
5WE_N_5	573312	274077	5	**A1065_WangS_W_80**	575644	283226	80
5WE_N_10	573313	274082	10	**A1065_WangS_W_90**	575634	283224	90
5WE_N_15	573313	274087	15	**A1065_WangS_W_100**	575625	283223	100
5WE_N_20	573313	274092	20	**A1065_WangS_W_125**	575600	283218	125
5WE_N_30	573314	274102	30	**A1065_WangS_W_150**	575575	283214	150
5WE_N_40	573314	274112	40	**A1065_WangS_W_175**	575551	283210	175
5WE_N_50	573315	274122	50	**A1065_WangS_W_200**	575526	283205	200
5WE_N_60	573315	274132	60	**5WNE_N_0**	573146	274396	0
5WE_N_70	573315	274142	70	**5WNE_N_5**	573144	274401	5
5WE_N_80	573315	274152	80	**5WNE_N_10**	573143	274405	10
5WE_N_90	573316	274162	90	**5WNE_N_15**	573141	274410	15
5WE_N_100	573316	274172	100	**5WNE_N_20**	573139	274415	20
5WE_N_125	573318	274197	125	**5WNE_N_30**	573136	274424	30
5WE_N_150	573319	274223	150	**5WNE_N_40**	573132	274434	40
5WE_N_175	573320	274248	175	**5WNE_N_50**	573129	274443	50
5WE_N_200	573321	274273	200	**5WNE_N_60**	573126	274452	60

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
5WE_S_0	573315	274058	0	**5WNE_N_70**	573122	274462	70
5WE_S_5	573315	274053	5	**5WNE_N_80**	573119	274471	80
5WE_S_10	573315	274048	10	**5WNE_N_90**	573115	274481	90
5WE_S_15	573315	274043	15	**5WNE_N_100**	573112	274490	100
5WE_S_20	573316	274038	20	**5WNE_N_125**	573103	274514	125
5WE_S_30	573316	274028	30	**5WNE_N_150**	573095	274537	150
5WE_S_40	573316	274018	40	**5WNE_N_175**	573086	274560	175
5WE_S_50	573316	274008	50	**5WNE_N_200**	573078	274584	200
5WE_S_60	573316	273998	60	**5WNE_S_0**	573153	274372	0
5WE_S_70	573317	273988	70	**5WNE_S_5**	573155	274367	5
5WE_S_80	573317	273978	80	**5WNE_S_10**	573156	274363	10
5WE_S_90	573317	273968	90	**5WNE_S_15**	573158	274358	15
5WE_S_100	573317	273958	100	**5WNE_S_20**	573160	274353	20
5WE_S_125	573318	273933	125	**5WNE_S_30**	573163	274344	30
5WE_S_150	573318	273908	150	**5WNE_S_40**	573167	274334	40
5WE_S_175	573318	273883	175	**5WNE_S_50**	573170	274325	50
5WE_S_200	573318	273858	200	**5WNE_S_60**	573174	274316	60
A11_NE_N_0	573989	274930	0	**5WNE_S_70**	573177	274306	70
A11_NE_N_5	573986	274934	5	**5WNE_S_80**	573180	274297	80

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
A11_NE_N_10	573984	274938	10	**5WNE_S_90**	573184	274287	90
A11_NE_N_15	573981	274943	15	**5WNE_S_100**	573187	274278	100
A11_NE_N_20	573978	274947	20	**5WNE_S_125**	573196	274255	125
A11_NE_N_30	573973	274956	30	**5WNE_S_150**	573204	274231	150
A11_NE_N_40	573968	274964	40	**5WNE_S_175**	573213	274208	175
A11_NE_N_50	573963	274973	50	**5WNE_S_200**	573221	274184	200
A11_NE_N_60	573958	274982	60	**5WN_E_0**	572844	274783	0
A11_NE_N_70	573952	274990	70	**5WN_E_5**	572849	274782	5
A11_NE_N_80	573947	274998	80	**5WN_E_10**	572854	274781	10
A11_NE_N_90	573941	275007	90	**5WN_E_15**	572859	274780	15
A11_NE_N_100	573936	275015	100	**5WN_E_20**	572864	274780	20
A11_NE_N_125	573923	275037	125	**5WN_E_30**	572874	274778	30
A11_NE_N_150	573910	275058	150	**5WN_E_40**	572883	274776	40
A11_NE_N_175	573896	275079	175	**5WN_E_50**	572893	274774	50
A11_NE_N_200	573884	275100	200	**5WN_E_60**	572903	274773	60
A11_NE_S_0	573996	274909	0	**5WN_E_70**	572913	274771	70
A11_NE_S_5	573998	274905	5	**5WN_E_80**	572923	274769	80
A11_NE_S_10	574001	274901	10	**5WN_E_90**	572933	274767	90
A11_NE_S_15	574004	274897	15	**5WN_E_100**	572943	274766	100

Receptor	X	Y	Distance from Road (m)	Receptor	X	Y	Distance from Road (m)
A11_NE_S_20	574007	274893	20	**5WN_E_125**	572967	274761	125
A11_NE_S_30	574013	274885	30	**5WN_E_150**	572992	274757	150
A11_NE_S_40	574019	274877	40	**5WN_E_175**	573016	274753	175
A11_NE_S_50	574026	274869	50	**5WN_E_200**	573041	274748	200
A11_NE_S_60	574033	274861	60				

Vehicle fleet

For the 2019 base year, road traffic emissions of NOx were derived using Defra's current Emission Factor Toolkit (EFT) v11 and associated tools [REF 79]. Road traffic emissions of NH_3 were derived using emission rates taken from Air Quality Consultants' Calculator for Road Emissions of Ammonia (CREAM) V1A [REF 80] and using a vehicle fleet consistent with Defra's EFT v11.

The projected EFT v11 vehicle fleet does not take account of any effects of the Covid-19 pandemic, nor the approaching ban on new petrol and diesel vehicles. In addition, the fleet presented for the period 2031-2050 is provided in support of climate assessments and appraisals only. As such, it is considered appropriate to employ an alternative method to determine a realistic vehicle fleet operating in the study region in 2040. This has been undertaken for use in this study by using data from the UK Department for Transport (DfT) '*Decarbonising Transport: A Better, Greener Britain*' [REF 81] and a subsequent publication, the '*additional information on assumptions used to develop decarbonising transport scenarios*' [REF 82] which includes the data used to inform the DfT projections.

The DfT data project the rate of uptake of zero-emissions vehicle-km (vkm) and so, for the purpose of detailed road transport emissions modelling, it is necessary to disaggregate the fleet by fuel type; nominally petrol, diesel and battery-electric drive cycles. Within this, it is necessary to also compensate for the operation of hybrid engine vehicles (HEV) and plug-in HEV (PHEV), which switch between electrified and petrol / diesel internal combustion engine (ICE) drive-cycles at different speeds.

To disaggregate the zero emissions projections into fuel proportions, battery engine vehicles (BEV) were derived from the reported stock of vehicles in the UK fleet [REF 83]) and adjusted to compensate for the different typical annual mileage for each fuel-type (data published by RAC [REF 84] and Nimblefins [REF 85]). The remaining proportion of zero-emissions vkm were assumed to be HEV and PHEV, with corresponding ICE drive cycles based on the proportions used in the EFT; this is linked to speed, so a greater proportion of the drive-cycle would be ICE at higher speeds.

The 2040 projection used in the air quality model utilises the DfT '*Low-ambition Decarb Fleet*' so as to represent a precautionary, but realistic, fleet. This scenario, as modelled by DfT, included a 'medium ambition' policy scenario for reduction of emissions, predominantly comprising regulated sales of vehicles to achieve 70% ULEV (ultra-low emission vehicle) sales by 2030, plus additional fiscal incentives to support ULEV, and the zero emissions bus scheme; this was combined with a 'low travel demand' traffic growth scenario representing lower gross domestic product (GDP) and higher fuel prices. Using these data results in a greater proportion of BEV when compared to the basic fleet split for the same year in the latest version of the EFT (v11). This is not unexpected as DVLA fleet data show a greater proportion of registered BEVin terms of vkm, compared to the EFT for 2022.

Model Setup

Detailed dispersion modelling was undertaken using ADMS-Roads v5.0 to model concentrations of NOx and NH_3 using the parameters in Table 6 for the following scenarios:

1. 2019 Baseline – 2019 AADT, emission factors and background concentrations
2. 2040 Future Baseline – 2019 AADT, 2040 vehicle fleet and 2030 background concentrations (the latest projected year available from Defra)
3. 2040 Do Minimum – 2040 AADT without Local Plan, 2040 vehicle fleet and 2030 background concentrations
4. 2040 Do Something – 2040 AADT with Local Plan in place, 2040 vehicle fleet and 2030 background concentrations

Table 6 General ADMS-Roads Model Conditions

Variables	ADMS-Roads Model Input
Surface roughness at source	0.5m
Surface roughness at Metrological Site	0.2m
Minimum Monin-Obukhov length for stable conditions	10m
Terrain types	Flat
Receptor location	x, y coordinates determined by GIS, z = 0m for ecological receptors.
Emissions	NO_x – Defra's EFT v11. NH_3 – CREAM V1A
Meteorological data	1 year (2018) hourly sequential data from Wattisham meteorological station.
Receptors	Ecological transects
Model output	Long-term (annual) mean NO_x and NH_3 concentrations.

Meteorological Data

One year (2018) of hourly sequential observation data from Wattisham meteorological station has been used in this assessment to correspond with the baseline year. The station is located approximately 45km south-east of the SACs/ SSSIs and experiences meteorological conditions that are representative of those experienced within the air quality study area.

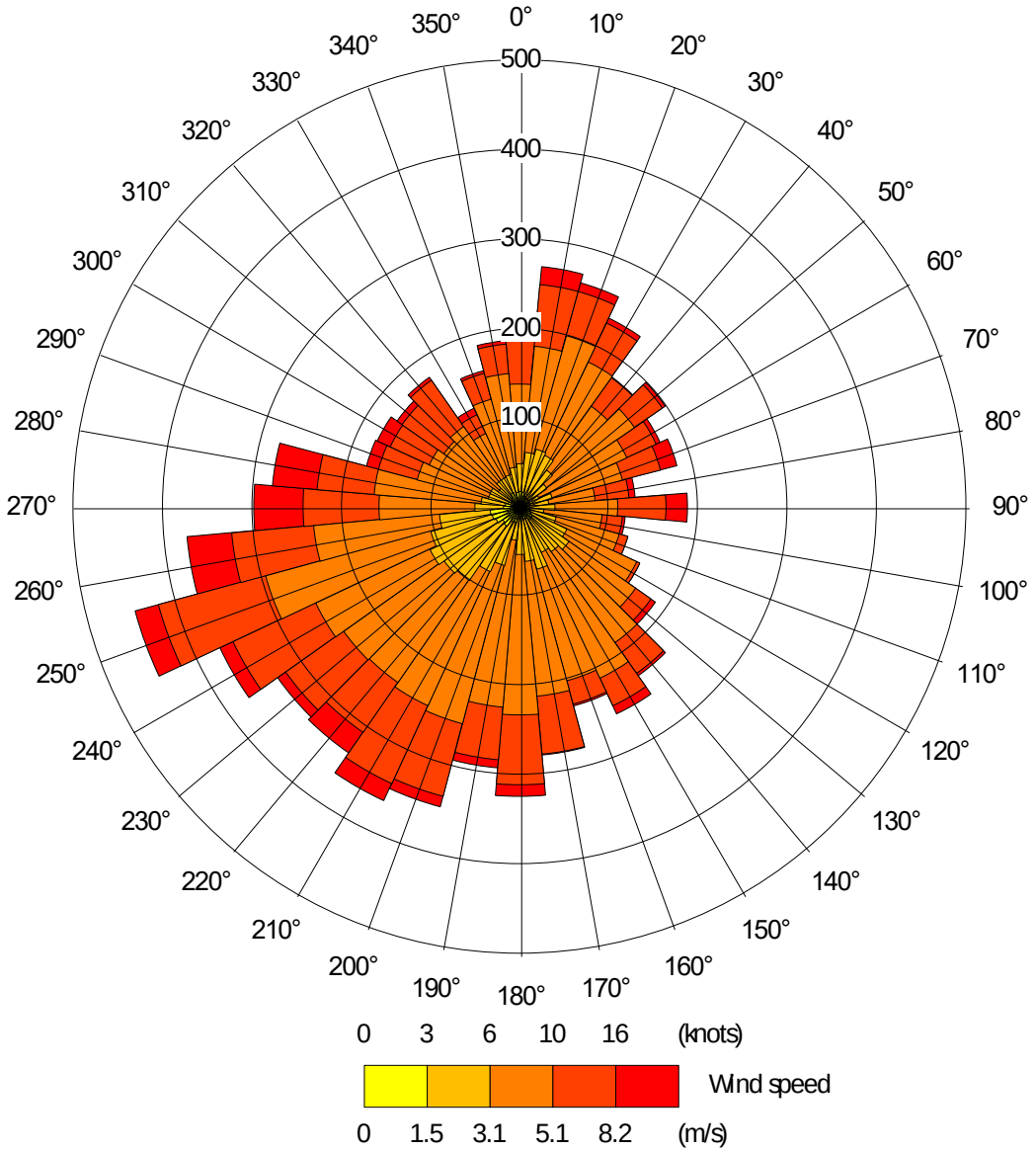


Figure 4 shows that the dominant direction of wind is from the south-west, as is typical for the UK. The wind speed ranges from 0-18 knots (0- ~9.3 m/s).

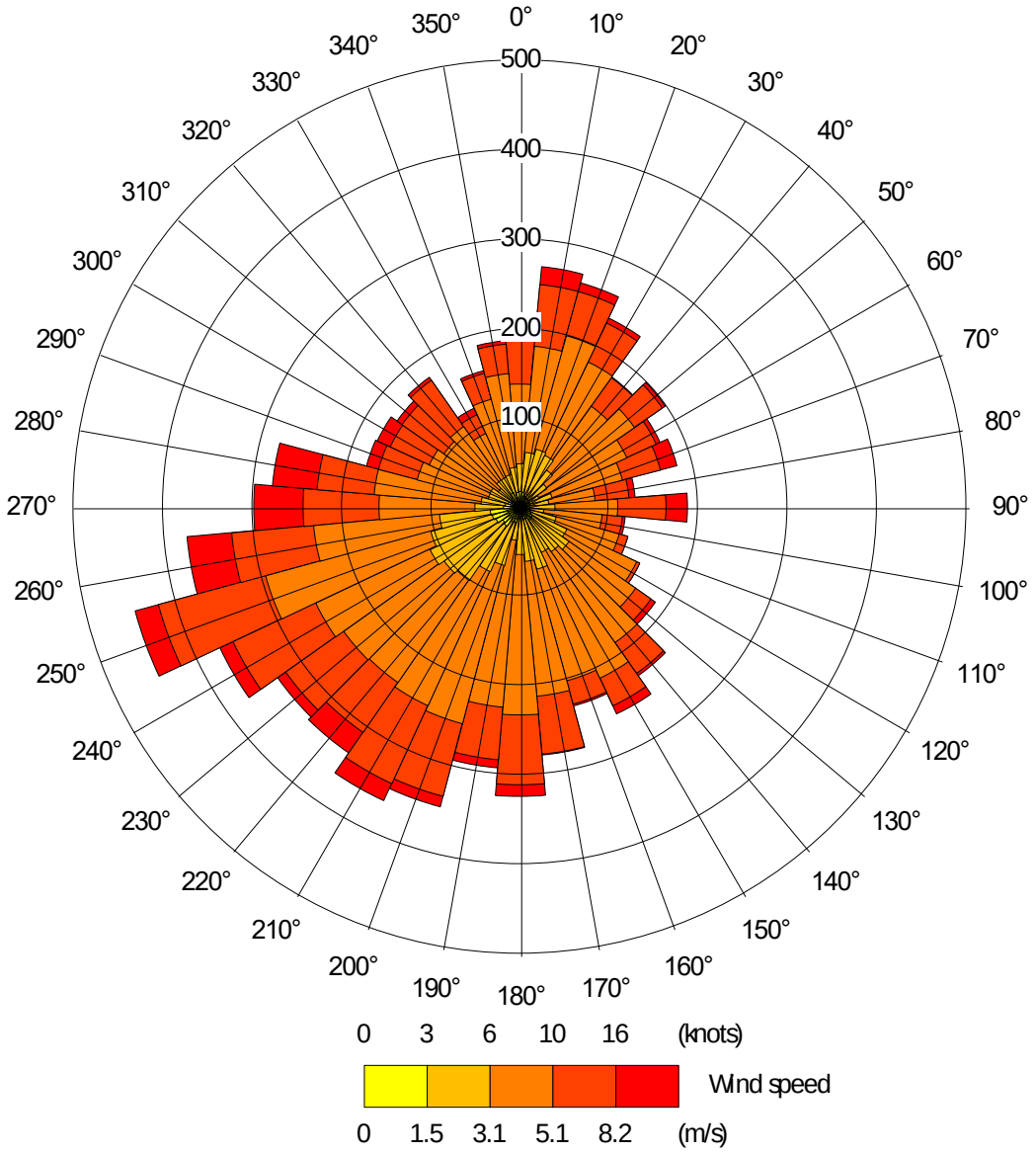


Figure 4 Wind Rose of Wattisham Met Data 2018

Background Data

Background mapped concentrations for NO_2 and NOx concentrations for 2019 and 2030 have been sourced from Defra's 2018-based background maps for receptors within the nearest 1km by 1km grid squares (Table 7). The data shows that the mapped background concentrations are predicted to decrease between 2019 and 2030.

Table 7 Defra Mapped Background Pollutant Concentrations (µg/m³)

Grid Square (X, Y)	Annual Mean Concentrations			
	2019 NOx	**2019 NO_2**	**2030 NOx**	**2030 NO_2**
558500, 261500	10.5	8.1	7.1	5.6
560500, 262500	11.0	8.5	7.3	5.8
560500, 263500	10.3	8.0	7.0	5.6
561500, 261500	9.4	7.3	6.6	5.2
562500, 262500	9.5	7.4	6.6	5.3
572500, 273500	9.6	7.5	6.8	5.4
572500, 274500	9.8	7.7	7.0	5.5
573500, 273500	9.3	7.3	6.6	5.2
573500, 274500	9.3	7.3	6.6	5.2
573500, 275500	9.5	7.4	6.7	5.3
573500, 277500	8.6	6.8	6.3	5.0
573500, 278500	8.4	6.6	6.2	4.9
574500, 274500	9.2	7.2	6.5	5.2
574500, 276500	9.0	7.1	6.5	5.1
574500, 277500	8.6	6.8	6.3	5.0
575500, 277500	8.8	6.9	6.4	5.1
575500, 283500	8.0	6.3	6.0	4.8
575500, 284500	7.9	6.2	6.0	4.8
576500, 284500	8.1	6.3	6.1	4.9

Ecological Data

The annual mean critical levels of NOx and NH_3, concentrations above which adverse effects on ecosystems may occur based on present knowledge are summarised in Table 8.

Table 8 Annual Mean Critical Levels (NOx and NH_3)

Pollutant	Critical Level
Oxides of nitrogen (NOx)	30 µg/m³
Ammonia (NH_3)	3 µg/m³ 1 µg/m³ for lichens and bryophytes

The Air Pollution Information System [REF 86] (APIS) provides ‘a searchable database and information on pollutants and their impacts on habitats and species’.

Site interest features were selected from Devils Dyke SAC, Breckland SAC, Newmarket Heath SSSI, Breckland Forest SSSI and Breckland Farmland SSSI. The site interest features within these ecological designations are listed in Table 9. The parameters for the relevant habitats within Each SAC and SSSI are also presented.

No change in the APIS concentrations of NH_3 or deposition rates of nitrogen and acid have been assumed from the APIS 2019-2021 values r to the future year.

Table 9 Air Pollution Information System (APIS) Data of the Ecological Receptors.

Transect	Av. N Dep Rate kgN/ha/yr	Critical Load Av. N Dep Rate kgN/ha/yr	Total Av. Acid Dep Rate keq/ha/yr	Critical Load Nitrogen Av. Acid Dep Rate keq/ha/yr	Ammonia $\mu g/m^3$	Habitat	APIS Data Year
A14_S2	14.84	10-20	1.1	4.856	1.57	Bromos Erectus Lowland Calcareous Grassland / Cynosurus Cristatus, Centaurea Nigra Grassland	2019 - 21
A304_N1	14.38	10-20	1.06	4.856	1.48	Cynosurus Cristatus, Centaurea Nigra Grassland / Cynosurus Cristatus, Centaurea Nigra Grassland	2019 - 21
A304_N2	14.57	10-20	1.07	4.856	1.49	Calcareous grassland	2019 - 21
A14_S1	14.64	10-20	1.08	5.856	1.54	Calcareous grassland	2019 - 21
5WS_W	28.95	3-15	2.11	0.536	1.94	Caprimulgus europaeus / Lullula arborea	2019 - 21
5WW_S	29.03	3-15	2.12	0.536	1.96	Caprimulgus europaeus / Lullula arborea	2019 - 21
5WW_N	29.03	3-15	2.12	0.536	1.96	Caprimulgus europaeus / Lullula arborea	2019 - 21
5WN_W	29.03	3-15	2.12	0.536	1.96	Caprimulgus europaeus / Lullula arborea	2019 - 21
5WE_S	29.06	3-15	2.12	0.536	1.90	Caprimulgus europaeus / Lullula arborea	2019 - 21
5WE_N	29.06	3-15	2.12	0.536	1.90	Caprimulgus europaeus / Lullula arborea	2019 - 21
5WNE_N	29.06	3-15	2.12	0.536	1.90	Caprimulgus europaeus / Lullula arborea	2019 - 21

5WNE_S	29.06	3-15	2.12	0.536	1.90	Caprimulgus europaeus / Lullula arborea	2019 - 21
5WN_E	29.03	3-15	2.12	0.536	1.96	Caprimulgus europaeus / Lullula arborea	2019 - 21
A11_NE_N	29.06	3-15	2.12	0.536	1.90	Caprimulgus europaeus / Lullula arborea	2019 - 21
A11_NE_S	29.06	3-15	2.12	0.536	1.90	Caprimulgus europaeus / Lullula arborea	2019 - 21
A1065_WangN_E	28.91	3-15	2.1	0.536	1.73	Caprimulgus europaeus / Lullula arborea	2019 - 21
B1112_E_W	16.41	-*	1.2	-*	1.83	Burhinus oedicnemus	2019 - 21
A1065_ErisS_E	16.41	-*	1.2	-*	1.83	Burhinus oedicnemus	2019 - 21
A1065_ErisN_E	16.43	-*	1.2	-*	1.88	Burhinus oedicnemus	2019 - 21
B1112_E_E	16.41	-**	1.2	-**	1.83	-	2019 - 21
A1065_WangN_W	16.56	5-15	1.2	0.944	1.73	Dwarf Shrub Heath / Acid grassland	2019 - 21
A1065_WangS_E	16.58	5-15	1.2	0.944	1.75	Dwarf Shrub Heath / Acid grassland	2019 - 21

A1065_WangS_W	16.58	5-15	1.2	0.944	1.75	Dwarf Shrub Heath / Acid grassland	2019 - 21

*Note: * Not assessed for feature; ** Transect not in SAC or SSSI

Verification

There are no local air quality monitoring stations near the modelled road links with which to make a comparison between modelled and measured concentrations to enable the model results can be adjusted to bring the modelled concentrations in-line with measurements. Therefore, verification factors have been used based upon professional judgement and experience. A verification factor of 1.5 for NOx and 1.0 for NH_3 have been applied based on previous verification and validation of the EFT and CREAM tools.

Deposition velocities

Deposition of nitrogen from road traffic derived NH_3 and NO_2 to the forest are estimated using the AQTAG deposition velocities that are cited in the 2020 IAQM guidance [REF 87], as shown in Table 10.

Table 10 Air Pollution Information System (APIS) Data of the Ecological Receptors.

Pollutant	Habitat	Nitrogen deposition conversion rates	Deposition velocity
NO_2	Forest	1 µg/m^3 NO_2= 0.29 kgN/ha/yr	0.003 m/s
NH_3	Forest	1 µg/m^3 NH_3 = 7.8 kgN/ha/yr	0.030 m/s
NO_2	Grassland	1 µg/m^3 NO_2= 0.14 kgN/ha/yr	0.0015 m/s
NH_3	Grassland	1 µg/m^3 NH_3 = 5.2 kgN/ha/yr	0.020 m/s

Limitations

The following limitations are recognised:

- No local monitoring data was available within 200m of the road network used in the current study. Therefore verification factors have been used based upon professional judgement and experience of the EFT and CREAM tools.
- Without monitoring of concentrations at background sites to compare with the mapped concentrations, it is assumed that the Defra and APIS concentrations correctly represent the background NOx, NO_2 and NH_3 concentrations for the baseline year.

Appendix E Regulation 19 Consultation Comments on HRA and Responses (September 2024)

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
1193794	Natural England	Air quality assessment	Natural England advise that at least 3 years (and ideally 5 years) of meteorological data from a local representative meteorological station should be used to ensure the assessment is robust. Table 6 shows that only one year (2018) of hourly sequential observation data has been used in this assessment (from Wattisham meteorological station).	While it is standard to use meteorological data for several years in point source assessments that is not the case for road traffic assessments such as the one undertaken for the Local Plan. Institute of Air Quality Management guidance states that: '*5.4.1.17 Multiple years of representative meteorological data (typically three to five consecutive years, depending on the type of assessment) should be used in the dispersion modelling of point sources; for road schemes, one year is normally sufficient (according to LAQM TG16*)'. This is also the approach	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
				used in Design Manual for Roads and Bridges which is the standard guidance for traffic-related air quality modelling. For other Local Plan modelling exercises AECOM has undertaken Natural England has been content with one year of meteorological data. Natural England has confirmed that as the air quality assessment related only to traffic, having only one year of air quality data is acceptable. No change required.		
1193794	Natural England	Air quality assessment	It is noted that no acidity critical loads have been included within the assessment, or assessed against the process contribution, despite some features of designated sites being	The HRA will be updated to include an assessment of acid deposition, as this was modelled. From an initial review of the data it will not materially affect the conclusions.	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			sensitive to acidity. Details of all critical loads and levels for designated sites are on the Air Pollution Information System (apis.ac.uk) (APIS).	Changes made to the HRA technical update, September 2024. See section on Acid deposition s5.84 – 5.91		
1193794	Natural England	Air quality assessment	There are a few locations where an adverse effect on site integrity has been ruled out where a process contribution of 1% has been exceeded as part of the in combination assessment, such as Mildenhall Road (A1101) and Rex Graham Reserve SAC. The justification given for this is because the contribution of the Local Plan alone is considered negligible. However Natural England advises that where modelling	The guidance regarding the 1% threshold quoted in this comment relates to the 'Likely Significant Effects' stage of assessment. AECOM can confirm that there are no links where in combination pollution exceeds 1% of the critical level/load but the HRA authors have nonetheless concluded no likely significant effect. All such links have been carried forward to appropriate assessment. At the appropriate assessment stage the 1% of	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			shows that a process contribution of 1% of critical levels and / or load is exceeded at European sites, either alone or in-combination with other plans and projects, that a likely significant effect cannot be ruled out.	the critical level/load threshold is no longer the sole basis for assessment, hence the inclusion of other factors such as the extent of retardation of any forecast improvement in nitrogen deposition expected as discussed in the HRA. Natural England has accepted that: - The nitrogen contribution of the WSLP is either very small indeed and can be disregarded (Breckland SPA) or will not materially interfere with the ability of the site to achieve its conservation objectives (Rex Graham SAC, Devils Dyke SAC) – no change required. - The process contribution of ammonia is so small that the effect can be disregarded (Rex Graham		

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
				SAC, Devils Dyke SAC) – no change required. NE are still considering further explanation in relation to the process contribution of ammonia at Breckland SAC.		
1193794	Natural England	Air quality assessment	It is also noted in section 5.72 that a critical load of 10kgN/ha/yr has been used for Breckland SPA due to Woodlark and Nightjar within the SPA being known to use clearings within the woodland for foraging and breeding, and therefore the lowest part of the critical load range for this habitat type was not deemed appropriate as this is only relevant to native conifer woodland designated for its diverse lichen flora. However, we believe the most appropriate habitat	The critical load for heathland was lowered from 10 kgN/ha/yr to 5 kgN/ha/yr due to emerging research that botanical features of heathland (e.g. species richness and percentage grass cover) can be significantly affected at rates below 10 kgN/ha/yr. However, these plantation clearings are heavily managed environments (as evidenced by the close association identified in research between differences in nightjar and woodlark density and different stages of plantation	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			type for these clearings on APIS is likely to be dry heath, which has a critical load of 5kgN/ha/yr rather than 10kgN/ha/yr.	development) and are not a structurally static environment unlike heathland (i.e. the plantation clearings progress from clear fell through stages of woody growth until mature plantation is present). As such coarse habitat structure is much more relevant to suitability for nightjar/woodlark in these clearings than the more subtle botanical and structural changes that might arise in an area of heathland or acid grassland. Therefore, the HRA authors do not consider that the lowest part of the critical load range for heathland is appropriate for these clearings and consider 10 kgN/ha/yr is more appropriate. This would also be appropriate for a high		

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
				intensity managed heathland environment as indicated in Bobbink et al 2022[12] which states: '*The high end of the CLempN range applies to dry Calluna-dominated heath with high intensity management, and the low end of the range to dry Calluna-dominated heath with low intensity management.'* The process of plantation felling and replanting would meet the definition of a high intensity management environment. Natural England has confirmed that as the qualifying feature of Breckland SPA is the birds (Stone Curlew, Woodlark and Nightjar) and not the habitat itself, using the lower part of		

[12] Bobbink R, Loran C, Tomassen H. 2022. Review and Revision of Empirical Critical Loads of Nitrogen for Europe. Report for the German Environment Agency

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
				the critical load range for heathland is justified.		
1193794	Natural England	Paragraph 3.11	We question the description of 'a mitigating 1,500m buffer'. It is our advice that the purpose of the buffer is to trigger the need for a HRA which can then consider the impact of a specific development on stone curlew in further detail.	The HRA authors recognise that the buffer is not a 100% exclusion zone, but by prohibiting net new residential development within 1500m of the SPA unless it can demonstrate it won't affect the SPA stone curlew the buffer does effectively serve a mitigating purpose. Changes made to the HRA technical update, September 2024. See section 3.11	No	N/A
1193794	Natural England	Recreational pressure on Habitats sites	Currently the HRA does not provide sufficient information on the mitigation measures within the proposed Supplementary Planning Document to be delivered, more information is required to	The HRA authors consider that the HRA itself can provide summary (rather than full) details on the content of the SPD, as in this case the SPD is being drafted alongside the Local Plan and HRA and will therefore be available to	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			provide certainty that the proposals will be suitably mitigated.	provide the full details of the strategy to inform the Local Plan Examination. Changes made to the HRA technical update, September 2024. See sections 5.34, 5.36, and following 5.38		
1193794	Natural England	Recreational pressure on Habitats sites	Natural England express the view that a strategic SPD covering all net new residential development within the recreational catchment around the Habitats sites goes further than is necessary at this stage. Natural England instead feel the issue can be addressed proportionately by targeting specific developments. However, Natural England recognise that this is ultimately a decision for	The visitor survey work underpinning the SPD indicates that recreational pressure issues are not likely to stem purely from a small number of larger developments but are a diffuse issue across the catchment of the Habitats sites, as is the case with numerous other Habitats sites such as the Thames Basin Heaths SPA. The HRA authors experience in other authorities is that delivering mitigation for such a diffuse issue is much easier with a strategic approach (and	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			West Suffolk Council as competent authority.	clearer for both the Councils and developers) than seeking to devise a bespoke solution for each relevant planning application at the Development Management stage. This would also be consistent with the approach being taken by the adjacent Norfolk authorities such as Breckland. Changes made to the HRA technical update, September 2024. See sections 5.38		
1193794	Natural England	Water resources	Fenland SAC (Wicken Fen SSSI and Chippenham Fen SSSI), near to the Newmarket allocations, is classed as water dependant …We are aware that this issue has not been assessed further due to the conclusion of the Anglian Water (Draft) HRA	Anglian Water ultimately have the legal duty to meet the public water supply needs of West Suffolk growth without an adverse effect on Habitats sites (or to provide compensatory measures if such effects will arise, following subsequent derogation tests). The Local Plan HRA authors note that	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			(December 2019) that no Habitat sites have been identified with the potential to be affected in combination with the Anglian Water 'Water Draft Water Resources Management Plan' (WRMP). However, we would advise that further updated information is required in relation to the recent EA report, including whether mitigation measures are required and how these would be secured.	the Environment Agency response to the Local Plan advises West Suffolk to base its plan on Anglian Water's draft Water Resources Management Plan 2024 (dWRMP24) as the most up to date assessment (revised-draft-wrmp24-environmental-report-sub-report-a---hra.pdf (anglianwater.co.uk)). The HRA will therefore be updated to reference that document rather than the adopted WRMP19. The Environment Agency also note in their letter that because the East of England is so water-stressed the dWRMP24 includes transfer schemes to pipe water from elsewhere. Consequently, additional public water supply may not necessarily be abstracted within the West Suffolk area. The HRA		

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
				of WRMP24 concludes that *'It is considered that at the plan level there is confidence adverse effects can be avoided or fully mitigated through adjustments to the detailed design of the scheme and the application of measures described in the individual assessments… At the plan level, it is concluded that there will be no adverse effect on the integrity of any Habitats Site'.* Changes made to the HRA technical update, September 2024. See section 4.33		
1193794	Natural England	Water quality, specifically regarding Policy AP20 (Pinewood Stud)	We advise further consideration should be given to allocation AP20 (Pinewood Stud) in relation to Fenland SAC in a project level HRA. The site of this allocation has a hydrological	The HRA authors note that Natural England consider this is an issue to be fully explored for a planning application HRA. However, the Local Plan HRA will be updated to discuss this issue with regard to this particular	Yes	Insert requirement for planning application-level HRA to consider and avoid significant water quality impacts on Fenland SAC

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			connection to the SAC. A project level HRA could include an assessment of the effect of increased sedimentation and eutrophication from dogs being near the water and whether parts of this site would need to be fenced off to become an appropriate site for a Country Park.	allocation and identify the need for application HRA, and its scope. Changes made to the HRA technical update, September 2024. See section 5.51 and 5.53		(Wicken Fen and Chippenham Fen) Modification to policy AP20 proposed (D7 PQ6d)
1192730	Exning New River Association	Water quality and resources, specifically regarding Policy AP20 (Pinewood Stud)	Similar point to that raised by Natural England on AP20 (Pinewood Stud). Specifically, comments that the HRA does not identify the potential for these to be exacerbated on the highly porous soils and geology of Newmarket. This impact pathway is relevant to policy AP20 – Pinewood Stud, due to the	The HRA authors note that this is similar to the matter raised by Natural England and is an issue to be fully explored for a planning application HRA. The Local Plan HRA will be updated to discuss this issue with regard to this particular allocation and identify the need for application HRA, and its scope. It is noted that Exning New River Association has asked for a	Yes	Insert requirement for planning application-level HRA to consider and avoid significant water quality impacts on Fenland SAC (Wicken Fen and Chippenham Fen), including specific reference to water quality monitoring.

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			hydrological connectivity between this site and the groundwater fed chalk springs on the adjacent Seven Springs site. These springs feed the New River chalk stream, which passes through Exning and continues on to Wicken Fen (SSSI, SAC, NNR, Ramsar) via the Monks Lode… Our main concerns are that increased nutrients, run-off pollution and increased abstraction could damage the delicate wet woodland Seven Springs site, in particular the springs of the 'Roman Baths' which are adjacent to and fed by the water from the Pinewood Stud site. We are also concerned that reducing the quality of water that Wicken Fen's	requirement to be introduced that *'independent water quality surveys be carried out within the Seven Springs for a minimum of 12 months prior to work starting, so that mitigation installations can be assessed and monitored'.* As above		As above

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			'Sedge Fen' (which has never been drained), relies on.			
1193751	Suffolk Wildlife Trust	Water quality and resources, specifically regarding Policy AP20 (Pinewood Stud)	Similar comment to Exning New River Association.	The HRA authors note that this is similar to the matter raised by Natural England and is an issue to be fully explored for a planning application HRA. The Local Plan HRA will be updated to discuss this issue with regard to this particular allocation and identify the need for application HRA, and its scope. As above	Yes	Insert requirement for planning application-level HRA to consider and avoid significant water quality impacts on Fenland SAC (Wicken Fen and Chippenham Fen). As above
1193751	Suffolk Wildlife Trust	Water quality	The HRA does not capture the following statement from the Stage 2 – Detailed Water Cycle Study (Stage 2 DWCS) in relation to the potential impacts of options for addressing predicted	Although these specific comments in the Stage 2 DWCS are not discussed in the HRA, the issue with Tuddenham WRC meeting its currently permitted DWF is discussed in the HRA report and Anglian Water's proposed solution is also	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			future exceedance of current permitted dry weather flow (DWF) limits at Tuddenham WRC (10.2 Wastewater, sewage and water quality, p.153 Stage 2 DWCS): • Pumping flows to a nearby water recycling centre (WRC) catchment. Potentially transferring flows to Mildenhall or West Stow WRC catchments as they have sufficient dry weather flow (DWF headroom to accommodate the shortfall at Tuddenham WRC. However potential damage to the surrounding SAC in laying a new sewer rising main and pumping station is a limitation. –	discussed, along with the need for delivery of housing in West Suffolk to keep pace with the delivery of necessary treatment infrastructure. Ultimately, it is for the statutory sewage services provider (Anglian Water) to plan for and deliver the necessary infrastructure to meet wastewater treatment needs in West Suffolk, and they now have a specific statutory process (the Drainage and Wastewater Management Plan) to address this matter. No changes required.		

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			• Move the discharge point to a more appropriate watercourse. The only geographically viable options are the Cavenham Stream or River Lark where flows are larger providing more dilution. However, potential damage to the surrounding SAC in laying a new sewer rising main and pumping station is a limitation.			
1193751	Suffolk Wildlife Trust	Water resources	The West Suffolk Council Water Cycle Study, Stage 2 – Detailed Water Study highlights that the growth projections used by Anglian Water Services (AWS) in the draft WRMP24 were lower than those used to inform the development of the West Suffolk Local	Anglian Water ultimately have the legal duty to meet the public water supply needs of West Suffolk growth without an adverse effect on Habitats sites (or to provide compensatory measures if such effects will arise, following subsequent derogation tests). The Local Plan HRA authors note that the Environment Agency	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			Plan. We agree it is important that this discrepancy is addressed in subsequent iterations of the WRMP. We note there is significant uncertainty about the ability to meet predicted future Public Water Supply needs associated with the level of growth projected in the West Suffolk Local Plan while preventing deterioration of Water Framework Directive waterbodies, including sensitive chalk streams. It will be important for the sections of the HRA that deal with potential impacts from water abstraction to be kept under review and	response to the Local Plan advises West Suffolk to base its plan on Anglian Water's draft Water Resources Management Plan 2024 (dWRMP24) as the most up to date assessment (revised-draft-wrmp24-environmental-report-sub-report-a---hra.pdf (anglianwater.co.uk)). The Environment Agency also note in their letter that because the East of England is so water-stressed the dWRMP24 includes transfer schemes to pipe water from elsewhere. Consequently, additional public water supply may not necessarily be abstracted within the West Suffolk area. The HRA of WRMP24 concludes that *'It is considered that at the plan level there is confidence adverse effects can be avoided or fully mitigated through adjustments to the*		

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			updated as more information becomes available from AWS and the Environment Agency, to ensure that impacts to Habitats sites can be avoided.	*detailed design of the scheme and the application of measures described in the individual assessments… At the plan level, it is concluded that there will be no adverse effect on the integrity of any Habitats Site'.* Since the WRMP must be regularly revised (including its population projections) the HRA authors intend to follow the EA advice and reference the WRMP24. Changes made to the HRA technical update, September 2024. See section 4.33		
1193701	The National Trust	Water quality (specifically regarding AP20 Pinewood Stud)	The requirements of draft Policy LP6 notwithstanding, we note and share Suffolk Wildlife Trust's concern that the impacts of polluted surface water	The HRA authors note that this is similar to the matter raised by Natural England, Suffolk Wildlife Trust, and Exning New River Association, and is an issue to be fully explored for a	Yes	Insert requirement for planning application-level HRA to consider and avoid significant water quality impacts on

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			infiltration into the chalk stream hasn't been taken into consideration strategically and cumulatively in the HRA, which evidences and supports the growth proposed in the draft Plan.	planning application HRA. The Local Plan HRA will be updated to discuss this issue with regard to this particular allocation and identify the need for application HRA, and its scope. Changes made to the HRA technical update, September 2024. See section 5.51 and 5.53		Fenland SAC (Wicken Fen and Chippenham Fen). Modification to policy AP20 proposed (D7 PQ6d)
1193701	The National Trust	Water resources	We also note and share Suffolk Wildlife Trust's concerns regarding the growth projections used in the draft WRMP24 being lower than those used to inform the WSLP.	Anglian Water ultimately have the legal duty to meet the public water supply needs of West Suffolk growth without an adverse effect on Habitats sites (or to provide compensatory measures if such effects will arise, following subsequent derogation tests). The Local Plan HRA authors note that the Environment Agency response to the Local Plan advises West Suffolk to base	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
				its plan on Anglian Water's draft Water Resources Management Plan 2024 (dWRMP24) as the most up to date assessment (revised-draft-wrmp24-environmental-report-sub-report-a---hra.pdf (anglianwater.co.uk)). The Environment Agency also note in their letter that because the East of England is so water-stressed the dWRMP24 includes transfer schemes to pipe water from elsewhere. Consequently, additional public water supply may not necessarily be abstracted within the West Suffolk area. The HRA of WRMP24 concludes that *'It is considered that at the plan level there is confidence adverse effects can be avoided or fully mitigated through adjustments to the detailed design of the scheme and the application*		

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
				of measures described in the individual assessments… At the plan level, it is concluded that there will be no adverse effect on the integrity of any Habitats Site'. Since the WRMP must be regularly revised (including its population projections) the HRA authors intend to follow the EA advice and reference the WRMP24. Changes made to the HRA technical update, September 2024. See section 4.33		
1193991	Elveden	Section 3	Various comments on background information	. Changes made where appropriate. See sections 3.6, 3.11, 3.19, final bullet of 3.26, 4.24 and 5.50	No	N/A
1193991	Elveden	Use of 1500m zone around Breckland SPA	It is desirable for research to look at the impacts of development	There has been extensive work done to establish the 1500m buffer and the buffer	No	N/A

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			within the 1500m zone prior to that zone being in place; this might provide good evidence to the impacts of development and test the perceived impacts. It would also be helpful to assess how the nest displacement has changed over time. Currently the analysis has used all nest data from 1987 to 2011. It might show an insight into changing behaviour if the data was re-analysed for perhaps each decade; displacement might increase or decrease as populations fluctuate in size and individual birds' response to population size change. The Local Plan is not sound until this vital research is	has now been applied consistently by West Suffolk Council and Breckland Council for many years and was debated at length in the Examinations for the adopted Local Plans for both authorities. Natural England continues to support the use of such a buffer and case law is clear that competent authorities should give 'considerable weight' to the organisation's opinion (Hart District Council) v Secretary of State for Communities and Local Government [2008]) on HRA matters. No change required. See A9j		

Rep ID	Organisation/person	HRA chapter/section	Summary of comments/Main issues	Councils response	Change to policy Yes/No	Outline of the modification
			carried out and the evidence base becomes sound.			
1193991	Elveden		The treatment of stone-curlews nesting on land outside the SPA, but being treated as part of the SPA population, with the creation of buffer zones, is now superseded by fresh Natural England advice. In March 2023, Natural England advised the Planning Inspectorate, in the context of a DCO Order for the Sunnica solar farm, that [stone-curlew] nesting at a distance more than one field away from the boundary of the SPA are not considered to be SPA birds.	The HRA authors understand that, notwithstanding their response to the Sunnica DCO Examination, Natural England are continuing to work on their position regarding this issue. The HRA authors also note that Natural England have not challenged the approach taken to functionally linked land for stone curlew in the Local Plan HRA. Until such time as Natural England guidance changes it is considered appropriate for the Local Plan HRA to take a precautionary stance on this issue. No changes required. See A9j	No	N/A

Appendix F Further Residual Natural England Air Quality Comments (October 2024)

NE Further Comment	NE Latest Comment (October 2024)	AECOM Second Response
Paragraph 5.67 of the HRA (AECOM, December 2023) notes that in combination ammonia contribution exceeds 1% of the critical level up to 20m from the roadside. However, no site specific consideration has been included of whether this would have an adverse effect on the integrity of the site against the interest features of the area where the 1% is exceeded. Additionally, it is not clear how the conclusion of "a net improvement" has been made considering that there is no definitive evidence of an improving trend in background ammonia emissions.	1. AECOM have stated that the small net improvement forecast within 200m of the roadside is due to the projected increase in ultra-low emission vehicles and associated reduction in combustion engine vehicles expected by 2040. It is our advice that the Defra Emissions Factors should not be used after year 2030 as there is less certainty of these after that date. We do not accept any ammonia decline in modelling at present but expect modelling to show that ammonia levels will stay level due to the complex picture and as there is insufficient certainty of uptake electric vehicles at present. 2. AECOM has not answered the question regarding the specific impact of ammonia over the 1% threshold on the specific interest features of the site in the area to be impacted. It may be that the increase will not have an adverse effect on the integrity of the	With regard to the suggested application of 2030 emission factors to 2040 traffic, AECOM have prepared a separate technical note explaining our approach to electrification of the vehicle fleet and confirming that the application of 2030 emission factors to a 2040 vehicle fleet would substantially overestimate emissions. The text below specifically concerns itself with part 2 of Natural England's comment. Mildenhall Road (A1101; transects 5WE_N and 5WE_S) has significant areas of acid grassland either side of the road, which are part of Cavenham & Icklingham Heaths. Anecdotal observation indicates lichens and bryophytes in the sward. The 'in combination' ammonia contribution exceeds 1% of the critical level up to 20m from the roadside, being 0.02 µg/m^3 (2% of the critical level) at 10m from the roadside. After 20m the 'in combination' impact falls below 1% of the critical level. As such, ammonia is forecast to be barely different with or without growth (maximum 2.01 µg/m^3 by 2040 with no traffic growth and 2.03 µg/m^3 with all forecast traffic growth). This affects a strip of the SAC amounting to 0.05% of the SAC, or 0.5% of the

NE Further Comment	NE Latest Comment (October 2024)	AECOM Second Response
	site, however this detail is missing so we would welcome some clarity before commenting further.	acid grassland interest feature. The contribution of West Suffolk Local Plan to this 'in combination' effect is a worst-case 0.001 µg/m^3 or 5% of the total 'in combination' effect. Paragraph 5.28 of Natural England guidance[13] states *'In practice, where a site is already exceeding a relevant benchmark, the extent to which additional increments from plans and projects would undermine a conservation objective to 'restore' will involve further consideration of whether there is credible evidence that the emissions represent a real risk that the ability of other national or local measures and initiatives to otherwise reduce background levels will be compromised in a meaningful manner'*. Total ammonia concentrations are already sufficiently far above the critical level for lichens and bryophytes that the additional 'in combination' ammonia (an increase in ammonia concentrations of 1% compared to a situation without any traffic growth) is unlikely to result in an effect on their populations or opportunities for restoration or compromise the ability of other national or local measures and initiatives to otherwise reduce background levels. Moreover, while there has been much less research on terricolous lichens than epiphytes,

[13] http://publications.naturalengland.org.uk/publication/4720542048845824

NE Further Comment	NE Latest Comment (October 2024)	AECOM Second Response
		available evidence suggests that management can be more important than ammonia concentrations in achieving a more diverse lower plant assemblage. Sanderson[14] found no correlation between the generally low ammonia levels in the New Forest (0.72 µg/m^3 to 1.51 µg/m^3) and terricolous lichen diversity and considered management history to be a much more significant factor. Monitoring of Thursley Common[15] showed terricolous lichens recovering well from a fire there in 2006, despite spring ammonia concentrations being as high as 1.6 µg/m^3. Coupled with the small area affected (0.05% of the SAC) this will not materially retard restoration of the SAC towards its conservation objectives. Moreover, the West Suffolk is a minor contributor to the total 'in combination' effect being responsible for 5% of the in-combination ammonia. In other words, West Suffolk Local Plan is responsible for 5% of the small (2% of the critical level or 1% of baseline concentrations) ammonia 'in-combination' effect on an area amounting to just 0.05% of the SAC or 0.5% of the acid grassland, localised in a narrow strip along the road. It is therefore considered no adverse effect on the integrity of the SAC would arise.

[14] Sanderson, NA. 2017. The New Forest heathland lichen survey 2011 to 2015. Natural England Joint Publication JP020.
[15] Nisbet, A, SJ Smith, J Holdsworth (eds). 2017. Taking the long view: An introduction to Natural England's Long Term Monitoring Network 2009 – 2016. Natural England Report NERR070.

Appendix G Main Modifications HRA (March and July 2025)

G.1 Introduction

AECOM was appointed by West Suffolk District Council to assist the Council in undertaking a Habitats Regulations Assessment (HRA) of the West Suffolk Local Plan (WSLP) January 2024 (Examination Document A1). The HRA included an appropriate assessment and concluded no adverse effect on the integrity of any Habitats sites (Previously referred to as "European sites"), and that the Local Plan had a suitable framework in place to ensure that development delivered would not affect the integrity of any Habitats sites either alone or 'in-combination' with other plans and projects.

Following the Examination into the Local Plan, the Inspector has recommended a series of Main Modifications (MM) to be made to the Plan (including Policies Map Modifications (PMM)), and some further modifications as set out in the July 2025 report into the Examination of the West Suffolk Local Plan. It is therefore necessary for those modifications to be assessed in order to confirm that they will not themselves introduce new likely significant effects that were not thoroughly investigated for the HRA of the WSLP January 2024. That is the purpose of this report. The Council has also prepared a schedule of proposed Additional Modifications (for information) alongside the Main Modifications. The additional modifications have been reviewed but are largely to rectify minor issues, presentation, grammar and for clarity. Therefore, none are considered to introduce new likely significant effects and formal screening of the additional modifications is not required. Main Modifications to Appendices have also been made. However, by definition these relate to information that is informative and supplementary and cannot affect the conclusions of the Local Plan HRA. They are therefore not discussed below.

This report should be considered an Addendum to the HRA of the Local Plan September 2024[16]. As such, it does not recap the methodology of the HRA or the results of either the likely significant effects test or appropriate assessment of the WSLP, including the 'in-combination' assessment. Instead, it focuses specifically on whether the Main Modifications (MMs) will result in likely significant effects on any Habitats sites.

[16] Available at West Suffolk Local Plan Habitats Regulations Assessment September 2024 [Accessed 18/02/2025].

G.2 Likely Significant Effects of Main Modifications (MMs)

Table 5-11 sets out the assessment of each Main Modification (MM).

Red text is used to indicate changes. ~~Text with a strike~~ through indicates text which was in the previous version of the WSLP and is now deleted. **Bold text** indicates new text as a result of the modifications.

Table 5-11Test of Likely Significant Effects for the Main Modifications to the West Suffolk Local Plan

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
MM1	Page 6, 9 and 10	Introduction	~~1.22. Strategic site allocation policies are the large sites of at least 500 homes, large employment or mixed-use allocations located in the towns of Bury St Edmunds, Mildenhall, Newmarket and Haverhill and some key service centres. These are listed before the local site allocations in the relevant section.~~ ~~1.23. Non-strategic site allocation policies are small to medium size sites in towns, key service centres, local service centres and type A villages ranging in size from 10 to 15 homes in the type A villages to 375 homes and a primary school in a key service centre.~~ **All site allocation policies in the local plan are strategic. There are a range of different allocations, from large residential, mixed-use and employment allocations in our towns of Bury St Edmunds, Haverhill, Mildenhall and Newmarket, to medium and small sites in towns, key service centres, local service centres and type A villages.** 1.50. The site allocations in this plan are identified as strategic ~~or non-strategic~~. The strategic sites are ~~larger~~ sites which help address the council's strategic priorities and housing and employment needs. ~~The non-strategic sites are smaller sites across the district in towns and villages that meet local housing, employment, and community need.~~ 1.52. The level of development proposed is influenced by the overall housing requirement and the spatial strategy. The distribution of development across the district takes into account existing environmental and physical constraints as well as the overall capacity for growth in the settlement. Appendix B sets out a schedule of all the strategic ~~and non-strategic~~, employment, mixed-use and residential site allocations in the plan.	See council's response inspectors' PQ16 and matter 1.	No Likely Significant Effect This modification redefines all site allocations in the plan as strategic, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM2	Page 12	Vision for West Suffolk	2.1. The vision for West Suffolk underpins the local plan. The vision is a statement of ambition setting out what changes and developments the policies within the local plan should seek to achieve in the area by ~~2040~~ **2041**. 2.2. The issues and options draft used the adopted council vision (as set out in the West Suffolk Council Strategic Framework 2020-2024) as a base for a vision for the local plan to ~~2040~~ **2041**. This was further developed using responses to the issues and options and preferred options draft consultations **The local plan vision for West Suffolk ~~2040~~ 2041** By ~~2040~~ **2041** we will have ensured a variety of well-designed new homes have been delivered in appropriate locations that meet the needs of our residents. Businesses and our diverse rural economy will have had the opportunity to grow and prosper. All new development will have been designed to respect, protect and enhance the natural environment and adapt to and mitigate for climate change and have achieved net zero carbon emissions in construction, energy sources and future use. All our settlements from towns to rural villages will be places where families and communities can live safe and healthy lives with infrastructure to be provided to accompany growth, particularly in respect of transport including highway improvements, providing pedestrian and cycling routes, social infrastructure and access to blue and green infrastructure. The special quality, character and heritage of our West Suffolk built and natural environment, and its historic assets will have been protected and enhanced.	In response to the inspectors' PQ23 and council's matter 2.	No Likely Significant Effect This modification extends the plan by one year, it does not introduce new developments, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
MM3	Page 14 and 15	Strategic objectives	Our strategic objectives will drive delivery of the spatial strategy and implementation of policies that will plan for and manage growth and development in West Suffolk to ~~2040~~ **2041**. **Environment** **SO15** Seek opportunities to increase the provision and biodiversity of high-quality ~~multi-use green spaces and corridors by achieving~~ **green and blue infrastructure, including through** biodiversity net gain**, to support nature recovery**. **Connectivity and accessibility** **SO20** ~~Recognising the differences between urban and rural areas,~~ **F**~~f~~oster sustainable travel **and reduced demand for transport through an integrated approach to sustainable transport.** ~~This will include promoting low carbon means of travel such as by ensuring provision of electric vehicle charging points. It will also involve an integrated sustainable transport network across the district~~, including travel demand management, that work together to encourage less reliance on **private** cars.~~ as the only means of travel.~~ **This will recognise the differences between urban and rural travel patterns, and will promote low carbon means of travel, such as provision of electric vehicle charging points.**	See council's response to the inspectors' PQ23 and matter 2. To make soundness changes in response to regulation 19 representations.	No Likely Significant Effect This modification proposes changes to the wording of the objectives, but the support for nature recovery and sustainable travel remain, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM4	Page 16 and 17	Policy SP1	**Policy SP1 The climate and environment emergency and sustainable development** Proposals for all types of development ~~must~~ **should where possible** take account of the climate and environment emergency through good design and inclusion of measures to build in resilience and adapt to or mitigate the impact of climate change**, as appropriate to the nature and scale of the proposal,** by: • Designing for accessible communities minimising the need to travel, creating active travel routes and maximising the potential for and delivering sustainable travel (including associated links and facilities). • Minimising energy consumption. • The use of low and zero carbon energy sources. ~~• The use of sustainably sourced and low carbon building materials.~~ • The use of sustainable drainage systems to help avoid and reduce the risk of flooding. • Providing betterment over the existing situation in areas at risk of flooding and seeking to achieve integrated water management. • Contributing to improving the water quality of rivers and groundwater in West Suffolk. • Providing, integrating and connecting blue and green infrastructure. • Climate resilient design including prevention of overheating in buildings and implementation of designs for urban cooling through the retention of landscape features and provision of green infrastructure, including appropriate tree-planting and increasing canopy cover. • Identifying and developing nature-based solutions to contribute to reducing carbon emissions and mitigating and adapting to climate change. • Conserving and enhancing biodiversity and protecting geodiversity of sites and surrounding areas through implementation of the mitigation hierarchy.	See council's response to the inspectors' preliminary questions and matter 10. To make soundness changes in response to regulation 19 representations.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidelines to account for climate change and the environment emergency, it does not introduce new developments, leaving the original HRA

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			• The reduction and prevention of pollution. • The use of higher water efficiency standards to ensure sustainable use of water resources across new developments including integrated water management measures. • The application of measures from construction through to end user to reduce waste, promote recycling, and source **sustainable and low carbon building** materials ~~locally~~. 4.1.7. West Suffolk is part of the Suffolk Climate Change Partnership and works together with partners to deliver a comprehensive action plan to mitigate and adapt to climate change. Sector 2 of the Suffolk Climate Emergency Plan focusses on sustainable homes. "Homes accounted for ~~over 25~~ **23** per cent of CO2 emissions in Suffolk in ~~2018~~ **2022**." The plan notes that to achieve **net zero** ~~carbon neutrality~~ in Suffolk, the homes sector will need to reduce its greenhouse gas emissions practically to zero and changing how homes are heated is critical to this. ~~Three goals are set out: transition to a fully decarbonised heat supply for homes, improved energy efficiency of homes, and behavioural change to use less energy. Of the five priority actions that follow, the third is: 'all Suffolk local planning authorities to develop new policies to require new homes to be built in line with the 2025 Future Homes and Planning Advice Service (PAS) 2035 standards, including heat pumps or new heat networks or connection to existing heat networks'~~ **Of the seven sustainable homes actions listed, the sixth is 'Support all Suffolk Local Planning Authorities to develop policies to require new homes to be built in line with the 2025 Future Homes and PAS [Planning Advisory Service] 2035 standards' and the seventh is 'Support all Suffolk Local Planning Authorities to develop policies to require new homes to be heat network connection-ready, or to connect to heat networks where these already exist.'**		conclusions unaffected.
MM5	Page 18 to 20	Policy LP1	**Policy LP1 Sustainable design and construction** All proposals for development, including the conversion of buildings and extensions, must submit evidence **commensurate to the nature, scale and location of the proposal** with each application demonstrating how the proposal will meet sustainable design and construction ~~requirements commensurate with the scale and location of the proposal~~. Proposals should demonstrate: **Active travel** a. Measures have been taken to include active travel to provide access to local services and facilities, designing walking and wheeling routes within sites and connecting sites to existing routes, improving existing routes and creating new connections where appropriate to suit all users. This must include the elderly, less mobile people, women, and those with prams, buggies and young children. b. Consideration of the location of future bus routes and stops with well-designed, safe and attractive pedestrian paths at reasonable walking distances from homes, and the provision of sustainable travel initiatives such as car clubs and e-bikes. **Environment** c. How green infrastructure, building design and landscaping proposals incorporate sustainability features that protect and enhance biodiversity such as nest boxes, hedgehog gaps, wildlife corridors (including providing routes under busy roads where appropriate), green roofs, green bus shelters, living walls on flats, community buildings and business premises. d. The development is located and designed to be resilient, taking account of long-term climate change impacts such as rising temperatures, flooding, wind speeds, heavy rain and snowfall. e. How integrated water management has been considered in the design process to increase water efficiency and reduce surface water flooding.	See council's matter 10. In response to the inspectors' action point AP21 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidelines to account for sustainable design and construction, it does not introduce new developments, leaving the original HRA conclusions unaffected.

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			Design and building f. Designs utilise the fabric first approach and achieve carbon standards primarily through energy efficient design and materials. This should specifically focus on how demands on heating and cooling have been considered in the design stage and reduced through orientation of the building, the location of windows, thermal mass and shading, and how orientation optimises opportunities for on-site photovoltaic or solar thermal heating. Designs should indicate how the balance between solar gain and solar shading is to be managed. g. The choice of materials has considered the use of biogenic building materials (for example wood, hemp and lime mortar or plaster) as alternatives to high carbon materials. All proposals for residential development are required to submit a sustainability statement that sets out what measures are proposed to address water efficiency and achieve energy efficiency**. Measures that go** above **development plan policy requirements and** building regulations standards ~~prior to the introduction and implementation of the Government's Future Homes Standards (intended 2025)~~ **are encouraged.** Sustainability statements should demonstrate how the design follows a fabric first approach. Applicants should consider renewable sources of energy (such as solar PV, solar thermal, air or ground source heat pumps, community or shared energy initiatives). ~~Applicants~~ **Proposals** will be **encouraged** ~~expected~~ to include photovoltaic (PV) panels on roofs ~~(~~unless it can be demonstrated that the orientation of the roof, lack of suitable roof area or other constraints makes this impractical~~)~~**, or because renewable energy can be generated more appropriately on-site by other means**. **Building Research Establishment Environmental Assessment Method (BREEAM)** Proposals for residential development of more than 100 homes ~~will be required~~ **are encouraged** to complete a BREEAM pre-assessment (to be submitted with ~~the~~ **any** application) and subsequently to complete a communities assessment excellent standard (evidenced by a certificate upon completion.) **unless it can be demonstrated that this is unachievable in which case evidence should be submitted that the highest possible standard has been achieved.** All new buildings of 500 square metres or more for non-residential and residential institution proposals (for example care homes) will be required to meet the latest version of Building Research Establishment Environmental Assessment Method (BREEAM) New Construction Excellent standard, evidenced on completion by a BREEAM fully fitted certificate. **Passivhaus** Passivhaus principles and certification are encouraged and will be considered as an exemption from BREEAM requirements. 4.1.19. The council will work with **Suffolk County Council as the lead flood authority,** the Environment Agency, Anglian Water Services and developers to encourage integrated water management. Policies ~~LP5~~ **SPX** Flood risk and sustainable drainage and LP6 Water quality and resources set the framework for this.		
MM6	Page 21 and 22	Policy LP2	**Policy LP2 Promoting energy and water efficiency in show homes**	In response to the inspectors' action point AP22	No Likely Significant Effect.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Mixed-use and residential development schemes of 100 homes or more that have one or more show homes or marketing suites must include with the sustainability statement provision for one show home to be equipped with environmentally sustainable alternatives and/or additions ~~(or in a marketing suite a display occupying at least 30 per cent of the floor and wall space)~~ and to indicate what these items will include. The sustainability statement should include the educational or explanatory material that will be provided to demonstrate the additional energy and water efficient items and/or fittings that will be available to purchase offered at a price (including delivery and/or installation) that reflects the same profit margin to the developer as other standard buyer's options or extras.	contained in IN12.	This modification proposes changes to wording however the policy continues to promote energy and water efficiency, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM7	Page 22 and 23	Policy LP3	**Policy LP3 Electric vehicle charging points in new developments** All proposals for new homes are required to provide smart charging facilities for plug-in electric vehicles in safe, accessible and convenient locations as follows: a. At least one electric charging point for every new home with parking space(s) regardless of whether the parking is provided in a garage, on plot or in off plot parking areas. b. In addition, **visitor parking in** all major developments **should be provided with an appropriate proportion of electric vehicle charging points having regard to** ~~with visitor parking provided in line with~~ the Suffolk Guidance for Parking ~~2019~~ **2023** ~~and~~ **or** any successor documents.~~, 25 per cent (rounded up) of parking spaces are to be provided with electric charging points.~~ In the case of homes that rely on shared parking areas, provision of EV charging points infrastructure should be designed so that cables do not obstruct footpaths and vehicle accesses or driveways and are installed to enable shared use. Provision of covered parking incorporating solar panels will be encouraged. All proposals for non-residential development and residential institutions such as care homes are required to provide smart EV charging points and charging infrastructure including cable routes to enable the installation of electric vehicle charging points as appropriate to the use proposed, **having regard to** ~~in accordance with~~ the adopted standards (Suffolk Guidance for Parking **2023** ~~2019~~ and successor documents). Accessible electric bicycle, buggy and scooter electric charging facilities should be provided where necessary All proposals for new petrol filling stations and proposals for extensions or alterations to existing petrol filling stations are required to provide smart rapid (50 kilowatts (kW) plus) EV charging points commensurate to the size of the garage, accessibility of the site to the strategic road network and network capacity.	To accord with latest Suffolk County Council guidance and building regulations and in response to matter 10. In response to the inspectors' action point AP23 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to promote the inclusion of electric vehicle charging points in developments, it does not introduce new developments, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			All proposals should specify the type and output power rating of charge points to be installed. Electric vehicle charging power capacity **should have regard to the power capacity set out in the** ~~is required to be at least equivalent to~~ Suffolk Guidance for Parking or successor documents. Chargers should provide suitable power for a meaningful charge to vehicles based on anticipated dwell time. Note: In circumstances where a new home is provided without on-site parking (for example conversion of premises in a town centre) a contribution may be required towards public charging facilities nearby.		
MM8	Page 23 and 24	Policy LP4	**Policy LP4 Reducing waste and the circular economy** All proposals for **major** development are required to submit a waste reduction and circular economy statement demonstrating circular economy principles. This should demonstrate**, as appropriate to the nature and scale of the proposal,** how: a. Circular economy principles have informed the design of the building(s) and site layout. b. Materials demand have been minimised and on-site reuse and recycling has been maximised. c. The local sourcing of materials has been considered and the steps taken to secure local materials and components. d. Construction waste is to be reduced, treated as a resource and managed on site. e. The scheme has been designed to minimise partial or complete demolition of any buildings or structure on sites. f. Where demolition is unavoidable, how materials will be managed by considering the implications of the loss of embodied carbon including: • An assessment of whether the materials are suitable for reclamation, with targets for reclamation and reuse, and • How building materials, components and products are to be disassembled, are to be stored, re-used and recycled.	See council's matter 10 and response to inspectors' PQ18. In response to inspectors' action point AP24 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to promote the reduction of waste and he circular economy, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM9	Page 25 and 26	Policy LP5	**Policy ~~LP5~~ SPX Flood risk and sustainable drainage** 4.1.31 The purpose of this policy is to provide guidance on flood risk and sustainable drainage, setting out when development may be permitted in addition to methods to reduce flood risk. **Policy ~~LP5~~ SPX Flood risk and sustainable drainage** All development proposals will be considered against national planning policy including the application of the sequential test and, if necessary, the exception test. Development will be directed to those areas at the lowest risk of all forms of flooding **taking into account the impacts of climate change and current and future available sites appropriate for the proposed development in areas with a lower risk of flooding.** ~~and will only be permitted where it has an acceptably low risk of being affected by flooding.~~ This will be assessed against the most up-to-date Environment Agency flood risk maps and the West Suffolk Strategic Flood Risk Assessment maps. **Sustainable drainage**	For clarity and in response to the inspectors' preliminary questions. In response to inspectors' action point AP21 and AP25 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidance on flood risk and sustainable drainage, it does not introduce new

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			Site-specific Flood Risk Assessments (FRA) and surface water drainage strategies should clearly demonstrate the proposal's contribution towards reducing the impacts of all flood risk and providing betterment over the existing situation. For example, through attenuating surface water runoff, providing additional floodplain storage, or enhancing the groundwater recharge regime or aiming to maximise potential integrated water management benefits. Site-specific FRAs should also assess the residual risk of flooding in areas that are reliant on flood risk management infrastructure. Development and supporting infrastructure should be safe for its lifetime ~~and not increase flow rate compared to a greenfield scenario, and where possible reduce flood risk overall.~~ **taking into account the safety of access and escape routes and should seek to reduce all flood risk overall. Development should not increase surface water flow rates compared to the existing situation and should reduce flow rates where possible.** Proposals for development that use integrated water management to provide upgrades to existing drainage in the area through additional sustainable drainage systems (SuDS) and improvements to blue infrastructure will be encouraged. **Development proposals should provide generous setbacks (buffer zones) to existing water courses, retaining and improving river corridor habitats and features.** ~~All p~~ **P**roposals for development ~~are~~ **that** require~~d to use~~ SuDS ~~and~~ **must** demonstrate how such elements will be delivered, maintained and managed in the future. Where appropriate to the scale of development, proposals are required to demonstrate how SuDS has been considered as part of an integrated water management approach to the design of the whole site. ~~At least 12 to~~ **Around** 15 per cent of the site should be set aside for SuDS to ensure that a viable sustainable scheme can be delivered. SuDS strategies should incorporate open conveyance and storage of surface water with SuDS features well integrated with ecology and landscape requirements. The design of SuDS should demonstrate how the following has been considered: • The effects of climate change. • The cumulative impact of development on flood risk within the catchment. • How SuDS has been considered **as an integral part of the overall provision of green infrastructure on the site** ~~in addition to public open space~~. • How the four pillars of SuDS: water quality, water quantity, biodiversity and amenity, have been incorporated. • How the SuDS will be managed for their whole life. • How development using sustainable drainage systems (SuDS) near airbases and specifically beneath, within and close to flight paths and other designated air manoeuvring areas, has been designed to minimise the opportunities for bird strike. The inclusion of sustainable drainage features such as green roofs, rainwater harvesting, rain gardens, tree pits, flood meadows, wetlands, ponds and other grass or woodland habitats are encouraged in all types and scales of development to diversify the types of features that can be incorporated. Relief roads, distributor, spine roads and primary roads must be drained with swales either to one or both sides of the highway. Treatment for road runoff must be carefully considered as these roads will carry a high volume of traffic with high potential for pollution.		developments, leaving the original HRA conclusions unaffected.

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			Other roads within new developments must have sustainable drainage and include space in the corridor cross section for swales**, having regard to** ~~in accordance with~~ **the** Suffolk Streets Design Guide. Drainage infrastructure for roads such as swales, filter strips and basins, must be designed to introduce green elements to highways and to separate walking and wheeling or cycling from cars. This needs to be considered and included from the earliest stage of design. Note: applicants should **have regard to** ~~follow~~ the Suffolk Sustainable Drainage System Guide 2023 (appendix A to the Suffolk Flood Risk Management Strategy) and any updated guidance. 4.1.34. The local plan process and the evidence set out in the sequential test, the West Suffolk Strategic Flood Risk Assessment and Water Cycle Study, has enabled West Suffolk to work with Anglian Water Services and the Environment Agency to prepare the policies in this section that play important parts of integrated water management. These require: • Sustainable drainage systems (SuDS) to help avoid and reduce the risk of flooding. • Betterment over the existing situation in areas at risk of flooding, making space for water. • Sustainable design and construction that contributes to improving the water quality of rivers and groundwater in West Suffolk. • Requires the provision, integration and connection of blue and green infrastructure. **4.1.35. The level 2 Strategic Flood Risk Assessment identifies requirements for site specific flood risk assessments. Applications that include the submission of a flood risk assessment should meet these requirements which enhances existing guidance set out within the National Planning Policy Framework and its subsequent guidance. Section 10 of the Strategic Flood Risk Assessment also identifies four flood risk management structures in West Suffolk. Development within these locations should require an assessment of the residual risk of flooding. The level 2 Strategic Flood Risk Assessment also identifies mitigation measures would be considered acceptable to ensure the safety of development during lifetime. The flood hazard datasets within the level 2 Strategic Flood Risk Assessment should also be used to determine the safety of access and escape routes.**		
MM10	Page 27	Policy LP6	**Policy LP6 Water quality and resources** All proposals for development will be required to demonstrate that they will not have a negative impact on water quality through pollution of surface or ground water or the discharge and treatment of water originating from the development site. Special consideration will be given to development proposals in source protection zones. All major development proposals and all proposals where it is not possible to connect to a public sewer are required to submit a foul drainage assessment. All new development proposals will be required to demonstrate that water efficiency measures have been employed. Water consumption in residential developments will be limited to **110**~~100~~ litres per person per day, (including external water use) using efficient water fittings and appropriate technology such as smart meters~~, (in line with the government's intention set out in the Plan for Water published in 2023)~~. Proposals that can achieve higher water efficiency (for example 85 litres per person per day) will be encouraged and supported.	See council's matter 10. In response to inspectors' action point AP26 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidance on water resources, it does not introduce new developments,

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			Rainwater and stormwater harvesting and reuse as part of integrated water management is encouraged on all types of development. Water butts should be provided for all new homes unless it is demonstrated that it is not appropriate. Water butts or other methods of rainwater collection should be provided with allotments or community gardens. Any application for non-residential development requiring significant non-domestic water use will be required to demonstrate that sufficient water capacity is available through a water supply management statement, in liaison with the relevant water supply company. All proposals for non-residential development should set out in a sustainability statement (or equivalent) how they have sought to reduce water use. Proposals for major non-residential developments over 1000 square metres should achieve the full water credits on the British Research Establishment Environmental Assessment Methodology (BREEAM) water calculator.		leaving the original HRA conclusions unaffected.
MM11	Page 28 and 29	Policy LP7	**Policy LP7 Renewable and low carbon energy** All proposals for renewable energy technology or the integration of renewable technology on existing or proposed structures including any associated infrastructure, **will be supported where the following criteria are met:** ~~are required to submit a landscape and visual impact assessment. This should include a landscape character or townscape appraisal as appropriate, and full details of mitigation measures for any visual impacts identified. The proposal should be assessed in isolation and cumulatively to determine the impact of the proposal on the environment.~~ ~~All proposals will need to demonstrate to the satisfaction of the local planning authority how the following will be addressed:~~ **a. A proportionate landscape and visual impact assessment must be submitted. This should include a landscape character or townscape appraisal as appropriate, and full details of mitigation measures for any visual impacts identified.** ~~a.~~ **b. Where the proposal involves significant development of agricultural land, preference has been given to areas of poorer quality agricultural land.** ~~Development should avoid the 'best and most versatile' agricultural land (grades 1, 2 and 3a as classified through the agricultural land classification system) in line with the National Planning Policy Framework.~~ **c. The proposal does not adversely impact the amenities of sensitive neighbouring uses (including residential amenities) in matters such as visual dominance, noise, fumes, odour, vibration, glint and glare, shadow flicker, traffic generation.** ~~b.~~ **d. The p**~~P~~roposals ~~will be required to~~ provide**s** for biodiversity net gain ~~in relation to the protected sites hierarchy in accordance with Policy SP6 biodiversity net gain. There~~ **and does not result in** ~~should be no~~ detrimental impacts **in terms of** ~~on issues of biodiversity,~~ geodiversity and water quality. ~~c.~~ **e.** ~~There should be no harmful~~ **The potential** impacts on ~~historical, archaeological and cultural~~ heritage assets, highway safety and associated infrastructure, **topography,** ~~residential and local amenity relating to visual dominance, noise, fumes, odour, vibration, glint and glare, shadow flicker, traffic generation,~~ broadcast interference, aviation, radar and telecommunications and associated infrastructure, and soil quality **have been considered and minimised within the proposal**. **Proposals should be considered in isolation and cumulatively to fully determine their impact.** **Wind energy proposals**	See council's matter 10 and response to inspectors' PQ18. In response to the inspectors' action point AP27 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidance on proposals for renewable and low carbon energy, it does not introduce new developments, leaving the original HRA conclusions unaffected.

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			In addition to the criteria a, b and c above, all wind energy applications are required to be accompanied by a residential visual amenity assessment, a statement indicating how the development mitigates for air traffic operations where necessary, and an appraisal of the impact of the wind turbine(s) on bats and migrating birds, and bird strike, and any mitigation measures necessary to address this. **Solar energy proposals** In addition to the criteria a, b and c above, all solar farm applications should be accompanied by ecology, nature conservation and mitigation statements that demonstrate potential impacts and how these will be mitigated. The potential for glint and glare and effects on biodiversity should also be demonstrated. **Anaerobic digestion and energy from waste** All applications for anaerobic digestion or energy from waste development should be accompanied by a statement that demonstrates the nature of the waste and origin(s) of the fuel, the distances from the proposed plant and proposed transport routes and frequency of delivery, and how the waste product(s) comprising the fuel would usually be disposed of or used. **Energy storage proposals** In addition to the criteria a, b and c above energy storage proposals should be accompanied by a site management plan that demonstrates fire safety measures are adequately addressed. 4.1.47 However, it is important to note that although biogas production is considered renewable it may not always be considered to be low carbon. Much will depend on the fuel and how and where it is sourced. For example, some biogas plants require crops to be grown as a source of fuel and some fuel sources may need to be transported by road over a distance. This form of renewable energy needs to be treated with caution, and it should be noted that **where** ~~some~~ applications for energy from waste **involve the import of waste from another location or business, they should be submitted to** ~~are managed by~~ Suffolk County Council as the waste authority. Developers are advised to contact the councils at an early stage in development of the project and prior to submission of an application		
MM12	Page 30 and 31	Policy LP8	**Policy LP8 Protecting and enhancing natural resources, minimising pollution and safeguarding from hazards** All proposals for development should minimise all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality. All applications for development where the existence or potential for creation of pollution is suspected, both on and off site, must include a full assessment of the impacts of potential hazards **and any necessary mitigation measures which could include a site-specific construction environment management plan (CEMP)**. Proposals will be permitted where, the development is, individually or cumulatively, unlikely to result in significant impacts on the following, as appropriate: a. The natural environment and general amenities that are intrinsic to the character of the surrounding areas, these can include impact from light, noise, smell, dust and vibrations of nearby areas. b. Health and safety of the public. c. Air quality, on the site and surrounding area. d. Surface or groundwater quality. e. Land quality or condition.	See council's response to matter 10. Paragraph amendments made to align more closely with the National Planning Policy Framework.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidance on protecting and enhancing natural

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			To safeguard development from potential hazards, development will not be permitted where the proposal is suspected to have an unacceptable risk, such as: • The site being situated on known or suspected unstable land or • The land is known to be or potentially affected by contamination or where the land may have a particular sensitive end use or • The storage or use of hazardous substances on site. Proposals for development on or adjacent to land which is known to be or potentially affected by contamination; or land which may have a particular sensitive end use; or involving the storage and/or use of hazardous substances, will be required to submit an appropriate assessment of the risk levels as part of any planning application. This assessment of risk should take a tiered approach to include as a minimum a tier one land contamination preliminary risk assessment and where necessary further technical reports. In appropriate cases, the local planning authority may impose planning conditions or through a legal obligation secure remedial works and/or monitoring processes. 4.1.50. As a minimum, applications should undertake a tier one land contamination preliminary risk assessment. Where it is necessary to further understand the impacts of potential hazards a tier two generic quantitative risk assessment and tier three detailed quantitative risk assessment based on suitable intrusive investigations together with options appraisals, remediation proposals and verification reports may also be required. **4.1.51. Exposure to air pollution over long term and even short term can result in significant health impacts. Poor air quality is often recorded in areas of high traffic congestion, and in these areas data shows higher rates of asthma and other respiratory conditions. Improving air quality by ensuring new developments incorporate effective active travel strategies, and existing neighbourhoods have increasingly better access to sustainable transport, could reduce health inequalities and improve health outcomes.** **4.1.52. The Suffolk County Council Air Quality Strategy was published in May 2023 and sets out the actions identified as being important to the improvement of air quality. It is important that new developments take into account the impact they will have on local air quality and consider the aims and objectives of this county-wide strategy.**		resources, minimising pollution and safeguarding from hazards, and includes the requirement for a Construction Environment Management Plan as required in the HRA to the WSLP, section 5.53, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM13	Page 33	Policy LP9	**Policy LP9 Designing for health and wellbeing and impacts of new development** Proposals for major residential and non-residential development should demonstrate ~~through the design and access statement or a separate health and wellbeing statement how the development has been designed to assist in delivering the elements (described in Strategic Policy SP2 Health and wellbeing) that contribute to improving the physical and mental wellbeing of people helping them to stay well and age well. The statement should use local population and demographic data and demonstrate~~ how any specific health and wellbeing needs of the community will be addressed. Such elements will be expected to include positive measures for health designed and provided as part of the development, for example walking and cycling routes, play on the way on routes to school, time and distance markers, benches and chatty benches, running and jogging routes, and outdoor gym equipment as appropriate to the scale, nature and location of the development.	See council's matter 10. In response to the inspectors' action point AP28 contained in IN12. A	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide

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			All new homes must be provided with private outdoor space, including**, where possible,** balconies for all flats, in addition to safe, well-designed access for all to shared, communal or public open space. Proposals for new large-scale developments of 100 homes or more or five hectares or more of mixed use or non-residential development **that are expected to have significant health impacts, excluding minerals and waste sites**, will be required to submit a health impact assessment (HIA). Submission of a HIA at the pre-application stage is encouraged. The HIA should demonstrate how the conclusions of the assessment have been designed into, and how they will be implemented through the development. Health impact assessments will enable the impact on health care provision in the area to be assessed and, where necessary mitigated through refurbishment, reconfiguration, extension, digital solution or potential relocation of facilities or other solutions including developer contributions that address capacity and increased demand that will arise from the development. Proposals for new health care facilities should be accessible by public transport and good walking and cycling routes and should be easily accessible to all sectors of the community. Proposals which utilise opportunities for the multi-use and co-location of health facilities with other services and facilities, and thus co-ordinate local care and provide convenience for the community, will be particularly supported**.**		guidance designing for health and well-being, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM14	Page 35 and 36	Policy SP3	**Policy SP3 Design** Proposals for all new development, including extensions and alterations to existing buildings, must create and contribute to a high quality, safe and sustainable environment by ~~demonstrating how the~~ **adhering to the** following principles (as appropriate to the scale and type of development proposed) ~~have been addressed~~: a. Early community engagement. b. Sustainable design principles through good quality and innovative design. c. Local character and context of the proposed development. Anchoring new developments within their immediate and local contexts maintaining or creating a sense of place and/or local character, particularly restoring or enhancing localities where strong local characteristics are lacking or have been eroded and respecting the urban form, including significant street patterns, individual or groups of buildings and the relationship with open spaces. d. Having regard to density, street layouts, scale, height and massing and the relationship of built form to landscape. e. Preserving or enhancing and respecting the historic environment including archaeological sites and heritage assets, the setting of, or views into and out of, a conservation area and recognising the distinctive historic character and architectural or archaeological value of the area and/or building. f. Protecting landscape settings, local character and prominent topographical features (such as respecting the Norman grid pattern and views of the cathedral in Bury St Edmunds, or the unique equine interests within and around Newmarket) particularly those protected by Policy SP5 Locally valued landscapes and the character assessments that support these designations. g. Protecting and enhancing the natural environment, habitats, species and features of ecological interest. h. Providing and enhancing open spaces, play, leisure and cultural facilities, and public community spaces in line with national and detailed local policies~~, to provide a sense of wellbeing, community cohesion, safety and ownership~~. i. Connecting homes and communities to nature through planting and landscaping and providing multi-functional and inter-connected green and blue spaces, ~~(ensuring designs for these spaces,~~ including sustainable drainage systems~~,~~ **and** ~~provide~~ **providing** access routes and recreational space**.** ~~for dog walkers).~~ To ensure the future of these important features all	See council's response to matter 10.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide design guidance, it does not introduce new developments, leaving the original HRA conclusions unaffected.

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			planning applications will be required to demonstrate that necessary utility infrastructure and associated easements do not compromise placemaking and/or the delivery and retention of green infrastructure. j. Supporting healthier and more active lifestyles by designing health and wellbeing into place and producing designs and layouts for accessible and adaptable homes (ensuring homes are suitable for lifetime living) which are safe and take account of crime prevention and community safety. k. Ensuring developments prioritise sustainable movement and reduce and minimise the need to travel by car by creating and providing the infrastructure necessary for integrated neighbourhoods with well defined, safe and attractive routes and spaces **with inclusive navigational wayfinding and** for walking and wheeling (this includes cycling, electric wheelchairs and buggies). Designing and providing the infrastructure with appropriate path widths to accommodate adults walking with prams and children, and people walking with wheelchair users, and routes that are overlooked and well-lit to optimise the safety of lone walkers, and where possible, layouts that incorporate car free areas near homes to encourage better social interaction and reduce air pollution. l. Designing for flexible living (including the provision of larger room sizes and adaptable spaces where appropriate) and providing good quality private or communal outdoor space as appropriate. m. Ensuring all new developments are inclusive to meet the needs of particular groups such as the elderly and those with physical mobility and mental health issues (such as the incorporation of sensory spaces to support mindfulness and those living with dementia), and that proposals for developments that provide accommodation for specific groups of people (whether as separate dwellings or as a communal living or care homes) are well designed and are high quality places to live. n. Ensuring the amenity of residents and users is protected or enhanced and free from unacceptable levels of pollution. o. The physical and social infrastructure provision required to create sustainable communities have been considered. Requirements for masterplans and design codes are set out in the local policies LP11 and LP12.		
MM15	Page 37 and 38	Policy LP10	**Policy LP10 Well-designed places** All proposals for development should maintain or create a sense of place and have regard to local context, by as appropriate: a. Employing designs that are specific to the scheme, and which respond intelligently and appropriately to a clear brief articulated in a design and access statement. b. Basing design on an analysis of existing buildings, landscape or topography, and fully exploiting the opportunities that these present, and where necessary, prepare a landscape or townscape character appraisal or heritage impact assessment to demonstrate this. c. Utilising the characteristics of the locality to create buildings and spaces that have a strong sense of place and distinctiveness, using an appropriate innovative design approach and incorporating a mix of building types, forms and scale of buildings that are appropriate for the location. d. Not involve the loss of gardens and important open, green or landscaped areas which make a significant contribution to the character and appearance of a settlement. e. Creating or contributing to a safe, coherent and legible place that is structured and articulated so that it is visually interesting and welcoming. f. Creating and supporting continuity of built form and enclosure of spaces. g. Ensure appropriate levels of permeability and accessibility favouring sustainable transport routes and consider the needs of pedestrians and cyclists before car users to encourage sustainable travel. h. Integrate comfortably with surrounding street networks and enable integration into future additional development. i. Seek to create a safe and welcoming environment.	See council's matter 10 and to provide further clarity and consistency with Policy LP21/SPX.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide design guidance, it does not introduce new developments, leaving the original HRA conclusions unaffected.

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			Residential development should be laid out to optimise amenity with streets and parking facilitating this primary objective. Therefore, in addition to the criteria above, development should: j. Where appropriate, apply innovative highways and parking measures designed to avoid the visual dominance of these elements in the design and layout of new developments, whilst still meeting highway safety standards. k. Take opportunities for parking to support the street scene. l. Where necessary, incorporate appropriate refuse and recycling facilities, compost bins, water butts and litter and dog waste bins. New homes should be of a high architectural quality, meaning that: m. They are fit for purpose and function well, providing adequate space, light and privacy. n. They are adaptable in terms of lifetime changes and use **in accordance with Part M4(2) or Part M4(3)**. o. They are the product of coherent and appropriate design principles. **p. Space standards and accessible home requirements are set out in policy ~~LP21~~ SPX.**		
MM16	Page 38	Policy LP11	**Policy LP11 Masterplans** A masterplan is required for proposals where it has been identified in a site allocation policy within the local plan and on any site by virtue of size, location or proposed mix of uses is justified by the local planning authority. The detailed requirements for masterplans are set out in appendix **D** ~~C~~. A masterplan ~~should be prepared in accordance with the statement of community involvement~~ ~~and~~ shall have been through the agreed process of consultation and approved prior to the determination of any related planning application. 4.1.79. **Masterplans should be prepared having regard to the masterplan protocol** ~~There is an adopted statement of community involvement (SCI)~~ which sets out **guidance on** how a masterplan should be produced**, responsibilities, timescales** and ~~what~~ **the expectations for** community engagement. ~~should be undertaken. All masterplans should be prepared in accordance with this SCI.~~	See council's matter 10. In response to inspectors' action point AP29 contained in IN12	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to sate the need for a masterplan where stipulated in the site allocation, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM17	Page 39	Policy LP12	**Policy LP12 Design codes** A design code should ~~accompany any planning application on:~~ **be used to inform the design principles of a development where:** ~~• Sites where a masterplan is required.~~ ~~• Proposals which provide self or custom-build.~~ ~~• Any site by virtue of size, location or proposed mix of uses as justified by the local planning authority.~~	See council's matter 10. In response to inspectors' action point AP29 contained in IN12	No Likely Significant Effect. This modification proposes

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			• **A masterplan has been produced for the site.** • **Proposals provide self or custom-build.** • **Major developments approved in outline form and where a design code may be secured in advance of the reserved matters submission.** **Subsequent planning applications shall be in accordance with any relevant approved design code, including any district or area wide design code that have been adopted by the local planning authority.** The detailed requirements for design codes are set out in appendix **E** ~~D~~. A design code should be prepared ~~in accordance with the statement of community involvement and shall have been through the agreed process of consultation and approved prior to the determination of any related planning application.~~ **in line with current best practice.**		changes to wording however the policy continues to require a design code for specified developments, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM18	Page 42	Policy SP4	**Policy SP4 Green infrastructure** Existing green infrastructure (GI), its integrity and connectivity, should be retained, restored, protected and enhanced, wherever possible, and new green infrastructure delivered to support sustainable development. Planning permission for development that would impact on the quantity or quality of the existing green infrastructure network will only be granted if it cannot be avoided and if alternative green infrastructure provision of equivalent benefit is provided as part of the development or as a last resort a financial contribution is secured for suitable alternative green infrastructure provision by the relevant authority. Opportunities to extend the coverage and connectivity of the strategic green infrastructure network including within and next to the priority areas as set out in the West Suffolk Green Infrastructure Study 2022 (or any subsequent study) will be supported. These could include improving access to countryside, interpretation and heritage conservation. All major residential development of 50 homes or more located on greenfield sites should provide around 40 per cent green infrastructure within the site. Green infrastructure can include public open space, sustainable drainage systems features including swales, basins and rain gardens, allotments, burial grounds, strategic landscaping, new and retained habitats including woodland, trees and hedgerows, green and blue corridors, **suitable alternative natural greenspace (SANG)** and recreational access routes. All other major developments including those on previously developed land should seek to provide sufficient space for green infrastructure on-site to accommodate the retention of existing features (for example existing trees and hedgerows) and the delivery of new green infrastructure such as sustainable drainage systems features, public open space and strategic landscaping where these are required. Development proposals should demonstrate a green infrastructure-led design approach. This could be using a green infrastructure (GI) design code, use of GI design tools, requirement for a GI plan, or implementation of a check list or set out principles that need to be demonstrated within the design and access statement.	In response to inspector's action point AP30 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide for protection of greenspace, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM19	Page 44	Policy LP13	**Policy LP13 Trees**	See council's response to matter 11.	No Likely Significant Effect.

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			On development sites, in order to conserve and enhance local distinctiveness in the landscape, trees, woodland and hedgerows must be retained, unless it can be demonstrated that removal cannot be avoided, and appropriate mitigation or compensation can be achieved. In the case of ancient woodland and ancient or veteran tree(s), development which would harm or destroy these assets will be refused unless it accords with the exceptional reasons identified within the National Planning Policy Framework. If exceptional reasons are justified a suitable compensation strategy including its delivery will need to be secured as part of any planning consent. Within developments, sufficient space will be made to accommodate **ancient and** veteran trees and allow a buffer for the expansion of ancient woodland (for example through woodland planting or natural regeneration). Development proposals should seek to positively integrate existing and new trees, on a sustainable basis having regard to the mature size of the trees, as part of the site layout. Potential long-term conflict between woodlands, trees including street trees, tree lines and avenues, hedgerows and the built form and infrastructure **including underground assets** must be avoided. Where it is demonstrated that tree removal to facilitate development is unavoidable, the loss must be appropriately compensated. However, the removal of large mature trees and their replacement with smaller shorter-lived species will not be acceptable. Sufficient space within developments must be reserved for the planting of new trees and the sustainable growth of existing and new trees to retain and improve tree canopy cover in the district as a whole. **The space required for trees will be case specific based on the impact of the proposals, the context of the development site, and the function of the planting.** All planning applications, where there are existing trees on or within the influence of a development site, must include details and a methodology for tree protection from the commencement of development to completion; to ensure that trees are not damaged by construction work 4.2.17. Within the Brecks, all new tree and woodland planting should be consistent with conserving and enhancing the notified interest features cited for the sites of special scientific interest and the conservation objectives of the special protection area. **Given the existing extensive tree cover and the importance and vulnerability of the open landscapes that remain, in most cases, the Brecks is not an appropriate target for tree planting.** 4.2.18. Veteran and ancient trees and ancient woodland are particularly valued and once lost cannot be replaced. Government guidance provides information on how the impacts should be considered. Within a European context the UK is home to more veteran trees than most other countries. West Suffolk is notable for its veteran and ancient trees as well as Brecks pine lines, and native black poplar. These particular landscape features, which contribute to the character of the landscape, should be conserved. **Where veteran or ancient trees are recorded during tree surveys; these should be recorded by the applicant on the Woodland Trust's Ancient Tree Inventory.**		This modification proposes changes to wording however the policy continues to provide protection for trees, hedgerows and woodland, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM20	Page 47 and 48	Policy LP14	**Policy ~~LP14~~ SPX Landscape** All proposals for development must be informed by, and be sympathetic to, the character of the landscape as described in the West Suffolk Landscape Character Assessment (2022) and Suffolk Landscape Character Assessment.	See council's response to the inspectors' preliminary questions and	No Likely Significant Effect.

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			Development proposals should, take into account and avoid detrimental effects on key landscape features and their legibility, local distinctiveness, visual amenity, key views, tranquillity and the nocturnal character of the landscape. Where a development proposal is likely to have a significant impact on landscape character and visual amenity, a full understanding of the context, characteristics and significance of the landscape, and the impact on character and the views (including cumulative impact) must be provided. Negative effects must be avoided, where possible, for example through alternative site selection. Where avoidance is not possible, negative effects must be minimised through the design, suitable mitigation measures or, as a last resort, through appropriate compensation. Landscape proposals must be appropriate for the scale, type, and location of the development. Individual proposals will be assessed based on their specific landscape and visual impact, taking into account any mitigation and future management proposals. Proposals that demonstrate their location, scale, design and materials will seek to protect, enhance and where possible restore the character of the landscape, including the setting of settlements, and the significance of gaps between them will be supported. Soft landscaping proposals must respond to the challenge of biodiversity loss and climate change. Species diversity is important as a diverse range of plants can help cope with warmer climates and limit the damage caused by pest and disease outbreaks, enhancing biosecurity, and providing resilience. Wherever appropriate native species should be included within planting mixes and species rich grassland proposed.	Matter 11 and matter 15.	This modification proposes a change to the policy name, it therefore, leaves the original HRA conclusions unaffected.
MM21	Page 49 and 50	Policy SP6	**Biodiversity net gain and enhancements** 4.2.36. The Environment Act 2021 mandates a minimum 10 per cent **biodiversity net gain (**BNG**)** ~~to be~~ **which was** implemented ~~from~~ **in spring 2024** ~~January~~ ~~2024 for all but small sites, which will be required from April 2024~~. Biodiversity net gain is a legislative requirement, with the detail of how it is implemented set out in regulations **and accompanying guidance**. Biodiversity net gain is calculated using the statutory metric and a biodiversity **gain plan** ~~statement~~, submitted **prior to the commencement of any development** ~~at the planning application stage~~, sets out how a development will deliver ~~BNG~~ **the biodiversity gain objective. However, guidance is clear that it is important for net gain to be considered throughout the planning process**. **Policy SP6 Biodiversity net gain and enhancements** ~~Qualifying development proposals are required to achieve a biodiversity net gain of at least 10 per cent, calculated using the statutory biodiversity metric.~~ **In line with the biodiversity gain hierarchy b**~~B~~iodiversity net gain will preferentially be delivered on-site where this would deliver the most appropriate outcome for biodiversity and to provide local benefit. Locally defined ecological networks identified in the local nature recovery strategy (LNRS) will be the focus for the delivery of **registered** off-site **habitat** and landscape scale biodiversity net gain. ~~Until such time as the LNRS for Suffolk is finalised, the 'strategic significance' category assigned to each habitat parcel (in the metric spreadsheet) must be fully justified and demonstrate that it is in accordance with either:~~ ~~• The West Suffolk Green Infrastructure Study – chapter 5, nature recovery.~~ ~~• Any forthcoming Suffolk guidance.~~	See council's matter 11 and matter 15 response.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidance for BNG, it does not introduce new developments, leaving the original HRA conclusions unaffected.

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			For meaningful contributions to nature recovery, biodiversity net gain actions and biodiversity enhancements should seek to deliver bigger, better, more and joined up habitat, safeguarding and enhancing habitat connectivity at a site level, locally and at the wider landscape scale. For developments which fall outside the scope of mandatory biodiversity net gain, enhancement for biodiversity ~~should~~ **must** be included as part of the proposals, commensurate with the scale of the development. 4.2.38. Biodiversity net gain (BNG) is a way to contribute to the recovery of nature while developing land. It is making sure that habitat for wildlife is in a better state than it was before development. The delivery of biodiversity net gain and ecological enhancement through development will be supported across the district. ~~4.2.39. Within Suffolk a Biodiversity Net Gain (Interim) Planning Guidance Note for Suffolk has been developed by the Suffolk authorities. The purpose of the (interim) guidance note is to provide further detail on how aspects of biodiversity net gain should be demonstrated within planning applications.~~ 4.2.40. The **biodiversity gain hierarchy which is distinct from the** ~~application of the~~ mitigation hierarchy **set out in the National Planning Policy Framework** ~~(avoiding impacts before mitigating and as a last resort compensating impacts) should~~ **must** be demonstrated **in the Biodiversity Gain Plan. The biodiversity gain hierarchy sets out priority actions for the ways that the objective of at least a 10 per cent gain can be achieved; the priority being on-site**. ~~The requirement to deliver~~ **Delivery of** biodiversity net gain (BNG) on-site will strengthen habitat avoidance on development sites. 4.2.41. Chaired by Professor Sir John Lawton, the independent review of England's wildlife sites and ecological network considered whether England's collection of wildlife areas represented a coherent and robust ecological network that would be capable of responding to the challenges of climate change and other pressures. Published in September 2010, the Making Space for Nature review summarised what needed to be done in four words: more, bigger, better and joined, and set out some guiding principles and recommendations. The findings of this report remain highly relevant and forms the basis for the nature recovery network **as outlined in Natural England's Nature Networks Evidence Handbook which was published in 2020**. 4.2.42. The requirement for development to demonstrate BNG does not replace or diminish existing protections for habitats and species which remain in place and continue to be a material consideration of any planning application. **The application of the mitigation hierarchy (avoiding impacts before mitigating and as a last resort compensating impacts) during the planning application stage must still be demonstrated.** 4.2.43. The local nature recovery strategy (LNRS) will agree priorities for nature recovery and propose actions in the locations where it would make a particular contribution to achieving those priorities. The strategy will include a local habitat map and a written statement of biodiversity priorities. Suffolk County Council have been appointed as the responsible authority and will prepare the LNRS. West Suffolk Council will work collaboratively with other Suffolk authorities in the preparation of the LNRS. 4.2.44. Strategic significance is the local significance of a habitat based on its location and habitat type and is categorised as either low, medium, or high in the BNG metric. The 'strategic significance' category for each individual habitat parcel, both at baseline and at post-intervention, is assigned based on the LNRS. Until the LNRS is completed, **strategic significance will be determined as set out in the statutory guidance and** the alternative **document** ~~plans which~~ **used to** determine		

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			strategic significance ~~are~~ **is** the West Suffolk Green Infrastructure Study ~~or any forthcoming published Suffolk wide guidance on strategic significance~~.		
MM22	Page 51 and 52	Policy LP15	**Policy ~~LP15~~ SPX Protected sites, habitats and features** All development must seek to protect sites designated for their biodiversity and geodiversity value, and conserve, restore and enhance important habitats (including priority habitats) and other important biodiversity features on development sites or affected by developments. Proposals which do not conserve and enhance biodiversity, failing to have appropriate regard to the 'mitigation hierarchy', will be refused. Proposals for development which could adversely affect the integrity of areas of international or European nature conservation importance, as indicated on the policies map, will be determined in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) or successor legislation. Proposed development likely to damage or destroy the interest features of a nationally important site of special scientific interest (SSSI) will not be permitted unless the benefits of the development, at the site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. Development resulting in the loss or deterioration of irreplaceable habitats such as lowland fens, ancient woodland, ancient and veteran trees will be refused unless it accords with the exceptional reasons identified within the National Planning Policy Framework. If exceptional reasons are justified, a suitable compensation strategy including its delivery will need to be secured as part of any planning permission. Development proposals which would have a direct or indirect adverse effect on locally designated sites, including county wildlife sites and county geodiversity sites, protected or priority habitats, will not be permitted unless the benefits of the development clearly outweigh the impacts on the features of the site and the wider network of habitats. In addition, proposals must demonstrate that: • The mitigation hierarchy has been implemented. • Mitigation, ~~and~~ compensation **and enhancement** measures are provided **as necessary to** ~~which~~ ensure there is a biodiversity net gain in such sites. Any enhancement measures should **be informed by** ~~align with~~ the relevant nature recovery priorities (if any) set out in the Suffolk Local Nature Recovery Strategy when completed.	See council's response to the inspectors' preliminary questions and matter 11 and matter 15.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide protection for protected sites, habitats and features, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM23	Page 53	Policy LP16	**Policy LP16 Protected species** Development which would have an adverse impact on protected or priority species will not be permitted unless there is no alternative, and the local planning authority is satisfied that suitable measures have been taken to: a. Reduce disturbance to a minimum. b. Maintain the population identified on site, or where this is not possible provide adequate alternative habitats to sustain at least the current levels of population~~.~~**; and** c. Provide enhancement measures to benefit the species.	See council's response to the inspectors' preliminary questions and matter 11 and matter 15.	No Likely Significant Effect. This modification proposes changes to wording

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			Any enhancement measures should **be informed by** ~~align with~~ the relevant nature recovery priorities (as appropriate) set out in the Suffolk Local Nature Recovery Strategy when completed. All planning applications must be supported~~, where necessary,~~ by appropriate protected species survey and ecological impact assessment, undertaken in accordance with national good practise guidelines.		however the policy continues to provide protection for protected species, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM24	Pages 58 and 59	Policy SP8 and paragraph 4.2.71	**Policy SP8 Recreational effects of development** All new development which would result in a net increase in dwellings ~~and therefore~~ **that would be** likely to increase recreational pressure on any European or nationally designated site for nature conservation, will be required to demonstrate that adequate measures are put in place to avoid or mitigate potential adverse effects. In all instances where recreational mitigation measures are applicable, as set out in the emerging West Suffolk Recreational Avoidance and Mitigation Framework, the following standards will apply, unless an evidence-based alternative strategy has been agreed with Natural England and the council: a. Provide measures for influencing recreation at, or close to the development site. Measures could include delivery of sufficient quantity and quality of alternative accessible natural green space and/or enhancement and promotion of dog friendly access routes within or in the immediate vicinity of the development or other measures to be agreed. For small developments, a financial contribution towards strategic measures may be accepted~~.~~**; and** b. An appropriate financial contribution towards recreational access management and monitoring of visitor pressure at sensitive nature conservation sites. A project level habitats regulations assessment will be required. The developer is required to submit information that clearly demonstrates that the above measures would result in no adverse effects on the integrity of the relevant European site. 4.2.71. The council has commissioned a study to explore how a range of avoidance, management and monitoring measures can be delivered through the framework of a recreational avoidance and mitigation study within West Suffolk. The ~~study~~ **West Suffolk Recreational Disturbance Avoidance and Mitigation study** ~~is ongoing but is anticipated to be completed late 2023 and will form a supplementary planning document (or subsequent planning document) providing~~ **provides** further guidance.	See council's response to inspectors' preliminary questions and matter 11 and matter 15. The change to paragraph 4.2.71 is a consequence of supplementary planning documents ceasing to exist under the planning reforms.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide protection for protected (European) sites, habitats and features, although updated to reflect the purpose of the policy, specifically 'protecting the district's sensitive nature conservation sites from harm through recreational pressure. It does not

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					introduce new developments, leaving the original HRA conclusions unaffected.
MM25	Page 59 to 74	Policy SP9	**4.3 Spatial strategy** 4.3.1. This section of the plan sets out the spatial strategy in policy SP9 and local policies, LP17, LP18 and LP19 which address the housing settlement boundaries and set out where development may be acceptable in the countryside including proposals relating to business and domestic equine. 4.3.2. The purpose of the spatial strategy is to set out the overall approach to protecting and enhancing the natural, built and historic environment and providing new homes, employment provision, community services and facilities and supporting infrastructure. It sets the broad strategy for managing development in the district to ~~2040~~ **2041**, reflecting the overall vision and strategic objectives of the plan. 4.3.3. The key diagram illustrates the **plan's spatial strategy for** ~~context of~~ the district, showing **the location of the higher order settlements in the settlement hierarchy, the broad locations of growth,** ~~the extent of the natural environmental constraints most notably the Breckland Special Protection Area (SPA) and Special Area of Conservation (SAC), which are national and European designations and its associated buffers~~, the military bases~~, the horse racing industry in Newmarket,~~ the **key** highways and rail corridors and **railway stations** ~~the location of the higher order settlements in the settlement hierarchy~~. **Policy SP9 The spatial strategy** The plan makes provision for development needs and supporting infrastructure for the district to ~~2040~~**2041**. ~~It promotes a~~ **A** sustainable pattern of development that conserves and enhances the natural, built and historic environment and seeks to mitigate climate change and adapt to its effects **will be promoted**. ~~It plans for the development needs of housing, employment, community uses and its supporting infrastructure. It makes provision for the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.~~ ~~It makes effective use and re-use of land including previously developed and brownfield land to meet the need for homes and other uses. It does this while safeguarding and improving the environment and ensuring safe and healthy living conditions.~~ ~~To meet West Suffolk's local housing need provision is made for at least 13,702 new homes (net) and supporting infrastructure to be delivered in the period 1 April 2023 to 31 March 2040. This is made in line with the Government's formula for objectively assessing future housing needs.~~ ~~15,486 homes (net) have been identified in this local plan to meet the overall housing requirement.~~ The provision of new homes ~~has been~~ **is** directed towards the more sustainable settlements in the settlement hierarchy **(policy SPX)**,where infrastructure **capacity** and **environmental** constraints allow. ~~as set out in the table below, and illustrated on the settlement~~	See council's response to inspectors' preliminary questions and matter 3. See response to inspector's action points AP2 and AP3 contained in IN10	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to define the spatial strategy. it does not introduce new developments, leaving the original HRA conclusions unaffected.

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			~~map, with towns at the top of the hierarchy and the countryside at the bottom. This strategy will contribute to balanced and sustainable communities~~. ~~**Settlement Hierarchy**~~ ~~**Towns**~~ ~~• Brandon~~ ~~• Bury St Edmunds~~ ~~• Haverhill~~ ~~• Mildenhall~~ ~~• Newmarket~~ ~~**Key service centres**~~ ~~• Barrow~~ ~~• Clare~~ ~~• Ixworth~~ ~~• Kedington~~ ~~• Lakenheath~~ ~~• Red Lodge~~ ~~• Stanton~~ ~~**Local service centres**~~ ~~• Barningham~~ ~~• Beck Row~~ ~~• Cavendish~~ ~~• Exning~~ ~~• Great Barton~~ ~~• Great and Little Whelnetham~~ ~~• Hopton~~ ~~• Hundon~~ ~~• Moulton~~ ~~• Rougham~~ ~~• West Row~~ ~~• Wickhambrook~~ ~~**Type A villages**~~ ~~• Bardwell~~ ~~• Barnham~~ ~~• Barton Mills~~ ~~• Chedburgh~~ ~~• Fornham All Saints~~ ~~• Fornham St Martin~~		

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			~~• Freckenham~~ ~~• Great Thurlow and Little Thurlow~~ ~~• Honington and Sapiston~~ ~~• Horringer~~ ~~• Ingham~~ ~~• Kentford~~ ~~•Pakenham~~ ~~• Risby~~ ~~• Stoke by Clare~~ ~~• Tuddenham~~ ~~**Type B villages**~~ ~~• Bradfield St George~~ ~~• Chevington~~ ~~• Coney Weston~~ ~~• Cowlinge~~ ~~• Elveden~~ ~~• Eriswell~~ ~~• Gazeley~~ ~~• Great Bradley~~ ~~• Hargrave~~ ~~• Hawkedon~~ ~~• Hepworth~~ ~~• Holywell Row~~ ~~• Icklingham~~ ~~• Lidgate~~ ~~• Lord's Walk~~ ~~• Market Weston~~ ~~• Ousden~~ ~~• RAF Honington~~ ~~• Rede~~ ~~• Stanningfield~~ ~~• Stansfield~~ ~~• Stradishall~~ ~~• Thelnetham~~ ~~• Troston~~ ~~• Whepstead~~ ~~• Withersfield~~ ~~• Worlington~~ ~~**Countryside**~~ ~~Comprises the countryside and small rural settlements.~~		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~The settlement hierarchy reflects the sustainability of settlements in terms of their provision of services, facilities and access to sustainable modes of travel to link to other higher order settlements to access their services, facilities and employment. Growth is directed to settlements which have existing infrastructure or have the capacity to expand infrastructure to meet the needs of development and reduce the necessity of car use wherever possible.~~ ~~The level of growth has been established in relation to the opportunities and constraints of each settlement and other technical studies such as the sustainability appraisal and habitat regulations assessment, landscape and ecology assessments, transport capacity, flooding and other key constraints, as well as an assessment of infrastructure needed to support any future growth.~~ ~~The council will promote the delivery of housing to meet the needs of different specific groups in the community, providing a range of sites, of different sizes and locations as well as homes of different tenures and types, including homes with care and support.~~ ~~Provision of new homes will be distributed in accordance with the components set out in the table below:~~		

	~~Existing commitments as at 1 April 2023 (homes) small sites and communal accommodation~~	~~Existing commitments as at 1 April 2023 large sites (homes)~~	~~Allocations in the development plan with planning permission (homes)~~	~~Allocations in the development plan without planning permission (homes)~~	~~Windfall~~	~~Total (homes)~~
~~Towns~~		~~1,007~~	~~6,163~~	~~3,453~~		~~10,623~~
~~Key service centres~~		~~55~~	~~785~~	~~1,255~~		~~2,095~~
~~Local service centres~~		~~255~~	~~192~~	~~384~~		~~831~~
~~Type A villages~~		~~7~~		~~119~~		~~126~~
~~Not specified~~						
~~Total~~	~~611~~	~~1,324~~	~~7,140~~	~~5,211~~	~~1,200~~	~~15,486~~

~~Explanatory text~~

~~The first column shows the number of homes with planning permission as at 1 April 2023, small sites with less than 10 homes and older person accommodation. A lapse rate of five per cent has been applied to all small sites (less than 10 homes) with planning permission. A ratio of 1.84 has been applied to planning permissions for older person accommodation.~~

~~The second column shows the number of homes with planning permission as at 1 April 2023, large sites 10 or more homes.~~

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~The third column shows the number of homes allocated in this plan with planning permission as at 1 April 2023.~~ ~~The fourth column shows the number of homes allocated in this plan and made neighbourhood plans without planning permission as at 1 April 2023.~~ ~~The fifth column shows the number of homes expected from windfall over the plan period.~~ ~~The last column shows the sum of the number of homes in the row. The number of homes with planning permission allocations in this local plan and made neighbourhood plans and a windfall allowance.~~ ~~The council will support development that accords with this spatial strategy and support communities taking forward neighbourhood plans. It will support strong and healthy communities and enable them to plan to meet their own local needs by supporting community led schemes such as community land trusts, community right to build orders or neighbourhood development orders and community initiatives for renewable and low carbon energy.~~ **Employment** Provision ~~is made for some 86 hectares~~ of employment land ~~within the district by 2040. This provision will be~~ **is** focused in the most sustainable settlements, the towns and key service centres and adjacent to existing rural employment areas. The strategy recognises the important role **that** existing general and rural employment areas play in accommodating local businesses in the district **also the importance of** and retaining home-based businesses within ~~their~~ **the** local ~~communities~~ **community**. Their role within the community will be supported. **Housing settlement boundary** **Housing settlement boundaries are defined on the policies map. Proposals for new residential development, residential conversion schemes, residential redevelopment and replacement of an existing dwelling with a new dwelling will be permitted within housing settlement boundaries where supported by other policies in the development plan. All areas outside of the defined housing settlement boundary are to be regarded as 'countryside' unless specifically identified for other uses in the development plan.** **Countryside** The ~~spatial strategy recognises the~~ intrinsic **benefits,** character and beauty of the **land designated as** countryside **on the policies map is recognised**, and **is** ~~it will be~~ protected from unsustainable development. **Development should avoid the 'best and most versatile' agricultural land (grades 1, 2 and 3a as classified through the agricultural land classification system) wherever possible in line with the National Planning Policy Framework.** ~~The following strategic allocations have been identified in this local plan, which are the focus of new housing and employment uses.~~ ~~**Site reference** | **Settlement** | **location** | **Indicative housing capacity (homes)** | **Indicative employment capacity (hectares)**~~		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment

~~**AP3**~~	~~Bury St Edmunds~~	~~Land north of Rougham Tower Avenue, Bury St Edmunds~~	~~500~~	~~20~~
~~**AP4**~~	~~Bury St Edmunds~~	~~West Bury St Edmunds~~	~~600~~	
~~**AP5**~~	~~Bury St Edmunds~~	~~North-east Bury St Edmunds~~	~~1375~~	
~~**AP6**~~	~~Bury St Edmunds~~	~~South-east Bury St Edmunds~~	~~1250~~	
~~**AP13**~~	~~Haverhill~~	~~North-west Haverhill~~	~~980~~	
~~**AP14**~~	~~Haverhill~~	~~North-east Haverhill~~	~~2500~~	
~~**AP16**~~	~~Mildenhall~~	~~Land west of Mildenhall~~	~~1300~~	~~5~~
~~**AP19**~~	~~Newmarket~~	~~Land at Hatchfield Farm~~	~~400~~	~~5~~
~~**AP20**~~	~~Newmarket~~	~~Pinewood Stud~~	~~415~~	
~~**AP12**~~	~~Bury St Edmunds~~	~~Suffolk Business Park extension~~		~~72 (of which 10 hectares of land is available)~~
~~**AP38**~~	~~Red Lodge~~	~~Land north of Acorn Way~~	~~300~~	~~8~~
~~**AP73**~~	~~Stanton~~	~~Shepherds Grove~~		~~31~~

Town centres and local centres

A positive approach will be taken to the growth, management and enhancement of the ~~The~~ town centres of Brandon, Bury St Edmunds, Clare, Haverhill, Mildenhall and Newmarket**. These towns** ~~in West Suffolk~~ play an important role and function in providing shops, services and facilities for our local communities **and will be safeguarded.** ~~The spatial strategy takes a positive approach to their growth, management and adaptation,~~ as the most sustainable locations.

The role and function of local ~~Local~~ centres ~~are also~~ identified **in policy LP41** ~~which~~ **will be protected in order to meet** ~~are important in meeting~~ the needs of the local community.

The horse racing industry, military bases and prison uses

~~Within the district there are military sites at RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp and prison uses at HMP Highpoint, Stradishall. These sites are defined on the policies map.~~
~~The district is proud to be home to the headquarters of the British Horse Racing Industry at Newmarket. The horse racing industry makes a major contribution to the economy and character of Newmarket and the surrounding area.~~ The spatial strategy will protect and ensure the operational needs of the military bases**, prisons,** and **the** horse racing industry **and ensure they** are not adversely affected by the impact of development.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Natural, historic and built environment ~~West Suffolk has a rich and diverse landscape much of it protected because these distinctive areas of land are home to rare and protected species and habitats. The area includes~~ **The** internationally, nationally and locally important nature conservation sites, locally valued landscape, historic parks and gardens, **other heritage assets** and the unique stud farm landscape around Newmarket **will be safeguarded and protected**. ~~In addition, there are a variety of heritage assets including listed buildings, ancient monuments such as the Abbey Ruins in Bury St Edmunds, and a number of conservation area across our historic towns and attractive villages.~~ ~~The natural environment also includes elements such as water supply and quality, as well as the more obvious landscape elements from the nature of the soil and agricultural productivity to the landscape character of different areas of the district and extent and nature of tree coverage.~~ ~~**Rural communities**~~ ~~Opportunities for growth, expansion, adaptation, re-use and replacement of buildings in the countryside will be supported where they accord with the local policies in this development plan.~~ ~~The spatial strategy supports communities taking forward neighbourhood plans. It plans for strong and healthy communities, enabling them to meet their own local needs through community led schemes such as community land trusts, community right to build orders or neighbourhood development orders and community initiatives for renewable and low carbon energy.~~ **Explanation** **4.3.7. The spatial strategy protects and enhances the natural, built and historic environment and seeks to focus an appropriate scale of development in, next to or well related to those settlements with capacity to expand, thereby contributing to the creation of balanced and sustainable communities. Growth will be directed to settlements which have existing infrastructure and where necessary have the capacity to expand infrastructure to meet the needs of new development, reducing the necessity of car use wherever possible and having regard to environmental constraints including the Breckland Special Protection Area.** **Sustainable settlements** ~~4.3.7.~~ **4.3.8.** The most sustainable places in the district to live are our towns, key service centres and local service centres which will support much of the local need for growth and rural sustainability in accordance with the National Planning Policy Framework. Type A villages also make a contribution to meeting the housing needs of the district through the provision of more modest growth on smaller sites where infrastructure and environmental constraints allow **4.3.9. The level of growth has been established in relation to the opportunities and constraints of each settlement and other technical studies such as the sustainability appraisal and habitats regulations assessment, landscape and ecology assessments, transport capacity, flooding and other key constraints, as well as an assessment of infrastructure needed to support any future growth.** **The main locations of growth**		

<table>
<tr><th>Modification reference number</th><th>Location in submission draft document</th><th>Policy number or paragraph reference</th><th>Proposed modification</th><th>Reason for modification</th><th>Assessment</th></tr>
<tr><td></td><td></td><td></td><td>~~4.3.8~~ 4.3.10. ~~Policy SP9~~ The table below shows the components of housing provision contributing to meeting the district's overall housing requirement and their spatial distribution. These comprise sites with planning permission as at 1 April ~~2023~~ 2024, site allocations in this local plan and made neighbourhood plans, of which some are allocations carried forward from extant local plans from the former St Edmundsbury Borough and Forest Heath District Councils. It also makes a windfall allowance. The purpose of the table is to summarise the distribution of new homes between the different levels in the settlement hierarchy as proposed in this plan. It is not intended to be used for the purposes of determining planning applications.
<table>
<tr><th></th><th>Existing commitments as at 1 April 2024 (homes) small sites (after applying lapse rate 5 per cent and communal accommodation)</th><th>Existing commitments as at 1 April 2024 large sites (homes)</th><th>Allocations in this plan with planning permission (homes)</th><th>Allocations in this plan without planning permission (homes)</th><th>Allocation in made Neighbourhood Plan without planning permission (homes)</th><th>Windfall (homes)</th><th>Total (homes) 2024 - 2041</th></tr>
<tr><td>Towns</td><td></td><td>763</td><td>6,109</td><td>3,330</td><td></td><td></td><td>10,202</td></tr>
<tr><td>Key service centres</td><td></td><td>45</td><td>923</td><td>1,115</td><td></td><td></td><td>2,083</td></tr>
<tr><td>Local service centres</td><td></td><td>119</td><td>227</td><td>247</td><td>150</td><td></td><td>743</td></tr>
<tr><td>Type A villages</td><td></td><td>4</td><td></td><td>121</td><td></td><td></td><td>125</td></tr>
<tr><td>Not specified</td><td></td><td></td><td></td><td></td><td></td><td>1,200</td><td>1,200</td></tr>
<tr><td>Total</td><td>522</td><td>931</td><td>7,259</td><td>4,813</td><td>150</td><td>1,200</td><td>14,875</td></tr>
</table>
~~Strategic allocations~~

~~4.3.9. The strategic allocations making an important contribution towards the housing and employment needs of the district are listed in policy SP9. Further details are provided in the site allocations section of the plan.~~

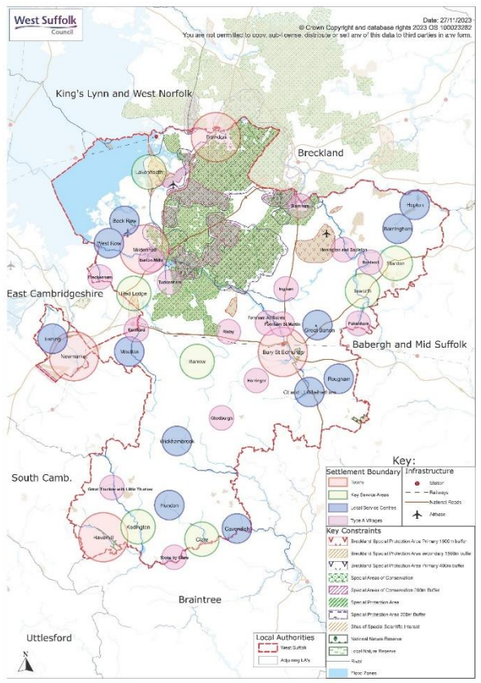
~~Settlement hierarchy~~

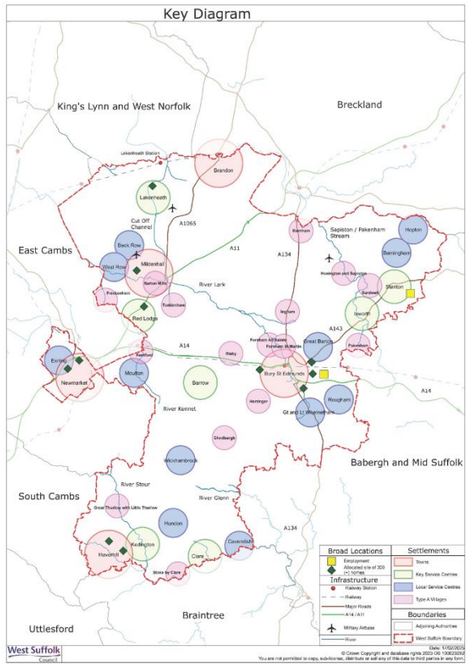
~~4.3.10. The district of West Suffolk has a population of approximately 179,928 (2021 mid-year estimate). It comprises a wide range of settlements, which for the purpose of this plan have been arranged into a settlement hierarchy reflecting their size, accessibility and range of services and facilities. Five categories of settlement form the basis of the hierarchy, with the largest and most sustainable being the towns, followed by key service centres, local service centres, type A villages and type B villages. The smallest settlements are~~</td><td></td><td></td></tr>
</table>

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~categorised as lying within the countryside; this categorisation is consistent with national policy. The approach to those settlements within the top five tiers of the hierarchy is set out below and these settlements are illustrated on the settlement hierarchy map. The smaller rural settlements falling within the countryside designation are not listed individually below due to their large number.~~ **~~Settlement hierarchy map~~** ~~4.3.11. The spatial strategy protects and enhances the natural, built and historic environment and seeks to focus an appropriate scale of development in, next to or well related to those settlements with capacity to expand, thereby contributing to the creation of balanced and sustainable communities. Growth will be directed to settlements which have existing infrastructure and where necessary have the capacity to expand infrastructure to meet the needs of new development, reducing the necessity of car use wherever possible and having regard to environmental constraints including the special protection area.~~ ~~4.3.12. The purpose of the settlement hierarchy is to reflect the sustainability of settlements in terms of the size of the settlement, their provision of services, facilities, and access to sustainable modes of travel to link to other higher order settlements to access their services, facilities and employment.~~ ~~4.3.13. The settlement hierarchy is an important tool to help determine the most sustainable locations for future growth.~~ ~~4.3.14.~~ **4.3.11.** The key issues taken into account in identifying a suitable spatial distribution strategy for the district included evidence of: • The need for the distribution of growth to accord with national policy. • The high number of environmental constraints in the district, and the need to accord with other primary legislation in respect of landscape, biodiversity and geodiversity interests. **Breckland Special Protection Area, designated for its population of ground nesting birds including stone curlew is a particular constraint to housing development.** • The availability of suitable sites in the West Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) to meet the distribution. • Outcomes of and recommendations made by the sustainability appraisal and habitats regulations assessments. • Known infrastructure constraints, including transport, issues and opportunities to support any future growth. • The consultation comments received to earlier consultations on the local plan. • Ongoing discussions with statutory consultees including Natural England, Environment Agency, Anglian Water, Historic England, Suffolk County Council and neighbouring authorities. ~~4.3.15. Major services are found in the district's five largest towns, including health, education, retail and employment. Some of these services are also found in key and local service centres which reduces the need to travel by car. Type A villages have a more limited range of services and facilities but can still meet some of the day to day needs of their residents. Type B villages are small in scale and provide few local services. The sustainable settlements study (2022) provided a full audit of the provision and sustainable access to services and facilities across settlements in this plan area, including those that are shared by settlements. The sustainable settlements study has informed the settlement hierarchy and the spatial strategy.~~ **Housing settlement boundary**		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Housing settlement boundaries for the settlements listed in the settlement hierarchy are defined on the policies map and on 'Find my nearest'. These may not be the physical boundary of the settlements, but in policy terms are the boundaries which manage development inside and outside of that area. Within such boundaries, the principle of new built development is accepted, subject to proposals' adherence of other development plan policies. Outside housing settlement boundaries, within the countryside residential development proposals are considerably more constrained. Small settlements, categorised as countryside in our settlement hierarchy, do not have defined housing settlement boundaries. **The council recognises the sustainability of settlements defined in the settlement hierarchy and will support sustainable development within the housing settlement boundary in accordance with the spatial strategy.** **The housing settlement boundaries of West Suffolk have been reviewed and define areas where residential land uses are concentrated. The boundaries exclude many non-residential uses.** **Employment** **The towns of Brandon, Bury St Edmunds, Haverhill, Mildenhall and Newmarket have the greatest concentrations of economic activity, with some key service centres making a smaller contribution to the provision. The district is also important for its tourism and visitor economy, focused on its historic towns and attractive rural landscape. Although predominantly rural in character the towns in the district are well connected to the rest of the country with the A14 connecting West Suffolk with Felixstowe to the east and Cambridge to the west, the A11 providing connections to Cambridge and Norwich, and the A1307 connecting the south of the district with the Cambridge Biomedical Campus and Stansted airport.** **The spatial strategy directs economic growth to the most sustainable locations, predominantly to the towns, with provision at the key services centre of Red Lodge. The district's smaller settlements and rural employment areas play an important role in accommodating local businesses and retaining home-based businesses within their local communities. The spatial strategy encourages appropriate sustainable rural enterprise and diversification schemes and makes provision for rural employment through site allocations adjacent to rural employment areas.** **Strategic policy SP12 provides the framework for considering proposals related to employment uses and local policies LP36 to LP38 will be used in development management.** **Town centres and local centres** **The town centres of Brandon, Bury St Edmunds, Clare, Haverhill, Mildenhall and Newmarket in West Suffolk play an important role and function in providing shops, services and facilities for our local communities. The spatial strategy takes a positive approach to their growth, management and adaptation, as the most sustainable locations, with easy access to facilities through walking, cycling and wheeling.** **The key service centres provide a range of shops and services which act as a local centre. Local centres are also identified within the towns of Bury St Edmunds, Haverhill and Newmarket which are important in meeting the needs of the local neighbourhood areas.** **Strategic policy SP13 provides the framework for considering proposals related to the retail and complimentary town centre uses and town centres and local centres are addressed in policies LP40 and LP41.**		

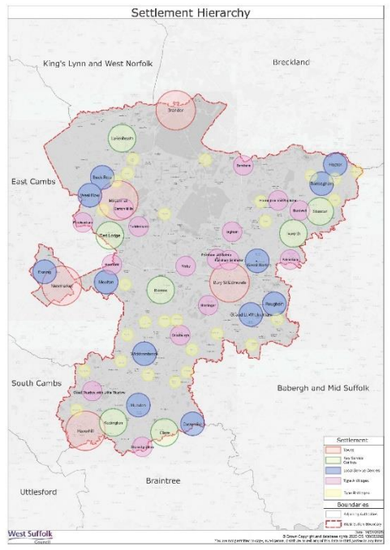
Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Military bases, prison uses and the horse racing industry **Within the district there are military sites at RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp and prison uses at HMP Highpoint, Stradishall. These sites are defined on the policies map.** **The district is proud to be home to the headquarters of the British Horse Racing Industry at Newmarket. The horse racing industry makes a major contribution to the economy and character of Newmarket and the surrounding area.** **The spatial strategy will protect and ensure the operational needs of the military bases and horse racing industry are not adversely affected by the impact of development.** **Strategic policy SP16 provides the framework for considering proposals related to the military bases and prison uses and ~~local policies~~ SPX to SPX provide the policies related to the horse racing industry.** **Natural, historic and built environment** **West Suffolk has a rich and diverse landscape and much of it is protected because these distinctive areas of land are home to rare and protected species and habitats. The area includes internationally, nationally and locally important nature conservation sites, locally valued landscape, historic parks and gardens, and the unique stud farm landscape around Newmarket. In addition, there are a variety of heritage assets from cottages to grade I listed buildings, ancient monuments such as the Bury St Edmunds Abbey Ruins, and a number of conservation areas across our historic towns and attractive villages.** **The natural environment also includes elements such as water supply and quality, and the air we breathe, as well as the more obvious landscape elements from the nature of the soil and agricultural productivity to the landscape character of different areas of the district and extent and nature of tree coverage.** **Breckland Special Protection Area, designated for its population of ground nesting birds including stone curlew is a particular constraint to housing development.** **Sections 4.2 and 4.7 provide strategic and local policies setting the framework for proposals related to the natural, built and historic environment.**		
MM26	Page 60	Key Diagram	*Key diagram to be replaced with new key diagram removing key constraints apart from rivers, and to show broad locations of housing and employment growth.*	See council's response to inspectors' preliminary questions and matter 3.	No Likely Significant Effect This modification updates the key diagram aligned to the spatial strategy, it does not introduce

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
					new developments, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
					
MM27	N/A	Policy SPX Settlement hierarchy	**Settlement Hierarchy** **The purpose of the settlement hierarchy is to reflect the sustainability of settlements in terms of the size of the settlement, their provision of services, facilities, and access to sustainable modes of travel to link to other higher order settlements to access their services, facilities and employment.** **Policy SPX Settlement hierarchy** **All proposals for new development will be expected to have regard to the position of the site within the settlement hierarchy as follows:** **Towns** • **Brandon** • **Bury St Edmunds** • **Haverhill** • **Mildenhall** • **Newmarket**	See council's response to inspectors' preliminary questions and matter 3. See response to inspector's action points AP2 and AP3 contained in IN10.	No Likely Significant Effect This new policy describes settlement hierarchy previously found in Policy SP9, it does not introduce new developments, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Key service centres • **Barrow** • **Clare** • **Ixworth** • **Kedington** • **Lakenheath** • **Red Lodge** • **Stanton** **Local service centres** • **Barningham** • **Beck Row** • **Cavendish** • **Exning** • **Great Barton** • **Great and Little Whelnetham** • **Hopton** • **Hundon** • **Moulton** • **Rougham** • **West Row** • **Wickhambrook** **Type A villages** • **Bardwell** • **Barnham** • **Barton Mills** • **Chedburgh** • **Fornham All Saints** • **Fornham St Martin** • **Freckenham** • **Great Thurlow and Little Thurlow** • **Honington and Sapiston** • **Horringer** • **Ingham** • **Kentford** • **Pakenham** • **Risby** • **Stoke by Clare** • **Tuddenham**		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Type B Villages • **Bradfield St George** • **Chevington** • **Coney Weston** • **Cowlinge** • **Elveden** • **Eriswell** • **Gazeley** • **Great Bradley** • **Hargrave** • **Hawkedon** • **Hepworth** • **Holywell Row** • **Icklingham** • **Lidgate** • **Lord's Walk** • **Market Weston** • **Ousden** • **RAF Honington** • **Rede** • **Stanningfield** • **Stansfield** • **Stradishall** • **Thelnetham** • **Troston** • **Whepstead** • **Withersfield** • **Worlington** **Countryside** **Comprises the countryside and small rural settlements** **Explanation** **The district of West Suffolk has a population of approximately 179,928 (2021 mid-year estimate). It comprises a wide range of settlements, which for the purpose of this plan have been arranged into a settlement hierarchy reflecting their size, accessibility and range of services and facilities. Five categories of settlement form the basis of the hierarchy, with the largest and most sustainable being the towns, followed by key service centres, local service centres, type A villages and type B villages. The smallest settlements are categorised as lying within the countryside; this categorisation is consistent with national policy. The approach to those settlements within the top five tiers of the hierarchy is set out below and these settlements are illustrated on the settlement**		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			hierarchy map. The smaller rural settlements falling within the countryside designation are not listed individually below due to their large number. **Settlement hierarchy map**  **Settlement types and the approach to growth** **Major services are found in the district's five largest towns, including health, education, retail and employment. Some of these services are also found in key and local service centres which reduces the need to travel by car. Type A villages have a more limited range of services and facilities but can still meet some of the day to day needs of their residents. Type B villages are small in scale and provide few local services. The sustainable settlements study (2022) provided a full audit of the provision and sustainable access to services and facilities across settlements in this plan area, including those that are shared by settlements. The sustainable settlements study has informed the settlement hierarchy and the spatial strategy.** **The purpose of stating an approximate number of homes in the site allocations is to give an indication of the scale of development expected. The actual number of homes on each site will be determined through the planning application process in the context of the relevant policy requirements in the Plan and the objective of making efficient use of land.** ~~4.3.23. Given the strong sustainability credential of the towns, major development schemes are considered appropriate with the scale of growth dependent on infrastructure and environmental capacity.~~ ~~4.3.27. The scale of growth considered appropriate for key service centres is an indicative maximum scheme size of around 200 homes, dependent on infrastructure and environmental capacity.~~		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~4.3.30. The scale of growth considered appropriate for local service centres is an indicative maximum scheme size of around 100 homes, dependent on infrastructure and environmental capacity.~~ ~~4.3.33. The scale of growth considered appropriate for Type A Villages is an indicative maximum scheme size of around 20 homes, dependent on infrastructure and environmental capacity.~~ ~~4.3.36. The scale of growth considered appropriate for type B villages is an indicative maximum scheme size of around five homes, as infill plots within the housing settlement boundary including making use of previously developed or brownfield land dependent on infrastructure and environmental capacity.~~ **Countryside** 4.3.37. The countryside contains small rural settlements with few or no services. These settlements do not have a defined housing settlement boundary and no sites have been allocated within them in this local plan. ~~4.3.38. Local policy LP18 sets out the appropriate types of development in the countryside and policy LP17 identifies housing settlements boundaries whose purpose is to set out where housing development can be appropriately located.~~ ~~**Employment**~~ ~~4.3.39. The towns of Brandon, Bury St Edmunds, Haverhill, Mildenhall and Newmarket have the greatest concentrations of economic activity, with some key service centres making a smaller contribution to the provision. The district is also important for its tourism and visitor economy, focused on its historic towns and attractive rural landscape. Although predominantly rural in character the towns~~ ~~in the district are well connected to the rest of the country with the A14 connecting West Suffolk with Felixstowe to the east and Cambridge to the west, the A11 providing connections to Cambridge and Norwich, and the A1307 connecting the south of the district with the Cambridge Biomedical Campus and Stansted.~~ ~~4.3.40. The spatial strategy directs economic growth to the most sustainable locations, predominantly to the towns, with provision at the key services centre of Red Lodge. The district's smaller settlements and rural employment areas play an important role in accommodating local businesses and retaining home-based businesses within their local communities. The spatial strategy encourages appropriate sustainable rural enterprise and diversification schemes and makes provision for rural employment through site allocations adjacent to rural employment areas.~~ ~~4.3.41. Strategic policy SP12 provides the framework for considering proposals related to employment uses and local policies LP36 to LP38 will be used in development management.~~ ~~**Town centres and local centres**~~ ~~4.3.42. The town centres of Brandon, Bury St Edmunds, Clare, Haverhill, Mildenhall and Newmarket in West Suffolk play an important role and function in providing shops, services and facilities for our local communities. The spatial strategy takes a positive approach to their growth, management and adaptation, as the most sustainable locations.~~		

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			~~4.3.43. The key service centres provide a range of shops and services which act as a local centre. Local centres are also identified within the towns of Bury St Edmunds, Haverhill and Newmarket which are important in meeting the needs of the local neighbourhood areas.~~ ~~4.3.44. Strategic policy SP13 provides the framework for considering proposals related to the retail and complimentary town centre uses and town centres and local centres are addressed in policies LP40 and LP41.~~ ~~**Military bases, prison uses and the horse racing industry**~~ ~~4.3.45. Within the district there are military sites at RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp and prison uses at HMP Highpoint, Stradishall. These sites are defined on the policies map.~~ ~~4.3.46. The district is proud to be home to the headquarters of the British Horse Racing Industry at Newmarket. The horse racing industry makes a major contribution to the economy and character of Newmarket and the surrounding area. The spatial strategy will protect and ensure the operational needs of the military bases and horse racing industry are not adversely affected by the impact of development.~~ ~~4.3.47. Strategic policy SP16 provides the framework for considering proposals related to the military bases and prison uses and local policies LP46 to LP49 provide the policies related to the horse racing industry.~~ ~~**Natural, historic and built environment**~~ ~~4.3.48. West Suffolk has a rich and diverse landscape and much of it is protected because these distinctive areas of land are home to rare and protected species and habitats. The area includes internationally, nationally and locally important nature conservation sites locally valued landscape, historic parks and gardens, and the unique stud farm landscape around Newmarket. In addition, there are a variety of heritage assets from cottages to grade I listed buildings, ancient monuments such as the Bury St Edmunds Abbey Ruins, and a number of conservation areas across our historic towns and attractive villages.~~ ~~4.3.49. The natural environment also includes elements such as water supply and quality, and the air we breathe, as well as the more obvious landscape elements from the nature of the soil and agricultural productivity to the landscape character of different areas of the district and extent and nature of tree coverage.~~ ~~4.3.50. Sections 4.2 and 4.7 provide strategic and local policies setting the framework for proposals related to the natural, built and historic environment.~~ ~~**Rural communities**~~ ~~4.3.51. Opportunities for growth, expansion, adaptation, re-use and replacement of buildings in the countryside are addressed in local policies LP18, LP28, LP29 and LP38 of this local plan.~~ ~~4.3.52. The spatial strategy supports communities taking forward neighbourhood plans. It will encourage strong and healthy communities and enable them to plan to meet their own local needs by supporting community led schemes such as community land trusts, community right to build order or neighbourhood development order and community initiatives for renewable and low carbon~~		

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			~~energy.~~ ~~4.3.53. Strategic policy SP11 sets out the housing requirement for designated neighbourhood plan areas.~~		
MM28	Page 74 and 75	**Policy LP17**	~~**Housing settlement boundaries**~~ ~~4.3.54. The purpose of this policy is to support proposals for residential development within defined housing settlement boundaries.~~ ~~**Policy LP17 Housing settlement boundaries**~~ ~~Housing settlement boundaries are defined on the policies map. Proposals for new residential development, residential conversion schemes, residential redevelopment and replacement of an existing dwelling with a new dwelling will be permitted within housing settlement boundaries where supported by other policies in the development plan~~ ~~**Explanation**~~ ~~4.3.55. Housing settlement boundaries for the settlements listed in the settlement hierarchy are defined on the policies map and on 'Find my nearest'. These may not be the physical boundary of the settlements, but in policy terms are the boundaries which manage development inside and outside of that area. Within such boundaries, the principle of new built development is accepted, subject to proposals' adherence of other development plan policies. Outside housing settlement boundaries, within the countryside residential development proposals are considerably more constrained. Small settlements, categorised as countryside in our settlement hierarchy, do not have defined housing settlement boundaries.~~ ~~4.3.56. The council recognises the sustainability of settlements defined in the settlement hierarchy and will support sustainable development within the housing settlement boundary in accordance with the spatial strategy.~~ ~~4.3.57. The housing settlement boundaries of West Suffolk have been reviewed and define areas where residential land uses are concentrated. The boundaries exclude many non-residential uses.~~	See council's response to inspectors' preliminary questions.	No Likely Significant Effect This modification removes policy LP17, placing housing settlement boundaries in Policy SP9. However, the policy did not introduce or restrict new developments or provide environmental protections, leaving the original HRA conclusions unaffected.
MM29	Page 75 and 76	Policy LP18	**Economic d~~D~~evelopment and essential utilities in the countryside** 4.3.58. The purpose of this policy is to set out what forms of **economic** development are acceptable in the countryside and protect the countryside from unsustainable development. **Policy ~~LP18~~ SPX Economic d~~D~~evelopment and essential utilities in the countryside** Land designated on the policies map as countryside is a valued asset within the district and will be protected from unsustainable development. ~~A new or extended building will only be permitted, in accordance with other policies within this plan, where it is for:~~ ~~a. Purposes directly related to agriculture, forestry or equine and the horse racing industry related activities.~~ ~~b. Essential small-scale facilities which preserve the openness, appearance and character of the countryside for outdoor sport, recreation, leisure activities, and new tourism facilities or other appropriate uses of land.~~ ~~c. Extension of community facilities where there is a proven need.~~	See council's response to inspectors' preliminary questions and matter 8 and matter 15.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidance for economic development, it does not

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~d. The replacement of an existing dwelling on a one for one basis where the proposed replacement dwelling and domestic curtilage respects the scale and floor area of the existing dwelling.~~ ~~e. Small scale extensions or alterations to existing dwellings, in accordance with other policies within the development plan.~~ ~~f. Small scale residential development of a small undeveloped plot, in accordance with local policy LP26 Housing in the countryside.~~ Proposals for **sustainable** economic growth and expansion of all types of business and enterprise **in the countryside** will be permitted where: g. They recognise the intrinsic character and beauty of the countryside. h. The proposal is on previously developed land or land that is physically well-related to existing settlements and will not result in the irreversible loss of best and most versatile agricultural land. i. The scale of development is sensitively integrated into the surrounding area and evidence is submitted through a landscape and visual impact assessment and any impacts are mitigated. j. There will be no significant harm, and where possible enhancements will be made, to the historic environment, green and blue infrastructure, and the natural environment. k. There are no unacceptable impacts, and where possible enhancements will be made, to the highways network, or public rights of way and any impacts are fully mitigated. l. Sustainable travel links are provided to maximise active travel opportunities to and from the site. m. The distinctive character of any settlement and its setting is maintained, and the proposal does not lead to coalescence with neighbouring settlements. **Proposals for the delivery and operation of utilities infrastructure where there is a proven need and where a countryside location is essential for the delivery of those utilities will be supported where they accord with other policies in the development plan.** **Explanation** 4.3.59. The area outside defined housing settlement boundaries is classified as the countryside. The countryside is a principal element of the rural character of West Suffolk and is enjoyed by both residents and visitors. The quality and character of the countryside should be protected and where possible enhanced and planning therefore has an important role in supporting and facilitating development and land use which enables those who live in, earn a living from, or help maintain and manage the countryside, ~~can~~ continue to do so. 4.3.60. The spatial strategy recognises the intrinsic character and beauty of the countryside and seeks to protect the countryside from unsustainable development. However, the local authority recognises the need to encourage the sustainable growth of businesses in rural areas, diversification of agricultural and other land-based businesses, development of rural tourism and leisure development which respects the character of the countryside ~~and retention and development of accessible local services and community facilities~~ to support a prosperous rural economy. This policy provides details of the types of development that are supported to promote sustainable **economic** growth within West Suffolk, whilst ensuring the character and quality of the countryside is protected for future generations. 4.3.61. It is important to manage development in the countryside, but it is also recognised that some new development will help to support the rural economy **and sustain rural communities**~~, meet local housing needs and provide for particular~~		introduce new developments, leaving the original HRA conclusions unaffected.

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			~~uses such as renewable energy, community facilities, recreation and leisure~~ **including essential development required by utility companies to fulfil their statutory obligations**.		
MM30	Page 78 to 80	Policy SP10	**Housing needs** 4.4.2. Strategic policy SP10 sets out the strategic housing requirement for the district and the needs of specific groups in the community over the plan period to ~~2040~~ **2041**. ~~It makes provision to accommodate sites no larger than one hectare. It sets out how the needs of specific housing groups will be met.~~ **Policy SP10 Housing needs** ~~**Overall housing requirement**~~ To meet West Suffolk's local housing need, provision is made for at least ~~13,702~~ **13,005** new homes (net) and associated infrastructure to be delivered in the period 1 April ~~2023~~ **2024** to 31 March ~~2040~~ **2041 (an average of 765 new homes (net) per annum)**. ~~15,486~~ **14,875** homes (net) have been identified in this local plan to meet the overall housing requirement. Provision ~~will be~~ **is** met through existing planning commitments, site allocations in the development plan and a windfall allowance. ~~The council has made provision for a mix of sites, in terms of size, type and tenure. Sites have been identified from the development plan and brownfield register to accommodate some ten per cent of the housing requirement on sites not larger than one hectare.~~ ~~**Housing requirement for designated neighbourhood areas**~~ ~~The minimum housing requirement for designated neighbourhood areas in the district is set out in policy SP11.~~ ~~**Housing needs of different groups in the community**~~ ~~The housing needs of different groups in the community will be supported including those who require affordable housing, families with children, older people, students, people with disabilities, service families, essential local workers, people who rent their homes and people wishing to commission or build their own homes. Other policies in the plan set out the detail of how these needs will be addressed.~~ ~~**Older person housing need**~~ ~~To meet West Suffolk's older person housing need, the council will support the provision of older persons accommodation including retirement housing, housing-with-care (including extra care) and care homes. Proposals for housing development and site allocations which make provision for older person needs as part of the development will be supported, particularly in the towns, key service centres and local service centres, given their good accessibility to services and facilities. Strategic housing and mixed-use allocations have been identified to address older person accommodation including housing-with-care (including extra care) and or a care home as part of the overall mix of housing accommodation. The approach to achieve this out in strategic site allocations.~~	See council's response to inspectors' preliminary questions and matter 2.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to describe housing needs and gives guidance on how these will be met. It reduces the overall capacity of new housing to be developed and does not introduce any new allocations. It does not introduce new developments, leaving the original HRA conclusions unaffected.

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			~~**Affordable housing need**~~ ~~West Suffolk's affordable housing need is to provide 505 rented homes per annum between 2023 and 2040. The council will seek to meet as much of this need as viably feasible as set out in policy LP20. The affordable housing needs of the most vulnerable groups will be prioritised wherever possible.~~ ~~**Gypsy, Traveller and travelling showpeople need**~~ ~~West Suffolk's Gypsy and Traveller need over the plan period has been identified as an overall cultural need of 39 pitches of which 26 meet the Planning Policy for Traveller Sites 2015 nomadic habitat of life test. The council plans for the first 10 years of its full cultural need of 16 pitches through the intensification of existing sites and regularisation of existing tolerated pitches. Applications will be supported subject to meeting relevant criteria in policy LP24. No need has been identified for travelling showpeople, boat dweller or other caravan dwellers accommodation in the plan period.~~ ~~**Custom and self-build**~~ ~~West Suffolk's custom and self-build housing need of 30 homes per annum will be addressed in local policy LP25 Custom and self-build homes.~~ ~~**People with disabilities**~~ ~~is set out in the local policy LP23 housing needs of specific groups, with detailed provisions set~~ ~~The needs of people with disabilities are addressed in local policy LP23 Housing Needs of Specific Groups.~~ ~~**Supporting communities make provision to meet local housing needs**~~ Support will be given to communities to make provision for housing by taking forward neighbourhood plans and proposals which support locally identified housing needs through the provision of rural exception sites, community-led schemes such as community**-led development**~~ land trusts~~, community right to build orders or a neighbourhood development order. 4.4.5. In seeking to address the overall identified housing need, provision has been made for at least a 10 per cent contingency, ~~thereby~~ making provision for some ~~15,486~~ **14,875** homes. This is to ensure there is choice in the market and a continuous supply coming forward over the plan period to ~~2040~~ **2041**. ~~This contingency is made up of the following sources of housing supply; additional commitments and allocations, brownfield sites not allocated in this plan and an allowance for windfall sites. A contingency is needed to allow for unexpected changes to this provision.~~ A five per cent lapse rate has been applied to small site commitments, as evidence in the housing delivery study and council's own monitoring ~~since~~, suggests ~~due to unforeseen circumstances~~ some small sites with planning permission may not come forward. 4.4.6. At least a 10 per cent contingency is considered appropriate, exceeding the buffer applied to the five-year housing land supply when the housing delivery test is met. ~~This contingency in the supply provides overall confidence that housing needs can be met while ensuring choice in the market and a continuous supply of housing land coming forward over the plan period.~~		

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			4.4.7. The local housing need assessment for West Suffolk Council has determined ~~13,702~~ **13,005** homes are needed to be planned for the period 1 April ~~2023~~ **2024** to 31 March ~~2040~~ **2041**. This equates to an annual requirement of ~~806~~ **765** homes each year. As of 1 April ~~2023~~ **2024**, some ~~9,075~~ **8,712** homes already have planning permission in West Suffolk, the site details of large sites (10 homes or more) including their planning status are listed in appendix E. Where sites with planning permission are under construction, we take account of the number of homes remaining to be built as at 1 April ~~2023~~ **2024** as contributing to the housing supply. A five per cent lapse rate is applied to small sites (less than 10 homes) commitments. A ratio of 1.84 has been applied to planning permissions for older person accommodation. Many of the large site commitments with planning permission were first identified in an adopted local plan. After taking account of homes already with planning permission, this leaves a remainder of at least ~~4,627~~ **4,293** homes to be identified through the local plan. A total of ~~5,211~~ **4,963** homes have been identified from new site allocations (excluding allocations which already have planning permission), as well as carrying forward some sites already allocated in adopted development plans (which at 1 April ~~2023~~ **2024** did not have planning permission). Each site allocated has been assessed for its suitability, availability and deliverability through the West Suffolk Strategic Housing and Economic Land Availability Assessment and has been found to meet these tests. The allocation of sites is in accordance with the spatial strategy, which directs growth to the most sustainable locations where infrastructure **capacity** and environmental ~~capacity~~ **constraints** allows. ~~13,702~~ **13,005** housing requirement for the period 1 April ~~2023~~ **2024** to 31 March ~~2040~~ **2041** 9,075 homes with planning permission (listed in appendix E) Leaves ~~4,627~~ **4,293** homes to be identified in this plan ~~4.4.8 In the three years prior to 1 April 2023, 2,689 homes (net) were delivered in the district, excluding homes delivered in communal accommodation such as care bed spaces. This additional provision has been measured against the previous local housing need and shows an excess of 288 homes were delivered since the start of the plan period 1 April 2020. This reduces the number of homes needed in the remaining years to meet overall needs over the plan period.~~ ~~**Number of homes (net) delivered in the district from 1 April 2020 to 31 March 2023**~~ ~~**Monitoring year** | **Number of homes needed using local housing need standard methodology** | **Number of homes delivered (net)**~~ ~~April 2020 to 31 March 2021 | 814 | 821~~ ~~April 2021 to 31 March 2022 | 796 | 865~~ ~~April 2022 to 31 March 2023 | 791 | 1,003~~ ~~Total | 2,401 | 2,689~~ 4.4.9. In assessing how the overall housing need will be met, committed homes with planning permission which are also existing local plan allocations, have been counted as sites with planning permission. Sites with planning permission where the development has **already** commenced are not **proposed as site allocations** ~~allocated~~ in this plan ~~where~~ **as** there is confidence they will continue to be built out. Some strategic sites where the development has commenced are included as allocations in this plan to ensure they are brought forward in accordance with the policy requirements of this plan. ~~4.4.12. Policy SP11 sets out the minimum housing requirement for designated neighbourhood areas.~~ **Range of housing sites**		

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			4.4.13. A range of sites of different sizes have been identified in the plan, including large ~~strategic~~ sites for at least 500 homes, medium sized sites ranging from 10 homes to up to 499 homes and small sites less than one hectare. ~~**Housing needs of specific groups**~~ ~~4.4.17. The NPPF requires local plans to contain strategic policies that make sufficient provision for affordable housing. Affordable housing in this context is defined to the NPPF and is repeated in the glossary to this local plan.~~ ~~4.4.18. The housing needs of specific groups study (October 2021) and housing evidence update (2023) has assessed the overall need for affordable housing in West Suffolk which amounts to 505 rented homes per annum between 2023 and 2040. At the time of the updated study the affordable rent need equated to over 63 per cent of overall housing need, notwithstanding there are other affordable products which meet the NPPF definition of affordable housing and can form part of this provision such as other routes to affordable home ownership. Given the identified affordable need the study recommends the council should seek to deliver as much affordable housing to rent as viability allows. To help meet West Suffolk's affordable housing need provision of 40 per cent of homes on a greenfield site and 30 per cent on brownfield sites will be required to be affordable. The approach to achieve this is set out in policy SP10 and local policy LP20.~~ ~~4.4.19. The studies provides evidence to support planning policies relating to the needs of groups with specific housing requirements and has assessed the overall need for affordable housing in West Suffolk.~~ ~~**Other housing groups**~~ ~~4.4.20. The needs for families with children, students, service families, people who rent their homes and essential local workers (public sector employees who provide frontline services) are addressed through the strategic and local policies which makes provision for a range of house types, sizes, and tenures and for those households with affordable housing needs. No specific need has been identified within the district for students, however, should this need arise in the plan period it can be addressed through the strategic and local policies in this plan. Accommodation for service families is met both on and off the airbases. The build to rent product and other affordable housing products identified in the glossary, are supported in local policy LP20 and provide opportunity to address specific needs including the needs of people who wish to rent, service personnel and essential local workers~~ ~~4.4.21. The needs of housing groups not specifically identified above, will be considered against the national, strategic, and local policies which seek to address all housing needs or on a case-by-case basis.~~ **Local and rural housing needs** 4.4.22. Where local housing needs surveys are undertaken to identify local needs and rural affordable needs in a parish or neighbourhood plan area, this need can be addressed through rural exception sites (including first homes exception sites) and supporting community-led-schemes such as community-**led development** ~~land trusts~~, community right to build order**s** or neighbourhood development order**s**. Local policy ~~LP22~~ **SPX** sets out further details on rural exception sites. 4.4.23. Neighbourhood planning groups through their neighbourhood plan can apply a local connection test to proposals for first homes, in order to seek to address local needs. ~~4.4.24. The needs of essential rural local workers are addressed in local policy LP27.~~		

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			~~**Gypsy, traveller and travelling showpeople need**~~ ~~4.4.25. West Suffolk has an established Gypsy and Traveller community residing on some 20 sites across the district.~~ ~~4.4.26. Many of the problems faced by Gypsies and Travellers, who are among the most deprived and socially excluded groups, arise from the lack of provision for their accommodation needs. The lack of provision of secure accommodation can also lead to unauthorised encampments.~~ ~~4.4.27. Government guidance in Planning Policy for Traveller Sites (PPTS) is used to plan for the accommodation needs of those Gypsies and Travellers who continue to lead a nomadic habit of life, even if they are temporarily not travelling. The National Planning Policy Framework (NPPF) is also used to plan for the accommodation needs of those Gypsies and Travellers that no longer lead a nomadic habit of life.~~ ~~4.4.28. The West Suffolk Gypsy and Traveller Accommodation Needs Assessment (GTAA) (2023) reviewed the needs for Gypsy and Traveller, travelling showpeople, others residing in caravans and boat dwellers accommodation across West Suffolk to 2040. This GTAA considers the above-mentioned accommodation need figures as well as the full cultural need for Gypsy and Travellers pitches.~~ ~~4.4.29. Prior to an Appeal Court ruling in October 2022, it was reasonable for a local planning authority to plan using the PPTS 2015 definition, and for West Suffolk this was identified as being 26 additional pitches to 2040. However, following the court ruling, the GTAA recommended that the council seeks to meet its overall cultural need whilst recognising that from a planning policy perspective, five-year land supply continues to be measured using the PPTS 2015 level of need.~~ ~~4.4.30. This plan seeks to address the needs of all Gypsies and Travellers including those that have ceased to travel permanently. The GTAA under this definition, identifies an overall cultural need for 39 pitches to 2040. This need is broken down identifying a need to 2027 to 2028 of six pitches. Beyond this a further 10 pitches are required to 2032 to 2033, 14 pitches to 2037 to 2038 and a further nine to 2040.~~ ~~4.4.31. The GTAA also looked at the likely drivers of that need and site preferences. Household formation is the key driver of longer-term need. As there are a substantial number of young people moving onto two recently permitted sites this has resulted in longer-term need being higher later in the plan period, when their children become adults and need separate accommodation. As such, it is concluded that the extension, intensification or regularisation of existing sites is the appropriate approach to meet the identified need in the most appropriate and deliverable manner in the short to medium term.~~ ~~4.4.32. The GTAA and accompanying site appraisals identify the potential for between 14 to 17 pitches that could come forward through the expansion or intensification of existing sites and a further 10 pitches by regularising sites that are not permanently authorised and a further five vacant pitches on such sites.~~ ~~4.4.33. Longer term need will be met by windfall provision. Analysis of past trends in the 10-year period from 2013 shows some 50 pitches have come forward in the district giving an average delivery of five pitches per year. The local planning authority is confident this, combined with a call for sites in an early review of the local plan will meet the longer term identified need.~~		

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			~~4.4.34. The GTAA also reviewed the need for transit provision and concluding that to manage unauthorised encampments a negotiated stopping policy to support the needs of Travellers passing through West Suffolk should be developed to allow caravans to be sited at suitable locations for a short period of time with provision of services such as waste disposal and toilets. West Suffolk in cooperation with other adjoining authorities and the county council are investigating sites accessible from the main trunk roads passing through the county.~~ ~~4.4.35. The West Suffolk Gypsy and Traveller Accommodation Assessment (GTAA) could not evidence any need for Travelling Showpeople, boat dweller or other caravan dwellers accommodation in the plan period.~~		
MM31	Page 85 and 86	Policy SP11	**Neighbourhood Plans** 4.4.36. Strategic policy SP11 sets out its support for the preparation of neighbourhood plans. It sets out the housing requirement for designated neighbourhood areas over the plan period to ~~2040~~ **2041** and approach to areas designated or reviewed after this local plan is adopted. **Policy SP11 Neighbourhood plans** The minimum housing requirement for the period 1 April ~~2023~~ **2024** to 31 March ~~2040~~ **2041** for each designated neighbourhood areas is set out in appendix G of this plan. This provision accords with the spatial strategy of this local plan and which seeks to address the strategic housing needs of the district. The council has identified site allocations to meet the minimum housing requirement for each designated neighbourhood area in this plan. There is no need for the neighbourhood groups to repeat these allocations in their neighbourhood plans. Neighbourhood groups may choose to identify additional sites in their neighbourhood area to address their locally identified housing needs. **Neighbourhood plans will need to be in general conformity with the site allocation policies in the local plan.** There is no identified housing requirement for the designated neighbourhood areas which only contain Type B villages and or the countryside, as no allocations are made in these locations in this plan. Following adoption of the local plan, indicative housing requirements will be provided upon request for those neighbourhood plan bodies undertaking a review of their neighbourhood plan. They will also be provided where a new neighbourhood area is designated. The housing requirement will be assessed based on the approach set out in the National Planning Policy Framework or any successor policy.	See council's matter 3 response.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide support for neighbourhood plans, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM32	Page 87 and 88	Policy LP20	**Policy ~~LP20~~ SPX Affordable housing** **West Suffolk's affordable housing need is to provide 505 rented homes per annum between 2023 and 2040.** The council is committed to improving housing affordability in West Suffolk. On all proposals for development of sites of ten or more (net) homes, or with an area of 0.5 hectares or more the following levels of affordable housing provision will be required: a. On greenfield sites 40 per cent of homes shall be affordable. ~~However, it is recognised that in exceptional circumstances some larger sites need to deliver important strategic infrastructure therefore variations to this requirement may be justified on viability grounds with the expectation that affordable provision will be maximised.~~ b. On brownfield sites 30 per cent of homes shall be affordable.	See council's response to inspectors' preliminary questions and matter 6. In response to inspectors' action points AP31 and AP32 contained in IN12 and AP64 contained in IN12A.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidance the

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			Where this would result in a requirement for a percentage of a dwelling to be affordable, this should be rounded up (0.5 or above) or down as appropriate to a whole number. **It is recognised that there may be particular circumstances (including on larger sites where there is a need to deliver important strategic infrastructure, all flatted development on brownfield sites and specialist schemes for older persons accommodation) where variations to this requirement may be justified on viability grounds with the expectation that evidence will be submitted to demonstrate affordable provision will be maximised.** Affordable housing shall be provided on-site, unless it can be demonstrated that exceptional circumstances exist which necessitate provision on another site within the control of the applicant, or the payment of a financial contribution to the local planning authority to enable the housing need to be met elsewhere. The exact tenure mix of affordable homes should be identified through discussions with the local authority and informed by the latest Government guidance and an up-to-date local housing need assessment **across social rent, other affordable housing for rent and affordable home ownership tenures**. The council will prioritise affordable housing for rent **to meet West Suffolk's local need** as set out in the most recent housing needs assessment **and policy LP21.** ~~subject to:~~ • ~~Satisfying national policy requirements including for ten per cent of all housing being for affordable home ownership (unless the development is listed as an exemption in the National Planning Policy Framework or subsequent successor policy).~~ • ~~If a proposal for a site includes First Homes, they should make up 25 per cent of all affordable homes secured.~~ The affordable homes should be distributed across the development and well-integrated within the design and layout such that they are indistinguishable from the market housing on the same site. This should be implemented in small groups or clusters of no more than 15 units. All new affordable homes should meet or exceed the nationally described space standards and be the appropriate type and size to meet local needs as informed by the council's latest evidence on local housing need. Planning permission will be refused for development proposals where a larger site has been deliberately sub-divided into smaller development parcels in order to avoid the requirements of this policy. To ensure the latest identified local needs are addressed sites with multiple phases of development will have the affordable housing provision reviewed for each subsequent phase. The affordable housing provided must be made available solely to people in housing need at an affordable cost and must include provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision in perpetuity. **Review mechanism** Where a proposal is being considered that does not meet local plan affordable housing requirements, the council may seek a review of viability of the scheme~~,~~ post decision, with the aim of achieving policy compliance over time.		inclusion of affordable housing in developments, it does not introduce new developments, leaving the original HRA conclusions unaffected.

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<tr><th>Modification reference number</th><th>Location in submission draft document</th><th>Policy number or paragraph reference</th><th>Proposed modification</th><th>Reason for modification</th><th>Assessment</th></tr>
<tr><td></td><td></td><td></td><td>This review will allow for any improvements in scheme viability ~~between~~ ~~the~~ ~~date that~~ after planning permission ~~was~~ has been granted ~~and later phases of the scheme (such as through reserved matters applications)~~ with the aim of achieving policy compliance.

The review mechanism, secured by legal agreement, will specify a trigger point or points for undertaking a review of viability. Any further provision or contributions secured via the review mechanism will be capped at the level of the minimum local plan affordable housing policy requirement, taking into account what was already secured at the time of determining the application.

The provisions of this policy will be secured through a section 106 agreement to accompany the planning permission.

~~4.4.47. Government guidance states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10 per cent of the homes to be available for affordable home ownership (as part of the overall affordable housing contribution from the site) unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Given the affordable rent needs in West Suffolk the council will seek to maximise the proportion of affordable homes for rent.~~

4.4.48. The Housing Needs of Specific Groups Cambridgeshire and West Suffolk Study (HNSG) examined the housing needs of specific groups for the 2020 to 2040 period (2021) and the West Suffolk Housing evidence update report (2023) are the primary evidence base for determining affordable housing need in the district. The updated report (2023) identifies there is an affordable housing need of 505 units per year. In recognition of the high affordable housing need in the district, in addition to the policy requirement, the council will work with developers and registered providers to maximise opportunities for additional affordable homes above the policy requirement

~~4.4.51. First Homes were introduced in 2021 as a new tenure of affordable housing. They are a type of discounted market housing which are reduced by a minimum of 30per cent against market value, sold to people meeting set eligibility criteria. Local authorities having the discretion to increase the discount to 40 per cent or 50 per cent. Evidence indicates First Homes could have a valuable role to play in enabling households to afford homes suited to their needs. As such, they are a valid form of an affordable route to home ownership in West Suffolk. The Council will support proposals for First Homes, in accordance with the Planning Policy Guidance (PPG) or subsequent guidance.~~</td><td></td><td></td></tr>
<tr><td>MM33</td><td>Page 90 and 91</td><td>Policy LP21</td><td>Policy ~~LP21~~ SPX Housing type and tenure

Proposals for major residential development should seek to meet the identified housing needs of the district in order to contribute towards the creation of mixed, balanced and inclusive communities. To achieve this new residential development, should provide a range of housing tenures, types and sizes as set out below:

<table>
<tr><th>Size</th><th>Market homes (per cent)</th><th>Affordable Routes to homeownership (per cent)</th><th>Affordable housing for rent (per cent)</th></tr>
<tr><td>One bedroom</td><td>0 to 10</td><td>10 to 20</td><td>30 to 40</td></tr>
<tr><td>Two bedrooms</td><td>30 to 40</td><td>40 to 50</td><td>30 to 40</td></tr>
<tr><td>Three bedrooms</td><td>40 to 50</td><td>30 to 40</td><td>15 to 25</td></tr>
<tr><td>Four bedrooms or more</td><td>10 to 20</td><td>0 to 10</td><td>5 to 15</td></tr>
</table>
</td><td>In response to inspectors’ action point AP33 contained in IN12.</td><td>No Likely Significant Effect.

This modification proposes changes to wording however the policy continues to provide guidance for housing type</td></tr>
</table>

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Any deviation from the above mix must be justified by evidence having regard to: • The nature of the site, its location and character of the area. • The existing mix of properties. • Any up-to-date evidence of need (such as the housing register). • Viability. ~~The council will monitor the mix of homes delivered and respond accordingly so that local need and strategic mix requirements are closely met.~~ **Space standards** All new homes should meet or exceed the nationally described space standards or any subsequent national standard or policy. **Accessible homes** All new homes must be built to building regulations M4(2) 'accessible and adaptable' standard, with **around** 13 per cent of affordable homes built to building regulations M4(3) 'wheelchair user' standard (or successor standards) **unless site specific factors mean that those standards cannot be achieved or would make the development unviable**. Proposals which deliver market homes to M4(3) standard will be encouraged. 4.4.61. This policy applies to **proposals providing 10 or more** ~~all~~ new homes including conversions and subdivision of existing buildings as appropriate.		and tenure, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM34	Page 92 and 93	Policy LP22	**Policy ~~LP22~~ SPX Rural exception sites** As an exception to the provision made in this plan to meet housing need, the local planning authority will permit rural affordable housing schemes adjoining but outside a housing settlement boundary provided that: a. The development will meet or assist in meeting a proven and specific need for affordable housing in the locality which could not otherwise be met. b. The development is on the edge of a key or local service centre or type A or B village and is well related to existing community services and facilities and sympathetic to the form and character of the settlement. c. The proposed development is considered suitable by virtue of its size and scale in relation to an existing settlement and its services, and its proximity to public transport, cycling and walking links. d. The development will not negatively impact on the natural environment or the surrounding landscape character and any unavoidable harm to the natural environment will be adequately mitigated. e. Secure arrangements are made to ensure that initial and subsequent occupation of the dwellings can be restricted to those having an identified local need for affordable housing through the use of appropriate safeguards, including conditions or legal obligations. In exceptional circumstances, a small number of market homes will be permitted where demonstrated to be essential on viability grounds to facilitate the delivery of affordable homes.	See councils' response to inspectors' preliminary questions, matter 6 and matter 15.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidance for development on rural exceptions sites, it does not introduce new developments, leaving the

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			First homes exception sites Proposals for first homes exception sites will be considered on a site-by-site basis considering the requirements of Government guidance for such sites, the above criteria and other relevant policies in this plan. **Community-led development exception sites** **Proposals for community-led development exception sites will be supported that are adjacent to an existing settlement and do not exceed five per cent of the existing settlement or one hectare in size subject to the above criteria, other relevant policies in this plan and relevant Government guidance.** **Custom and self-build housing** Custom and self-build housing will be supported to facilitate affordable housing subject to the criteria above where relevant, a proven local need and compliance with Policy ~~LP25~~ **SPX** Custom build and self-build homes. For the purposes of this policy local housing need is confined to the parish in which the proposal is situated and immediately adjoining rural parishes and is evidenced by the council's housing register or an independent housing needs survey. 4.4.66. In rural areas high house prices and a limited supply of new affordable homes restricts the potential for some residents and those working in the area to live in a home that they can afford. Government guidance recognises this and encourages local authorities to support opportunities to bring forward rural exception sites **and exception sites for community-led development** that will meet a range of local affordable housing needs in rural areas, by allowing for genuinely affordable housing schemes that meet evidenced local needs and consider whether allowing some market housing on these sites would help to facilitate this. 4.4.70. To maximise the delivery of affordable housing on exception sites it may be appropriate, to permit an element of open market homes, including self-build and custom build serviced plots (subject to the identified need) to facilitate the delivery of the affordable housing. **Further guidance can be found in the West Suffolk Affordable Housing Supplementary Planning Document and/or subsequent guidance.**		original HRA conclusions unaffected.
MM35	Page 94 and 95	Policy LP23	**Policy LP23 Housing needs of specific groups** The council will support the delivery of specialist housing and care accommodation for older, and/or vulnerable persons and people with disabilities to reflect the needs of the changing demographic profile of the district's population across the plan period. Proposals for new or extensions to existing accommodation for elderly and/or vulnerable people **that are of an appropriate scale** will be permitted ~~on sites deemed appropriate for residential development by other policies contained within the development plan~~, **within housing settlement boundaries** provided that such schemes meet the following criteria: a. The proposed development is designed to meet the specific needs of residents including requirements for disabled persons where appropriate. b. Appropriate amenity space for residents of an acceptable quantity and quality is provided.	In response to inspectors' action point AP34 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidance delivery of

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			c. The location of the development is well served by sustainable transport routes including footpaths, cycle routes and/or adequate public transport, community and retail facilities. Isolated accommodation ~~in the countryside~~ will not be permitted. d. Includes secure, covered ground floor electric buggy parking and charging points where appropriate. e. There is no adverse impact on the surrounding landscape, local character, residential amenity or highway safety. f. The proposed development does not create an over concentration of similar accommodation in any one street or area. **Proposals for new specialised accommodation meeting particular needs of specific groups may be justified outside settlement boundaries which meet criteria a – f above and where evidence is provided to the satisfaction of the local planning authority demonstrating:** • **Why any other sequentially preferable sites are unsuitable.** • **The need for the facility or accommodation in that location.** Proposals for extensions to existing specialist accommodation outside areas otherwise suitable for residential development will be permitted providing a need can be clearly demonstrated and the proposal meets the above criteria as appropriate.		specialist housing, it does not introduce new developments, leaving the original HRA conclusions unaffected.
MM36	Page 96 and 97	Policy LP24	**Policy ~~LP24:~~ SPX Gypsies, Travellers and travelling showpeople** **West Suffolk's Gypsy and Traveller need over the plan period has been identified as an overall cultural need of 39 pitches. No need has been identified for travelling showpeople, boat dweller or other caravan dwellers accommodation in the plan period. The full cultural need for 39 pitches will be met through the intensification of, or extension to, existing sites and the regularisation of existing tolerated pitches. The intensification of, or extension to, existing sites will be supported having regard to criteria c to k below.** Proposals for Gypsy and Traveller sites and sites for travelling showpeople yards will be supported where there is an identified need that cannot be met on existing sites, having regard to the following criteria: a. The site is within or adjacent to a settlement identified as more sustainable within the settlement hierarchy (towns, key service centre, local service centres and type A villages) or other sustainable locations. b. Accessibility to local services, including schools, shops, community and health facilities, by a variety of means of transport. c. The site is suitable in terms of vehicular and pedestrian access to the highway, parking, turning and road safety. d. The proposal respects the scale of the nearest settled community to allow for successful co-existence. e. The proposal will not unacceptably impact on landscape and settlement character, the natural environment, and heritage. f. Proposals provide for satisfactory residential amenity both within the site and with neighbouring occupiers and thereby do not detrimentally affect the amenity of residents by reason of on-site business activities, noise, disturbance, or loss of privacy. g. Pitch sizes that facilitate good quality living accommodation without over-crowding or unnecessary sprawl. h. Good design and layout including, the adequacy of facilities, services and amenities, the utility of outside space for leisure, recreation and for any essential employment related activities including storage and maintenance of equipment, where required. i. Appropriate landscaping and screening to provide privacy for occupiers and to maintain the visual amenity of the wider landscape and townscape.	See council's response to inspectors' preliminary questions and matter 7 and matter 15. In response to inspectors' action points AP35, AP36 and AP37 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however the policy continues to provide guidance for gypsy and traveller sites, it does not introduce new developments, leaving the original HRA conclusions unaffected.

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			j. The site is served, or could readily be provided with, electricity, mains water, drainage, sewage and waste disposal facilities. k. The site is not affected by environmental hazards that may affect the residents' health or welfare or be in an area ~~of high risk of flooding, including functional floodplains.~~ **at high risk of flooding or a functional flood zone, and will only be allowed in an area at medium risk of flooding if both the sequential and exception tests are satisfied in accordance with national policy.** The change of use of existing sites to alternative uses will not be permitted unless replacement provision meeting the above criteria is provided elsewhere. A condition or legal agreement to control the future uses of sites for Gypsies, Travellers or travelling showpeople may be imposed, as appropriate. Where the proposed use is short term, the development will be limited by a temporary permission. **Explanation** **West Suffolk has an established Gypsy and Traveller community residing on some 20 sites across the district.** **Many of the problems faced by Gypsies and Travellers, who are among those at the greatest risk of disadvantage and social exclusion due to a number of factors, arise from the lack of provision for their accommodation needs. The lack of provision of secure accommodation can also lead to unauthorised encampments.** **Government guidance in Planning Policy for Traveller Sites (PPTS) is used to plan for the accommodation needs of Gypsies and Travellers.** **This plan seeks to address the needs of all Gypsies and Travellers including those that have ceased to travel permanently. The Gypsy and Traveller and Travelling Snowperson Accommodation Assessment (GTAA) identifies an overall cultural need for 39 pitches to 2040. This need is broken down identifying a need to March 2028 of six pitches. Beyond these a further 10 pitches are required to March 2033, 14 pitches to March 2038 and a further nine to March 2040.** **The GTAA also looked at the likely drivers of that need and site preferences. Household formation is the key driver of longer-term need. As there are a substantial number of young people moving onto two recently permitted sites this has resulted in longer-term need being higher later in the plan period, when their children become adults and need separate accommodation. As such, it is concluded that the extension, intensification or regularisation of existing sites is the appropriate approach to meet the identified need in the most appropriate and deliverable manner.** **The GTAA and accompanying site appraisals identify the potential for around 22 pitches to come forward through the expansion or intensification of existing sites and a further 15 pitches by regularising sites that are not permanently authorised. This will ensure that the identified needs associated with existing households can be met in appropriate locations. If necessary, additional windfall sites will be supported having regard to criteria a to k in policy LP24.** **The GTAA also reviewed the need for transit provision and concluding that to manage unauthorised encampments a negotiated stopping policy to support the needs of Travellers passing through West Suffolk should be developed to allow caravans to be sited at suitable locations for a short period of time with provision of services such as**		

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			waste disposal and toilets. West Suffolk in cooperation with other adjoining authorities and the county council are investigating sites accessible from the main trunk roads passing through the county. **The West Suffolk Gypsy and Traveller Accommodation Assessment (GTAA) could not evidence any need for Travelling Showpeople, boat dweller or other caravan dwellers accommodation in the plan period.** ~~4.4.83. Local planning authorities are required to identify and plan for the accommodation needs of Gypsies and Travellers, travelling showpeople, others residing in caravans and boat dwellers.~~ ~~4.4.84. The council will seek to meet the needs for Gypsy and Traveller accommodation in the district across the plan period through the provision of additional pitches on suitable permitted and tolerated sites and the protection of existing Gypsy and Traveller sites against loss to alternative uses.~~ ~~4.4.85. It is recognised that there will be circumstances where planning applications will be submitted on sites not identified through the local plan process.~~ 4.4.86. ~~A windfall~~ **This** policy enables the council to deal with planning applications for traveller sites on a site-by-site basis, subject to individual circumstances and need. To this end, suitable sites, which are well-related to existing and proposed services and facilities, and which would not adversely impact on a protected landscape, settlement character, the natural environment, and heritage that have not previously been identified, have the opportunity to come forward in the plan period. 4.4.87. ~~This~~ **The** policy also allows windfall Gypsy and Traveller sites to come forward in the district where they are necessary to meet an unmet need for Gypsy and Traveller accommodation, whilst ensuring that such sites are appropriately located and designed.		
MM37	Page 98 and 99	Policy LP25	**Policy ~~LP25~~ SPX Custom and self-build homes** **Demand for custom and self-build plots in West Suffolk is approximately 30 plots per annum.** Proposals for self-build or custom-build housing, or proposals that provide serviced self-build and/or custom plots ~~as a proportion of a site~~ will be supported to meet demand on the West Suffolk Council Self-Build and Custom House Building Register where they comply with other policies in the development plan. Proposals for self-build and custom-build homes will be supported within a housing settlement boundary, or by allocation in a neighbourhood plan. All proposals for development of 100 homes or more will be encouraged to provide at least ten per cent of the total homes as custom and/or self-build plots. Where this would not result in a whole dwelling the requirement for self and custom build should be rounded up (where it is 0.5 or above) or down as appropriate. The inclusion of self-build plots on sites of less than 100 homes will also be encouraged. All proposals for self-build or custom build housing plots must include: a. Legal access onto a public highway. b. Water, foul drainage, broadband connection, and electricity supply available at the plot boundary.	See council's response to inspectors' preliminary questions and matter 6. In response to inspectors' action point AP38 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

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			c. Sufficient space in order to build without compromising neighbouring properties and their amenity and the amenity of future occupiers. d. An agreed design code or plot passport for the plots to include: • Marketing details • plot size and location • the ratio of built footprint to overall plot size • permissible building lines • maximum building heights. Custom and self-build homes will not contribute towards the requirement to provide affordable housing unless ~~delivered by a registered provider of social housing.~~ **it is a form of affordable housing that meets the definition in the NPPF Annex 2 or successor documents.** Once completed the self-build and custom build home should be the sole residence of the owner. Plots must be made available, and appro Tips composite Pick one. priately marketed for a period of at least 12 months before being returned to the market or built out by the developer if not taken up. Communities preparing neighbourhood plans are encouraged to consider the identification of sites which make provision for self and custom-build plots within their neighbourhood plan area subject to evidence of demand on the self-build register or an up-to-date housing needs study. 4.4.97. In order to meet the need identified by West Suffolk's Self-Build and Custom Build Register, this policy sets out the councils' approach to delivering serviced plots across the plan area. In addition to ~~requiring~~ **encouraging** all developments of 100 or more homes to provide a proportion of serviced plots for self and custom build homes, the council also encourages individual self and custom build on smaller sites where they conform with other relevant policies of this plan including rural exception schemes.		
MM38	Page 100 and 101	Policy LP26	**Policy ~~LP26~~ SPX Housing in the countryside** Proposals for new dwellings will be permitted in the countryside subject to satisfying the following criteria: a. The development is within a small cohesive group of seven or more existing dwellings next to or fronting an existing highway. b. The scale of development consists of the infilling of a small undeveloped plot in the order of one dwelling or a pair of dwellings and that these are commensurate with the scale and character of existing dwellings within an otherwise continuous built-up frontage. c. Locations must have access to sustainable transport links, including footpaths, cycle routes and/or adequate public transport to ~~higher order~~ **a** settlement~~s with a range of services and facilities~~ **in the hierarchy defined in policy SP9X.** Locations that are so remote or so poorly served by sustainable transport options that occupants will rely exclusively on a car to access everyday goods and services will not be supported. Permission will not be granted where a proposal harms or undermines a visually important gap that contributes to the character and distinctiveness of the rural scene, results in an unacceptable level of harm to the amenity of neighbouring properties, or where development would have an adverse impact on the environment or highway safety. Development	See council's response to inspectors' preliminary questions and matter 6. In response to inspectors' action point AP39 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			should not contribute towards coalescence with adjacent settlements or contribute towards the development of isolated homes in the countryside in a piecemeal manner on sites next to other dispersed rural housing in the countryside. Proposals for self-build and custom-build homes will be supported where they meet the above criteria and do not conflict with other policies within this plan. **The replacement of an existing dwelling on a one for one basis where the replacement dwelling and domestic curtilage respects the scale and floor area of the existing dwelling is supported.** The subdivision of an existing isolated home in the countryside will be supported where the proposed subdivision respects the scale, floor area and domestic curtilage of the existing dwelling and does not conflict with other policies within this plan. Note: A small undeveloped plot is one which could be filled by one detached or a pair of dwellings where the plot sizes and spacing between dwellings is similar to neighbouring properties and thereby respects the rural character and street scene of the locality.		conclusions unaffected.
MM39	Page 104 and 105	Policy LP29	**Policy LP29 Alterations and extensions to dwellings and residential annexes** **Alterations, extensions and ancillary development** Proposals for alterations or extensions to existing dwellings, and ancillary development within the curtilage of dwellings will be permitted, in accordance with other policies within the development plan, where the proposal: a. Respects the character, scale and design of existing dwellings, and the character and appearance of the immediate and surrounding area. b. Will not result in **inadequate garden, functional or amenity space.** ~~over-development of the dwelling curtilage.~~ c. Will not adversely affect the residential amenity of occupants of nearby properties. Proposals for the alteration or extension of an existing dwelling in the countryside should be subservient in scale and proportion to the original dwelling and preserves or enhances the character and openness of the surrounding countryside. **Residential annexes** Proposals for residential annexes within the curtilage of an existing dwelling will be permitted, in accordance with other policies within the development plan, where: d. The annexe is ancillary to and subservient in size and scale to the host dwelling and respects the design of the existing dwelling, and the character and appearance of the immediate and surrounding area **without creating an independent and/or separate planning unit at any time.** e. The annexe is located within the current residential curtilage and ~~contains~~ **has** strong functional links to the host dwelling. f. The annexe is physically and functionally integrated into the existing dwelling, ~~except where exceptional circumstances demonstrate otherwise,~~ and the design and siting of the annexe is such that it is capable of being reasonably integrated into the use of the original dwelling once the need for it has ceased. ~~Development of detached residential annexes within the defined property boundary will only be permitted where it is demonstrated that the accommodation cannot reasonably be provided through extension to the original dwelling.~~	In response to the inspectors' action point AP55 contained in IN13.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

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			g. Evidence is submitted to demonstrate the need for the annexe and the size of the annexe is the minimum necessary to meet the purpose. h. The proposal will not result in **inadequate garden, functional or amenity space** ~~over-development of the dwelling curtilage~~ and will not adversely affect the residential amenity of occupants of nearby properties. **Development of detached residential annexes within the defined property boundary will only be permitted in exceptional circumstances where it is demonstrated that the accommodation cannot reasonably be provided through extension to the original dwelling.** Where a proposal does not meet these criteria, the proposal will be considered as a new dwelling and will be assessed against the appropriate policies within the development plan. The occupation of the annexe will be controlled by a planning condition to ensure that it is related to the main dwelling and cannot be used as a separate dwelling. 4.4.117. For a development to be considered as an annexe, the proposal must be within the curtilage of the main host dwelling and provide ancillary accommodation that has a functional and physical relationship with the main dwelling. **Therefore, the annexe must share utility services, access, vehicular parking, private amenity space and be in the same ownership as the host dwelling.** Proposals which are functionally and physically separate from the host dwelling, and capable of self-contained occupation, are unlikely to meet the definition of an annexe.		
MM40	Page 106 and 107	Policy LP30	**Policy LP30 Extensions to domestic gardens in the countryside** To protect the intrinsic character and appearance of the countryside, large, obtrusive extensions to domestic gardens within the countryside will not normally be permitted. Small, unobtrusive extensions of residential curtilages into the surrounding countryside, which will not adversely affect the character **or appearance** ~~and rural amenities~~ of the site ~~and~~ **or** wider countryside will be permitted where the following criteria are met: a. The development will not result in the loss of the best and most versatile agricultural land. b. The proposal will not involve the loss of an important hedgerow or other important landscape feature. c. Provision is made for suitable boundary treatment, such as appropriate landscaping to ensure the extension retains the rural character and appearance of the countryside. ~~d. The development does not have an adverse impact on the amenities within the immediate vicinity of the proposal and the wider surrounding landscape.~~	In response to inspectors' action point AP56 contained in IN13.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM41	Page 110 and 111	Policy LP33	**Policy LP33 Open space, sport, play and recreation facilities** Proposals for the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities**,** **including playing fields,** will be supported where the proposal is well related to the local community and meets the needs of residents.	See council's matter 13.	No Likely Significant Effect.

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			Development which will result in the loss of existing amenity, sport or recreation open space or facilities will not be permitted unless: a. It can be demonstrated to the local authority's satisfaction that the **open** space or facility is surplus to requirement against the local planning authority's standards for the particular location, and the proposed loss will not result in a likely shortfall during the plan period. Or b. Replacement for the **open** space or facilities lost is made available, of at least equivalent quantity and quality, and in a suitable location to meet the needs of users of the existing space or facility. Or c. The proposal is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. Any replacement provision must consider the needs of the settlement where the development is taking place and the current standards of open space and sports facility provision including quality, quantity, and accessibility standards. Where it is necessary to the acceptability of the development, the local planning authority will require proposals to provide accessible open space including play areas, formal sport and/or recreation areas, allotments, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate. **The quantity, quality and accessibility requirements for public open space and built facilities must be in accordance with standards set out in appendix H.** The delivery of these facilities, including the long-term management of the facilities will be secured through the use of conditions or planning obligations. Clubhouses, pavilions, car parking and ancillary facilities must be of a high standard of design. The location of such facilities must be well related and sensitive to the topography, character and uses of the surrounding area, particularly when located in or close to residential areas. Proposals for floodlighting will only be supported where the proposal is sensitive to the nocturnal character and appearance of the surrounding landscape and it can be demonstrated through a light assessment that the final total light levels, spillage and hours of use do not cause harm to the amenities of neighbouring occupiers, nature conservation or contribute to increased night blight.		This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM42	Page 112	Policy LP35	**Policy LP35 Local green spaces** An area identified as a local green space on the policies map or within an adopted neighbourhood plan will be protected from development in **accordance** ~~line~~ with ~~the N~~**n**ational ~~P~~**p**lanning ~~P~~**p**olicy ~~Framework or successor policy, which rules out development on these sites other than in very special circumstances~~ **relating to Green Belt**.	In response to inspectors' action point AP57 contained in IN13.	No Likely Significant Effect. This modification proposes changes to wording however this is a management

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					policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM43	Page 113 to 124	Policy SP12	**Employment** **Strategic employment** 4.5.2. The purpose of the strategic employment policy SP12 is to make provision for employment land to meet the needs identified over the plan period to ~~2040~~ **2041**. The spatial strategy for the distribution of employment land has been informed by the employment land review, alongside reports produced for the council including the ~~Economic Impact of the Horseracing Industry Centred Upon Newmarket (updated 2023)' and the report on the~~ 'Local National and International Impact of the Horseracing Industry in Newmarket ~~(2016)'~~ **(2015 Deloitte) and Newmarket's Horse Breeding and Racing Cluster Local Impact Report (2023 SQW).**The strategic employment policy identifies how existing employment land will be protected, where new sustainable growth is directed and how new proposals will be considered on land within and outside identified general and rural employment areas. It supports sustainable growth, expansion and diversification of local and rural businesses. **Policy SP12 Strategic employment** a. **To meet the need for a total of at least 86 hectares of land to accommodate employment development between 2024 and 2041, a total of around 90 hectares is identified in the Plan within general and rural employment areas (total 5 hectares) and on allocations (total 85 hectares).** ~~Provision is made for 86 hectares of employment land in the district by 2040 to support local and sub regional employment needs. This will be met through land available in defined general and rural employment areas and strategic and non-strategic site allocations.~~ The provision will address the following employment needs; offices, research and development, light industrial, general industrial and storage and distribution. ~~Proposals for employment uses in general and rural employment areas which do not neatly fall within the employment uses defined above, will only be accepted where they meet the criteria in h. below.~~ ~~**Strategic and non-strategic**~~ **Site allocations** b. The focus of new strategic employment provision is directed to the towns of Bury St Edmunds, Mildenhall and Newmarket with further provision in the key service centre of Red Lodge and at Shepherds Grove near Stanton. The ~~strategic~~ employment and mixed-use allocations ~~are~~ identified ~~below. Strategic allocations~~ in this plan set out the policy considerations and types of uses appropriate for each site. The ~~strategic~~ **site** allocations together provide for **some 85** ~~79~~ hectares of employment land~~, including 10 hectares of land available at Suffolk Business Park extension~~. In order to ensure the ~~strategic~~ employment allocations are protected to meet the local plans employment needs over the plan period, any proposals for non-employment uses will only be considered if it can be demonstrated it is no longer required in a review of the allocation in a subsequent local plan. ~~• Policy AP3 Land north of Rougham Tower Avenue, Bury St Edmunds 20 hectares.~~	See council's response to inspectors' preliminary questions and matter 2 and matter 8. In response to inspectors' action points AP40, AP41, AP42, AP43 and AP44 contained in IN12.	No Likely Significant Effect. This modification makes changes to wording, however, the changes do not change or introduce new development sites, leaving the original HRA conclusions unaffected.

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			~~• Policy AP12 Suffolk Business Park extension, Bury St Edmunds 10 hectares (of which 72.34 hectares allocation 10 hectares remain available at 1 April 2023)~~ ~~• Policy AP16 Land west of Mildenhall, Mildenhall five hectares~~ ~~• Policy AP19 Hatchfield Farm, Newmarket five hectares~~ ~~• Policy AP38 Land north of Acorn Way, Red Lodge eight hectares~~ ~~• Policy AP42 Shepherd's Grove, Stanton 31 hectares~~ ~~c. Three non-strategic employment allocations identified in this local plan, are smaller in scale and will meet local demand and/or rural needs. The policy considerations for each site are set out in the policy allocations. These non-strategic allocations together provide for some 7.83 hectares of employment land.~~ **General employment areas and rural employment areas** d. Existing general employment areas and rural employment areas identified **in policy SPX** ~~below~~ and as defined on the policies map, will continue to meet local and sub regional employment needs. These **areas** ~~sites~~ will be protected for employment uses as described in ~~the~~ policy **SPX**, in order to maintain an adequate supply of employment land. ~~They will continue to be primary locations for employment uses including, offices (subject to satisfying a sequential test as required by m. below), research and development, light industrial, general industrial and storage and distribution in accordance with the uses specified for each designation as set below. Proposals for strategic logistics provision will not be supported within general employment areas and rural employment areas, as it would result in the erosion of space available to local and sub regional small and medium businesses looking to expand, upgrade and consolidate.~~ The general and rural employment areas together provide for some ~~15.10~~ **5.3** hectares of available employment land (as at 1 April ~~2023~~ **2024**~~), which includes some 10 hectares remaining at Suffolk Business Park extension which is reallocated in this local plan~~. ~~**General employment areas**~~ ~~e. The following general employment areas will be suitable for offices (subject to satisfying a sequential test as required by paragraph m. below), research and development, light industrial, general industrial and storage and distribution uses as defined in the glossary. Those areas with additional restrictions on appropriate employment uses are noted in the table below. General employment areas with land available at 1 April 2023 are noted in brackets in the list below.~~ ~~• SP12a Land at Station Way, Brandon~~ ~~• SP12b Land south of railway line, Brandon~~ ~~• SP12c Land south of London Road, Brandon~~ ~~• SP12d Land south of Mile End, Brandon~~ ~~• SP12e Anglian Lane, Bury St Edmunds (excluding general industrial uses)~~ ~~• SP12f Barton Road, Bury St Edmunds (excluding general industrial uses)~~ ~~• SP12g Dettingen Way, Bury St Edmunds~~ ~~• SP12h British Sugar, Hollow Road and areas north of Compiegne Way, Bury St Edmunds (The north-eastern and north-western areas of the British Sugar site which forms part of SP12h in which the soakaway and soil conditioning areas are located are intrinsic to the operations of British Sugar and are not appropriate for employment uses.)~~ ~~• SP12i Suffolk Business Park, Bury St Edmunds (excluding general industrial uses)~~ ~~• SP12j Chapel Pond Hill, Bury St Edmunds~~ ~~• SP12k Eastern Way, Bury St Edmunds~~ ~~• SP12l Enterprise Park, Etna Road, Bury St Edmunds (excluding general industrial uses)~~ ~~• SP12m Mildenhall Road, Bury St Edmunds~~		

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			~~• SP12n Moreton Hall, Bury St Edmunds~~ ~~• SP12o Northern Way, Bury St Edmunds~~ ~~• SP12p Western Way, Bury St Edmunds (excluding storage and distribution uses)~~ ~~• SP12q Greene King, Friars Lane, Bury St Edmunds~~ ~~• SP12r Rougham Industrial Estate, Bury St Edmunds~~ ~~• SP12s Bumpstead Road, Haverhill~~ ~~• SP12t Falconer Road, Haverhill (2.77 hectares land remaining)~~ ~~• SP12u Haverhill Research Park, Haverhill (excluding general industrial, storage and distribution uses. 0.68 hectares land remaining)~~ ~~• SP12v Haverhill Industrial Estate, Haverhill~~ ~~• SP12w Homefield Road, Haverhill (excluding general industrial uses)~~ ~~• SP12x Stour Valley Road, Haverhill~~ ~~• SP12y Mildenhall Industrial estate, Mildenhall~~ ~~• SP12z Newmarket Industrial estate, Newmarket~~ ~~Any development at SP12d must protect and enhance the existing London Road Industrial Site of Special Scientific Interest and the Brandon Road Industrial Estate County Wildlife Site.~~ ~~In addition to employment uses, SP12p general employment area could accommodate other alternative uses such as leisure, education, health and public facilities and service uses.~~ ~~**Rural employment areas**~~ ~~f. The following rural employment areas will be suitable for offices (subject to satisfying a sequential test as required by m. below), research and development, light industrial, general industrial and storage and distribution uses as defined in the glossary. These uses will be accommodated in buildings of an appropriate size for their rural location to meet local business and community needs. Rural employment areas with land available at 1 April 2023 are noted in brackets in the list below.~~ ~~• SP12aa Chilton Street Business Park, Clare (excluding general industrial, storage and distribution uses).~~ ~~• SP12ab Bridewell Business Estate, Clare (excluding general industrial uses)~~ ~~• SP12ac Station Road, Lakenheath.~~ ~~• SP12ad Kings Warren Business Park, Red Lodge.~~ ~~• SP12ae Shepherds Grove, Stanton and Hepworth (excluding storage and distribution uses).~~ ~~• SP12af Land south of Swan Lane, Exning.~~ ~~• SP12ag Gorse Industrial Estate, Barnham (excluding offices uses)~~ ~~• SP12ah Land off Silver Tree Way, Chedburgh.~~ ~~• SP12ai Land south of Bury Road, Chedburgh.~~ ~~• SP12aj Woodside Business Centre, Ingham (excluding general industrial uses).~~ ~~• SP12ak Moseley Farm, Fornham All Saints.~~ ~~• SP12al Park Farm, Fornham St Genevieve.~~ ~~• SP12am Land east of Gazeley Road, Kentford.~~ ~~• SP12an Land south of Bury Road, Kentford.~~ ~~• SP12ao land south of Bury Road, Lanwades Business Park, Kentford.~~ ~~• SP12ap Risby Business Park, Risby.~~		

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			~~• SP12aq Saxham Business Park, Saxham.~~ ~~• SP12ar Karro foods north, Little Wratting. (2.37 hectares land remaining, excluding general industrial uses)~~ ~~• SP12as Karro foods south, Little Wratting.~~ ~~• SP12at land east of Mildenhall Drove, Beck Row~~ ~~g. The council will support proposals for employment uses in general employment areas and rural employment areas in accordance with the uses identified for each site as set out above, providing that parking, and secure cycle storage, access, travel, visual impact, archaeology and general environmental considerations can be met.~~ ~~h. Proposals for employment uses in general and rural employment areas which do not neatly fall within the employment uses defined above, will only be accepted where they:~~ ~~• Seek to maximise the sites' potential for jobs growth and/or support the continued operation of the existing businesses and industrial activities.~~ ~~• Do not generate potential conflict with existing or proposed employment activities, in terms of noise, external lighting, vibrations and hours of operation.~~ **Strategic logistics** i. Large scale strategic logistics proposals, typically more than 9,000 square metres floorspace per unit ~~which are of a regional or national significance will not~~ **may** be permitted **on suitable allocations and general and rural employment policy areas provided that all relevant national (National Planning Policy Framework and Planning Practice Guidance) and local policy requirements are met and that the proposal would not prevent more localised needs being met, including for particular sectors or existing firms that need to expand or relocate.** ~~in the district, in order to ensure the identified needs of local businesses within the sub region can be met locally.~~ A sub-regional approach to site identification for regionally and nationally significant logistics provision will be taken. **Local and rural businesses** j. The council values the contribution local businesses make to the local economy, providing local jobs and opportunities for our local communities and it will support those businesses wanting to grow, expand and diversify within the district to find suitable premises. The policy supports the sustainable growth, expansion and diversification of local and rural businesses, where this accords with ~~local~~ policies ~~LP18~~ **SPX,** LP37 and LP38. k. The council will support local businesses to become established and grow, developing the district's skills base, supporting training and links to education. It will also support the development of growth sectors and infrastructure investment that will aid economic growth. **Existing employment uses** l. Local policy LP36 set out in this plan provides a criteria-based approach to protecting existing employment uses. **Offices** m. Proposals for new offices will be directed to the town centres as defined on the policies map. A sequential test will be required for proposals outside a town centre to demonstrate a town centre or edge of centre site, accessible to the town		

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			centre was not available. ~~Strategic and non-strategic~~ **Site** allocations in this local plan and small-scale rural office proposal will be exempt from undertaking this sequential test. **Horse racing industry** n. Newmarket is recognised as the international home of horse racing and the industry plays a significant role in the area in terms of its economic importance (it is one of the largest employers and economic contributor in West Suffolk), and social and cultural influence and the character of the built and natural environment. This policy supports the continued growth and expansion of the horse racing industry as a cluster. It is recognised that not all of these uses fall neatly within employment uses covered by this policy. There are also specific policies ~~LP46 to LP49~~ **SPX–SPX** of this plan which protect and enhance the industry. **USAFE airbases** o. The two United States Air Force in Europe (USAFE) airbases at RAF Mildenhall and RAF Lakenheath have historically provided significant employment in the area, both directly and indirectly. These bases are identified in the policies map and covered by strategic policy SP16 of this plan. **British Sugar** p. The council recognises British Sugar's continued operation and the importance of the factory site to the district and the wider area and will support its continued operation and future growth. The sites are identified in the policies map and covered by policy SP12h of this plan. q. The north-eastern and north-western areas of the British Sugar site in which the soakaway and soil conditioning areas are located are intrinsic to the operations of British Sugar. These areas are protected in the plan (as indicated on the policies map) for uses in connection with the on-going operation and continued growth of the factory. Appropriate forms of development and/or uses on these areas, which are connected to British Sugar's operation, will be supported, having regard to the relevant requirements of the local plan. **Lorry parking, driver services and facilities** r. Proposals for new or expanded storage and distribution should provide for sufficient lorry parking, driver services and facilities to cater for their anticipated need. Proposals for lorry parking, driver services and facilities will be supported. Existing truck stops (including closed facilities) on or near to the strategic road network will be retained for their continued and future use unless it can be clearly demonstrated that a need no longer exists. 4.5.5. The district sits within a strategic location, where the A11 and A14 'corridors' are becoming more established. The conceptual 'Cambridge-Norwich Tech Corridor' has and will continue to play, a growing role in driving the district's commercial property market and economic growth more generally. The spatial strategy focusses economic growth to the most sustainable locations where constraints allow. The sustainable locations which lie along the A11 and A14 corridors are Newmarket, Mildenhall, Red Lodge and Bury St Edmunds, and villages in close proximity include Exning, Kentford and Risby. Saxham Business Park lies **in a rural location** outside Bury St Edmunds along the A14. General and rural employment areas and site allocations are proposed in these locations. The council will monitor the take up of sites, and employment land supply and assess the need to identify new sites in the next local plan review.		

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			4.5.9. The West Suffolk Employment Land Review Study was published in November 2021 with an addendum published in May 2022 **and a further update in 2024**. It has assessed existing employment provision and future need for employment land in the district to ~~2040~~ **2041**. 4.5.10. The **employment land review update 2024 identifies a need for a total of 86 hectares of land to accommodate employment development between 2024 and 2041 and that this need comprises: office (7 hectares); industrial (13 hectares); local warehouse (31 hectares); and strategic distribution (35 hectares).** ~~study assessed there is a forecast demand for 86 63 hectares of employment land to be provided over the plan period to 2040.~~ Around ~~15.10~~ **5** hectares (as at 1 April ~~2023~~**2024**) has been identified as already available within existing employment areas. This leaves ~~47.9~~ **81** hectares of additional sites to be identified through this local plan in order to meet forecast demand. This residual need has been met by sites allocations in this local plan which provide for some ~~86~~ **85** hectares of land. This will meet needs for offices, research and development, light industrial, general industrial and storage and distribution which allows for choice and flexibility in meeting the identified needs, whilst being ambitious to support growth. 4.5.12. The identified additional employment land need will be met through ~~strategic and non-strategic~~ site allocations and land available in existing general and rural employment areas. **General and rural employment areas** ~~4.5.15. There are a number of established centres of employment in the district, referred to as general and rural employment areas. Evidence in the employment land review suggests that these concentrations of economic employment activity should be protected. Some of these employment areas have opportunities for further development and intensification of use and in particular the occupation or redevelopment of vacant premises and land will be encouraged.~~ ~~4.5.16. The scale and design of new development within these sites, particularly rural employment areas, should be sympathetic to any sensitive environmental and heritage features and any potential adverse effects should be mitigated. Rural employment areas provide opportunities to support sustainable growth and expansion of rural businesses. Employment uses of a strategic nature, meeting wider sub regional needs should be focussed on sustainable locations in the towns with suitable accessibility to transport links. The location of these general and rural employment areas is shown on the policies map. Some five hectares of employment land has been identified as available at 1 April 2023 in the general and rural employment areas. This baseline assessment will continue to be monitored.~~ ~~4.5.17. These rural and general employment areas will be suitable for offices (subject to passing a sequential test), research and development, light industrial, general industrial, storage and distribution uses. In accordance with the spatial strategy and the local plan evidence, the policy seeks to direct appropriate employment uses to appropriate sustainable locations, providing opportunity to support and enhance the diverse range of jobs and sectors. This will enable existing established businesses in the district opportunities to expand or diversify, so they can flourish and thrive, whilst avoiding harm to residential amenity and affording protection to the district's sensitive environment and heritage. Where certain employment uses are not considered appropriate in designated employment areas these are noted in the policy.~~ ~~Strategic and non-strategic site allocations~~ **Site allocations** 4.5.18. The ~~strategic and non-strategic~~ site allocations identified in this plan comprise new sites identified as suitable for employment use, or mixed-use comprising employment uses and existing allocated sites which are re-allocated in this plan as they are all at varying stages in the planning process. New employment allocations are focused on the towns where there		

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			is strongest demand, and a small amount of rural provision. Existing sites and allocations from the previous local plan have been assessed against a number of criteria, those currently the subject of a planning application for proposed development and those continuing to offer good locations for employment have been re-allocated in this local plan. An example of this includes the allocated site for eight hectares of employment land at Red Lodge, which has links to the A11 corridor. The sustainable growth and expansion of businesses in rural areas will be supported, where it accords with policies in this plan. The spatial strategy has established this approach to economic growth. 4.5.20. In recent years, following successful appeals against the council, two local plan employment allocations have been lost to residential uses. This has impacted the council's ability to maintain a supply of employment land to meet needs over the plan period. In response to this pressure, the council is seeking to ensure employment allocations are given additional protection, to ensure these allocations are not lost to higher value land uses, such as housing. The council will only consider changes of use away from employment uses on ~~strategic~~ allocations if it can be demonstrated the employment allocation is no longer required in a review of the allocation in a subsequent local plan. 4.5.21. Shepherd's Grove, Stanton and Hepworth, is a long-standing rural employment area separated into east and west parcels. Between the two existing rural employment areas an existing site allocation is carried forward as an allocation for 31 hectares of strategic employment provision, allocation ~~AP43~~ **AP42**. Given the site's poor road access leading to traffic passing through the settlement of Stanton and its elevated position in the landscape, the applicant will need to address these issues as part of the overall proposals in order for the allocation to be found acceptable. ~~There is currently an undetermined planning application under consideration for this site.~~ **Strategic logistics provision** 4.5.24. The employment land review study therefore recommended logistics provision be considered at a sub-regional level rather than individual districts acting in isolation. The council is working with neighbouring authorities and its partners as part of its duty to cooperate to seek to address this need. **Whilst the employment land supply identified in the plan has some capacity to accommodate large scale strategic logistics development, such developments have particular locational requirements as set out in national planning guidance requiring 'significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour' and there are circumstances in which such development may not be acceptable. These include where they would be likely to prevent more localised employment needs being met. The need for large scale logistics development associated with national and regional demand will be further addressed through sub regional working and future updates to relevant local plans.** ~~This policy does not support the provision of new strategic logistics provision in the district, instead this provision will be addressed at the sub regional level to meet national and regional demand.~~ ~~4.5.26. Whilst storage and distribution uses will be supported in general and rural employment areas and employment allocations, subject to other policy requirements, large scale proposals typically more than 9,000 square metres floorspace per unit, serving a wider regional or national function will not be supported. The reason for this is that these large scale proposals generate relatively low numbers of low skilled jobs, whilst potentially increasing the pressure on transport networks and quickly reducing the availability of land to support local businesses and their needs.~~ **Local employment** 4.5.29. The employment land review, along with the ~~Economic Impact of the Horseracing Industry Centred Upon Newmarket' study~~ **report on Newmarket's Horsebreeding and Racing Cluster 2022 Local Impact Report** and the Deloitte report on		

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			the 'Local National and International Impact of the Horseracing Industry in Newmarket' recognise the major contribution the horse racing industry makes to the economy of Newmarket and the surrounding area, as a cluster. In terms of employment, it is directly responsible for about 3,200 jobs, as well as additional 8,500 jobs created indirectly. The expertise built up over several hundred years has created a business sector worth more than 200 million pounds to the local economy and continues to present new opportunities for entrepreneurs. Newmarket's position as the home of horse racing means there are more racehorses, trainers, stable staff, stud farms and racing organisations based in and around the town than anywhere else in the world. The horse racing industry has an impact on the demand for employment space through supply chain effects. The sector includes not only Newmarket Racecourse itself, but also the associated horse training services, stud farms, bio-science institutions and suppliers of equine equipment. The industry also contributes to the local economy through the recreation and leisure expenditure generated by visitors to the racecourse. 4.5.30. This policy supports the continued growth and expansion of the industry as a cluster. It is recognised that not all of these uses fall neatly within employment uses covered by this policy, therefore there are also ~~local~~ policies ~~LP46 to LP49~~ **SPX to SPX** which make special provision for the horse racing industry. Reports undertaken by Deloitte and SQW assessed the economic needs of the horse racing industry, and the associated employment uses within the cluster. A ~~strategic~~ mixed use site allocation AP19 has been identified north of Newmarket, at Hatchfield Farm to provide five hectares of employment land, identified to meet local and sub regional needs including those of the horse racing industry cluster, such as research and development, life sciences uses and mid-tech.		
MM44		New SP policy	**General employment area and rural employment areas** **The purpose of this policy is to identify and protect general employment areas and rural employment areas.** **SP12X General employment areas and rural employment areas** **Existing general employment areas and rural employment areas identified below and defined on the policies map, will continue to meet local and sub regional employment needs. These sites will be protected for employment uses as described in the policy, in order to maintain an adequate supply of employment land. They will continue to be primary locations for employment uses including, offices (subject to satisfying a sequential test as required by Policy SP12), research and development, light industrial, general industrial and storage and distribution in accordance with the uses specified for each designation as set below. The general and rural employment areas together provide for some 5 hectares of available employment land (as at 1 April 2024).** **General employment areas** **The following general employment areas will be suitable for offices (subject to satisfying a sequential test as required by Policy SP12), research and development, light industrial, general industrial and storage and distribution uses as defined in the glossary. Those areas with additional restrictions on appropriate employment uses are noted in the list below. General employment areas with land available at 1 April 2024 include SP12t Falconer Road with 2.48 hectares and SP12u Haverhill research Park with 0.47 hectares available.** • **SP12a Land at Station Way, Brandon** • **SP12b Land south of railway line, Brandon** • **SP12c Land south of London Road, Brandon** • **SP12d Land south of Mile End, Brandon** • **SP12e Anglian Lane, Bury St Edmunds (excluding general industrial uses)** • **SP12f Barton Road, Bury St Edmunds (excluding general industrial uses)**	See council's response to inspectors' preliminary questions and matter 8. In response to inspectors' action point AP45 and AP46 contained in IN12.	No Likely Significant Effect. This new policy separates out employment areas previously captured in Policy SP12. It does not make changes to previous proposals or introduce new development, leaving the original HRA conclusions unaffected.

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			• SP12g Dettingen Way, Bury St Edmunds • SP12h British Sugar, Hollow Road and areas north of Compiegne Way, Bury St Edmunds (The north-eastern and north-western areas of the British Sugar site which forms part of SP12h in which the soakaway and soil conditioning areas are located are intrinsic to the operations of British Sugar and are not appropriate for development unrelated to those operations) • SP12i Suffolk Business Park, Bury St Edmunds (excluding general industrial uses) • SP12j Chapel Pond Hill, Bury St Edmunds • SP12k Eastern Way, Bury St Edmunds • SP12l Enterprise Park, Etna Road, Bury St Edmunds (excluding general industrial uses) • SP12m Mildenhall Road, Bury St Edmunds • SP12n Moreton Hall, Bury St Edmunds • SP12o Northern Way, Bury St Edmunds • SP12p Western Way, Bury St Edmunds (excluding storage and distribution uses) • SP12q Greene King, Friars Lane, Bury St Edmunds • SP12r Rougham Industrial Estate, Bury St Edmund • SP12s Bumpstead Road, Haverhill • SP12t Falconer Road, Haverhill • SP12u Haverhill Research Park, Haverhill (excluding general industrial, storage and distribution uses) • SP12v Haverhill Industrial Estate, Haverhill • SP12w Homefield Road, Haverhill (excluding general industrial uses) • SP12x Stour Valley Road, Haverhill • SP12y Mildenhall Industrial estate, Mildenhall • SP12z Newmarket Industrial estate, Newmarket Any development at SP12d must protect and enhance the existing London Road Industrial Site of Special Scientific Interest and the Brandon Road Industrial Estate County Wildlife Site. In addition to employment uses, SP12p general employment area could accommodate other alternative uses such as leisure, education, health and public facilities and service uses. Rural employment areas The following rural employment areas will be suitable for offices (subject to satisfying a sequential test as required by Policy SP12), research and development, light industrial, general industrial and storage and distribution uses as defined in the glossary. These uses will be accommodated in buildings of an appropriate size for their rural location to meet local business and community needs. Those areas with additional restrictions on appropriate employment uses are noted in the list below. The rural employment area with land available at 1 April 2024 is SP12ar Karro Foods north with 2.37 hectares available. • SP12aa Chilton Street Business Park, Clare (excluding general industrial, storage and distribution uses). • SP12ab Bridewell Business Estate, Clare (excluding general industrial uses). • SP12ac Station Road, Lakenheath. • SP12ad Kings Warren Business Park, Red Lodge. • SP12ae Shepherds Grove, Stanton and Hepworth • SP12af Land south of Swan Lane, Exning. • SP12ag Gorse Industrial Estate, Barnham (excluding offices uses)		

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			• SP12ah Land off Silver Tree Way, Chedburgh. • SP12ai Land south of Bury Road, Chedburgh. • SP12aj Woodside Business Centre, Ingham (excluding general industrial uses). • SP12ak Moseley Farm, Fornham All Saints. • SP12al Park Farm, Fornham St Genevieve. • SP12am Land east of Gazeley Road, Kentford. • SP12an Land south of Bury Road, Kentford. • SP12ao land south of Bury Road, Lanwades Business Park, Kentford. • SP12ap Risby Business Park, Risby. • SP12aq Saxham Business Park, Saxham. • SP12ar Karro foods north, Little Wratting. (excluding general industrial uses). • SP12as Karro foods south, Little Wratting. • SP12at Land east of Mildenhall Drove, Beck Row. The council will support proposals for employment uses in general employment areas and rural employment areas in accordance with the uses identified for each site as set out above, providing that parking, and secure cycle storage, access, travel, visual impact, archaeology and general environmental considerations can be met. Proposals for employment uses in general and rural employment areas which do not neatly fall within the employment uses defined above, will only be accepted where they: • Seek to maximise the sites' potential for jobs growth and/or support the continued operation of the existing businesses and industrial activities. • Do not generate potential conflict with existing or proposed employment activities, in terms of noise, external lighting, vibrations and hours of operation. Explanation General and rural employment areas There are a number of established centres of employment in the district, referred to as general and rural employment areas. Evidence in the employment land review suggests that these concentrations of economic employment activity should be protected. Some of these employment areas have opportunities for further development and intensification of use and in particular the occupation or redevelopment of vacant premises and land will be encouraged. The scale and design of new development within these sites, particularly rural employment areas, should be sympathetic to any sensitive environmental and heritage features and any potential adverse effects should be mitigated. Rural employment areas provide opportunities to support sustainable growth and expansion of rural businesses. Employment uses of a strategic nature, meeting wider sub regional needs should be focussed on sustainable locations in the towns with suitable accessibility to transport links. The location of these general and rural employment areas is shown on the policies map. Some five hectares of employment land has been identified as available at 1 April 2024 in the general and rural employment areas. This baseline assessment will continue to be monitored.		

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			These rural and general employment areas will be suitable for offices (subject to passing a sequential test), research and development, light industrial, general industrial, storage and distribution uses. In accordance with the spatial strategy and the local plan evidence, the policy seeks to direct appropriate employment uses to appropriate sustainable locations, providing opportunity to support and enhance the diverse range of jobs and sectors. This will enable existing established businesses in the district opportunities to expand or diversify, so they can flourish and thrive, whilst avoiding harm to residential amenity and affording protection to the district's sensitive environment and heritage. Where certain employment uses are not considered appropriate in designated employment areas these are noted in the policy.		
MM45	Page 124 and 125	Policy LP36	**Policy LP36 Safeguarding employment** In order to meet our overall employment needs over the plan period this policy seeks to protect and safeguard all employment land and existing businesses, across the district which include: a. Land designated as a general employment areas and rural employment areas. b. Sites allocated for employment purposes (including employment land as part of a mixed-use allocation). c. Land and existing businesses which are not specifically identified in the local plan. Policy SP12 sets out the uses permitted in each general employment area and rural employment area. Individual site allocations in this plan set out uses that will be permitted in each allocation. It is recognised that there are a number of existing businesses and employment uses across the district that are not designated on the policies map that lie outside of the defined general employment areas, rural employment areas and employment allocations as detailed above (category c). These businesses make an important economic contribution within West Suffolk and the council will support and work with businesses across the district to enable them to grow, expand and diversify and find suitable accommodation to meet their needs. Proposals resulting in the loss of employment land or an existing business falling within categories a and c to an employment use which generates jobs but do not neatly fall within the employment uses set out in policy SP12, will only be permitted where the proposal complies with the following criteria d. to i., as appropriate: As a minimum, evidence of 12-month marketing of the site and premises in accordance with guidance in appendix I, demonstrating that genuine attempts have been made to sell and/or let the site and premises in its **existing** ~~current~~ use (or last **previous** use) **and other suitable employment uses (where supported by the policies in the development plan)** and no alternative business use has been found. d. Evidence is provided demonstrating there is sufficient supply of alternative and suitable employment land available. e. The existing use has created over-riding environmental problems (such as noise, odours or traffic) and permitting an alternative use would be a substantial environmental benefit that would outweigh the loss of an employment site. f. An alternative use would assist in urban regeneration and offer greater benefits to the community in meeting local business and employment needs and would provide other sustainability benefits that would outweigh the loss of the existing employment use. g. Is for an employment related support facility such as employment training and/or education. h. It is demonstrated to support business operations and diversifications such as on-site renewable energy development.	In response to inspectors' preliminary questions. In response to inspectors' action point AP47 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			To ensure the long-term protection of employment land across the district, proposals for non-employment uses on ~~strategic~~ sites allocated on the policies maps for employment purposes (category b) will only be considered if it can be demonstrated it is no longer required in a review of the allocation in a subsequent local plan.		
MM46	Page 130	Policy LP39	**Policy LP39 Tourism development** Proposals for new tourism facilities, including overnight visitor accommodation such as hotels, bed and breakfast, self-catering, holiday lodges, static and touring caravans and tenting fields, or improvements and extension to existing facilities, will be permitted provided that: a. The site has good transport connections to existing facilities or the site is well related to the main urban areas of a defined settlement. b. The site is accessible by adequate public transport, cycling and walking links. c. It would not adversely affect the character, appearance or amenities of the area and the design is to the satisfaction of the local authority. d. Vehicle access, on-site vehicle parking and secure cycle storage would be provided to an appropriate standard. e. Where an essential worker is proposed, evidence has been submitted demonstrating the need for a 24-hour presence on site. The larger urban areas (towns and key service centres) will be the focus for larger scale tourism activities and overnight accommodation in accordance with the requirement to concentrate development at the most sustainable locations. Proposals for tourism development and activities within local service centres, type A villages, type B villages and the countryside must, in addition to the criteria above, have good access to existing local community services and facilities, and: f. ~~Have no significant adverse impact on~~ **Recognise** the intrinsic character ~~or appearance of the landscape~~ and **beauty of the** countryside. g. Be of an appropriate scale when compared to existing development in the surrounding area or comprise of the conversion of suitable existing rural buildings or limited extension to existing visitor accommodation. The occupation of any new tourist accommodation will be restricted through condition or legal agreement to ensure proposals remain in tourism use and do not result in permanent residential occupation where it may not otherwise be appropriate.	In response to inspectors' action point AP48 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy and the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM47	Page 140 and 142	Policy LP41	**Policy LP41 Local centres** There are 23 existing local centres in West Suffolk and eight new local centres proposed within the strategic housing and mixed-use allocations and commitments. These are defined on the policies map and listed in the policy. New local centres will be defined on the policies map, in a local plan review after their implementation. The role of the local centres is to serve local community needs. **Existing local centres:** • LP41(a) Barton Road, Bury St Edmunds • LP41(b) Cadogan Road, Bury St Edmunds	See council's response to inspectors' preliminary questions and matter 1.	No Likely Significant Effect. This modification proposes changes to wording however this is a management

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			• LP41(c) Glastonbury Road, Bury St Edmunds • LP41(d) Hardwick Precinct, Bury St Edmunds • LP41(e) Lake Avenue Parade, Bury St Edmunds • LP41(f) Moreton Hall, Bury St Edmunds • LP41(g) The Parade, Ridley Road, Bury St Edmunds • LP41(h) St Olaves Precinct, Bury St Edmunds • LP41(i) Stamford Court, Bury St Edmunds • LP41(j) Hales Barn, Haverhill • LP41(k) Strasbourg Square, Haverhill • LP41(l) Leiston Road, Haverhill • LP41(m) Blair Parade, Haverhill • LP41(n) Hanchett End, Haverhill • LP41(o) Valley Way, Newmarket • LP41(p) Elizabeth Avenue, Newmarket • LP41(q) St Johns Close, Mildenhall • LP41(r) Barrow • LP41(s) Ixworth • LP41(t) Kedington • LP41(u) Lakenheath • LP41(v) Red Lodge • LP41(w) Stanton **Proposed new local centres within ~~strategic~~ sites** • Marham Park, (north-west Bury St Edmunds ~~strategic~~ site) • Lark Grange, (Moreton Hall ~~strategic~~ site) • North-east Bury St Edmunds ~~strategic~~ site • South-east Bury St Edmunds ~~strategic~~ site • North-west Haverhill ~~strategic~~ site • Two local centres at north-east Haverhill ~~strategic~~ site • Land west of Mildenhall ~~strategic~~ site Within the local centres as defined on the policies map, support will be given to proposals for retail and community services and facilities as defined below: a. Small scale retail development, to meet local needs (not exceeding 280 square metres in gross floor area unless a larger area is required to meet a demonstrated local need). b. Leisure and recreation uses. c. Health and community facilities. d. Early years setting including creche and day nursery. In local centres the loss or change of use of shops or services and facilities (or premises last used for such purposes) will not be permitted unless it has been demonstrated the following criteria have been met: • The use is no longer viable or that the change of use will not have a detrimental impact on the vitality and viability of the centre.		policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

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			• Suitable alternative provision is available which will meet the day to day needs of people in the local area. • The premises have been realistically, and unsuccessfully, marketed for a minimum period of 12 months in accordance with guidance in appendix I. Proposals for new or extended shops or services within local centres will be permitted provided that there is no adverse effect on residential amenity, highways and environmental quality. New local centres should be well served by public transport, cycle path access and cycle parking, and be within reasonable walking distance of all parts of the development. Green infrastructure in local centres contributes towards environmental quality, amenity, health and wellbeing and will be retained, restored, protected and enhanced. Proposals for the provision, enhancement or loss of community facilities and services, leisure and recreation, health and education uses will be subject to compliance with other policies within this development plan. 4.5.100. Retail uses should be of a scale suitable to meet local needs, and a threshold is included in the policy to achieve this. This threshold is evidenced in the ~~Retail and Main Town Centre Uses study was published in May 2022, Retail~~ **retail** and main town centre uses study **published in** May 2022. It is in line with the new use Class F2 (local community uses) which defined shops as not more than 280 square metres mostly selling essential goods, including food, and at least one kilometre from another similar shop.		
MM48	Page 146 and 147	Policy LP46	**Policy ~~LP46~~ SPX Horse racing industry development** Proposals for development relating to the horse racing industry will be permitted provided that: a. There is satisfactory evidence proportionate to the scale and type of use, of the business viability, functional need for and scale of the proposal as appropriate. b. The development is designed to make a positive contribution to local character and distinctiveness and will not have an unacceptable impact on the historic environment or local amenity. c. The occupation of any residential accommodation is restricted by condition or legal agreement to key workers essential to the day-to-day operation and management of the horse racing establishment. d. Proposals for development in the countryside: • Do not result in the irreversible loss of best and most versatile agricultural land. • The scale of development is sensitively integrated into the surrounding area and does not have a significant detrimental impact on visual amenity of the landscape, or nature conservation interests. e. Proposals include detailed consideration of the movement of horses to and from training, highway safety, network capacity and accessibility for all modes of transport, opportunities for more sustainable travel links, including active travel, and measures to reduce any transport impacts of the proposal to an acceptable level to the local highway authority. Proposals that create additional travel, of both people and horses must submit a sustainable transport statement or a workplace travel plan appropriate to the scale and impacts of development in accordance with current Suffolk County Council travel plan guidance.	Council's response to preliminary questions and matter 9	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM49	Page 148	Policy LP47	**Policy ~~LP47~~ SPX Development affecting the horse racing industry** Any development within or around Newmarket which is likely to have a material adverse impact on the operational use of an existing site within the horse racing industry (such as noise, air quality, volume of traffic, ~~loss of paddocks or other open space,~~ horse movements, access and/or servicing requirements), or which would threaten the ~~long term~~ viability of the horse	See council's response to inspectors' preliminary	No Likely Significant Effect.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			racing industry as a whole, will only be permitted in exceptional circumstances and where it is demonstrated the benefits would significantly outweigh the harm to the horse racing industry. Proposals shall include detailed consideration of the movement of horses to and from training, highway safety, network capacity and accessibility for all modes of transport, and measures to reduce any transport impacts of the proposal to an acceptable level to the local highway authority.	questions and matter 9. In response to inspectors' action point AP50 contained in IN12.	This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM50	Page 149 and 150	Policy LP48	**Policy ~~LP48~~ SPX Change of use and development of horse racing industry sites** The change of use of racehorse training yards, stud farms, **paddocks,** racecourses and horse training grounds, including associated residential accommodation (and buildings and/or land last lawfully used for such purposes) to alternative uses directly related to the horse racing industry, will only be permitted ~~in exceptional circumstances and~~ where it is demonstrated the benefit to the horse racing industry outweighs the loss of the existing use. The change of use of racehorse training yards, stud farms, **paddocks,** racecourses, and horse training grounds, including associated residential accommodation or other uses directly related to the horse racing industry (and buildings and/or land last lawfully used for such purposes) to uses **unrelated, or** not directly related to the horse racing industry, will only be permitted if allocated as a proposal in an adopted local plan. Permission will only be granted for schemes that conserve and/or enhance the character and appearance of the area and, where relevant and necessary, conditions will be imposed removing permitted development rights to prevent further changes of use.	See council's response to inspectors' preliminary questions and matter 9. In response to inspectors' action point AP50 and AP51 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM51	Page 151	Policy LP49	**Policy ~~LP49:~~ SPX Safeguarding horse walks and crossings** The council will prioritise the retention and improvement of existing horse walks and crossings, as shown on the policies map, to safeguard horse movements in Newmarket. The extension or the provision of new facilities ~~by traffic management proposals~~ will be supported through: **• traffic management proposals** • Parking restrictions • signage • reserving land as part of new development proposals	Council's response to inspectors' preliminary questions and matter 9.	No Likely Significant Effect. This modification proposes changes to wording however this is a management

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			• direct provision by horse racing interests or by developers through a legal agreement under Section 106 of the 1990 Planning Act (or successor legislation) where necessary to the acceptability of the development. Any proposal shall be of an appropriate design and make a positive contribution to the area's local character and distinctiveness and will not have an unacceptable impact on the historic environment or local amenity. Proposals shall include detailed consideration of the movement of horses to and from training, highway safety, network capacity and accessibility for all modes of transport, and measures to reduce any transport impacts of the proposal to an acceptable level to the local highway authority.		policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM52	Page 153 and 154	Policy LP50	**Policy LP50 Listed buildings** Proposals to alter, extend or change the use of a listed building, or development affecting its setting, will be permitted where**, as appropriate to the nature and scale of the proposal,** they: a. Demonstrate a clear understanding of the significance of the building including the contribution made by its setting. b. Contribute to the preservation of the building. c. Are not detrimental to the building's character or any architectural, archaeological, artistic or historic features that contribute towards its significance. d. Are of an appropriate scale, form, height, massing, and design which respects the existing building and its setting. e. Use appropriate architectural details, materials and methods of construction which respect the character of the building. f. Respect the historic internal layout (which may include later remodelling) and other internal features of importance. g. Respect the setting of the listed building, including inward and outward views and how it is experienced and understood. h. Respect the character, appearance and setting of a park, garden or training yard of historic or design interest, particularly where the grounds have been laid out to complement the design or function of the building. A curtilage and/or setting which is appropriate to the listed building, and which maintains its relationship with its surroundings should be retained. i. Have regard to the present and future viability or function of the listed building. Proposals to demolish all or part of a listed building will only be permitted in very exceptional circumstances. Applicants must demonstrate that all reasonable efforts have been made to ensure the ongoing appropriate repair of the building; sustain existing uses or find viable new ones, and that they have addressed the considerations set out in national legislation and guidance. Where appropriate, the recording of the building to a specified standard will be required prior to the commencement of demolition. **Retrofitting proposals should be supported by a statement demonstrating an understanding of the building's environmental performance and be accompanied by an assessment of the building's current fabric and energy performance. The level of detail submitted should be sufficient to evaluate and or understand the impact of the proposed works on both the environmental performance and the significance of the heritage asset using appropriate expertise where necessary.** All development proposals should provide a clear justification for the works, especially if these works would harm the listed building or its setting, so that the harm can be weighed against any public benefits. Where a proposal would result in harm to the significance of the asset the relevant tests of the National Planning Policy Framework (or successor document) will be applied.	Council's response to inspectors' preliminary questions and matter 12.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

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			The level of detail of any supporting information should be sufficient to understand the potential impact of the proposal on its significance and/or setting. Energy efficiency measures that do not harm the building's significance, setting, fabric or ongoing preservation, as informed by an assessment of the building's fabric and by robust technical detailing, and which take a holistic whole building approach to energy efficiency will be supported. 4.7.9. It is a statutory requirement for local planning authorities to have special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest which it possesses. Consent will not be granted for the demolition of a listed building other than in the most exceptional circumstances and applicants will need to demonstrate that every effort has been made to keep the building. **4.7.10. New uses must adapt to the building, not the other way around. The best alternative or new use for a listed building will be one that involves the least amount of intervention and preserves as much of the historic fabric and character of the building as possible.**		
MM53	Page 154 and 155	Policy LP51	**Policy LP51 Built non-designated heritage assets** Proposals for the alteration, extension or demolition of buildings, or structures identified (at application stage or otherwise) as being non-designated heritage assets, including those protected by an article 4 direction or subsequent legislation, will be permitted where**, as appropriate to the nature and scale of the proposal,** they: a. Demonstrate a clear understanding of the significance of the building or structure and/or its setting. b. Respect the historic fabric, design, materials, elevational treatment and ornamentation of the original building or structure. c. Will not entail an unacceptable level of loss, damage or covering of original features. d. Have regard to the setting, plot layout and boundary features. The level of detail of any supporting information should be proportionate to the importance of the asset, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting. The effect of an application on significance will be taken into account in determining applications having regard to the scale of the harm and loss of significance. 4.7.12. Significance is the value of a heritage asset to this and future generations because of its heritage interest which may be from its archaeological, architectural, artistic or historic qualities. Given the role that they play in reinforcing a sense of local identity and distinctiveness, and the embodied carbon emissions that would result from demolition and redevelopment compared to retention and refurbishment, the unsympathetic alteration or demolition of such locally important buildings and structures will only be acceptable where it is demonstrated the public benefits of the proposed development would outweigh any adverse impact on the heritage asset or adverse carbon consequences. **New uses must adapt to the building, not the other way around. The best alternative or new use for a historic building will be one that involves the least amount of intervention and preserves as much of the historic fabric and character of the building as possible.** 4.7.13. Current legislation gives general permission for specified minor development and uses of land, including limited alterations and extensions affecting property in residential use (referred to as 'permitted development'). Although permitted development is more restricted in conservation areas, in cases where buildings have qualities likely to be prejudiced by unsympathetic or uncoordinated change, and the appearance of the conservation area might be adversely affected, the local	See council's response to inspectors' preliminary questions and matter 12.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

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			planning authority has the power to withdraw some specific permitted development rights entirely. This is through serving a direction under Article 4 of the General Permitted Development Order. The effect of this is to require owners and occupiers to make individual applications for these specified forms of development so that the local planning authority can support sympathetic alterations and has the right to refuse permission for unsympathetic proposals.		
MM54	Page 156	Policy LP52	~~**New uses for historic buildings**~~ ~~4.7.15. The purpose of this policy is to set out how proposals to alter the use of a historic building will be assessed. Historic buildings are heritage assets, both designated and undesignated, which are identified as having a degree of significance meriting consideration in planning decisions, because of their heritage interest.~~ ~~**Policy LP52 New uses for historic buildings**~~ ~~Proposals for the adaptation of a historic building (including designated and non-designated heritage assets) to sustain a new use will only be permitted where the proposal will protect the significance of the building, and would not have a detrimental impact on:~~ ~~a. The character, appearance and setting of the building or significant elements of the buildings historic fabric.~~ ~~b. The scale, height, massing, alignment, style and materials of the building.~~ ~~c. The form, function and manner of construction of the building.~~ ~~d. The present and future viability of the building.~~ ~~The level of detail of any supporting information should be proportionate to the importance of the building, the work proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.~~ ~~Development proposals which result in harm to or loss of the significance of a designated heritage asset should provide clear and convincing justification for the works.~~ ~~Where a proposal would result in harm to the significance of a designated heritage asset, the relevant tests of the National Planning Policy Framework, or successor document, will be applied.~~ ~~The effect of an application on significance of a non-designated heritage asset will be taken into account in determining applications having regard to the scale of the harm and loss of significance.~~ ~~**Explanation**~~ ~~4.7.16. Many heritage assets are no longer in their original use and have been adapted over time to new uses. It is particularly the case with buildings that their survival will frequently depend upon finding a viable new use. Keeping heritage assets in use avoids the consumption of new building materials and energy and the generation of waste from the construction of replacement buildings.~~ ~~4.7.17. The council will encourage new uses and/or modification and/or adaptation schemes for heritage assets that are in accordance with other policies contained within this plan and which are designed to reduce carbon emissions and secure sustainable development. However, local evidence has shown that conversion schemes can have a detrimental impact on the historic fabric and character of such buildings. The alterations necessary to continue the use of a building must be balanced against any impact on the historic fabric and character of the building and the council will ensure that new uses or works respect the existing features of the building.~~	See council's response to matter 12.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

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			~~4.7.18. New uses must adapt to the building, not the other way around. The best alternative or new use for a listed building will be one that involves the least amount of intervention and preserves as much of the fabric and character of the building as possible~~.		
MM55	Page 157 and 158	Policy LP53	**Policy LP53 Conservation areas** Proposals for development within, **or within the setting of** ~~adjacent to or visible from~~ a conservation area**, as appropriate to the nature and scale of the proposal,** should: a. Preserve or enhance the character or appearance of the conservation area or its setting, and views into, within, and out of the area. b. Be of an appropriate scale, form, height, massing, alignment and detailed design which respect the area's character **or appearance** and its setting. c. Retain important natural features such as open spaces, plot divisions, boundary treatments, and trees and hedges, which contribute to the special character **or appearance** of the area. d. Retain important traditional features that contribute to the area's character **or appearance** such as original doors, windows, shop fronts and boundary structures. e. Include fenestration which respects its setting. f. Use materials and building techniques which complement or harmonise with the character **or appearance** of the area. g. Demonstrate a clear understanding of the significance of the conservation area and/or its setting. The proposal should demonstrate how the key characteristics of the character **or appearance of the** area have been addressed. New shop fronts, fascias, awnings, canopies, advertisements and other alterations to commercial premises must be of a high standard of design which respects the character **or appearance** of the conservation area and the building to which they relate, having ~~close~~ regard to the content of West Suffolk Shop Front and Advertisement Design Guidance. Standardised shop fronts, unsympathetic 'house' signs, projecting box signs, internally illuminated signs and externally lit signs will not normally be granted consent. In rural locations with low levels of street lighting and where it can be demonstrated that premises rely principally on trading after dark, externally illuminated signs sympathetic to the character of the building and the surrounding area may be permissible. Proposals to demolish buildings or structures that make a positive contribution to the special architectural or historic interest of a conservation area **will require clear and convincing justification and** only be permitted ~~in very exceptional circumstances, in particular~~ where it can be demonstrated that: • The building or structure is structurally unsound and beyond reasonable repair, or the proper repair of the building would result in the loss of the qualities which give it architectural or historic interest. • All possible measures to sustain an existing use or find an alternative use have been explored and failed, and redevelopment would bring substantial public benefits. • In both cases planning permission has been granted for the redevelopment of the site and a contract for the carrying out of the works has been made. The level of detail of any supporting information should be sufficient to understand the potential impact of the proposal on its significance and/or setting.	See council's response to Inspectors' preliminary questions and matter 12. In response to inspectors' action point AP58 contained in IN13.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

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			Development proposals which cause harm to the significance of a conservation area including its setting will require clear and convincing justification. Where a proposal would result in harm to significance the relevant tests of the National Planning Policy Framework, or successor document, will apply. Outline applications will only be accepted where sufficient information is provided to identify how the proposals will impact upon the elements which contribute to the significance of the conservation area.		
MM56	Page 159 and 160	Policy LP55	**Policy LP55 Archaeology** Development will not be permitted where it is expected to have a material adverse effect on scheduled monuments or other sites of similar archaeological importance, or their settings. On sites with known archaeological interest, or that have potential to contain heritage assets with archaeological interest, planning permission will be granted subject to other policies within the development plan and subject to one, or a combination, of the following being agreed before the development commences: a. An appropriate level of assessment to deliver understanding of the nature and significance of any heritage assets that may be impacted by development. This may include desk-based assessment and/or field evaluation. b. The preservation of archaeological remains in situ. c. An appropriate level of archaeological investigation and recording to achieve preservation by record, prior to the commencement of the development. This should include fieldwork, post-excavation analysis, dissemination of the results of the investigations and deposition of any archive generated with the appropriate repository. Where a proposal would result in harm to significance the relevant tests of the National Planning Policy Framework, or successor document, will apply. Development will not **normally** be permitted where it is expected to have a material adverse effect on scheduled monuments or ~~other sites of similar archaeological importance,~~ **non-designated heritage assets,** or their settings**, which are demonstrably of equivalent significance unless the public benefits outweigh the harm.**	In response to inspectors' action point AP59 contained in IN13.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM57	Page 161	Policy LP56 explanatory paragraph 4.7.30	4.7.30. The Abbey of St Edmund lies at the heart of Bury St Edmunds, with the former Abbey precinct comprising some 24 hectares. The precinct encompasses a number of grade I and II listed buildings and scheduled monuments, as well as the Abbey Gardens and St Edmundsbury Cathedral. Any future development in the vicinity of the Abbey precinct must have regard to The Abbey of St Edmund Heritage Partnership **Overarching Plan (2021)**, Heritage Assessment **(2018)** and Conservation Plan (2018) which brings together numerous local and regional organisations to care for the Abbey and explain its heritage. **The need for an integrated and comprehensive approach to the development of, and improvement to, the Abbey of St Edmund area is recognised and in the longer term, the preparation of a masterplan to develop a framework for future improvements to heritage conservation, heritage interpretation and natural environment conservation across the whole Abbey of St Edmund area is supported.**	In response to the inspectors' action point AP60 contained in IN13.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the

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					original HRA conclusions unaffected.
MM58	Page 162 and 163	Policy SP15	**4.8 Infrastructure** 4.8.1. Infrastructure can come in various forms and in this plan falls into three categories: • Hard infrastructure such as pedestrian and cycle routes, energy and water supply, wastewater recycling (sewage treatment works), telecommunications and broadband. • Green and blue infrastructure, including green spaces for parks and sport and recreation, access to the countryside, protecting and enhancing biodiversity and providing informal green and blue spaces, sustainable drainage systems. • Social and community infrastructure such as education and early years, healthcare, **ambulance,** police, sport and leisure and community and cultural infrastructure. 4.8.2. The delivery of resilient infrastructure is important to create **community safety and cohesion,** connected communities and determine how places are shaped and how the quality of life in existing communities can be maintained and improved. **Infrastructure** 4.8.4. The purpose of this policy is to ensure that the infrastructure **and facilities** needed to support planned growth and new development is provided alongside development at the appropriate time, and to set out the development requirements needed to deliver this. **Policy SP15 Infrastructure** It is important that the infrastructure **and facilities** needed to support new development and planned growth is delivered alongside development at the appropriate time, and for existing infrastructure to be protected and enhanced for the future. Proposals for development will be required to retain, enhance, and provide additional infrastructure, as appropriate to the scale and location of the proposal, to mitigate **direct and cumulative** impact of development. Proposals will need to demonstrate how they will: a. Deliver the necessary on-site infrastructure requirements and where appropriate off-site infrastructure requirements and/or a financial contribution which will be secured through a legal agreement. b. Provide a suitable mechanism, subject to approval by the district council, to ensure the appropriate and sustainable long-term governance, stewardship, maintenance and management of infrastructure including blue and green infrastructure, integrated water management infrastructure, the public realm, and community facilities, for example through a financial contribution and supporting statement or a management plan. c. Ensure the timely and phased delivery of infrastructure to serve development, especially where new development is dependent on this infrastructure. Existing resources and infrastructure and, where necessary access to them, will be protected to ensure a flexible approach to future growth and infrastructure requirements. The delivery or the capacity of essential infrastructure must be confirmed by the provider or acceptable mitigation provided. Where this is not possible, development may be phased by condition of a planning permission or by prior agreement with	See council's response to supplementary questions and matter 3. In response to inspectors' action point AP61 contained in IN13.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			the developer to ensure the delivery of infrastructure at the appropriate time. On large strategic developments that are being delivered incrementally over the plan period, improvements to essential infrastructure and phasing should be addressed in masterplans. This requirement also applies to future phases of developments where either a full or reserved matters planning application is required. The council will continue to work with statutory consultees and infrastructure providers, organisations and other authorities within and across administrative boundaries to take account of the impacts of cumulative and residual growth. It will seek to safeguard, protect and ensure provision, resilience and enhancement of infrastructure and services to meet the current and planned future needs of residents, businesses and communities in West Suffolk are delivered in a timely manner. Proposals for development which are located adjacent to existing educational facilities will not be supported if they compromise the ability of the school to expand to an appropriate size to meet a future potential need **for additional school places, or to be reconfigured and improved to meet the needs of the school and the community it serves.** **Proposals for development which are located adjacent to existing health facilities will not be supported if they compromise the ability for their expansion to meet a future potential need.** **The council will work with the relevant stakeholders, National Highways and Suffolk County Council, to enable the delivery of key strategic highways infrastructure projects to mitigate the cumulative traffic impacts arising from the plan. Primarily, the impacts will be mitigated through modal shift to sustainable transport.** **Development will be expected to contribute to the delivery of sustainable transport strategies for managing the cumulative impacts of growth directly or through financial contributions, including to measures to promote sustainable travel. Transport Statements and Assessments will provide the evidence of how cumulative impacts are being addressed**. 4.8.6 The developers guide (or its successor) provides guidance on a wide range of infrastructure issues that may be considered when determining planning applications. It includes public service provision by service providers and commissioners such as NHS providers, libraries and the police as well as key infrastructure needed to support planned growth. Examples of this key strategic infrastructure include contributions to sustainable transport schemes, ~~G.P.~~ **GP** and community health care, **police facilities** and provision of a new school. *New paragraph in reasoned justification:* **4.8.9. The councils are developing a more detailed strategic sustainable transport strategy, alongside the local transport plan, which is an alternative approach to delivering the physical costed highways measures. The aim of the strategic sustainable transport strategy is to enable the councils to use the developer contributions with more flexibility given how quickly sustainable transport measures are changing and advancing. The contributions secured will relate to on site, local and strategic highway mitigation. The sustainable transport strategy approach involves monitoring the cumulative impacts of development. This will be monitored through the developments and delivery will be phased as appropriate. The councils will prepare a guide to explain the sustainable transport strategy funding mechanism and implementation.**		
MM59	Page 164 and 165	Policy LP57	**Policy LP57 Active and sustainable travel** Proposals for development must provide for active travel on and off site by:	See council's response to inspectors' action	No Likely Significant Effect.

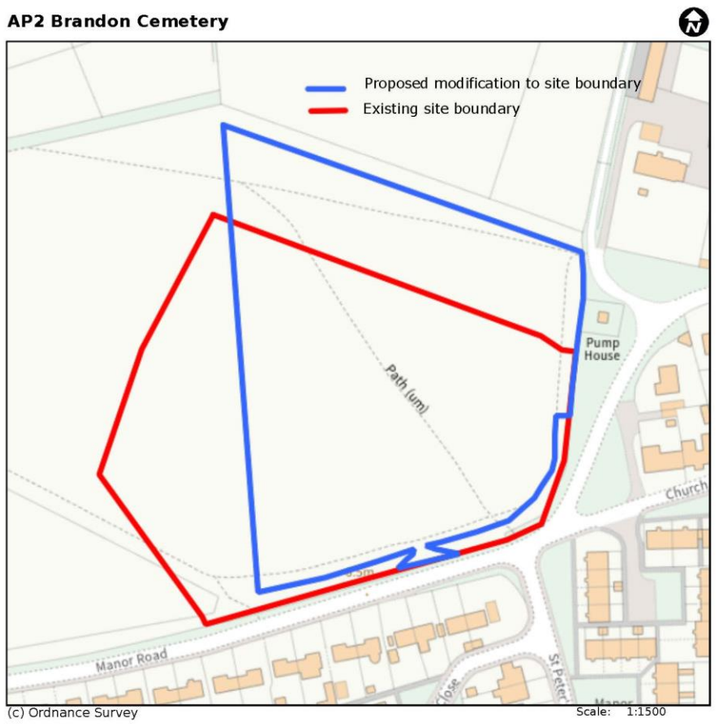
Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			a. Maximising walking opportunities for all levels of personal mobility and contributing to a positive public realm. Proposals must maintain, improve and create new safe and attractive routes suitable for pedestrians, push chairs and wheelchairs including appropriate street furniture such as seating and lighting as necessary. b. Promoting opportunities for an accessible, safe, and segregated cycle network, including protecting existing routes, and providing appropriate facilities for the use of cyclists. Cycle infrastructure should be built to the requirements of Gear Change and Cycle Infrastructure Design Local Transport Note 1/20 and related guidance or successor documents. c. All destinations, transport hubs and commercial, business and service premises are required to having facilities to allow people to cycle all year around including, but not limited to, workplace showers, covered cycle storage, changing rooms, drying rooms and lockers provided, with opportunities for the hire of bicycles, e-bikes and e-scooters as appropriate to the use and scale of the proposal. d. Provide sufficient, secure, convenient and accessible undercover cycle spaces for a range of bicycles and installing and maintaining secure, undercover cycle parking spaces in line with Suffolk Guidance for Parking 2023 or successor document. e. Ensuring new or improved sustainable links both within the site and to local destinations are provided to enhance access within the settlement, between settlements and/or provide access to the countryside or green infrastructure sites, local facilities, services, and other destinations as appropriate. f. Improvements to public transport infrastructure through upgrading bus and/or rail links, providing well-designed facilities, passenger information infrastructure, protection and enhancement of public transport routes, bus stops, provision of shelters and by appropriate contributions as necessary. g. Safe and suitable access to public transport through direct provision of suitable infrastructure. **Where it is necessary to mitigate and accommodate the transport impacts of development, developers will be required to make provision or ~~F~~f**inancial contributions will be required, appropriate to the scale of the development, towards the delivery of improvements to transport infrastructure which includes facilitation or improvements to access for sustainable modes of transport.	point AP52 contained in IN12.	This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM60	Page 166	Policy LP58	**Policy LP58 Rights of way** Development will be expected to improve or contribute to the improvement of public rights of way on and off site to facilitate sustainable modes of access, connect communities together, promote access to the countryside for recreation, and improve health and wellbeing. **Where necessary, new links should be added to the Public Rights of Way Network.** Public rights of way should be maintained on their original alignments wherever possible, within a wide green corridor, and should be enhanced. Development which would adversely affect the character or result in the loss of existing or proposed public rights of way will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to public rights of way for pedestrian, cyclist, or horse rider use. The rights of way network should be seamlessly integrated with the site layout. Improvements to the Suffolk Public Rights of Way Network through development should contribute to achieving the aims of the Suffolk Green Access Strategy Rights of Way Improvement Plan 2020–2030 (or its successor document)	See council's matter 15.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
MM61	Page 167	Policy LP59	**Policy LP59 Transport assessments, transport statements and travel plans** For major development and/or where a proposal is likely to have significant or complex transport implications, the council requires the applicant to submit the following documents alongside their planning applications: a. A multi modal transport assessment or transport statement appropriate to the scale and impacts of development identifying the likely extent of transport implications and proposed mitigation measures. b. A travel plan that outlines physical and management measures necessary to mitigate impacts and deliver a sustainable transport solution for the development. The developer will be required to provide the necessary funding to deliver and monitor any required travel plan for at least 10 years from first occupation. Where **the local highway authority considers that a** transport assessment, transport statement and/or travel plan indicates that the cumulative and residual travel impacts on the road network and other routes arising from the development would be severe, or there would be an unacceptable impact on highway safety, then planning permission will not normally be granted. Where it is necessary to mitigate and accommodate the transport impacts of development, developers will be required to make provision or a financial contribution, appropriate to the scale of the development, towards the delivery of improvements to transport infrastructure which includes facilitation or improvements to access for sustainable modes of transport.	See council's matter 15.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM62	Page 168 and 169	Policy LP60	**Policy LP60 Parking standards** All proposals for development, including changes of use, will be required to provide appropriately designed and sited car parking and secure cycle storage and where necessary two-wheeler parking. Provision should be made for visitor, emergency, delivery, service, and disabled vehicle parking. All proposals must **have regard to** ~~be in accordance with~~ the adopted standards (**Suffolk** Guidance for Parking 2023 ~~and~~ **or** successor documents). The council will seek to reduce over-reliance on the car and to promote more sustainable forms of transport. Provision should have regard to the accessibility of the site to sustainable transport modes with consideration for the need to decarbonise. In the town centres and other locations with good accessibility to facilities and services, and/or well served by public transport, a reduced level of car parking may be permitted in new development proposals where it is demonstrated there are appropriate sustainable transport measures and no cumulative harm to the highway network.	See council's response to inspectors' action point AP53 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM63	Page 169 and 170	Policy LP61	**Policy LP61 Digital infrastructure** **Digital infrastructure** The improvement of the digital communications network in the district, including through the provision of mobile data networks and digital technology upgrades, will be supported, subject to compliance with relevant policies in this plan and	See council's response to inspectors' preliminary questions and matter 14.	No Likely Significant Effect. This modification

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			national policy. Proposals for new residential, public and business premises will include gigabit-capable connections, or be constructed to be high-speed ready~~, with all associated physical infrastructure in accordance with building regulations (Approved Document R: Volumes 1 and 2 or subsequent documents)~~. **Telecommunications** Telecommunications development shall be permitted in accordance with other policies within the development plan where it is demonstrated as appropriate: a. The selection of the location has applied the following order of preference: • Sharing existing telecommunications sites and installations, including masts, structures and buildings. • Using existing buildings and structures where there are no existing telecommunications installations. • Other locations. b. Street clutter is minimised including the number, size, and prominence of equipment cabins. c. The impacts on the surrounding area's visual amenity, character, and appearance through appropriate design and/or mitigation measures is demonstrated. d. Where on a building, the location and design does not have a detrimental impact to that building's appearance. e. The proposal has special regard to the natural and historic environment where the quality of the landscape or townscape may be particularly sensitive to the intrusion of communications infrastructure. f. No detrimental impact is caused on the movement of pedestrians and cyclists or on the safe and effective functioning of highways or cause severe harm to the highway. g. There is no interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM64	Page 171 and 173	Policy SP16	**Policy SP16 Existing special operational uses** RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp and HMP Highpoint, Stradishall are identified as land and assets for 'special operational uses' and are identified as such on the policies map. RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp and HMP Highpoint, Stradishall are identified as land and assets for 'special operational uses' and are identified as such on the policies map. RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp military air bases are recognised for their strategic military importance to the UK. The policy identifies the sites and supports their expansion to meet their operational needs including necessary related facilities, taking into account existing constraints and statutory guidelines. Proposals for development, including permitted development at RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp may require a project level habitat regulations assessment (HRA), the competent authority being the local planning authority or the Ministry of Defence. The applicant is required to submit information to inform the HRA **in accordance with policy SP7**. ~~The information must address the impact of the proposals alone and in-combination with other relevant plans and projects within the whole special protection area and its relevant constraint zones where appropriate.~~ At HMP Highpoint, Stradishall the policy supports expansion to meet operational needs including necessary related facilities, taking into account existing constraints and statutory guidelines. In order to protect and ensure the operational needs of RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp are met, where development is outside of the area of operational use applicants will be required to submit	See council's response to inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording however this is a management policy, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			evidence demonstrating that there would be no detriment to operational use resulting from the development having regard to the following constraints which are identified on the council's on-line mapping system: • The aircraft noise and vibration constraints associated with the airbase flight paths. • Safeguarding zones. • Areas where building height restrictions and restrictions on some methods of renewable energy generation for example wind turbine generators or solar photo voltaic panels are not permitted on development due to their potential impact upon military aviation activities. In the event 'special operation uses' of land and assets become available for redevelopment or change of use, or are known to shortly become surplus to requirements, whether for the whole or part of the landholding in that area, the council will consult with the Ministry of Defence and/or Ministry of Justice as appropriate. A feasibility assessment exploring potential future opportunities and uses appropriate to the site, having regard to the site's opportunities and constraints and wider impacts of the proposal will be carried out. This evidence would then inform the next local plan review, and/or a masterplan, for the site to be prepared in accordance with policy LP11 in this local plan.		
MM65	Page 174	Site allocations	**5 Site allocations** This section of the West Suffolk Local Plan sets out the council's site allocations in accordance with the spatial strategy in policy SP9, for housing, employment, mixed-use and other types of uses. The site allocations are identified as strategic ~~or non-strategic~~ and make provision for residential, employment, school expansion and other land uses. The strategic allocations are important in addressing the council's strategic priorities for the area and the ~~non-strategic~~ allocations provide the detail on sites smaller in scale. **The purpose of stating an approximate number of homes in the site allocations is to give an indication of the scale of development expected. The actual number of homes on each site will be determined through the planning application process in the context of the relevant policy requirements in the Plan and the objective of making efficient use of land.** Many of the residential, mixed-use and employment site allocations originate from the former St Edmundsbury and Forest Heath area Local Plans. A table of existing residential, mixed use and employment allocations to be carried forward and new allocations~~, along with their strategic or non-strategic status~~, can be seen at appendix **C** ~~B~~. Mapping All of the allocated sites can be viewed in this plan, on 'Find my nearest' on the council's website and on the policies map.	In response to inspectors' PQ16 and council's matter 1. In response to Inspectors' preliminary questions and council's matter 1. In response to the inspectors' action point AP5 contained in IN10.	No Likely Significant Effect. This modification proposes changes to wording however this is none-specific and the actual site allocations are provided later in the plan, the changes do not introduce new development or alter allocations, leaving the original HRA conclusions unaffected.
MM66	Various - see mod	Site allocations policies	*Amend as follows:* Remove '~~Non-strategic allocations~~' and replace with '**Site allocations**' on following pages	In response to inspectors' PQ16 and council's matter 1. In response to	No Likely Significant Effect.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			179, 181, 200, 224, 236, 247, 256, 260, 265, 270, 278, 288, 294, 309, 315, 319, 327, 332, 339, 344, 350, 353, 358, 364, 366, 370, 378, 384, 389, 396, 403, 408, 413, 420, 425.	inspectors' preliminary questions and council's matter 1.	This modification proposes changes to wording to remove references to "non-strategic allocations", the change does not impact the original HRA conclusions unaffected.
MM67	Page 179 and 180	Policy AP1	**Policy AP1 Land at Warren Close, Brandon** A site of 0.67 hectares at Warren Close, as shown on the policies map, is allocated for **around** 20 homes. The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations and open space to the south **in accordance with policy LP57**. **Existing pedestrian connectivity should be maintained and enhanced with an east-west route through the site.** ~~c. Existing pedestrian connectivity should be maintained and enhanced with an east-west route through the site.~~ d. Fully accessible informal and formal open space and play space. e. Green and blue infrastructure that will include: • Strategic landscaping • Sustainable drainage systems features. • Existing woodland and mature trees which should be retained and enhanced. **Noise mitigation** Given the proximity to RAF Lakenheath, development must incorporate appropriate noise mitigation measures. **Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. Information to inform a project level appropriate assessment will **also** be required **in accordance with policy SP7.** **Archaeology** ~~Any planning application should be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts. Geophysical survey in the first instance would inform on the scope and timing of intrusive trial trenched evaluation.~~ **An archaeological evaluation will be required in accordance with policy LP55.**	See council's response to Matter 4. In response to inspectors' action point AP9 contained in IN11, and action point AP6 contained in IN10.	No Likely Significant Effect. This modification proposes changes to wording. It is now specific about the designated site which must be mitigated for recreational pressure, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
MM68	Page 181 and 182	Policy AP2	**Policy AP2 Brandon Cemetery** 	Site boundary amended to reflect land ownership. See council's matter 13.	No Likely Significant Effect. This modification proposes changes to the site boundary, the changes are not significant and therefore leave the original HRA conclusions unaffected.
MM69	Page 188 to 191	**Policy AP3**	**Policy AP3 Land north of Rougham Tower Avenue, Bury St Edmunds** A site of 63 hectares north of Rougham Tower Avenue, as shown on the policies map, is allocated for 20 hectares of employment land and around 500 homes. The amount of land available for development, phasing arrangements, location of uses, access arrangements, mix, design and scale of buildings and landscaping will be informed by a masterplan for the site. Applications for planning permission will only be determined once the masterplan has been agreed by the local planning authority. This masterplan will be prepared by the site promoters and be subject to public engagement with the local community and key stakeholders in accordance with the statement of community involvement. The additional specific requirements should be met:	See council's matter 4 and matter 15. In response to inspectors' action point AP6 contained in IN10, action point AP9 contained in IN11, and action point AP54 contained in IN12	No Likely Significant Effect. This modification proposes changes to wording. It is now specific about the designated site which must be considered for impacts and mitigated for recreational

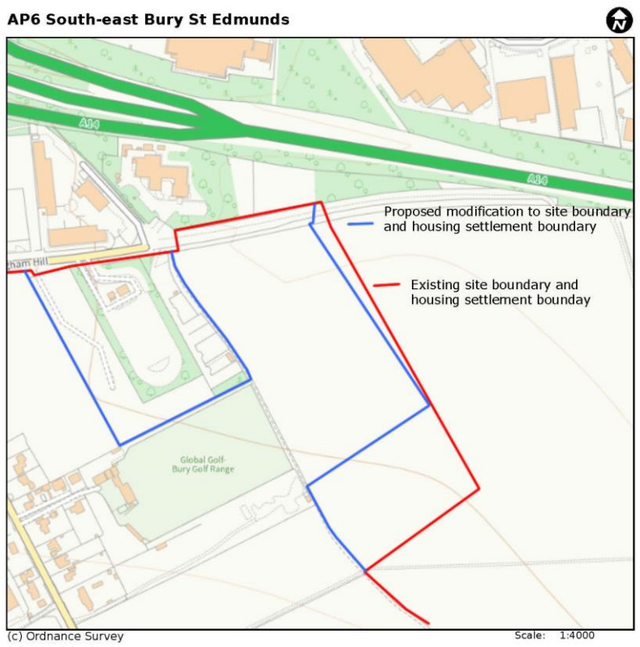
Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			a. Land sufficient for a primary school and early years setting. b. Provision for older person accommodation, including housing-with-care (including extra care) and/or a care home to be established through the preparation of the site masterplan. c. Community uses that might include a health facility, library, community building, to serve local needs. d. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged in accordance with** ~~in line with the provisions of~~ policy LP25. e. Fully accessible informal and formal open space and play space. f. Green and blue infrastructure that will include: • Strategic landscaping which could include suitable alternative natural greenspace. • Provision of buffers between areas of employment and residential use. • Retention of existing woodland and hedgerows. • Sustainable drainage systems features. g. Protection of the designated on-site heritage assets and their context through the provision of an appropriate safeguarding buffer for the setting of the listed control tower, radar rooms and other notable historic and associated landscape features (see below). h. Sustainable travel connections both within the site and to existing local destinations should be provided **in accordance with policy LP57,** including to Bury St Edmunds Town Centre, Moreton Hall Local Centre and primary and secondary schools to the east, ~~non-strategic~~ allocation ~~policy~~ AP7 (Mount Road) to the north, nearby public rights of way and the countryside. This should **also** include active travel infrastructure improvements to connect to and enhance **the** surrounding local cycling walking infrastructure ~~plan~~ network**, including a cycle and foot link between cycle path 51 and Rougham Tower Avenue.** **Employment** There should be a range of employment uses, and the mix and scale should be defined through the site masterplan. Suitable uses include: • Offices • research and development • light industrial • education and skills development to assist with providing employers access to a skilled workforce • storage and distribution. ~~The storage and distribution uses shall be no more than 9,000 square metres floorspace per unit, to ensure it meets the identified local employment needs as identified in the employment land review.~~ General industrial ~~and strategic logistics~~ provision will not be supported at this location due to the potential for their detrimental impact on adjacent existing and proposed residential development. In order to ensure the allocation brings forward 20 hectares of employment land to meet identified employment needs over the plan period, proposals for non- employment uses, will only be considered if it can be demonstrated it is no longer required in a review of the allocation in a subsequent local plan. ~~Well-connected walking and cycling routes should be located throughout the employment site forming a network of accessible and safe routes to surrounding residential areas and public rights of way networks.~~ A landmark building at the gateway to Suffolk Business Park extension ~~to north-east corner of the site~~ should be delivered **with the location to be determined by the site masterplan.**		pressure, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~**1.1.1.3 Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ ~~A cycle and foot link between cycle path 51 and Rougham Tower Avenue should be provided.~~ **1.1.1.4 Biodiversity** An east-west green corridor should be provided to facilitate movement of bats and other species continuing the green wedge through Moreton Hall out to the countryside beyond the site. The development must mitigate for its recreational effects on **Breckland (SPA and SAC) and Bradfield Woods (SSSI)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.** **1.1.1.5 Heritage and archaeology** ~~Future development must demonstrate that any negative impacts on the significance of the designated heritage assets and their settings identified in the council's heritage impact assessment or any subsequent fieldwork assessment, have been avoided or mitigated through design.~~ Specific mitigation measures to help protect the significance of the heritage assets in the vicinity of the site should include: i. Retention of meaningful and focussed views of the control tower and radar building within the layout. j. Retention of some degree of open space around the control tower and radar building to provide an open setting and provide a buffer between them and the new development. k. Retention and enhancement of existing planting to maintain the enclosed setting at their points of access. l. Ensure low scale development at closest points to the listed buildings. m. Restrict the tallest development to the north-east corner of the site. n. An east west green corridor should be provided to reflect the historic context of the former runway. Prior to the determination of any planning application, a ~~further detailed~~ heritage impact assessment ~~should be submitted~~ **will be required in accordance with policy LP50**. ~~This should demonstrate how the settings and significance of the heritage assets and above mitigation measures have been addressed in the proposals.~~ ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.** **Minerals** This site is partially or wholly within a minerals consultation area. The quantity and quality of the minerals resources beneath the site and the feasibility of either extraction prior to development of the site or use of some of the sand and gravel in the development itself, should be assessed in consultation with Suffolk County Council as Minerals and Waste Authority, prior to any planning application being approved.		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
MM70	Page 192 to 195	**Policy AP4**	**5.2.27 The allocation requires the development to deliver a distributor road. The distributor road has a wider strategic rationale beyond providing access to the residential and other uses on the site and mitigating the transport impacts of that development. Its wider purpose is in providing a route from Haverhill to the A14 for HGV and other motorised traffic that both avoids Westley village, and the Town Centre of Bury St Edmunds. In addition, the road will reduce the number of vehicles using junctions 43 and 44 of the A14 when travelling between Haverhill and the A14.** **Policy AP4 West Bury St Edmunds ~~(strategic)~~** A site of 54.2 hectares at West Bury, as shown on the policies map, is allocated for around 600 homes and a distributor road linking Westley Road to Newmarket Road. The amount of land available for development, phasing arrangements, location of uses, access arrangements, mix, design and scale of buildings and landscaping will be informed by a masterplan for the site. Applications for planning permission will only be determined once the masterplan has been adopted by the local planning authority. This masterplan will be prepared by the site promoters and be subject to public engagement with the local community and key stakeholders in accordance with the statement of community involvement. The additional specific requirements should be met: a. An appropriate buffer to Westley village which could include suitable alternative natural greenspace, retained and new habitats. b. A minimum 25 metre landscape buffer for residential amenity should be provided to the Cambridge to Ipswich railway line to the north to protect resident amenity and mitigate against any noise and vibration issues. c. ~~A footway~~ **Foot** and cycleway ~~underpass~~ **infrastructure** that will create an attractive, unimpeded route that will eliminate the scope for conflict between pedestrians, cyclists and vehicles across the distributor road. d. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged in accordance with** ~~in line with the provisions of~~ policy LP25 e. Provision for older person accommodation, including housing-with-care (including extra care) and/or a care home to be established through the preparation of the site masterplan. f. Provide sufficient land to accommodate an early years setting. g. A two-hectare burial site ~~adjacent to Westley Church~~ and associated infrastructure to be explored through the preparation of the site masterplan. h. Fully accessible informal and formal open space and play space integrated within residential parcels on both sides of the distributor road. i. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development edge and reduce the visual impacts when viewed from the surrounding countryside. • Sustainable drainage systems features. Improve and create sustainable travel connections to existing local destinations **in accordance with policy LP57,** including **to** Bury St Edmunds Town Centre, the local centre at Ridley Road, primary school, nearby public rights of way and the countryside. This should **also** include active travel infrastructure improvements to connect to and enhance **the** surrounding	See council's matter 4 and matter 15. In response to inspectors' action point AP6 contained in IN10, action points AP9, A10a, AP10b, AP11 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording. It is now specific about the designated sites which must be considered for impacts, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			local cycling walking infrastructure ~~plan~~ network**, including maintaining and improving the public footpath which runs from Westley Church eastwards towards Bury St Edmunds** **1.1.1.6 Distributor road** The distributor road will connect Newmarket Road to the north with Westley Lane to the south and will provide direct access to the development. The road must accommodate heavy goods vehicles. **The trigger point for the delivery of the entire road shall be informed by a Transport Assessment agreed by the Highway Authority and National Highways.** The masterplan will need to address the full nature and route of the distributor road, together with its delivery and appropriate traffic mitigation measures in Westley, ranging from traffic calming to an outright ban on through traffic by the closure of Fornham Lane at one point. ~~**1.1.1.7 Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ ~~The public footpath which runs from Westley Church eastwards towards Bury St Edmunds should be maintained and improved.~~ ~~An off-site contribution is required for improved walking and cycling infrastructure to the town centre, local schools, West Suffolk Hospital and the wider countryside.~~ **Landscape and biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required~~. Retention of existing habitat features on-site including the tree belt across the high point of the site, and the boundary woodland to the north. Built development within the southern section of the site which is highly visible from the Horringer Farmland and Parks Locally Valued Landscape will be strictly limited to the distributor road and associated infrastructure. Strategic landscaping will be required to soften the visual impacts. **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.** **Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.** **Infrastructure**		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			The design and layout of the development must recognise the underground assets (sewer and water mains) on site appropriately.		
MM71	Page 196 to 197	Policy AP5	**Policy AP5 North-east Bury St Edmunds ~~(strategic)~~** A site of 89.5 hectares north-east of Bury St Edmunds, as shown on the policies map, is allocated for ~~up to~~ **around** 1375 homes. The site should provide as a minimum the following: a At least two points of access onto the A143 and creation of new foot and cycleway links into the site. b New cycle and pedestrian crossings of the A143, a cycle and pedestrian link through the existing railway underpass and a new footbridge at the Cattishall crossing. c Sustainable travel connections both within the site and to existing local destinations **in accordance with policy LP57**, including **to** nearby public rights of way and the countryside including but not limited to: • Link to Great Barton. • Link to Fornham Business Park. • Upgrading of Suffolk County Council Footpath 21. • Improved walking and cycling links to the town centre (including bus and rail stations). • Improvements to the Orttewell Road crossing. • Upgrading of Suffolk County Council Bridleway 5 and Bridleway 6. d Public open space and play equipment, allotments. e Provide a buffer to Cattishall and Great Barton. f Green and blue infrastructure across the site that will include strategic landscaping and sustainable drainages systems features. g A new local centre of sufficient size to meet the needs of the development. h Land sufficient to accommodate a primary school. i Highway improvements within Bury St Edmunds to include, but not limited to: • Contribution towards junction improvements and/or the promotion of methods of sustainable transport. • Improvements to the A143 and Fordham Road junction. • Improvements between A14 J43 and Northgate roundabout. • Traffic calming on East Barton Road. • Improvements to A143 and A134 roundabout (south) approach. j Improvements to public transport linking the site to the town centre and bus and rail stations. k Delivery of a community building for use by future residents. l Retain and enhance the existing woodland, hedgerows, trees including veteran trees and boundary features and provide appropriate buffers. ~~m~~ The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ Any proposal should not prejudice the future delivery of an A143 Great Barton Bypass. **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.**	See council's matter 4 and matter 15. In response to inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording. It is now specific about the designated site which must be considered for impacts and mitigated for recreational pressure, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM72	Page 198 to 199	Policy AP6	5.2.30 A concept statement (2013) and masterplan (2015) have been adopted for the site and an outline planning application DC/15/2483/OUT was approved in March 2020 for up to 1250 homes, relief road, local centre, community hub,	See council's matter 4 and matter 15. Site	No Likely Significant Effect.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			primary school and associated infrastructure. **Since then various reserved matters applications have been approved and development has commenced on site.** **Policy AP6 South-east Bury St Edmunds ~~(strategic)~~**  A site of 75 hectares south-east of Bury St Edmunds, as shown on the policies map, is allocated for ~~up to~~ **around** 1250 homes. The site should provide as a minimum the following: a. A relief road between Rougham Hill roundabout and Sicklesmere Road and associated highways works including a River Lark crossing. b. Sustainable travel connections both within the site and to existing local destinations **in accordance with policy LP57**, including nearby public rights of way and the countryside, including a route into Nowton Park. c. A new local centre of sufficient size to meet the needs of the development and community facilities (in the form of a community building or centre or equivalent). d. Land sufficient to accommodate: • A primary school • Sports playing fields • allotments • open space and play equipment. e. Green and blue infrastructure that will include: • Strategic landscaping which will include measures to minimise the visual impacts of the new development on the	boundary changes to reflect planning permission DC/15/2483/OUT. In response to inspectors' action point AP9 contained in IN11.	This modification proposes changes to wording. It is now specific about the designated site which must be considered for impacts and mitigated for recreational pressure, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Horringer Farmland and Parks Locally Valued Landscape, to the south-east boundary. • Sustainable drainage systems features. • Retention of existing woodland, mature trees and hedgerows within the site. • Twenty-five metre dark corridor linking the River Lark to Nowton Park. • Thirty metre buffer to either side of the River Lark within the site. f. Design of the landscape planting and streets to minimise the impact of the existing retained power lines within the site. g. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ h. Any proposal should positively use the framework for new development provided by the existing natural environment and character of the area including the maintenance of significantly important open spaces that provide views towards the cathedral tower. Proposals should also **ensure that that there is no increase in flooding off site.** ~~make a positive contribution to reducing the potential for flooding both in the area and downstream in the Lark Valley.~~ **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.**		
MM73	Page 200 to 201	Policy AP7	**Policy AP7 Land to the north of Mount Road, Bury St Edmunds** A site of ~~7.9~~ **8.04** hectares to the north of Mount Road Bury St Edmunds, as shown on the policies map, is allocated for around 120 homes. The site should also deliver the following: a. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged** in **accordance** ~~line~~ with ~~the provisions of~~ policy LP25. b. A minimum 25 metre landscape buffer for residential and ecological amenity should be provided between the site and the railway to the north. c. Existing boundary hedgerows and trees should be retained and enhanced, and new hedgerows to the southern boundary. d. Fully accessible informal and formal open space and play space. e. Green and blue infrastructure that will include strategic landscaping including a buffer of at least 15 metres on the eastern boundary to further reduce the visual impact of the development from the countryside beyond and sustainable drainage systems features. f. Sustainable travel connections both within the site and to existing local destinations should be provided **in accordance with policy LP57,** including to Moreton Hall to the west and strategic allocation policy AP3 (Land north of Rougham Tower Avenue, Bury St Edmunds) to the south. Connections should also be provided to primary and secondary schools, the local centre **at Lark Grange** ~~to the south~~ and nearby public rights of way and the countryside. This should **also** include active travel infrastructure improvements to connect to and enhance **the** surrounding local cycling walking infrastructure ~~plan~~ network. **Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC) and Bradfield Woods (SSSI)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8. ~~Recreational effects of development~~.	See council's matter 4 and matter 15. In response to inspectors' action point AP6 contained in IN10, and AP9 and AP12 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording. It is now specific about the designated site which must be considered for impacts and mitigated for recreational pressure, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~Information to inform a project level appropriate assessment will be required.~~ **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.** ~~**1.1.1.9 Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any planning application for development on the site.~~ **0 Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application should be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts. Geophysical survey in the first instance would inform on the scope and timing of intrusive trial trenched evaluation.~~ **1 Minerals** This site is partially or wholly within a minerals consultation area. The quantity and quality of the minerals resources beneath the site and the feasibility of either extraction prior to development of the site or use of some of the sand and gravel in the development itself, should be assessed in consultation with Suffolk County Council as Minerals and Waste Authority, prior to any planning application being approved.		
MM74	Page 203 to 205	Policy AP8	**Policy AP8 Former railway sidings, Bury St Edmunds** A site of 3.3 hectares at the former railway sidings in Bury St Edmunds, as shown on the policies map, is allocated for around 200 homes. The amount of land available for development, phasing arrangements, location of uses, access arrangements, mix, design and scale of buildings and landscaping will be informed by a masterplan for the site. Applications for planning permission will only be determined once the masterplan has been agreed by the local planning authority. This masterplan will be prepared by the site promoters and be subject to public engagement with the local community and key stakeholders in accordance with the statement of community involvement. The additional following specific requirements should be met: a. A suitable buffer to the Cambridge to Ipswich railway line to the north to protect resident amenity and mitigate against any noise and vibration issues. ~~b. Vehicular access and on-site parking provision to meet the satisfaction of the highways authority.~~ c. Sustainable travel connections both within the site and to existing local destinations **in accordance with policy LP57,** including **to** the railway station, neighbouring developments at Tayfen Road, phase one of the Station Hill development area and Bury St Edmunds Town Centre. d. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged** in **accordance** ~~line~~ with ~~the provisions of~~ policy LP25. e. Strategic landscaping, sustainable drainage systems features, open space and public realm improvements to meet the site's requirements. f. Protection of the setting of Bury St Edmunds Railway Station and Yard Signal Box (off-site and both grade II listed) and Burlington Mill (off-site undesignated heritage asset). g. Appropriate cycle and bin storage should be provided within each residential block. h. All residential parking spaces should be provided with an operational electric vehicle charging point **in accordance with policy LP3**.	See council's matter 4 and matter 15. In response to inspectors' action point AP6 contained in IN10, action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording. It is now specific about the designated site which must be considered for impacts and mitigated for recreational pressure, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

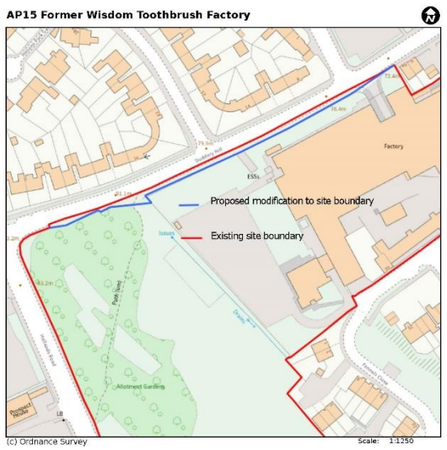
Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			1.1.1.12 Sustainable travel A transport assessment and travel plan will be required as part of any application for development on the site **in accordance with policy LP59**. This should address the requirement to utilise connections to the nearby residential developments, including Tayfen Meadows and Station Hill, and demonstrate measures will be undertaken to expand the car club that has been established on the Tayfen Meadows site as well as introducing other new and innovative initiatives. **1.1.1.13 Flood risk** Any planning application submitted should be accompanied by a flood risk assessment which addresses flood risk from and to the proposals from surface water, including a surface water drainage strategy. **1.1.1.14 Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ Any planning application must be accompanied by a full suite of ecological surveys. **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.** **1.1.1.15 Heritage** **Prior to the determination of** ~~A~~**a**ny planning application ~~must be supported by~~ a heritage impact assessment **will be required in accordance with policies LP50 and LP51.** ~~of structures on and adjacent to the site, including the station buildings, signal control box and Burlington Mill, and should demonstrate the impacts of development on the significance of structures and proposals for managing those impacts.~~ **1.1.1.16 Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.**~~Any planning application should be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts. Geophysical survey in the first instance would inform on the scope and timing of intrusive trial trenched evaluation.~~		
MM75	Page 206 to 207	Policy AP9	**Policy AP9 Land west of Rougham Road, Bury St Edmunds** A site of 15 hectares to the west of Rougham Road, as shown on the policies map, is allocated for use as amenity public open space for informal outdoor recreation. Any development on the land will be limited to that which is directly related to that use and must not have a detrimental impact on the setting of the Bury St Edmunds Town Centre Conservation Area in accordance with policy LP56. Initiatives will be supported that promote: a. Public access to the land for informal outdoor recreation. b. The provision of a cycle route and footpath linking Rougham Road and National Cycle Route 51. c. The provision of new areas of habitat and biodiversity opportunities in appropriate locations across the site. **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.**	See council's response to matter 13.	No Likely Significant Effect. This modification proposes changes to wording however improves protection for protected species, the changes do not introduce new

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
					development, leaving the original HRA conclusions unaffected.
MM76	Page 209 to 210	Policy AP10	**Policy AP10 West Suffolk Hospital** Within the site shown on the policies map at Hardwick Lane, Bury St Edmunds (known as the hospital site), support will be given for the provision of new buildings and extension of existing premises for health care and associated uses where: a. Efficient use of land is maximised. b. Adequate car parking is provided. c. Measures to promote sustainable modes of transport are incorporated into the development. d. Any development mitigates against any unacceptable impact on residential amenity and that of the surrounding area. e. Impact on the landscape is adequately mitigated and on-site landscape features including woodland, mature and veteran trees, parkland and grassland are retained, conserved and enhanced. **Policy AP10 West Suffolk Hospital** Within the site shown on the policies map at Hardwick Lane, Bury St Edmunds (known as the hospital site), support will be given for the provision of new buildings and extension of existing premises for health care and associated uses where: a. Efficient use of land is maximised. b. Adequate car parking is provided. c. Measures to promote sustainable modes of transport are incorporated into the development. d. Any development mitigates against any unacceptable impact on residential amenity and that of the surrounding area. e. Impact on the landscape is adequately mitigated and on-site landscape features including woodland, mature and veteran trees, parkland and grassland are retained, conserved and enhanced. f. The areas of irreplaceable habitat (as shown on the policies map) are safeguarded and are not negatively impacted on, either directly or indirectly. In addition, should major development be proposed above and beyond the new hospital planning permission (DC/22/0593/HYB), a site wide masterplan must be prepared which will need to take account of on-site constraints, increased demand for parking, traffic generation, sustainable modes of transport and environmental impacts on the site. The future management, design and development of the site should be sympathetic to sensitive environmental and heritage features and any potential adverse effects must be mitigated. **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.**	See council's response to matter 13.	No Likely Significant Effect. This modification proposes changes to wording. It is now specific about the designated sites which must be considered for impacts, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM77	Page 211 to 212	Policy AP11	**Policy AP11 West Suffolk Operational Waste Hub and reserved land** Site AP11(a) east of the A143 and south of Fornham Road, as identified on the policies map, is in existing use as an operational waste and associated services hub. Any future development on this land must be directly related to the current use.	See council's response to matter 13. In response to inspectors' action point AP9	No Likely Significant Effect. This modification

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Site AP11(b) to the east of the operational waste hub is identified on the policies map as land reserved to meet any future expansion of the operational hub. Should the reserved land be required in the plan period, the amount of land required for development, location of uses, access arrangements and design and landscaping, will be determined through discussions with West Suffolk Council and/or Suffolk County Council. Any application for development on this reserved land, which is wholly or mainly for the storage and/or processing of waste or associated activities, must be made to ~~West Suffolk Council and~~ Suffolk County Council as Minerals and Waste Authority. ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.**	contained in IN11.	proposes changes to wording. It is now specific about the designated site which must be considered for impacts, the changes do not introduce new development, leaving the original HRA conclusions unaffected.
MM78	Page 214 to 215	Policy AP12	5.2.48 ~~Strategic logistics, typically 9,000 square metres of floorspace or more, will not be supported on the remaining 10 hectares of the site, as the developed part of the allocation has been dominated by storage and distribution uses.~~ **Policy AP12 Suffolk Business Park extension, Bury St Edmunds** A site of some 72 hectares known as Suffolk Business Park extension, as shown on the policies map, is allocated for employment uses. As of 1 April ~~2023~~**2024**, about ~~10~~**7.7** hectares of land remained available for development for employment uses. The employment uses, mix and scale of development should be in accordance with the adopted site masterplan (2010). Suitable uses include: • Offices • research and development • light industrial • units for new and small firms involved in high technology and related activities • storage and distribution. **Provision of start-up units will be supported.** **General industrial uses will not be supported on this site.** ~~Strategic logistics provision more than 9,000 square metres floorspace per unit will not be supported on this site, as there is already a predominance of these uses. This is to ensure the remaining 10 hectares of the land available on this site meets the identified local employment needs as identified in the employment land review and supports the creation of skilled jobs in high and mid tech industries.~~ In order to ensure the employment allocation meets the long-term employment needs over the plan period, proposals for non-employment uses will only be considered if it can be demonstrated it is no longer required in a review of the allocation in a subsequent local plan.	In response to inspectors' action points AP44 and AP54 in IN12.	No Likely Significant Effect. This modification proposes changes to wording. It is now specific about the designated site which must be considered for impacts, the changes do not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~**Sustainable travel**~~ ~~Well-connected walking and cycling routes should be located throughout the employment site, forming a network of accessible and safe routes.~~ **Infrastructure** **There are a number of water mains within the proposed site that should be considered as part of any development.** **Green and blue infrastructure** Green and blue infrastructure within the site should include: • Strategic landscaping including to reduce the impact of proposals from the surrounding countryside to the south and east, to form a landscape framework and setting for the new development, and to soften the impact of new development on adjacent users and the business park environment. • A minimum 30 metre buffer along the A14 corridor. • Sustainable drainage systems features. • Existing hedgerows, trees and landscape features are to be retained and enhanced with appropriate buffers. **Biodiversity** **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.**		
MM79	Page 220 to 221	Policy AP13	**Policy AP13 North-west Haverhill ~~(strategic)~~** A site of 47.4 hectares north-west of Haverhill, as shown on the policies map, is allocated for mixed-use development to provide around 980 homes. The site should provide as a minimum the following: a. A relief road and associated strategic landscape buffers between Haverhill Road (A143) and Hales Barn Road and associated highways works. b. 2.5 hectares of land for a primary school and community centre. c. A local centre to include retail and community uses. d. Sustainable travel connections both within the site and to existing local destinations, including nearby public rights of way and the countryside **in accordance with policy LP57,** including but not limited to: • Cycle and footway route along northern edge of the site. • Cycle and pedestrian link to Hales Barn Road and further foot and cycle connection to existing route south of Billings Close. • Bus gate connection to Howe Road. • Improvements to footpath 45. • Improved walking and cycling links to Samuel Ward Academy and the town centre. • Byway open to all traffic crossing point and alternative crossing point to facilitate access to countryside to the north,	See council's matter 4 and matter 15. In response to inspectors' action point AP9 contained in IN11. In response to the inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			reducing impacts to Ann Suckling Way County Wildlife Site. e. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development edge and reduce the visual impacts on the surrounding countryside and provide buffers between the relief road and residential areas. • Green corridors across the site with retained and proposed habitats including mature hedgerows, trees, woodland, scrub and meadow areas. • Blue corridors and sustainable drainage systems features. f. Public open space, allotments and play equipment, with a minimum of three play spaces with a multi-use games area. g. Improvements to public transport including the provision of new bus stops and passenger travel boards. ~~h. The development must mitigate for its recreational effects on designated sites of nature conservation interest in accordance with Policy SP8 Recreational effects of development. Information to inform a project level appropriate assessment will be required.~~		
MM80	Page 222 to 223	Policy AP14	**Policy AP14 North-east Haverhill ~~(strategic)~~** A site of 175 hectares north-east of Haverhill, as shown on the policies map, is allocated for mixed-use development to provide ~~up to~~ **around** 2,500 homes. The site should provide as a minimum the following: a. At least two points of access into the site, one along the A143 and one along Chalkstone Way, with a primary road connection between the two accesses. b. New cycle and pedestrian connections along the A143 towards the town centre and a cycle and pedestrian link to Chalkstone Way. c. Land sufficient for two primary schools. d. Two new local centres of sufficient size to meet the needs of the development, including retail, community uses, offices and hospitality. Within the western local centre, 0.3 hectares of land should be reserved for health uses. e. Sustainable travel connections both within the site and to existing local destinations, including nearby public rights of way (PROW) and the countryside **in accordance with policy LP57,** including but not limited to: • Improvements to the existing PROW network within and adjacent to the site. • Upgraded PROW to Kedington. • Improved pedestrian and cycle links to the local schools and town centre. f. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development edge and reduce the visual impacts on the surrounding countryside. • Green corridors across the site with retained and proposed habitats including mature hedgerows, trees, including veteran trees, woodland, scrub and meadow areas. • Blue corridors and sustainable drainage systems features. • Great Fields Plantation woodland enhanced and managed with community access. g. Public open space including at least four equipped play spaces with a multi- use games area, allotments and country	See council's matter 4 and matter 15. In response to inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			park (which forms a buffer to Calford Green). h. Highway improvements within Haverhill to include but not limited to: • New roundabouts at the A143 and Chalkstone Way. • New signalised junction between Chalkstone Way and the A143. ~~i. The development must mitigate for its recreational effects on designated sites of nature conservation interest in accordance with Policy SP8 Recreational effects of development. Information to inform a project level Appropriate Assessment will be required.~~		
MM81	Page 224 to 226	Policy AP15	5.3.21 **Within t**~~T~~he **site there is a** large factory building that lies in between Duddery Hill and Colne Valley Road**. This building has no heritage designation and** is currently vacant. ~~It was used for manufacturing, before operations ceased in 2009.~~ The historic building within the **south-east part of the** site is currently in office use. This building would need to be retained on site as a heritage asset. The site forms part of the historic core of the town and will need to be sensitively integrated into the surrounding townscape, including maintaining views into the historic cores. **Policy AP15 Former Wisdom Toothbrush Factory, Colne Valley Road, Haverhill** **Insert new site plan showing revised boundary**  A site of 3.4 hectares at the former Wisdom Toothbrush Factory site, as shown on the policies map, is allocated for around 80 homes and 0.77 hectares of employment land. The amount of land available for development, phasing arrangements, location of uses, access arrangements, mix, design and scale of buildings and landscaping will be informed by a masterplan for the site. Applications for planning permission will only be determined once the masterplan has been agreed by the local planning authority. This masterplan will be prepared by the site promoters and be subject to public engagement with the local community and key stakeholders in accordance with the statement of community involvement. The additional specific requirements should be met: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11. In response to the inspectors' action point AP44 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			and nearby public rights of way **in accordance with policy LP57**. c. Retention and conservation of the non-designated heritage asset on site. d. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems features. • Retained and new trees, treelines, and habitats with appropriate buffers. e. Any masterplan and subsequent planning application must assess and consider the impact of land contamination on the site. **1.1.1.17 Employment** The employment uses, mix and scale should be defined through the site masterplan. Suitable uses include: • Offices • research and development • light industrial • education and skills development to assist with providing employers access to a skilled workforce. General industrial~~,~~ **and** storage and distribution ~~and strategic logistics~~ will not be supported at this location due to the potential detrimental impact on both the current neighbouring and proposed residential development. **1.1.1.18 Biodiversity** Any planning application must be accompanied by a full suite of ecological surveys. ~~The development must mitigate for its recreational effects on designated sites of nature conservation interest in accordance with Policy SP8 Recreational effects of development. Information to inform a project level appropriate assessment will be required.~~ **1.1.1.19 Heritage** ~~Any masterplan and subsequent~~ **Prior to the determination of any** planning application~~,s must be supported by~~ a heritage impact assessment **will be required in accordance with policy LP51 in respect** of **the** non-designated heritage asset in the south-east of the site. ~~This should demonstrate the impacts of development on the significance of structure and proposals for managing those impacts.~~ **1.1.1.20 Archaeology** ~~Any planning application should be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts. Geophysical survey in the first instance would inform on the scope and timing of intrusive trial trenched evaluation.~~ **An archaeological evaluation will be required in accordance with policy LP55.**		
MM82	Page 232 to 235	Policy AP16	**Policy AP16 Land west of Mildenhall, south of West Row Road, Mildenhall ~~(strategic)~~** A site of 81 hectares north and south of West Row Road, known as land west of Mildenhall, as shown on the policies map, is allocated for ~~up to~~ **around** 1,300 homes, a minimum of five hectares of employment land and minimum of 10 hectares of suitable alternative natural green space. The additional specific requirements should be met:	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in	No Likely Significant Effect. This modification proposes

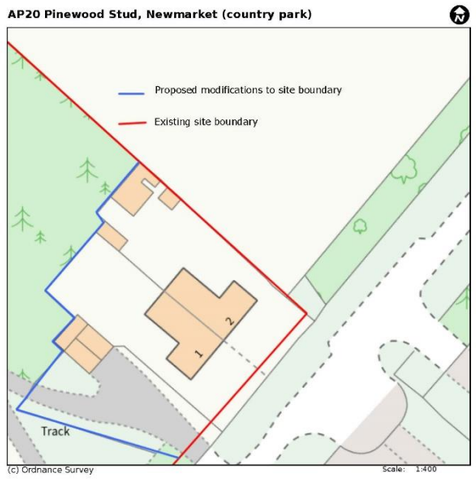
Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			a. Provision for older person accommodation, including housing-with-care (including extra care) and/or a care home to be established through the preparation of the site masterplan. b. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged in accordance with** ~~in line with the provisions of~~ policy LP25. c. Land sufficient to accommodate two early years facilities, one associated with the primary school and one within the local centre. d. Land sufficient to accommodate a primary school. e. A new local centre of sufficient size to meet the needs of the development. f. Community uses to include allotments g. Fully accessible informal and formal open space and play space, which includes a neighbourhood equipped area for play, local equipped area for play and destination play space located within the suitable alternative natural greenspace. h. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development edge and reduce the visual impacts on the surrounding countryside and provide buffers between areas of employment and residential use. • Sustainable drainage systems features. • Existing woodlands and hedgerows to be retained and enhanced through connection to the River Lark corridor and the wider landscape providing a framework of interconnecting green corridors for people and wildlife. i. Sustainable travel connections both within the site and to existing local destinations, including nearby public rights of way and the countryside **in accordance with policy LP57** including but not limited to: • Provide footway and cycle connections and improvements to the town centre, bus station and health facilities within Mildenhall. • Provide footway and cycle connections and improvements to Fiveways Roundabout and RAF Mildenhall. • Provide footway and cycle connections between the existing settlement edge and new development. j. Highway mitigation measures in and around Mildenhall will be required to mitigate the impact from the development. Such measures to be addressed through transport assessment. **Masterplan** Any planning application on the site will be required to be in accordance with the adopted masterplan. The adopted masterplan sets out the framework for the amount of land available for development, phasing arrangements, location of uses, access arrangements, mix and design and matters including landscaping and ecology. **Employment** The site will deliver a minimum five hectares of employment land. There should be a range of employment uses, mix and scale. Suitable uses include: • Offices • research and development • light industrial • general industrial • storage and distribution. ~~Strategic logistics provision will not be supported at this location due to the size of the site allocation not being suitable for~~	IN10, and action point AP9 contained in IN11. In response to the inspectors' action point AP44 contained in IN12.	changes to wording, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~large scale strategic logistic and potential for their detrimental impact on adjacent existing and proposed residential development.~~ In order to ensure the allocation brings forward employment land to meet identified employment needs over the plan period, proposals for non- employment uses, will only be considered if it can be demonstrated it is no longer required in a review of the allocation in a subsequent local plan. **Sustainable travel** A transport assessment and travel plan will be required as part of any application for development on the site. The provision of a responsive bus service shall be provided. The development of the site shall include footpath and cycle connections to the town centre, River Lark Valley and Suffolk County Council Bridleway 1 and provide improvements along these routes. **Landscape and biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ The measures must include the provision of suitable alternative natural greenspace (SANG) of at least 10 hectares in size ~~which is well connected via green corridors, and the enhancement and promotion of dog friendly facilities and access routes in the immediate vicinity of the development and/or other agreed measures~~. Information to inform an appropriate assessment will **also** be required ~~with any future planning application~~ **in accordance with policy SP7**. A substantial buffer (30 metres minimum) should be retained adjacent to the River Lark to maintain and enhance the connectivity of the river corridor for people and wildlife within the site and the wider landscape. This buffer could be the focus of the SANG. Off-site provision is required to mitigate for impacts on farmland birds and arable flora. **Infrastructure** Existing water mains and sewers cross this site, and the site layout should be designed to take these into account. Suitable access must be safeguarded for the maintenance of water supply and foul drainage infrastructure. An appropriate buffer to the sewerage treatment plant should be provided to mitigate odour impacts. **Heritage and archaeology** Development must have regard to the setting of Wamil Hall, a grade II listed building south-west of the site and the conservation area to the east **in accordance with policies LP50 and LP53**. In addition, views to the St Mary's Church must be protected. **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
MM83	Page 236 to 237	Policy AP17	**Policy AP17 Land at College Heath Road, Mildenhall** A site of 2.14 hectares at land at College Heath Road, as shown on the policies map, is allocated for around 53 homes (part of the site (former police station) has planning permission for eight homes. These home numbers are included within the indicative capacity for the site as a whole). The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations and nearby public rights of way **in accordance with policy LP57**. This should include active travel infrastructure improvements to connect to and enhance surrounding local cycling walking infrastructure ~~plan~~ network. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems features. • The existing trees on site should be retained and the veteran trees must not be adversely affected by any development and their setting should be enhanced. **1.1.1.21 Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required~~. ~~**1.1.1.22 Sustainable Travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **1.1.1.23 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**	In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM84	Page 239 to 240	Policy AP18	**Policy AP18 Mildenhall Academy and Dome Leisure Centre, Mildenhall** A site of four hectares at the former Mildenhall Academy and Dome Leisure Centre, as shown on the policies map, is allocated to deliver a minimum of three hectares of employment land. The site is suitable for the following uses: • Offices • research and development • light industrial • education and skills development to assist with providing employers access to a skilled workforce.	In response to the inspectors' action point AP44 and AP54 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording, it confirms the requirement for a project level

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Community uses are considered suitable within the Mildenhall Dome Leisure Centre. Should the community not acquire the site through the asset of community value in the future, the land associated with the built development of the Dome Leisure Centre will revert back to being suitable for employment uses. General industrial~~,~~ **and** storage and distribution ~~and strategic logistics~~ provision will not be supported at this location. **Biodiversity** **Redevelopment of site would need to have regard to the site's location adjacent to Breckland Special Protection Area which may limit the type of use that would be acceptable. A project level habitats regulations assessment will be required in accordance with policy SP7.** ~~**Sustainable travel**~~ ~~Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations and nearby public rights of way.~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **Heritage** ~~The dome is a listed building included on Historic England's National Heritage List and should remain in situ as part of any redevelopment scheme for the site. Any proposals which affect the exterior or interior of the building shall require listed building consent. Any new development within its vicinity should also have regard to its setting.~~ **Prior to the determination of any planning application a heritage impact assessment will be required in accordance with policies LP50.** **Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.** **Green and blue infrastructure** Green and blue infrastructure within the site should include: • Strategic landscaping including to reduce the impact of proposals from the surrounding countryside, to form a landscape framework and setting for the new development, and to soften the impact of new development on adjacent users. • Sustainable drainage systems features. • The existing woodland and trees are to be retained and enhanced with appropriate buffers.		HRA, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~Redevelopment of site would need to have regard to the site's location adjacent to Breckland Special Protection Area which may limit the type of use that would be acceptable. A project level habitats regulations assessment will be required.~~ Access should be maintained to the open space and sports pitches to the south of the site.		
MM85	Page 245 and 246	Policy AP19	**Policy AP19 Hatchfield Farm, Fordham Road, Newmarket** A site of 26 hectares of land at Hatchfield Farm, as shown on the policies map, is allocated for ~~up to~~ **around** 400 homes and five hectares of employment land. The site should provide as a minimum the following: a. Land sufficient for a primary school **and early years setting to be confirmed in accordance with policy AP23**. b. At least two points of access onto the A142 and creation of new foot and cycleway links into the site. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include strategic landscaping and sustainable drainage systems. e. Sustainable travel connections to existing local destinations, nearby public rights of way and the countryside **in accordance with policy LP57**. f. The development must mitigate for its recreational effects on **Breckland (SPA and SAC), Devils Dyke (SSSI and SAC) and Wicken Fen (Ramsar and Fenland SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8. ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ g. Highway improvements within Newmarket – to include (but not limited to): • Provision of new and enhanced crossing for the signalisation of the A14 and A142 junction, or other agreed measure. • The signalisation of the Rayes Lane and the Fordham Road and Snailwell Road Junction horse crossing. **1.1.1.24 Employment** There should be a range of employment uses, ~~and the~~ mix and scale. Suitable uses include: • Offices • research and development • light industrial • general industrial • storage and distribution • uses related to the equine life science and the horse racing industry. ~~Strategic logistics provision will not be supported at this location due to the size of the site allocation not being suitable for large scale strategic logistic and potential for their detrimental impact on adjacent existing and proposed residential development.~~ In order to ensure the allocation brings forward five hectares of employment land to meet identified employment needs over the plan period, proposals for non-employment uses, will only be considered if it can be demonstrated it is no longer required in a review of the allocation in a subsequent local plan. **1.1.1.25 Transport impacts** Permission will only be granted for development proposals where applicants can demonstrate that the transport impact of each proposal (including cumulative impacts where appropriate) on horse movements in the town, together with impacts on other users of the highway, has been assessed to: • Determine whether the proposal results in material adverse impacts and	See council's matter 4, matter 8 and matter 15. In response to Inspectors' action point AP9 contained in IN11, and action point AP44 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording and strengthens reference to Breckland SAC/SPA, Wicken Fen, and Devils Dyke SAC. It does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			• Where necessary, to identify any measures necessary to mitigate the individual (and, where appropriate, cumulative) transport impacts of development (which may include contributions to upgrading horse crossings and measures to raise awareness of the special circumstances and highway safety issues in Newmarket where appropriate).		
MM86	Page 248 to 250	Policy AP20	**Policy AP20 Pinewood Stud, Newmarket**  A site of 20 hectares at Pinewood Stud, Hamilton Road, as shown on the policies map, is allocated for around 415 homes, alongside a country park. The amount of land available for development, phasing arrangements, location of uses, access arrangements, mix, design and scale of buildings and landscaping, and the country park will be informed by a masterplan for the site. Applications for planning permission will only be determined once the masterplan has been agreed by the local planning authority. This masterplan will be prepared by the site promoters and be subject to public engagement with the local community and key stakeholders in accordance with the statement of community involvement. The additional specific requirements should be met: a. ~~Adequate~~ **Safe and suitable** access **for all users** off Exning Road should be provided. ~~to the satisfaction of the highways authority.~~ b. Any development should be sympathetic to the horse walk along Hamilton Road. **c. Land sufficient for a primary school and early year setting to be confirmed in accordance with policy AP23.** c. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged in accordance with** ~~in line with the provisions of~~ policy LP25. d. Fully accessible informal and formal open space and play space, to include: • Allotments • A multi-use games area • A circular running/walking track around the perimeter of the site. e. Green and blue infrastructure that will include: • Strategic landscaping, including a landscape buffer along Exning Road to mitigate noise impacts. • Retention of existing trees, woodland and hedgerows which should inform areas of development. • Sustainable drainage systems features.	See council's matter 4 and matter 15. Site boundary amended to reflect land ownership. In response to the inspectors' action points AP6 and AP7 contained in IN10, and action point AP9 contained in IN11	No Likely Significant Effect. This modification proposes changes to wording and strengthens reference to Breckland SAC/SPA, Wicken Fen, and Devils Dyke SAC and introduces a protective reference to New River water quality. It does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			f. Sustainable travel connections to existing local destinations, including the local centre at Elizabeth Avenue (LP41p), National Cycle Route 51, nearby public rights of way and the countryside **in accordance with policy LP57.** **Th**~~is~~**ese** shall include the creation of a new footway along the B1103 as well as bus stop improvements on Exning Road. **A new footpath and pedestrian crossing should be provided across Exning Road to Studland Park Avenue.** **1.1.1.26 Transport impacts** Permission will only be granted for development proposals where applicants can demonstrate that the transport impact of each proposal (including cumulative impacts where appropriate) on horse movements in the town, together with impacts on other users of the highway, has been assessed to: • Determine whether the proposal results in material adverse impacts and • Where necessary, to identify any measures necessary to mitigate the individual (and, where appropriate, cumulative) transport impacts of development (which may include contributions to upgrading horse crossings and measures to raise awareness of the special circumstances and highway safety issues in Newmarket where appropriate). ~~**1.1.1.27 Sustainable Travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ ~~A new footpath and pedestrian crossing should be provided across Exning Road to Studland Park Avenue.~~ **1.1.1.28 Landscape and Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC), Devils Dyke (SSSI and SAC) and Wicken Fen (Ramsar and Fenland SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. Information to inform a project level Appropriate Assessment will **also** be required **in accordance with SP7**. **This information must include an assessment of water quality impacts within the New River on downstream hydrologically connected European sites, the avoidance of increased sedimentation and eutrophication, and water quality surveys to inform future monitoring of mitigation installations.** **1.1.1.29 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.** **Minerals** This site is partially or wholly within a minerals consultation area. The quantity and quality of the minerals resources beneath the site and the feasibility of either extraction prior to development of the site or use of some of the sand and gravel in the development itself should be assessed, in consultation with the local minerals and waste authority (Suffolk County Council), prior to any planning application being approved. **Country park** An area for a country park is identified on the policies map. The masterplan should demonstrate how the design and construction of the park complements and can be delivered alongside this site allocation.		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
MM87	Page 252 to 253	Policy AP21	**Policy AP21 Land off High Street, Black Bear Lane and Rowley Drive (Queensbury Lodge), Newmarket** A site of 3.57 hectares that is located off High Street, Black Bear Lane and Rowley Drive, as shown on the policies map, is allocated for ~~up to~~ **around** 123 homes. The site should provide as a minimum the following: a. At least one point of **safe and suitable** access **for all users** onto the High Street and creation of new foot and cycleway links into the site. b. Sustainable travel connections both within the site and to existing local destinations, including nearby public rights of way **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure across the site that will include strategic landscaping and sustainable drainages systems features. e. Existing boundary hedgerows and trees should be retained and enhanced. f. A horse racing related use should be retained on the site. g. The development must mitigate for its recreational effects on **Breckland (SPA and SAC), Devils Dyke (SSSI and SAC) and Wicken Fen (Ramsar and Fenland SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **Historic environment** h. Any scheme for development of the site must be comprehensive and facilitate the restoration, repair, reinstatement and appropriate reuse of the listed buildings and preserve or enhance the character and appearance of the conservation area. It should reflect the significant contribution Fitzroy Paddocks makes to the conservation area owing to its openness, historic character and importance to the horse racing industry, and these attributes should be incorporated in any proposed scheme. i. A suitable scheme for the restoration, repair, reinstatement, and reuse of the listed buildings shall be approved prior to the development of the housing scheme. j. The restoration, repair, reinstatement and reuse of the listed buildings shall be completed prior to occupation of any home. **1.1.1.30 Transport impacts** Permission will only be granted for development proposals where applicants can demonstrate that the transport impact of each proposal (including cumulative impacts where appropriate) on horse movements in the town, together with impacts on other users of the highway, has been assessed to: • Determine whether the proposal results in material adverse impacts. • Where necessary, to identify any measures necessary to mitigate the individual (and, where appropriate, cumulative) transport impacts of development (which may include contributions to upgrading horse crossings and measures to raise awareness of the special circumstances and highway safety issues in Newmarket where appropriate).	See council's matter 4 and matter 15. In response to inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording and strengthens reference to Breckland SAC/SPA, Wicken Fen, and Devils Dyke SAC. It does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			1.1.1.31 Archaeology ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**		
MM88	Page 254 to 255	Policy AP22	**Policy AP22 Former St Felix Middle School site, Newmarket** A site of 4.5 hectares at the former St Felix Middle School site, as shown on the policies map, is allocated for around 50 homes. The site should deliver the following: a. ~~Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations and nearby public rights of way **in accordance with policy LP57**. The**se**~~is~~ should **also** include active travel infrastructure improvements to connect to and enhance surrounding local cycling walking infrastructure ~~plan~~ network. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include strategic landscaping and sustainable drainage systems. e. Retain the existing tennis courts and open space for public use and provide access and connectivity to this facility and open space from George Lambton Playing Fields. f. Protection and enhancement of the amenity and biodiversity of the Yellow Brick Road blue and green corridor and access route. g. Retain and enhance any hedgerow and boundary features and provide appropriate buffers. h. The development must mitigate for its recreational effects on **Breckland (SPA and SAC), Devils Dyke (SSSI and SAC) and Wicken Fen (Ramsar and Fenland SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **1.1.1.32 Transport impacts** Permission will only be granted for development proposals where applicants can demonstrate that the transport impact of each proposal (including cumulative impacts where appropriate) on horse movements in the town, together with impacts on other users of the highway, has been assessed to: • Determine whether the proposal results in material adverse impacts. • Where necessary, to identify any measures necessary to mitigate the individual (and, where appropriate, cumulative) transport impacts of development (which may include contributions to upgrading horse crossings and measure to raise awareness of the special circumstances and highway safety issues in Newmarket where appropriate). **1.1.1.33 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**	In response to inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording and strengthens reference to Breckland SAC/SPA, Wicken Fen, and Devils Dyke SAC. It does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
MM89	Page 255 and 256	Policy AP23	*Delete existing supporting text and policy and replace with new as below:* ~~**Land to expand Laureate Community Primary Academy**~~ ~~5.5.25 The level of growth planned for Newmarket area generates the potential need for Laureate Community Primary Academy to expand. A site is yet to be identified therefore a proactive policy has been prepared to support site selection and delivery.~~ ~~**Policy AP23 Land to expand Laureate Community Primary Academy**~~ ~~To cater for any projected need a site to provide an expansion to Laureate Community Primary Academy will be supported.~~ **Policy AP23 Primary School Provision in Newmarket** **5.5.25. The level of growth planned for the Newmarket area generates the need for infrastructure provision in relation to education during the plan period. There is a projected need for a primary school and early years setting identified by Suffolk County Council as the education authority.** **5.5.26. Whilst the need has been established, a site is yet to be identified by Suffolk County Council and therefore a proactive policy has been prepared to support site selection and delivery.** **AP23 Newmarket Primary School Provision** **To cater for the projected need, primary school and early years provision will be required in Newmarket.** **New provision will be confirmed by Suffolk County Council and may be located on one of the following options or an alternative, appropriately located site: :** • **AP19 Hatchfield Farm** • **AP20 Pinewood Stud** • **The former Scaltback Middle School site.** • **The Laureate Community Primary Academy site.**	In response to the inspectors' action point AP8 contained in IN10 and action point AP62 contained in IN13.	No Likely Significant Effect. This modification proposes changes to wording, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM90	Page 260 to 262	Policy AP24	5.6.10 This site ~~is surrounded by~~ **is located in the vicinity of** the following designated heritage assets as set out in the heritage impact assessment, including: • Feltons, Feltons Cottage and The Gables (all grade II listed buildings and off site) located to the north. • The Weeping Willow Public House (grade II listed building and off site) located to the north-west. • Barrow House and Thatched Cottage (both grade II listed buildings and off site) located to the west. **Policy AP24 Land off Bury Road, Barrow** A site of 10 hectares off Bury Road, as shown on the policies map, is allocated for around 150 homes. The site should also deliver the following:	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			a. **A safe and suitable** ~~Adequate~~ access **for all users should be provided** onto Bury Road. ~~should be provided to the satisfaction of the highways authority.~~ b. **The provision** ~~Provide~~ **of** custom and self-build plots **will be encouraged** in **accordance** ~~line~~ with ~~the provisions of~~ policy LP25. c. Sustainable travel connections to existing local destinations **in accordance with LP57. These should include**~~, including~~ the primary school, nearby public rights of way~~, and~~ the countryside **and existing neighbouring development.** ~~d. Pedestrian and/or cycle linkages to existing neighbouring development.~~ e. Fully accessible informal and formal open space and play space. f. Green and blue infrastructure that will include: • Strategic landscaping including along the southern and eastern boundaries of the site to soften the development edge and reduce the visual impacts on the wider countryside. • Sustainable drainage systems features that will also address and improve drainage along the Bury Road site frontage. • The existing small woodland and hedgerows on the site should be retained and enhanced with appropriate buffers. ~~**1.1.1.34 Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ ~~An off-site contribution towards the delivery of a car free route to Bury St Edmunds to replace the existing on road national cycle route.~~ **1.1.1.35 Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **1.1.1.36 Heritage** ~~Future development must demonstrate that any negative impacts on the significance of the designated heritage assets and their settings identified in the council's heritage impact assessment (HIA) or any subsequent fieldwork assessment, have been avoided or mitigated through design.~~ Specific mitigation measures to help protect the significance of the heritage assets in the vicinity of the site should include: • Enhancement of the existing planting along the Bury Road boundary. • Provision of denser planting along the eastern boundary to screen views from Feltons Cottage (grade II listed). Prior to the determination of any planning application a ~~further detailed~~ **heritage impact assessment will be required in accordance with policy LP50.** ~~HIA should be submitted. This should demonstrate how the settings and significance of the heritage assets and above mitigation measures have been addressed in the proposals.~~ **1.1.1.37 Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~		recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
MM91	Page 263 and 264	Policy AP25	**Policy AP25 Land off Denham Lane, Barrow** A site of 0.7 hectares off Denham Lane, as shown on the policies map, is allocated for around 15 homes. The site should also deliver the following: a. ~~Adequate~~ **A safe and suitable** access **for all users** should be provided onto Denham Lane. ~~to the satisfaction of the highways authority.~~ b. Sustainable travel connections to existing local destinations, nearby public rights of way and the countryside **in accordance with LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems features. • Existing hedgerows and mature trees should be retained and enhanced with appropriate buffers. **Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8. ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **Infrastructure** Part of the site lies within the safeguarding boundary of a **sewer pumping stations** and any new development must not inhibit its operation. **A 15 metre exclusion to the edge of any residential curtilage must be provided to minimise any adverse impacts such as odour that might arise from the operation of this facility.** **Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM92	Page 270 and 271	Policy AP27	**Policy AP27 land north of Cavendish Road, Clare** A site of 2.56 hectares to the north of Cavendish Road, as shown on the policies map, is allocated for residential development to provide ~~up to~~ **around** 53 homes. The site should provide as a minimum the following: a. ~~Access~~ **Safe and suitable access for all users** to be provided off Cavendish Road (A1092) and creation of new foot and cycleway links into the site. b. Off-site highway improvements, including a pedestrian and cycle route from the site to Stour Valley Community School, road markings and pedestrian crossing to the west of the site access**, in accordance with policy LP57**. c. Sustainable travel connections both within the site and to existing local destinations, including nearby public rights of way and the countryside and route to the south linking to Clare Castle Country Park and the town centre**, in accordance with**	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			policy LP57. d. Fully accessible open space to be provided on site and a financial contribution to play equipment which will be provided off-site. e. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development edge and reduce the visual impacts on the surrounding countryside. • Sustainable drainage systems features. • Existing hedgerows are to be retained and enhanced with appropriate buffers. f. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ ~~**1.1.1.38 Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **1.1.1.39 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**		mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM93	Page 273 and 274	Policy AP28	**Policy AP28 land south of Cavendish Road, Clare** A site of 5.36 hectares to the south of Cavendish Road, as shown on the policies map, is allocated for around 60 homes and a 30-space car park. The site should also deliver the following: a. ~~Adequate access should be provided to the satisfaction of the highways authority.~~ b. Thirty space car park to serve the country park and town centre, which includes the provision of a fully accessible access to footpath 18 via a linked green corridor. c. Sustainable travel connections both within the site and to existing local destinations, including Stour Valley School, nearby public rights of way and the countryside and route to the south linking to Clare Castle Country Park**, in accordance with policy LP57**. d. Fully accessible informal and formal open space and play space. e. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development edge and reduce the visual impacts on the surrounding countryside including to the south and east. • A buffer along the southern boundary of the site with Clare Castle County Park County Wildlife Site. • Sustainable drainage systems features. • Hedgerows on the northern and western boundaries which are to be retained and enhanced with appropriate buffers. f. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effect of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ ~~**1.1.1.40 Sustainable travel**~~	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **1.1.1.41 Heritage** ~~Future development must demonstrate that any negative impacts on the significance of the designated heritage assets and their settings identified in the council's heritage impact assessment (HIA) or any subsequent fieldwork assessment, have been avoided or mitigated through design.~~ Specific mitigation measures to help protect the significance of the heritage assets in the vicinity of the site should include: • Retaining and enhancing the existing trees and hedges, particularly along the northern edge of the railway cutting and the western edge of the site. • Creating a buffer between any the new development and Clare Hall (grade II listed) by locating open space in the north-east corner of the site and increasing landscaping along the northern boundary Prior to the determination of any planning application, a ~~further detailed~~ ~~HIA~~ **heritage impact assessment** ~~should be submitted~~ **will be required in accordance with policy LP50**. ~~This should demonstrate how the settings and significance of the heritage assets and above mitigation measures have been addressed in the proposals.~~ **1.1.1.42 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.** **1.1.1.43** **1.1.1.44 Infrastructure** Part of the site lies within the safeguarding boundary of a wastewater treatment facility and any new development must not inhibit its operation. **Any development should take into account the sewer located on the southern boundary in the design and layout of the site.**		
MM94	Page 278	Ixworth introduction	~~5.8.9 The site has been identified in the Ixworth Neighbourhood Plan which was subject to pre-submission consultation (regulation 14) from May to July 2023. The allocation seeks to bring forward a comprehensive approach to the delivery of mixed-use development on the site, to include housing, retail and community facilities.~~ ~~5.8.10 The site boundary and indicative capacity in this plan differs to that proposed in the neighbourhood plan to ensure that an area of surface water flood risk is avoided to the west.~~	See council's matter 4 and matter 15.	No Likely Significant Effect. This text has been removed leaving the original HRA conclusions unaffected.
MM95	Page 279 to 281	Policy AP29	**Policy AP29 Land at Bardwell Road, Ixworth**	See council's matter 4 and matter 15. In response to the inspectors' action point AP6	No Likely Significant Effect. This modification

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			A site of 9.8 hectares, as shown on the policies map, is allocated for mixed-use development to include around 145 homes, up to 300 square metres gross retail floorspace and associated car parking~~, and community uses~~. The site should also deliver the following: a. ~~Adequate access should~~ **A safe and suitable access for all users should** be provided **onto** ~~to the satisfaction of the highways authority from~~ Bardwell Road. b. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations within Ixworth village and nearby public rights of way **in accordance with policy LP57**. c. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged in accordance with** ~~in line with the provisions of~~ policy LP25. d. Fully accessible informal and formal open space and play space. e. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development edge and reduce the visual impacts on the surrounding countryside and provide buffers between areas of employment and residential use. • A green access corridor for cycling and walking adjacent to the Langridge. • Sustainable drainage systems features. • Existing hedgerows are to be retained and enhanced with appropriate buffers. f. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ ~~**1.1.1.45 Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ ~~An off-site contribution is required for the provision of a bridge crossing from Crown Lane across the A143 bypass, unless it is demonstrated not to be feasible. Where this is the case, the offsite contribution will be required to be used for enhancement and provision of non-vehicular links to the Public rights of way network and/or green open spaces.~~ **1.1.1.46 Heritage** ~~Future development must demonstrate that any negative impacts on the significance of the designated heritage assets and their settings identified in the council's heritage impact assessment, or any subsequent fieldwork assessment, have been avoided or mitigated through design.~~ Specific mitigation measures to help protect the significance of the heritage assets in the vicinity of the site should include: g. Retaining and reinforcing the trees and hedging along the eastern boundary to preserve and enhance the verdant setting of, and views in and out of, the conservation area. h. The scale of development should be appropriate to the rural location and reflect that of the existing agricultural buildings. i. New buildings should be positioned to protect views along the access track to Dairy Farm and its tree-lined approach. Prior to the determination of any planning application, a ~~further detailed HIA~~ **heritage impact assessment** ~~should be submitted~~ **will be required in accordance with policies LP50 and LP53**. ~~This should demonstrate how the settings and significance of the heritage assets and above mitigation measures have been addressed in the proposals.~~ **1.1.1.47 Archaeology**	contained in IN10, and AP9 and AP13 contained in IN11.	proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.

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			~~Any planning application should be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.** **1.1.1.48 Minerals** This site is partially or wholly within a minerals consultation area. The quantity and quality of the minerals resources beneath the site and the feasibility of either extraction prior to development of the site or use of some of the sand and gravel in the development itself should be assessed, in consultation with the local minerals and waste authority (Suffolk County Council), prior to any planning application being approved. **Infrastructure** **There are a number of water mains and wastewater assets within the proposed site that should be considered as part of any development.**		
MM96	Page 283 and 284	Policy AP30	**Policy AP30 Land off Crown Lane and west of A143, Ixworth** A site of 14 hectares, as shown on the policies map, is allocated for residential development ~~to include~~ **for** around 145 homes. The amount of land available for development, phasing arrangements, location of uses, access arrangements, mix, design and scale of buildings and landscaping will be informed by a masterplan for the site. Applications for planning permission will only be determined once the masterplan has been agreed by the local planning authority. The additional specific requirements should be met: a. ~~Adequate access should~~ **A safe and suitable access for all users should** be provided ~~to the satisfaction of the highways authority from~~ **onto** the A1088. b. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations within Ixworth village and nearby public rights of way and the countryside **in accordance with policy LP57. In addition, the masterplan process for the site should consider whether facilities for pedestrian and cyclists should include a foot/cycle bridge from the site across the A143 to link to existing public rights of way in the countryside to the east.** c. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged in accordance with** ~~in line with the provisions of~~ policy LP25. d. Land sufficient to accommodate a primary school and early years setting. e. Fully accessible informal and formal open space and play space. f. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems features. • The woodland on the eastern and northern edges of the site adjacent to the A1088 and the A143 provides important strategic landscaping and should be retained and enhanced as a buffer (excluding the access point into the site) as shown on the policies map. ~~• Land to facilitate the delivery of a bridge across the A143 must be reserved.~~ g. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ ~~**1.1.1.49 Sustainable travel**~~	In response to the inspectors' action point AP6 contained in IN10, and AP9 and AP14 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.

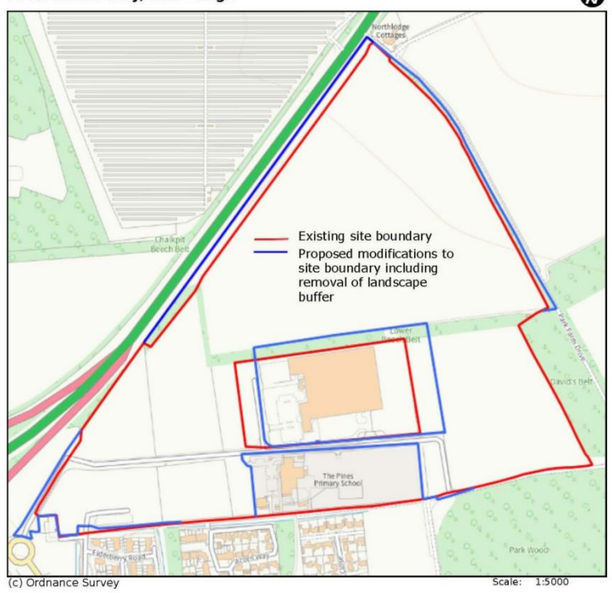
Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ ~~An off-site contribution is required for the provision of a bridge crossing from Crown Lane across the A143 bypass, unless it is demonstrated not to be feasible. Where this is the case, the offsite contribution will be required to be used for enhancement and provision of non-vehicular links to the public rights of way network and/or green open spaces.~~ **1.1.1.50 Archaeology** ~~Any planning application should be supported by the results of a programme of archaeological evaluation, with appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**		
MM97	Page 289 and 290	Policy AP31	**Policy AP31 Land at junction of Hall Road and Mill Road, Kedington** A site of 1.8 hectares at the junction of Hall Road and Mill Road, as shown on the policies map, is allocated for ~~up to~~ **around** 40 homes. The site should deliver the following: a. Alterations to existing vehicular access to provide a new junction with Mill Road **which provides a safe and suitable access for all users**~~., to the satisfaction of the highways authority.~~ b. Sustainable travel connections both within the site and to existing local destinations, including nearby public rights of way and the countryside **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development edge and reduce the visual impacts on the surrounding countryside. • Existing woodland and trees to be retained and enhanced. • Sustainable drainage systems features. e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8. ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~	See council's matter 4 and matter 15. In response to the inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM98	Page 294 and 295	Policy AP32	**Policy AP32 Matthews Nursery, High Street, Lakenheath** A site of 1.86 hectares at Matthews Nursery, as shown on the policies map, is allocated for mixed-use development to provide ~~up to~~ **around** 28 homes and **900** ~~1,000~~ square metres of commercial space. The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include:	See council's matter 4 and matter 15. In response to the inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			• Strategic landscaping including to soften and screen the development from the surrounding countryside. • Sustainable drainage systems features. • Retained protected trees. e. A landscape buffer to the cut-off channel to the west of the site, providing semi natural habitat. **1 Noise mitigation** Given the proximity to RAF Lakenheath, development must incorporate appropriate noise mitigation measures. **2 Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC) and Maidscross Hill (SSSI)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~		for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM99	Page 296 and 297	Policy AP33	**Policy AP33 Land west of Eriswell Road, Lakenheath** A site of 5.45 hectares west of Eriswell Road, as shown on the policies map, is allocated for residential development to provide ~~up to~~ **around** 140 homes. The site should also deliver the following: a. ~~Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping including measures to soften and screen the development from the fenland countryside to the west. • Sustainable drainage systems features. • A landscape buffer to the cut-off channel to the west of the site, providing semi natural habitat. • Retained pine line with an appropriate buffer along the eastern boundary of the site. **1.1.1.53 Noise mitigation** Given the proximity to RAF Lakenheath, development must incorporate appropriate noise mitigation measures. **1.1.1.54 Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC) and Maidscross Hill (SSSI)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. Information to inform a project level appropriate assessment will **also** be required **in accordance with policy SP7**.	See council's matter 4 and matter 15. In response to the inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM100	Page 298 and 299	Policy AP34	**Policy AP34 Land at Rabbithill Covert, Station Road, Lakenheath** A site of 3.45 hectares at Rabbithill Covert, as shown on the policies map, is allocated for residential development to provide ~~up to~~ **around** 81 homes.	See council's matter 4 and matter 15. In response to the inspectors' action point AP9	No Likely Significant Effect. This modification

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			The site should also deliver the following: a. **Safe and suitable access for all users** ~~Access~~ to be provided off Station Road (B1112) and creation of new foot and cycleway links into the site. b. Sustainable travel connections both within the site and to existing local destinations and adjacent allocations, including nearby public rights of way **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping. • Retention of the existing woodland with an appropriate buffer on the southern and western boundaries of the site. • Sustainable drainage systems features. **Noise mitigation** Given the proximity to RAF Lakenheath, development must incorporate appropriate noise mitigation measures. **Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC) and Maidscross Hill (SSSI)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. Information to inform a project level appropriate assessment will **also** be required **in accordance with policy SP7**.	contained in IN11.	proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM101	Page 300 and 301	Policy AP35	**Policy AP35 Land north of Station Road, Lakenheath** A site of 22.4 hectares at north of Station Road, as shown on the policies map, is allocated for mixed-use development to provide ~~up to~~ **around** 375 homes and land sufficient to accommodate a primary school. The site should also deliver the following: a. **Safe and suitable access for all users** ~~Access~~ to be provided off Station Road (B1112) and creation of new foot and cycleway links into the site. b. Sustainable travel connections both within the site and to existing local destinations and adjacent allocations, including nearby public rights of way **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • A substantial landscape buffer to the cut-off channel along the northern boundary of the site. • Strategic landscaping including to soften and screen the development from the surrounding countryside. • Sustainable drainage systems features. • The existing pine lines, woodland to the south and west, and grassland on the eastern boundary of the site should be retained and enhanced. **1.1.1.55 Noise mitigation** Given the proximity to RAF Lakenheath, development must incorporate appropriate noise mitigation measures. **1.1.1.56 Biodiversity**	See council's matter 4 and matter 15. In response to the inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			The development must mitigate for its recreational effects on **Breckland (SPA and SAC) and Maidscross Hill (SSSI)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. Information to inform a project level appropriate assessment will **also** be required **in accordance with policy SP7**.		
MM102	Page 302 and 303	Policy AP36	**Policy AP36 Land off Briscoe Way, Lakenheath** A site of 2.78 hectares off Briscoe Way, as shown on the policies map, is allocated for residential development to provide ~~up to~~ **around** 67 homes. The site should also deliver the following: a. **Safe and suitable access for all users** ~~Access~~ to be provided off Briscoe Way and creation of new foot and cycleway links into the site. b. Sustainable travel connections both within the site and to existing local destinations, including nearby public rights of way and the countryside **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems feature. **Noise mitigation** Given the proximity to RAF Lakenheath, development must incorporate appropriate noise mitigation measures. **Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC) and Maidscross Hill (SSSI)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **Infrastructure** Part of the site lies within the safeguarding boundary of a wastewater treatment facility and any new development must not inhibit its operation.	See council's matter 4 and matter 15. In response to the inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM103	Page 304 and 305	Policy AP37	**Policy AP37 Land north of Burrow Drive and Briscoe Way, Lakenheath** A site of 9.52 hectares north of Burrow Drive and Briscoe Way, as shown on the policies map, is allocated for residential development to provide ~~up to~~ **around** 100 homes. The site should also deliver the following: a. ~~Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations, adjacent allocations and nearby public rights of way. c. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged in accordance with** ~~in line with the provisions of~~ policy LP25. d. Fully accessible informal and formal open space and play space.	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			e. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems features. • Existing trees and habitats to be retained and enhanced. • A 30 metre minimum landscape buffer to the cut-off channel in the north and west of the site. ~~**1.1.1.57 Sustainable Travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **1.1.1.58 Noise mitigation** Given the proximity to RAF Lakenheath, development must incorporate appropriate noise mitigation measures. **1.1.1.59 Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **Flood risk** **The layout of the site should be based on a sequential risk-based approach with residential development directed to the areas at the lowest risk of all forms of flooding.** **1.1.1.60 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.** **1.1.1.61 Infrastructure** Part of the site lies within the safeguarding boundary of a wastewater treatment facility and any new development must not inhibit its operation.		for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM104	Page 310 to 312	Policy AP38	**Policy AP38 Land north of Acorn Way, Red Lodge**	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, AP9 and AP15 contained in IN11 and AP44 contained in IN12. New site map showing revised	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			AP38 Acorn Way, Red Lodge  A site of 2~~87.4~~ hectares north of Acorn Way, as shown on the policies map, is allocated for mixed-use development to provide ~~up to~~ **around 300** homes and eight hectares of employment land. The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. Community uses to meet the needs of the development, including sufficient land to allow for the expansion of the primary school. c. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations, adjacent allocation~~s~~ **AP39** and nearby public rights of way **in accordance with policy LP57**. d. Fully accessible informal and formal open space and play space. e. Green and blue infrastructure that will include: • Strategic landscaping including on the north-west boundary with the A11 and the north-east boundary to soften the development edge and reduce the visual impacts on the surrounding countryside**.** • ~~p~~**P**rovide buffers between areas of employment and residential use. • Sustainable drainage systems features. • Existing pine lines, tree belts and woodland (some protected by tree preservation orders) are to be retained with appropriate buffers and enhanced to provide a framework of interconnecting green corridors for people and wildlife. f. Appropriate noise mitigation measure along the A11 boundary. ~~**1.1.1.62 Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~	boundary to delete the green buffer and amend the allocation boundary along the A11 to accurately reflect the adopted masterplan and planning application.	not introduce new development, leaving the original HRA conclusions unaffected.

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			1.1.1.63 Biodiversity Information to inform a project level appropriate assessment will **also** be required **in accordance with policy SP7**. **1.1.1.64 Employment** The site will deliver eight hectares of employment land. There should be a range of employment uses, mix and scale. Suitable uses include: • Offices • research and development • light industrial • general industrial • storage and distribution. ~~Strategic logistics provision will not be supported at this location due to the size of the site allocation not being suitable for large scale strategic logistic and potential for their detrimental impact on adjacent existing and proposed residential development.~~ In order to ensure the allocation brings forward employment land to meet identified employment needs over the plan period, proposals for non- employment uses, will only be considered if it can be demonstrated it is no longer required in a review of the allocation in a subsequent local plan. **1.1.1.65 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**		
MM105	Page 313 and 314	Policy AP39	**Policy AP39 Land east of Warren Road, Red Lodge** A site of 5.5 hectares east of Warren Road, as shown on the policies map, is allocated for residential development for around 141 homes. The site should also deliver the following: a. ~~Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations, adjacent allocations and nearby public rights of way **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping • Sustainable drainage systems features. e. Development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to red Lodge Heath Site of Special Scientific Interest and Breckland Special Protection Area. Measure should include the enhancement and promotion of dog friendly access routes, in the immediate vicinity of the development(s), and/or other agreed measures. f. Development should have regard to the proper function of the existing sustainable drainage system infrastructure location on the site. ~~**1.1.1.66 Sustainable travel**~~	In response to the inspectors' action point AP6 contained in IN10, and AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **1.1.1.67 Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. Information to inform a project level appropriate assessment will **also** be required **in accordance with policy SP7**. **1.1.1.68 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**		conclusions unaffected.
MM106	Page 315	Policy AP40	*Policy AP40 to become a non-strategic policy, which should be after policy LP60 (parking standards, under the infrastructure chapter of the local plan.* ~~**Other non-strategic allocation**~~ **Secondary school ~~site~~, Red Lodge** ~~5.11.16 The level of growth planned for the Mildenhall, Lakenheath and Red Lodge area generates the need for infrastructure provision in relation to education during the plan period. There is a projected need for a new secondary school in Red Lodge, identified by Suffolk County Council as the education authority.~~ ~~5.11.17 Whilst the need has been established, a site is yet to be identified by Suffolk County Council and therefore~~ **The purpose of this policy is to provide** a proactive policy ~~has been prepared~~ to support site selection and delivery **of a secondary school at Red Lodge**. **Policy ~~AP40~~ LPXX Secondary school site, Red Lodge** To cater for the projected need, a site of around nine hectares to provide a secondary school will be supported. ~~If the site falls within Breckland Special Protection Area (SPA), special area of conservation, or site of special scientific interest impact pressure zone of influence, appropriate measures to mitigate impacts from the proposed development will be required.~~ Any planning application will require a project level habitats regulations assessment **in accordance with policy SP7** should the site fall within the Breckland SPA or associated buffer. **Explanation** **The level of growth planned for the Mildenhall, Lakenheath and Red Lodge area generates the need for infrastructure provision in relation to education during the plan period. There is a projected need for a new secondary school at Red Lodge, identified by Suffolk County Council as the education authority.**	See council's matter 13. In response to the inspectors' action point AP63 contained in IN13.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM107	Page 319 and 320	Policy AP41	**Policy AP41 Land east of Bury Road, Stanton** A site of 10.39 hectares to the east of Bury Road, as shown on the policies map, is allocated for around 200 homes. The	See council's matter 4 and matter 15. In	No Likely Significant Effect.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			site should also deliver the following: a. **A safe and suitable access for all users** ~~Adequate access~~ should be provided ~~to the satisfaction of the highways authority along~~ **onto** Bury Road (A143). b. ~~Community facilities, including the provision of allotments, car park and pavilion.~~ **Provision of community facilities if required in accordance with policy LP31.** c. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations and nearby public rights of way, which include foot and cycleways into village centre and existing community facilities **in accordance with policy LP57.** d. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged in accordance with** ~~in line with the provisions of~~ policy LP25. e. Fully accessible informal and formal open space and play space. f. Green and blue infrastructure that will include: • Strategic landscaping including a new boundary to the south with the countryside and to the west along the A143. • Sustainable drainage systems features. • Retention and enhancement of the existing species rich hedgerows providing appropriate buffers. g. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8. ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ ~~**1.1.1.69 Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **1.1.1.70 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.** **1.1.1.71 Mineral** This site is partially or wholly within a minerals consultation area. The quantity and quality of the minerals resources beneath the site and the feasibility of either extraction prior to development of the site or use of some of the sand and gravel in the development itself should be assessed, in consultation with the local minerals and waste authority (Suffolk County Council), prior to any planning application being approved. **Infrastructure** • **There are a number of water mains within the proposed site that should be considered as part of any development**	response to the inspectors' action point AP6 contained in IN10, and AP9 and AP16 contained in IN11.	This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM108	Page 322 to 323	Policy AP42	**Policy AP42 Shepherds Grove, Stanton and Hepworth** A site of 31 hectares known as Shepherd's Grove, as shown on the policies map, is allocated for employment uses. The amount of land available for development, phasing arrangements, location of uses, access arrangements, mix, design and scale of buildings and landscaping will be informed by a masterplan for the site. Applications for planning permission will	See council's response to matter 8. In response to the inspectors' action point AP44 and	No Likely Significant Effect. This modification

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			only be determined once the masterplan has been agreed by the local planning authority. This masterplan will be prepared by the site promoters and be subject to public engagement with the local community and key stakeholders in accordance with the statement of community involvement. There should be a range of suitable uses to include: • Offices • research and development • light industrial • general industrial • storage and distribution. **Provision of start-up units will be supported.** ~~Given the site's rural location, its remoteness from the trunk road network and to ensure the needs identified in the employment land review (2021) are met, strategic logistics provision over 9,000 square metres floorspace per unit, to meet regional and national distribution needs, will not be supported.~~ Any uses which do not accord with the spatial strategy, such as housing or retail development, will not be permitted on the site. In order to ensure the employment allocation meets the employment needs over the plan period, proposals for non-employment uses will only be considered if it can be demonstrated it is no longer required in a review of the allocation in a subsequent local plan. **Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **Sustainable travel** A transport assessment and travel plan will be required as part of any application for development on the site. The development will be expected to provide the necessary road infrastructure, including a new roundabout access on the A143 Bury Road and link road through to Grove Lane at Shepherds Grove west. **Green and blue infrastructure** Green and blue infrastructure within the site should include: • Strategic landscaping including to reduce the impact of proposals from the surrounding countryside, to form a landscape framework and setting for the new development, and to soften the impact of new development on adjacent users and the business park environment. • Sustainable drainage systems features.	AP54 contained in IN12.	proposes changes to wording, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			• Existing hedgerows, trees and the woodland to the south-east corner are to be retained and enhanced with appropriate buffers. **Infrastructure** **There are a number of water mains within the proposed site that should be considered as part of any development.**		
MM109	Page 327 and 328	Policy AP43	**Policy AP43 Land south of Hopton Road, Barningham** A site of 2.6 hectares **south of Hopton Road** ~~at the junction of Hall Road and Mill Road~~, as shown on the policies map, is allocat**ed**~~ion~~ for around 37 homes. The site should also deliver the following: ~~a. Adequate access should be provided onto Hopton Road to the satisfaction of the highways authority.~~ b. Sustainable travel connections to existing local destinations **in accordance with policy LP57**, including the primary school, nearby public rights of way**,** ~~and~~ the countryside **and existing neighbouring development**. ~~c. Pedestrian and cycle linkages to existing neighbouring development.~~ d. Fully accessible informal and formal open space and play space. e. Green and blue infrastructure that will include: • Strategic landscaping including to screen the visual impacts of development from the surrounding countryside. • Sustainable drainage systems features. • The existing hedgerows and boundary features should be retained and enhanced by providing appropriate buffers and a new connecting hedgerow to the south-east. **Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ ~~**Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~	See council's matter 15. In response to the inspectors' action point AP6 contained in IN10, action point AP9 contained in IN11, and action point AP17 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM110	Page 332 and 333	Policy AP44	**Policy AP44 Land at Lamble Close, Beck Row** A site of 2.33 hectares at Lamble Close, as shown on the policies map, is allocated for residential development to provide ~~up to~~ **around** 60 homes. The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. ~~Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations and nearby public rights of way.~~ **Sustainable travel connections to existing local destinations and nearby public**	See council's matter 4 and matter 15. In response to the inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It

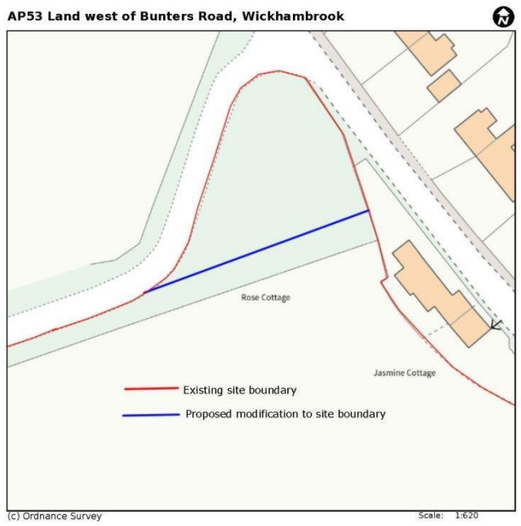
Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			rights of way in accordance with policy LP57. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems) features. • Retain and enhance the existing trees and pine line (some protected) with appropriate buffers. **1.1.1.72 Noise mitigation** Given the proximity to RAF Mildenhall, development must incorporate appropriate noise mitigation measures. **1.1.1.73 Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8. ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **1.1.1.74 Infrastructure** Part of the site lies within the safeguarding boundary of a sewage treatment facility to the south-west and any new development must not inhibit its operation and an appropriate buffer should be provided		confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM111	Page 334 and 335	Policy AP45	**Policy AP45 Land at Rookery Drove, Beck Row** A site of 5.3 hectares at Rookery Drove, as shown on the policies map, is allocated for residential development for around 100 homes. The site should also deliver the following: a. ~~Adequate access should be provided to the satisfaction of the highways authority.~~ b. ~~Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations and nearby public rights of way.~~ **Sustainable travel connections to existing local destinations and nearby public rights of way in accordance with policy LP57.** c. ~~Provide~~ **The provision of** custom and self-build plots **will be encouraged** in accordance ~~line~~ with ~~the provisions of~~ policy LP25. d. Sufficient land to accommodate an early years setting. e. Fully accessible informal and formal open space and play space. f. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems features. • Retain and enhance any existing hedgerows, scrub habitat on the northern boundary and other boundary features and provide appropriate buffers. ~~**1.1.1.75 Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **1.1.1.76 Noise mitigation and safeguarding** Given the proximity to RAF Mildenhall, development must incorporate appropriate noise mitigation measures.	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			In order to protect and ensure the operational needs of RAF Mildenhall are met, all buildings within the statutory safeguarding zone should be non- vulnerable and of a robust construction and design. **1.1.1.77 Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8.~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **1.1.1.78 Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **1.1.1.79 Minerals** This site is partially or wholly within a minerals consultation area. The quantity and quality of the minerals resources beneath the site and the feasibility of either extraction prior to development of the site or use of some of the sand and gravel in the development itself should be assessed, in consultation with the local minerals and waste authority (Suffolk County Council), prior to any planning application being approved. **1.1.1.80 Infrastructure** Part of the site lies within the safeguarding boundary of a sewage treatment facility to the north-west and any new development must not inhibit its operation and an appropriate buffer should be provided. **A 15 metre exclusion to the edge of any residential curtilage must be provided to minimise any adverse impacts such as odour that might arise from the operation of this facility.**		
MM112	Page 339 and 340	Policy AP46	**Policy AP46 Land off Bury Road, Hopton** A site of 3.25 hectares south of Bury Road, as shown on the policies map, is allocated for ~~up to~~ **around** 37 homes and community facilities. The site should provide as a minimum the following: a. **Safe and suitable access for all users** ~~Access~~ to be provided off Bury Road (B1111). b. Community facilities. c. Extension and alterations to Hopton Village Hall. d. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations and nearby public rights of way and a footpath link to the village centre **in accordance with policy LP57**. e. Fully accessible informal and formal open space and play space including a village green and football pitch. f. Green and blue infrastructure that will include: • Strategic landscaping including to reduce the visual impact of the development from the surrounding countryside. • Sustainable drainage systems features. • Existing hedgerows, trees and boundary features including the stream to the south are to be retained with an appropriate buffer and enhanced. **Biodiversity**	See council's matter 4 and matter 15. In response to the inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, it confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~		conclusions unaffected.
MM113	Page 345 and 346	Policy AP47	**Policy AP47 Land at Mill Lane, Hundon** A site of 0.52 hectares north-east of Mill Lane, as shown on the policies map, is allocated for around 10 homes. The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. ~~Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations and nearby public rights of way.~~ **Sustainable travel connections to existing local destinations and nearby public rights of way in accordance with policy LP57.** c. Connections to the existing playing fields to the east and open space to the north should be retained. d. Fully accessible informal and formal open space and play space. e. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems features. • Existing hedgerows, trees and treelines are to be retained and enhanced with appropriate buffers. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **1.1.1.81 Heritage** ~~Future development must demonstrate that any negative impacts on the significance of the designated heritage assets and their settings identified in the council's heritage impact assessment, or any subsequent fieldwork assessment, have been avoided or mitigated through design.~~ Specific mitigation measures to help protect the significance of the heritage assets in the vicinity of the site should include: • Retain and enhance the planting along the eastern boundary of the site and the conservation area. • Ensure the proposed development reflects the scale of the existing buildings in Mill Lane. Prior to the determination of any planning application, a ~~further detailed HIA~~ **heritage impact assessment** ~~should be submitted~~ **will be required in accordance with policy LP50**. ~~This should demonstrate how the settings and significance of the heritage assets and above mitigation measures have been addressed in the proposals.~~ **1.1.1.82 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**	In response to the inspectors' action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, it confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM114	Page 351 and 352	Policy AP48	**Policy AP48 Land east of School Road, Moulton** A site of 1.78 hectares to the east of School Road, as shown on the policies map, is allocated for around 30 homes. The site should also deliver the following: a. ~~Adequate~~ **A safe and suitable** access **for all users should be provided** onto the B1085. ~~should be provided to the~~	In response to the inspectors' action point AP6 contained in IN10, and action point AP9	No Likely Significant Effect. This modification proposes

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			~~satisfaction of the highways authority.~~ b. Sustainable travel connections to existing local destinations **should be provided in accordance with policy LP57**, including **to** the village to the south, the primary school, nearby public rights of way including the riverside footpath and the countryside. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping including a substantial new landscape buffer to the northern boundary of the site to form a new settlement edge and to soften the impact of the development from the surrounding countryside. • Sustainable drainage systems features. • Existing trees on the site and other boundary features should be retained and enhanced with appropriate buffers. • A minimum 50 metre buffer between the built development edge and the River Kennet should be retained to safeguard and enhance the ecological network and recreational green corridor. e. Development must be designed to take account of the edge of settlement location and open nature of the countryside. f. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8. ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ ~~**1.1.1.83 Transport**~~ ~~A transport statement will be required to consider congestion at the School Road and B1085 junction.~~ **1.1.1.84 Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~	contained in IN11.	changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM115	Page 359 and 360	Policy AP50	**Policy AP50 Land west of Kingshall Street, Rougham** A site of 2.68 hectares to the west of Kingshall Street, as shown on the policies map, is allocated for ~~up to~~ **around** 30 homes (The capacity includes the 13 homes subject to outline planning permission DC/19/1405/OUT). The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel **connections** ~~provision~~ **to existing local destinations should be provided in accordance with policy LP57** ~~including facilities for pedestrians and cyclists should be made with links to local destinations,~~ including **to** the primary school and Kingshall Street, and nearby public rights of way. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • strategic landscaping including to reduce the impact of the development from the surrounding countryside. • Sustainable drainage systems features. • The existing pond, hedgerows and boundary features with appropriate buffers are to be retained and enhanced including the provision of a new hedgerow to the west and south. e. Development must be designed to reflect the edge of settlement location and open nature of the countryside. ~~**1.1.1.85 Sustainable transport**~~ ~~A transport assessment will be required as part of any application for development on the site.~~	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			1.1.1.86 Biodiversity The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ The site is within a great crested newt (GCN) risk zone and participation in the GCN District Level Licensing Scheme should be considered. **1.1.1.87 Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~		conclusions unaffected.
MM116	Page 364 and 365	Policy AP51	**Policy AP51 Land east of Beeches Road, West Row** A site of 9.37 hectares to the east of Beeches Road, as shown on the policies map, is allocated for ~~up to~~ **around** 161 homes. The site should provide as a minimum the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. Community uses including parish office and car parking. c. ~~Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to local destinations and nearby public rights of way.~~ **Sustainable travel connections to existing local destinations and nearby public rights of way in accordance with policy LP57.** d. Fully accessible informal and formal open space and play space. e. Green and blue infrastructure that will include: • Strategic landscaping to include softening of the development edge and reduction of the visual impacts when viewing from the surrounding countryside to the east. • Sustainable drainage systems features. • Retention and enhancement of existing hedgerows and boundary features providing appropriate buffers. **Biodiversity** The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8.~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **Archaeology** ~~Any future planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.** **Infrastructure**	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.

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			The site lies within safeguarding area of waste transfer facility and any development should not impact on, or inhibit, its operation.		
MM117	Page 371 and 372	Policy AP53	*Amend site boundary to reflect landownership and land uses.* **Policy AP53 Land west of Bunters Road, Wickhambrook**  A site of 2.~~85~~**70** hectares west of Bunters Road, as shown on the policies map, is allocated for around 40 homes and community facilities and/or retail or local employment. The types and locations of these uses within the site will be determined through the neighbourhood plan. The site should also deliver the following: a. ~~Adequate~~ **A safe and suitable** access **for all users** should be provided ~~to the satisfaction of the highways authority via~~ **onto** the B1063 Bunter's Road. b. Sustainable travel connections to existing local destinations **in accordance with policy LP57**, including **to** the primary school and doctors' surgery, nearby public rights of way and the countryside. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development and settlement edge and reduce the visual impacts on the surrounding countryside in particular the long-distance views and to provide buffers between any areas of employment and residential use. • Sustainable drainage systems features. • Existing hedgerows and trees are to be retained and enhanced with appropriate buffers. e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required~~. ~~**1.1.1.88 Sustainable transport**~~ ~~A transport assessment will be required as part of any application for development on the site.~~	In response to the inspectors' action point AP6 contained in IN10, and action points AP9 and action point AP18 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			1.1.1.89 Heritage ~~Future development must demonstrate that any negative impacts on the significance of the designated heritage assets and their settings identified in the council's heritage impact assessment, or any subsequent fieldwork assessment, have been avoided or mitigated through design.~~ Specific mitigation measures to help protect the significance of the heritage assets in the vicinity of the site should include: • Retaining and enhancing the existing trees and hedges around the site. • Providing a buffer along Bunters Road so the new development is not readily apparent and the rural character of the road is maintained. • Using the design, layout and landscaping to create an enhanced view from Gaines Cottage. Prior to the determination of any planning application, a ~~further detailed~~ heritage impact assessment **will be required in accordance with policy LP50.** ~~should be submitted. This should demonstrate how the settings and significance of the heritage assets and above mitigation measures have been addressed in the proposals.~~ **1.1.1.90 Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any future planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~		
MM118	Page 379 and 380	Policy AP54	**Policy AP54 Land at School Lane, Bardwell** A site of 0.7 hectares at School Lane, as shown on the policies map, is allocated for around 15 homes. The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b.~~ Sustainable travel connections to existing local destinations, nearby public rights of way and the countryside.~~ **Sustainable travel connections to existing local destinations and nearby public rights of way in accordance with policy LP57.** b. Fully accessible informal and formal open space and play space. c. Green and blue infrastructure that will include: • Strategic landscaping to soften the development edge and reduce the visual impacts when viewed from the surrounding countryside and the conservation area. • Sustainable drainage systems features. • The trees on the site, particularly the mature oaks in the north-east corner, should be retained with appropriate buffers and enhanced by improving connectivity to the wider ecological corridor. d. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **1.1.1.91 Heritage** ~~Future development must demonstrate that any negative impacts on the significance of the designated heritage assets and their settings identified in the council's heritage impact assessment (HIA) or any subsequent fieldwork assessment, have been avoided or mitigated through design.~~	In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Specific mitigation measures to help protect the significance of the heritage assets in the vicinity of the site should include: • Retain and enhance the planting along the east boundary along the public footpath to maintain a green backdrop to the setting of the listed school and school house (both grade II listed). • Set the building line behind a landscaped frontage to maintain the green character of the street and views into and out of the conservation area. • Provide planting along the west side of the site to screen direct views of the development from the corner of the conservation area to the south-west. • Provide a specialist assessment of the impact of development on wind flow to the windmill (grade II listed) to demonstrate that the working of the windmill will not be adversely affected. Prior to the determination of any planning application, a ~~further detailed HIA~~ **heritage impact assessment** ~~should be submitted~~ **will be required in accordance with policy LP50**. ~~This should demonstrate how the settings and significance of the heritage assets and above mitigation measures have been addressed in the proposals.~~ **1.1.1.92 Archaeology** ~~Any future planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.** **1.1.1.93 Minerals** This site is partially or wholly within a minerals consultation area. The quantity and quality of the minerals resources beneath the site and the feasibility of either extraction prior to development of the site or use of some of the sand and gravel in the development itself, should be assessed in consultation local minerals and waste authority (Suffolk County Council), prior to any planning application being approved.		
MM119	Page 384 and 385	Policy AP55	**Policy AP55 Land east of Church Lane, Barton Mills** A site of 0.4 hectares east of Church Lane, as shown on the policies map, is allocated for around 12 homes. The site should also deliver the following: a. **A safe and suitable access for all users** ~~Adequate access~~ should be provided onto Church Lane ~~to the satisfaction of the highways authority~~. b. Sustainable travel connections to existing local destinations, and nearby public rights of way including the provision of a pedestrian crossing to footway on western side of Church Lane **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping to soften the development edge and reduce the visual impacts when viewed from the surrounding countryside. • Sustainable drainage systems features. • Existing hedgerows and boundary features to be retained with appropriate buffers and enhanced. e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~	In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development,

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Archaeology ~~Any future planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**		leaving the original HRA conclusions unaffected.
MM120	Page 389 and 390	Policy AP56	**Policy AP56 Land at Queens Lane, Chedburgh** A site of 0.6 hectares at Queens Lane, as shown on the policies map, is allocated for around 10 homes. The site should also deliver the following: a. ~~Adequate~~ **A safe and suitable** access **for all users** should be provided onto Queens Lane. ~~to the satisfaction of the highways authority.~~ b. Sustainable travel connections to existing local destinations, nearby public rights of way and the countryside **should be provided in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development edge and reduce the visual impacts from the surrounding countryside. • Sustainable drainage systems features. The existing intermittent hedgerows trees and boundary features to be retained with appropriate buffers and enhanced by improving connectivity to the wider ecological corridor. e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **1.1.1.94 Infrastructure** Any application for development should demonstrate how surface water flooding issues will be mitigated. **1.1.1.95 Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any future planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~	In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, it confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM121	Page 391 and 392	Policy AP57	**Policy AP57 Land west of Queens Lane, Chedburgh** A site of 1.5 hectares west of Queens Lane, as shown on the policies map, is allocated for around 12 homes. The site should also deliver the following: a. ~~Adequate~~ **A safe and suitable** access **for all users should be provided** onto Queens Lane. ~~should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel connections to existing local destinations, nearby public rights of way and the countryside **in accordance with policy AP57** to include: • The maintenance and enhancement of the east to west footpath crossing the site. • A pedestrian crossing to the footway on the western side of Queens Lane. c. Fully accessible informal and formal open space and play space.	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			d. Green and blue infrastructure that will include: • Strategic landscaping including to soften the development edge and reduce the visual impacts from the surrounding countryside. • Sustainable drainage systems features. • Existing trees and boundary features to be retained with an appropriate buffer and enhanced by providing new hedges to the northern and eastern boundaries improving connectivity to the wider ecological network. e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)**~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **1.1.1.96** **1.1.1.97 Infrastructure** Any application for development should demonstrate how surface water flooding issues will be mitigated. **There are a number of water sewers and mains within the proposed site that should be considered as part of any development.** **1.1.1.98 Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any future planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~		mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM122	Page 397 to 399	Policy AP58	**Policy AP58 Land adjacent to Moseleys Farm, Fornham All Saints** A site of 2.5 hectares at Moseley's Farm, as shown on the policies map, is allocated for around 10 homes as enabling development to bring forward 0.43 hectares of employment land and an extension to the village cemetery. The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel connections to existing local destinations, nearby public rights of way and the countryside **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems features. • Existing woodland, hedgerows and trees to be retained with appropriate buffers apart from any removal necessary to allow a link between the existing cemetery and its extension. e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level Appropriate Assessment will be required.~~ The planning application for the site will need to demonstrate how the proposed uses, their location, access arrangements, design and landscaping will be accommodated on the site and how these will be delivered. This is to ensure the enabling housing development secures the provision of employment land and the extension to the village cemetery. **1.1.1.99 Employment**	See council's matter 4, matter 8 and matter 15. In response to the inspectors' action point AP6 contained in IN10, action point AP9 contained in IN11 and action point AP44 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording, it confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			The employment uses, mix and scale should reflect that of the adjacent rural employment area at Moseley Farm, Fornham All Saints (policy SP12ak) being low rise, low density and high quality. Suitable uses include: • Offices • research and development • light industrial. **Provision of start-up units will be supported.** General industrial ~~and storage and distribution~~ will not be supported at this location due to the potential detrimental impact on both the current neighbouring and proposed residential development. **1.1.1.100 Extension to village cemetery** The cemetery extension must be suitably landscaped, enclosed and linked by a path to the existing facility. The extension should be of sufficient size to meet the burial demands of the parish for at least the next 75 years (the parishes current period exclusive right of burial) and must also have vehicular access with suitable turning space for a hearse and funeral cortege. **1.1.1.101 Sustainable travel** An appropriate off-site contribution shall be requested for the delivery of an active travel route between Fornham All Saints and Hengrave. The proposed route will form part of an improved green infrastructure network and help achieve the objectives set out in the Suffolk Rights of Way Improvement Plan. **1.1.1.102 Heritage** ~~Future development must demonstrate that any negative impacts on the significance of the designated and heritage assets and their settings identified in the council's heritage impact assessment, or any subsequent fieldwork assessment, have been avoided or mitigated through design.~~ Specific mitigation measures to help protect the significance of the heritage assets in the vicinity of the site should include • Retaining and enhancing the tree bank between the western boundary of site and the scheduled monument. • Having regard to the settings of the listed buildings within and surrounding the sites and locate new buildings where they would not adversely affect their settings. • Locating any new buildings within the site away from the boundaries, in order to maintain the character and appearance of the conservation area. • The design and scale of the new buildings and the palette of materials selected should reflect the historic use of the site and complement the existing buildings. Prior to the determination of any planning application, a ~~further detailed~~ heritage impact assessment **will be required in accordance with policy LP50 and LP55.** ~~should be submitted. This should demonstrate how the settings and significance of the heritage assets and above mitigation measures have been addressed in the proposals.~~ **Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			Biodiversity **The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.**		
MM123	Page 403 and 404	Policy AP59	**Policy AP59 Land fronting The Street, Fornham St Martin** A site of 0.4 hectares fronting The Street, as shown on the policies map, is allocated for around 10 homes. The site should also deliver the following: ~~a. Adequate access should be provided onto The Street to the satisfaction of the highways authority.~~ b. Sustainable travel connections to the wider village, nearby public rights of way and the countryside, including the provision of a pedestrian crossing to the footway on the eastern side of The Street **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems features. • The existing woodland and hedgerows to be retained with appropriate buffers and enhanced. e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**	In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM124	Page 408 and 409	Policy AP60	**Policy AP60 Land north of the Village Hall, Freckenham** A site of 0.7 hectares north of the village hall, as shown on the policies map, is allocated for around 10 homes. The site should also deliver the following: a. ~~Adequate~~ **A safe and suitable** access **for all users** should be provided onto Fordham Road. ~~to the satisfaction of the highways authority.~~ b. Sustainable travel connections to the wider village **in accordance with policy LP57**, **including to** nearby public rights of way and the countryside, ~~including~~ **and** the provision of a pedestrian crossing to the footway on the southern side of Fordham Road. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping to soften the development edge and reduce the visual impacts on the surrounding countryside. • Sustainable drainage systems features. • The existing hedgerow to be retained with an appropriate buffer, and connectivity to the ecological network enhanced through planting of native hedgerows on the boundaries.	In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts~~		new development, leaving the original HRA conclusions unaffected.
MM125	Page 413 and 414	Policy AP61	**Policy AP61 Land north of Troston Road, Honington and Sapiston** A site of 0.6 hectares **north of Troston Road** ~~north of the village hall~~, as shown on the policies map, is allocated for around 12 homes. The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel connections to existing local destinations, including the wider village, the national cycle route along Troston Road, nearby public rights of way and the countryside, including the provision of a pedestrian crossing to the footway on the southern side of Troston Road **in accordance with policy LP57**. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping to soften the development edge and reduce the visual impacts on the surrounding countryside. • Sustainable drainage systems features. • The existing boundary hedgerows and trees are to be retained with appropriate buffers and enhanced. e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ ~~**1.1.1.103 Sustainable travel**~~ ~~A transport assessment will be required as part of any application for development on the site.~~ **1.1.1.104 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.** ~~**Infrastructure**~~ ~~Part of the site lies within the safeguarding boundary of a wastewater treatment facility and any new development must not inhibit its operation.~~	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10 and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM126	Page 415 and 416	Policy AP62	**Policy AP62 Land south of Bardwell Road, Honington and Sapiston** A site of 0.6 hectares south of Bardwell Road, as shown on the policies map, is allocated for around 10 homes. The site should also deliver the following: a. **A safe and suitable access for all users** ~~Adequate access~~ **should be provided** onto Bardwell Road. ~~should be provided to the satisfaction of the highways authority~~.	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10	No Likely Significant Effect. This modification proposes

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			b. Sustainable travel connections to existing local destinations, nearby public rights of way and the countryside **in accordance with policy LP57**, including: • Extension of the existing footway to the site frontage. • Provision of a new bus shelter at the Coney Western Road stop. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping to soften the development edge and reduce the visual impacts on the surrounding countryside. • Sustainable drainage systems features. • The existing boundary hedgerows and trees, and the woodland to the east are to be retained with appropriate buffers and enhanced. e. The development must mitigate for its recreational effects **Breckland (SPA and SAC)**~~on designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ ~~**1.1.1.105 Sustainable travel**~~ ~~A transport statement will be required as part of any application for development on the site.~~ ~~**Infrastructure**~~ ~~Part of the site lies within the safeguarding boundary of a wastewater treatment facility and any new development must not inhibit its operation.~~ **1.1.1.106 Archaeology** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **An archaeological evaluation will be required in accordance with policy LP55.**	and action point AP9 contained in IN11.	changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM127	Page 420 and 421	Policy AP63	**Policy AP63 Land off Chevington Road, Horringer** A site of one hectare between Glebe Close and the A143 Chevington Road, as shown on the policies map, is allocated for around 10 homes. The site should also deliver the following: ~~a. Adequate access should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel connections to existing local destinations, nearby public rights of way and the countryside **in accordance with policy LP57**, including: • The provision of a footpath and cycle link onto the A143 Chevington Road. • Improvements to the nearest bus stop. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping. • Sustainable drainage systems features. • The existing boundary hedgerows and trees are to be retained with appropriate buffers and enhanced. e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8~~ Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ ~~**1.1.1.107 Sustainable travel**~~ ~~A transport statement will be required as part of any application for development on the site.~~ **1.1.1.108 Archaeology**	See council's matter 4 and matter 15. In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			An archaeological evaluation will be required in accordance with policy LP55. ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **Biodiversity** **The impact of the development on bats and the nearby Glen Chalk Caves Site of Special Scientific Interest (SSSI) and/or Horringer Court Caves SSSI must be assessed as part of any planning application.**		conclusions unaffected.
MM128	Page 425 and 426	Policy AP64	**Policy AP64 Land north of Griffin Gardens, Ingham** A site of 0.47 hectares west of the A134, as shown on the policies map, is allocated for around 10 homes. The site should also deliver the following: a. ~~Adequate and~~ **A** safe **and suitable** access **for all users should be provided** onto the A134. ~~should be provided to the satisfaction of the highways authority.~~ b. Sustainable travel connections to existing local destinations **in accordance with policy LP57**, including **to** the wider village, nearby public rights of way and the countryside. c. Fully accessible informal and formal open space and play space. d. Green and blue infrastructure that will include: • Strategic landscaping to soften the development edge and reduce the visual impacts on the surrounding countryside. • Sustainable drainage systems features. • Retain and enhance the existing hedgerow. e. The development must mitigate for its recreational effects on **Breckland (SPA and SAC)** ~~designated sites of nature conservation interest~~ in accordance with Policy SP8 ~~Recreational effects of development~~. ~~Information to inform a project level appropriate assessment will be required.~~ **Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~	In response to the inspectors' action point AP6 contained in IN10, and action point AP9 contained in IN11.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which mitigation for recreational pressure is required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM129	Page 430 and 431	Policy AP65	5.30.4 General industrial~~,~~ **and** storage and distribution ~~and strategic logistics~~ will not be supported at this site due to its rural location. **Policy AP65 Land adjacent to Park Farm, Fornham St Genevieve** A site of 4.4 hectares on land next to Park Farm, as shown on the policies map, is allocated for employment land. The amount of land available for development, location of uses, access arrangements, mix, design and scale of buildings and landscaping will be informed by a masterplan for the site. Applications for planning permission will only be determined once the masterplan has been agreed by the local planning authority. This masterplan will be prepared by the site promoters and be subject to public engagement with the local community and key stakeholders in accordance with the statement of community involvement.	See council's matter 13 and matter 15. In response to the inspectors' action point AP44 contained in IN12.	No Likely Significant Effect. This modification proposes changes to wording, It confirms the designated sites for which consideration is

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			The employment uses, mix and scale should reflect that of the neighbouring rural employment area at Park Farm, Fornham St Genevieve (policy SP12al) being low rise, low density and high quality. Suitable uses include: • Offices • research and development • light industrial. **Provision of start-up units will be supported.** General industrial~~,~~ **and** storage and distribution~~ and strategic logistics~~ will not be supported at this location due to its rural location. ~~**Sustainable travel**~~ ~~A transport assessment and travel plan will be required as part of any application for development on the site.~~ **Green and blue infrastructure** Green and blue infrastructure within the site should include: • Strategic landscaping including to reduce the impact of proposals from the surrounding countryside to the south and east, to form a landscape framework and setting for the new development, and to soften the impact of new development on adjacent users and the business park environment. • Sustainable drainage systems features. • Existing woodland and tree belts are to be retained and enhanced with appropriate buffers. **Archaeology** **An archaeological evaluation will be required in accordance with policy LP55.** ~~Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.~~ **Biodiversity** **The impact of the development on bats and the nearby Glen Chalk Caves Site of Special Scientific Interest (SSSI) and/or Horringer Court Caves SSSI must be assessed as part of any planning application.**		required, it does not introduce new development, leaving the original HRA conclusions unaffected.
MM130	Page 433 and 434	Policy AP66	**Policy AP66 Park Farm (St Genevieve Lakes), Ingham** A site of 86 hectares at Park Farm, Ingham, as shown on the policies map, is allocated for leisure, recreation and tourism. The following specific requirements should be met on the site: • Up to 100 holiday lodges.	See council's response to matter 13.	No Likely Significant Effect. This modification proposes changes to

<table>
<tr><th>Modification reference number</th><th>Location in submission draft document</th><th>Policy number or paragraph reference</th><th>Proposed modification</th><th>Reason for modification</th><th>Assessment</th></tr>
<tr><td></td><td></td><td></td><td>• Public footpath and cycleway access within the site and to the nearby villages of Fornham All Saints, Fornham St Genevieve, Ingham and Culford.
• Public transport links.
• Areas of public open space and recreational open space.
• A landscape managed to enhance nature conservation value and provide opportunities for contact with nature.
Development will be subject to the necessary planning controls to restrict the use of lodges to holiday accommodation only.

Sustainable travel

A transport assessment and safety audit will need to be provided as part of any proposal for development on the site.

Landscape and biodiversity

The area of woodland on the northern boundary of the site is to be retained and enhanced with an appropriate buffer to protect its integrity. All planning proposals should be supported by an up-to-date ecological survey to ensure that the existing habitats and species on the site are protected and enhanced.

The impact of the development on bats and the nearby Glen Chalk Caves SSSI and/or Horringer Court Caves SSSI must be assessed as part of any planning application.

Archaeology

Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.</td><td></td><td>wording, It confirms the designated sites for which consideration is required, it does not introduce new development, leaving the original HRA conclusions unaffected.</td></tr>
<tr><td>MM131</td><td></td><td>New Appendix A</td><td>Appendix A: Glossary of Terms
Note: where the term used is defined in the National Planning Policy Framework (NPPF) the definition links directly to the NPPF September 2023.

<table><tr><th>Acronym</th><th>Term</th><th>Definition</th></tr><tr><td></td><td>Section 106 agreement (s106)</td><td>Section 106 of the Town and Country Planning Act 1990 allows a local planning authority to enter into a legally binding agreement with a landowner as part of the granting of planning permission.</td></tr><tr><td></td><td>Accessible communities</td><td>Communities that are inclusive to all people and enable everyone to participate in and access all aspects of society.</td></tr><tr><td></td><td>Active travel and Active Travel England</td><td>Active travel refers to making journeys in physically active ways. Active Travel England is a government executive agency responsible for making walking, wheeling and cycling the preferred choice for people to get around.</td></tr><tr><td></td><td>Adoption</td><td>The final confirmation of a local plan document as having statutory (legal) status for implementation by a local planning authority.</td></tr><tr><td></td><td>Affordable housing</td><td>National Planning Policy Framework 2023</td></tr></table></td><td>For soundness and in response to the inspector’s preliminary questions and council’s matter 1.</td><td>No Likely Significant Effect.

This is a glossary of terms and as such has no impact on the HRA.</td></tr>
</table>

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
				Affordable housing for rent	National Planning Policy Framework 2023		
				Agricultural Land Classification System	The grading system used to assess and compare the quality of agricultural land in England and Wales. See also best and most versatile agricultural land (BMV).		
			AQMA	Air quality management areas	National Planning Policy Framework 2023		
				Anaerobic digestion plants	Anaerobic digestion (AD) plants process plant materials (biomass) into gas for heating, power or transport fuel. The gas is called methane or biogas. It is produced by bacteria, which digests biomass and produces methane as a by-product. Biomass includes anything that is plant-derived: municipal solid waste, manure, crop residues, compost, food waste, paper and wastewater. Crops can be grown specifically for use in AD, as a supplementary feedstock or a stabilising material.		
				Ancient Woodland	An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).		
				Ancient or veteran tree	A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.		
				Article 4 direction	National Planning Policy Framework 2023		
			AMR	Authority monitoring report	Report produced every year on the progress of preparing the local plan and the extent to which policies within it are being achieved.		
			ACV	Asset of community value	A local authority is able to designate a building and/or an area of land as an asset of community value to ensure the protection of the use of the building and/or land in the interest of a community.		
			BMV	Best and most versatile agricultural land	Classifies agricultural land into five categories according to versatility and suitability for growing crops. The top three grades (Grade 1, 2 and 3a) are referred to by the Ministry of Agriculture Fisheries and Foods as 'best and most versatile agricultural land' and enjoy significant protection from development. Grade 4 and 5 are described as poor quality agricultural land and very poor quality agricultural land.		
				Biodiversity	Biodiversity or biological diversity is the variety and variability of life on Earth.		
			BNG	Biodiversity net gain	Biodiversity net gain (BNG) is a way of creating and improving natural habitats that has a positive impact on biodiversity.		
				Biogenic material	Used as a term in construction means the material is from a biological source or derived from living matter such as timber. The term includes		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
					building materials such as glued laminated timber, known as Glulam, straw bale construction and hempcrete.		
				Biosecurity	Precautions that aim to prevent the introduction and spread of harmful organisms.		
				Brecks Pine Lines	Pine lines are the most familiar and iconic feature of the Brecks landscape. Comprising of long straight lines of contorted Scots and Corsican pines, they march across the landscape. They were originally planted as hedges to provide a windbreak for the crops in adjacent fields, but subsequently grew into twisted mature trees		
			BREEAM	Building Research Establishment Environmental Assessment Method	BREEAM sets the standard for best practice in sustainable building design, construction and operation. A BREEAM assessment uses recognised measures of performance, which are set against established benchmarks, to evaluate a building's specification, design, construction and use.		
				Brownfield land	(See previously developed land)		
				Build to Rent	National Planning Policy Framework 2023		
				Cambridge sub-region housing market area	The Cambridge housing sub-region is made up of seven district councils: five in Cambridgeshire and two in Suffolk: • Cambridge • East Cambridgeshire • Fenland • Huntingdonshire • South Cambridgeshire • The former Forest Heath (now West Suffolk Council) • The former St Edmundsbury (now West Suffolk Council).		
				Car club	Provides residents, visitors or businesses with access to a vehicle as a short-term rental.		
				Climate change adaptation	National Planning Policy Framework 2023		
				Climate change mitigation	National Planning Policy Framework 2023		
				Climate resilience	The ability of an area to respond to and withstand changes brought about by climate change.		
				Communities assessment excellent standard	The communities assessment is a BREEAM tool to measure, certify and improve the sustainability of large-scale developments.		
				Community facilities	Community facilities and services may include shops (which have a floorspace of less than 280 square metres), pubs, post offices, health care facilities, community centres, village halls, places of worship, cemeteries, schools and other educational establishments.		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
				Community Land Trust	**Democratic, non-profit organisations that own and develop land for the benefit of the community.**		
				Community-led developments	**A development instigated and taken forward by a not- for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local community, rather than being a primarily commercial enterprise. The organisation is created, managed and democratically controlled by its members. It may take any one of various legal forms including a community land trust, housing co-operative and community benefit society. Membership of the organisation is open to all beneficiaries and prospective beneficiaries of that organisation. The organisation should own, manage or steward the homes in a manner consistent with its purpose, for example through a mutually supported arrangement with a Registered Provider of Social Housing. The benefits of the development to the specified community should be clearly defined and consideration given to how these benefits can be protected over time, including in the event of the organisation being wound up.**		
				Community right to build order	**National Planning Policy Framework 2023**		
				Concept statement	**A concept statement is a simple, clear expression of the kind of place that a new development should create. It sets out how the policies and objectives of the local plan will apply to a specific site to deliver the best possible economic, social and environmental benefits. Concept plans prepared by the former St Edmundsbury Council are available on the website.**		
				County geodiversity site	**County Geo Sites are non-statutory designations aimed at highlighting sites of local geological interest in Suffolk.**		
				CWS	**County wildlife site**	**Non-statutory sites that are designated locally, in this case at the county level. 'County wildlife sites' are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery.**		
				Custom and self-build	**National Planning Policy Framework 2023**		
				Design and Access Statement	**A concise report which explains how a proposed development is suitable for a site and its setting and demonstrates that it can be adequately accessed by prospective users. This is required to be submitted with most types of planning application.**		
				Development brief	**A development brief provides a detailed framework for development of a site where a full masterplan approach is not required. Details of development briefs prepared for the former Forest Heath and St Edmundsbury councils from 2008 to 2019 are on the supplementary planning guidance page of the website.**		
				Design code	**National Planning Policy Framework 2023**		
				Design guide	**National Planning Policy Framework 2023**		
				Development management	**The term applied to the consideration and determination of planning applications by a local planning authority.**		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
				Development plan	The statutory development plan comprises the development plan documents contained in an authority's adopted local plans and neighbourhood plans and is defined by section 38 of the Planning and Compulsory Purchase Act 2004.		
				Discounted market sales housing	National Planning Policy Framework 2023		
			ELR	Employment land review	Assessment of the supply of and demand for employment land and floorspace.		
				Employment Uses	Employment uses include the following: Offices - Offices to carry out any operational or administrative functions, which can be carried out in a residential area without detriment to its amenity. Use class E(g)(i). Research and development - Research and development of products or processes, which can be carried out in a residential area without detriment to its amenity. Use class E(g)(ii) Light industrial - Industrial processes, which can be carried out in a residential area without detriment to its amenity. Use class E(g)(iii) General industrial - Use for industrial process other than one falling within class E(g)(iii) (excluding incineration purposes, chemical treatment or landfill or hazardous waste). Use class B2 Storage and distribution – use for storage and distribution including open air storage. Use class B8 Strategic logistics - use for storage and distribution, typically more than 9,000 square metres floorspace per unit, which are of a regional or national significance. Use class B8. Other employment uses - which do not neatly fall within the uses categories described above nor classified by legislation, are referred to as Sui generis uses, the Latin term meaning 'in a class of its own'.		
				Energy hierarchy	The energy hierarchy is a classification of energy options which is often illustrated as a pyramid or triangle with the best, most sustainable approach at the base of the diagram, and least sustainable approach at the top of the diagram.		
				Environmental constraints study	A study to establish the environmental constraints that are likely to impact on future growth of West Suffolk.		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
				Fabric first approach	Prioritises the energy efficiency of fabric and materials from the outset of a building project rather than considering these elements at a later stage.		
				Find my nearest	West Suffolk Council's public mapping system Find my nearest		
			FRA	Flood risk assessment	An assessment of the risk of flooding, particularly in relation to residential, commercial and industrial land uses. The Environment Agency requires a flood risk assessment to be submitted alongside planning applications in areas that are known to be at risk of flooding (within flood zones 2 or 3) and/or are greater than one hectare.		
				Flood zones	Flood zones refer to the probability of a river or the sea flooding, ignoring the presence of defences. The zones are shown on the Environment Agency's Flood Map available to view via their webpage.		
				Former Forest Heath area	The area of land previously under the authority of Forest Heath District Council.		
				Former St Edmundsbury area	The area of land previously under the authority of St Edmundsbury Borough Council.		
				Geodiversity	The range of rocks, minerals, fossils, soils and landforms.		
			GI	Green (and blue) infrastructure	A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.		
				Greenfield land	Land (or a defined site) which has never been built on before or where the remains of any structure or activity have blended into the landscape over time (opposite of brownfield).		
				Gypsies and Travellers	Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.		
			HRA	Habitats regulations assessment	A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.		
				Health and wellbeing statements	A statement accompanying a planning application describing how the development has been designed to assist in delivering the elements that contribute to improving the physical and mental wellbeing of people helping them to stay well and age well.		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
			HIA	Health Impact Assessments	A tool to identify and optimise the health and wellbeing impacts of planning.		
				Heritage asset	National Planning Policy Framework 2023		
			HER	Historic environment record	National Planning Policy Framework 2023		
				Horse crossing/Pegasus crossing	Rider operated traffic light-controlled road crossing		
			HRI	Horse racing industry	A term applied to the unique assembly of horse racing related interests concentrated in and around Newmarket.		
				Horse walks	The infrastructure that allows the movement of horses through Newmarket.		
				Housing settlement boundary	Represents the development limits of residential areas within which housing development proposals would be acceptable subject to complying with other policies contained in the development plan. They seek to prevent development from gradually extending into the surrounding countryside.		
				Indicative capacity	An estimate of the number of housing or intensity of economic uses that can be developed in an area.		
			IWM	Integrated water management	A collaborative approach to land and water governance that integrates social, environmental, and economic factors to deliver coordinated management of water storage, supply, demand, wastewater, flood risk, water quality and the wider environment.		
			IDP	Infrastructure delivery plan	The infrastructure delivery plan is an evidence base study supporting the local plan which sets out baseline information for those categories of settlements which could experience growth in this plan period.		
			LDS	Local development scheme	This sets out a programme for the preparation of local plan documents. It is a project management tool that identifies which documents are to be prepared, the various stages required in their production together with a detailed timetable.		
				Local green space	A green area of land identified by the community as of particular importance to them and protected through designation.		
			LHN	Local housing need	National Planning Policy Framework 2023		
			LNRS	Local Nature Recovery Strategy	Strategies that propose how and where to recover nature and improve the wider environment across England.		
				Local Nature Reserve	A statutory designation made by local authorities; they are places with wildlife or geological features that are of special interest locally.		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
			LVL	Locally valued landscape	Locally designated landscapes which are worthy of recognition because of their special landscape qualities.		
				Main town centre uses	Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).		
				Major development	National Planning Policy Framework 2023		
			M4(2)	M4(2): Accessible and adaptable dwellings	Building Regulations standard “when a new dwelling provides reasonable provision for most people to access the dwelling and includes features that make it suitable for a range of potential occupants, including older people, individuals with reduced mobility and some wheelchair users.”		
			M4(3)	M4(3): Wheelchair user dwellings	Building Regulations standard “when a new dwelling provides reasonable provisions for a wheelchair user to live in the dwelling and have the ability to use any outdoor space, parking and communal facilities.”		
			NPPF	National Planning Policy Framework	National Planning Policy Framework 2023		
			NPPG	National planning practice guidance	Online suite of national planning guidance intended to elucidate on sections of the national planning policy as contained in the National Planning Policy Framework.		
			NNR	National Nature Reserve	National Nature Reserves (NNRs) were established to protect some of our most important habitats, species and geology, and to provide ‘outdoor laboratories’ for research.		
				Natural assets	The natural wealth of the UK made up from rock, minerals, soil, air, water and all living material		
			NbS	Nature-based solutions	Ways of working with natural processes to provide benefits to both people and nature.		
				Nature recovery network	An expanding, increasingly connected, network of wildlife-rich habitats supporting species recovery, alongside wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation. It includes the existing network of protected sites and other wildlife rich habitats as well as and landscape or catchment scale recovery areas where there is coordinated action for species and habitats.		
				Neighbourhood area	An area designated by the Local Planning Authority following an application by the parish council or a prospective neighbourhood forum as part of the neighbourhood plan process.		
			NDO	Neighbourhood Development Order	A neighbourhood development order can grant planning permission for specific types of development in a specific neighbourhood area such as		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
					housing or offices. It can be prepared by a town or parish council or a neighbourhood forum.		
				Neighbourhood plan	A plan prepared by a parish council or neighbourhood forum for a particular neighbourhood area made under the Planning and Compulsory Purchase Act 2004.		
				Neighbouring authorities	The local authorities that are adjacent to West Suffolk Council. Namely: Babergh District Council Braintree District Council Breckland Council East Cambridgeshire District Council King's Lynn and West Norfolk Borough Council Mid Suffolk District Council South Cambridgeshire District Council		
				Net zero	"A person, company or country is carbon neutral if they balance the carbon dioxide they release into the atmosphere through their everyday activities with the amount they absorb or remove from the atmosphere. This is also called net zero carbon emissions or net zero carbon, because overall no carbon dioxide is added to the atmosphere." Natural History Museum		
				Nocturnal character	The sounds, smells and sights that exist at night without pollution or interference of any man-made activity.		
				Non-designated heritage assets	A heritage asset that does not meet the definition of a designated heritage asset.		
				Omission sites	These are sites which have been discounted and not proposed for allocation in this plan. Further details can be seen in the omission sites report on the council's background evidence page.		
				Passivhaus Passivhaus principles	Passivhaus adopts a whole-building approach with clear, measured targets, focused on high-quality construction, certified through an exacting quality assurance process. Buildings created to rigorous energy efficiency standards so that they maintain an almost constant temperature and require very little heating or cooling no matter what the outside temperature.		
				Permitted development rights	The Town and Country Planning (General Permitted Development) (England) Order 2015 is a statutory instrument that sets out a range of certain types of development that do not require planning permission, which are known as permitted development rights.		
				Placemaking	The shaping of public spaces and buildings through community-based participation, planning, design, delivery and management.		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
			PPTS	Planning Policy for Traveller Sites	Government planning policy set out in Planning policy for traveller sites - GOV.UK (www.gov.uk)		
				Previously developed land	National Planning Policy Framework 2023		
				Primary shopping area	National Planning Policy Framework 2023		
				RAMSAR site	A wetland habitat of international importance, designated under the 1971 Ramsar convention		
				Registered provider	This is a term used for all registered providers of social housing such as housing associations and local authorities.		
				Renewable and low carbon energy	National Planning Policy Framework 2023		
				Research and development use	See definition of employment uses above		
				Rural exception sites	National Planning Policy Framework 2023		
				Scheduled monument	A scheduled monument is a 'nationally important' archaeological site or historic building given protection against unauthorised change.		
				Sequential test	A comparison of sites in order to identify which development site might be better or worse for a particular use, particularly related to flooding or a sequential test of main town centre uses in accordance with the test set out in the National Planning Policy Framework.		
			SANG	Suitable alternative natural greenspace	Suitable alternative natural greenspace' (SANGS) is the name given to green space that is of a quality and type suitable to be used as mitigation to offset the impact of new residential development on European protected sites such as Special Protection Areas (SPAs) and Special Areas of Conservation.		
			SSSI	Site of special scientific interest	Sites designated by Natural England under the Wildlife and Countryside Act 1981.		
				Smart charging	Smart charging is a safe and convenient way of charging your electric vehicle (EV) at times when demand for electricity is lower, for example at night, or when there is lots of renewable energy on the grid. Charging during these off-peak times not only reduces costs for EV drivers by using cheaper energy rates, but also helps to prevent unwanted intervals of really high demand for electricity from the grid.		
			SAC	Special areas of conservation	Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 (as amended) which have been given special protection as important conservation sites.		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
			SPA	Special protection area	Areas classified under regulation 15 of the Conservation of Habitats Regulations 2017 (as amended) which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.		
				Starter homes	National Planning Policy Framework 2023		
			SCI	Statement of community involvement	A statement prepared by the local authority setting out how the community will be consulted and engaged with throughout the plan making and decision-making processes.		
			SEA	Strategic Environmental Assessment Directive	The European Strategic Environment Assessment Directive (2001/42/EC) (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) requires an assessment of certain plans and programmes including those related to planning and land-use.		
			SFRA	Strategic flood risk assessment	A strategic flood risk assessment, assessing sources of flooding, flood risk management, the impact of climate change and the need to address flood risk in new developments within the district.		
			SHELAA	Strategic housing and economic land availability assessment	One of the principal documents used in the preparation of the local plan. The SHELAA is produced periodically to help demonstrate that the area has sufficient sites to meet demand and it is a key evidence base for the local plan insofar as it considers the 'status' of all known sites within the area i.e. their availability, suitability, viability and deliverability.		
			SHMA	Strategic housing market assessment	A document which provides an objective assessment of the need for all homes, as well as for affordable homes, to inform local plan reviews.		
				Strategic logistics	See Employment Uses		
			SRN	Strategic road network	The structure of motorways and major trunk or A roads in England that are managed by National Highways.		
			SPD	Supplementary planning document	National Planning Policy Framework 2023		
			SA	Sustainability appraisal	A sustainability appraisal is a legal requirement and accompanies each stage of the local plan. This continuous appraisal process helps ensure this plan is in line with the aims of sustainable development.		
				Sustainable development	National Planning Policy Framework 2023		
			SuDS	Sustainable Drainage Systems	Land designed to manage local flood and stormwater by mimicking natural drainage and encouraging water infiltration, attenuation and passive treatment. SuDS provides opportunities to manage flood risk and improve water efficiency, amenity and to enhance biodiversity.		
				The standard method(ology)	A standardised system introduced by central government for calculating the local housing need.		
				Town centre	National Planning Policy Framework 2023		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification			Reason for modification	Assessment
				Transport assessment	National Planning Policy Framework 2023		
				Transport statement	A lighter touch form of a Transport Statement for evaluating the implications of a proposed development.		
				Travelling showpeople	Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.		
				Travel plan	National Planning Policy Framework 2023		
				Use class and Use Classes Order	The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes' which are detailed below. 'Change of use' can occur within the same Use Class or from one Use Class to another. Depending on the specifics of any proposed change of use, including any building work associated with the proposal, it may require an application for planning permission or prior approval.		
				Waste hierarchy	The waste hierarchy is a simple approach that progresses from the most favourable and sustainable approach to the least sustainable. There are five stages: prevention, re-use, recycling, recovery, and finally disposal.		
				WCS	Water cycle study	The water cycle study describes the water cycle as the process by which water is transported throughout a region. It considers the potential impact of development on water resources, quality and supply, wastewater, sewage, and flood risk management.		
					Water resources management plan	A document produced by Anglian Water to outline their strategy for managing the demand and supply of water in the East of England.		
					Water stress	Water stress is a result of water being a scarce resource. This is especially applicable to the east of England as it is the driest region in the country.		
					Water supply management statement	A statement that demonstrates that sufficient water capacity will be available to meet the predicted demand from development.		

<table>
<tr><th>Modification reference number</th><th>Location in submission draft document</th><th>Policy number or paragraph reference</th><th>Proposed modification</th><th>Reason for modification</th><th>Assessment</th></tr>
<tr><td>MM132</td><td>Page 436 to 450</td><td>Appendix A</td><td>
Appendix ~~A~~ B: Development plan documents and policies that will be replaced by the West Suffolk Local Plan

Forest Heath Core Strategy 2010

The former Forest Heath Core Strategy was adopted in 2010. The following ~~saved~~ policies are superseded ~~or deleted~~ on adoption of the West Suffolk Local Plan.
<table>
<tr><th>Policy heading</th><th>Where policy is superseded by the West Suffolk Local Plan</th></tr>
<tr><td>Policy CS1 Spatial strategy</td><td>SP9 The spatial strategy</td></tr>
<tr><td>Policy CS2 Natural environment</td><td>SP4 Green infrastructure
SP5 Locally valued landscape
SP6 Biodiversity net gain
SP7 Breckland Special Protection Area and Special Area of Conservation
SP8 Recreational effects of development</td></tr>
<tr><td>Policy CS3 Landscape character and historic environment</td><td>SP4 Green infrastructure
SP5 Locally valued landscape
SP14 Historic environment</td></tr>
<tr><td>Policy CS4 Reduce emissions, mitigate and adapt to climate change</td><td>SP1 The climate and environment emergency and sustainable development</td></tr>
<tr><td>Policy CS5 Design quality and local distinctiveness</td><td>SP2 Health and wellbeing
SP3 Design</td></tr>
<tr><td>Policy CS6 Sustainable economic and tourism development</td><td>SP12 Strategic employment
LP39 Tourism development</td></tr>
<tr><td>Policy CS7 Overall housing provision</td><td>SP10 Housing needs</td></tr>
<tr><td>Policy CS8 Provision for Gypsy and Travellers</td><td>SP10 Housing needs
LP24 Provision for Gypsies and Travellers and travelling showpeople</td></tr>
<tr><td>Policy CS9 Affordable housing provision</td><td>SP10 Housing needs
LP20 Affordable housing</td></tr>
<tr><td>Policy CS10 Sustainable rural communities</td><td>SP9 The spatial strategy
LP18 Development in the countryside</td></tr>
<tr><td>Policy CS11 Retail and town centre strategy</td><td>SP13 Retail and other complimentary town centre uses
LP40 Town centres
LP41 Local Centres</td></tr>
<tr><td>Policy CS12 Strategic transport improvement and sustainable transport</td><td>SP15 Infrastructure
LP57 Active and sustainable travel
LP58 Rights of way
LP59 Transport assessments, transport statements and travel plans</td></tr>
<tr><td>Policy CS13 Infrastructure and developer contributions</td><td>SP15 Infrastructure</td></tr>
</table>
Core Strategy Single Issue Review 2019
</td><td>See council’s response to inspectors’ preliminary questions and matter 1.</td><td>No Likely Significant Effect.

This is a list of policies that will be replaced by the WSLP. The WSLP HRA looks at policies within the WLSP not those that sit outside it (except in terms of in-combination impacts) and as such has no impact on the HRA.</td></tr>
</table>

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			The former Forest Heath Core Strategy Single Issue Review was adopted in 2019. The following ~~saved~~ policies are superseded ~~or deleted~~ on adoption of the West Suffolk Local Plan.		

Policy heading	Where policy is superseded by the West Suffolk Local Plan
Policy CS7 Overall housing provision and distribution	SP9 The spatial strategy SP10 Housing needs

Site Allocations Local Plan 2019

The former Forest Heath Site Allocations Local Plan was adopted in 2019. The following saved policies are superseded ~~or deleted~~ on adoption of the West Suffolk Local Plan.

Policy heading	Where policy is superseded by the West Suffolk Local Plan
Policy SA1 Settlement boundaries	~~LP17 Housing settlement boundaries~~ **SP9 The Spatial Strategy**
Policy SA2 Housing allocations in Brandon Site SA2(a) Land at Warren Close Site SA2(b) Land off Gas House Drove	 AP1 Land at Warren Close, Brandon ~~Deleted~~ **SP9 The Spatial Strategy**
Policy SA3 Brandon Cemetery	AP2 Brandon Cemetery
Policy SA4 Focus of growth – Land West of Mildenhall	AP16 Land west of Mildenhall
Policy SA5 Housing allocations in Mildenhall Site SA5(a) Land at 54 Kingsway Site SA5(b) Council Offices, College Heath Road	 ~~Deleted~~ **SP9 The Spatial Strategy** AP17 Land at College Heath Road, Mildenhall
Policy SA6 Housing and mixed-use allocations Newmarket Site SA6(a) Brickfield Stud, Exning Road Site SA6(b) Land at Black Bear Lane and Rowley Drive Site SA6(c) Land at Phillips Close Site SA6(d) Former St Felix Middle School Site SA6(e) Land adjacent to Jim Joel Court Site SA6(f) Land at 146a High Street Site SA6(g) Hatchfield Farm	 ~~Deleted~~ **SP9 The Spatial Strategy** AP21 Land off High Street, Black Bear Lane and Rowley Drive (Queensbury Lodge) ~~Deleted~~ **SP9 The Spatial Strategy** AP22 Former St Felix Middle School ~~Deleted~~ **SP9 The Spatial Strategy** ~~Deleted~~ **SP9 The Spatial Strategy** AP19 Hatchfield Farm, Fordham Road
Policy SA7 Housing and mixed-use allocations Lakenheath Site SA7(a) Matthews Nursery Site SA7(b) Land west of Eriswell Road	 AP32 Matthews Nursery, High Street AP33 Land west of Eriswell Road

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification		Reason for modification	Assessment
			Policy SA8 Focus of growth – North of Lakenheath Site SA8(a) Rabbit Hill Covert, Station Road Site SA8(b) Land north of Station Road Site SA8(c) Land off Briscoe Way	AP34 Land at Rabbithill Covert, Station Road AP35 Land north of Station Road AP36 Land off Briscoe Way, Lakenheath		
			Policy SA9 Housing allocations in Red Lodge Site SA9(a) Land off Turnpike Road and Coopers Yard Site SA9(b) Land east of Red Lodge (north) Site SA9(c) Land east of Red Lodge (south) Site SA9(d) Land west of Newmarket Road and north of Elms Road	~~Deleted~~ **SP9 The Spatial Strategy** AP39 Land east of Warren Road ~~Deleted~~ **SP9 The Spatial Strategy** ~~Deleted~~ **SP9 The Spatial Strategy**		
			Policy SA10 Focus of growth – North of Red Lodge	AP38 Land north of Acorn Way, Red Lodge		
			Policy SA11 Housing allocations in Beck Row Site SA11(a) Land adjacent to St Johns Street Site SA11(b) Land adjacent to and south of the caravan park, Aspal Lane Site SA11(c) Land east of Aspal Lane Site SA11(d) Land adjacent to Beck Lodge Farm	AP44 Land at Lamble Close, Beck Row ~~Deleted~~ **SP9 The Spatial Strategy** ~~Deleted~~ **SP9 The Spatial Strategy** ~~Deleted~~ **SP9 The Spatial Strategy**		
			Policy SA12 Housing allocation in Exning	~~Deleted~~ **SP9 The Spatial Strategy**		
			Policy SA13 Housing and mixed-use allocations Kentford Site SA13(a) Land to the rear of The Kentford Site SA13(b) Land at Meddler Stud	~~Deleted~~ **SP9 The Spatial Strategy** ~~Deleted~~ **SP9 The Spatial Strategy**		
			Policy SA14 Housing allocation and school expansion in West Row	AP51 Land east of Beeches Road AP52 Land west of West Row Primary School		
			Policy SA15 Moulton Primary School	AP49 Land north of Moulton Primary School		
			Policy SA16 Existing employment areas	SP12 Strategic employment		
			Policy SA17 Employment allocations SA17(b)St Ledger	SP12 Strategic employment ~~Deleted~~ AP18 Mildenhall Dome AP19 Hatchfield Farm, Fordham Road AP38 Land north of Acorn Way, Red Lodge AP16 Land west of Mildenhall		
			Policy SA18 Retail allocations	~~Deleted~~ **SP13 Retail and other complimentary town centre uses**		
			Policy SA19 Town centre masterplans	~~Deleted~~ **LP11 Masterplans**		
			Joint Development Management Policies Document 2015			

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
			The Joint Development Management Policies Document was adopted in 2015. The following saved policies are superseded or deleted on adoption of the West Suffolk Local Plan.		

Policy heading	Where policy is superseded by the West Suffolk Local Plan
Policy DM1 Presumption in favour of sustainable development	~~Deleted~~ ***This policy was published by the Planning Inspectorate and was required to be included in all Local Plans. There is no longer a requirement to include this policy and no policy to supersede it.***
Policy DM2 Creating places – development principles and local distinctiveness	LP9 Designing for health and wellbeing and impacts of new development LP10 Well-designed spaces LP12 Design codes
Policy DM3 Masterplans	LP11 Masterplans
Policy DM4 Development briefs	~~Deleted~~ **LP11 Masterplans**
Policy DM5 Development in the countryside	LP18 Development in the countryside
Policy DM6 Flooding and sustainable drainage	LP5 Flood risk and sustainable drainage
Policy DM7 Sustainable design and construction	LP1 Sustainable design and construction
Policy DM8 Low and zero carbon energy generation	LP7 Renewable and low carbon energy
Policy DM9 Infrastructure services and telecommunications	LP61 Digital infrastructure
Policy DM10 Sites of biodiversity and geo-diversity	LP15 protected sites, habitats and features
Policy DM11 Protected species	LP16 Protected species
Policy DM12 Mitigation, enhancement and management of biodiversity	SP6 Biodiversity net gain LP15 protected sites, habitats and features
Policy DM13 Landscape features	LP13 Trees LP14 Landscape
Policy DM14 Protecting and enhancing natural resources, pollution and hazards	LP8 Protecting and enhancing natural resources, minimising pollution and safeguarding from hazards
Policy DM15 Listed buildings	LP50 Listed buildings
Policy DM16 Local heritage assets and article 4 directions	LP51 Built non-designated heritage assets
Policy DM17 Conservation areas	LP53 Conservation areas
Policy DM18 New uses for historic buildings	LP52 New uses for historic buildings
Policy DM19 Development affecting parks and gardens	LP54 Development affecting parks and gardens of special historic or design interest
Policy DM20 Archaeology	LP55 Archaeology
Policy DM21 Enabling development	~~Deleted~~ **LP50 Listed buildings**
Policy DM22 Residential design	LP9 Designing for health and wellbeing and impacts of new development LP10 Well-designed spaces LP12 Design codes

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification		Reason for modification	Assessment
			Policy DM23 Special housing needs	LP23 Housing needs for specific groups		
			Policy DM24 Alterations or extensions to dwellings and annexes	LP29 Alterations and extensions to dwellings and residential annexes		
			Policy DM25 Extensions to domestic gardens in countryside	LP30 Extensions to domestic gardens in the countryside		
			Policy DM26 Agricultural and essential workers dwelling	LP27 Agricultural and essential workers dwelling		
			Policy DM27 Housing in the countryside	LP26 Housing in the countryside		
			Policy DM28 Residential use of redundant buildings countryside	LP28 Residential use of redundant buildings in the countryside		
			Policy DM29 Rural housing exception sites	LP22 Rural exception sites		
			Policy DM30 Appropriate employment uses and protection of employment land and businesses	LP36 Safeguarding employment		
			Policy DM31 Farm diversification	LP37 Farm diversification		
			Policy DM32 Business and domestic equine	LP19 Business and domestic equine		
			Policy DM33 Re-use or replacement of buildings in the countryside	LP38 Re-use or replacement of buildings in countryside		
			Policy DM34 Tourism development	LP39 Tourism development		
			Policy DM35 Proposals for main town centre uses	SP13 Retail and other complimentary town centre uses LP40 Town centres		
			Policy DM36 Local centres	LP41 Local centres		
			Policy DM37 Public realm improvements	LP43 Public realm improvements		
			Policy DM38 Shopfronts and advertisements	LP44 Shop fronts and advertisements		
			Policy DM39 Street trading and street cafes	LP42 Street trading and street cafes		
			Policy DM40 Ancillary retail uses	LP45 Ancillary retail uses		
			Policy DM41 Community facilities and services	LP31 Community facilities and services		
			Policy DM42 Open space, sport and recreation facilities	LP33 Open space, sport, play and recreation facilities		
			Policy DM43 Leisure and cultural facilities	LP32 Leisure and cultural facilities		
			Policy DM44 Rights of way	LP58 Rights of way		
			Policy DM45 Transport assessments and travel plans	LP59 Transport assessments, transport statements and travel plans		
			Policy DM46 Parking standards	LP60 Parking standards		
			Policy DM47 Development relating to the horse racing industry	LP46 Horse racing industry development		
			Policy DM48 Development affecting the horse racing industry	LP47 Development affecting the horse racing industry		
			Policy DM49 Re-development of existing sites relating to the horse racing industry	LP48 Change of use and development of horse racing industry sites		
			Policy DM50 Horse walks	LP49 Safeguarding horse walks and crossings		
			St Edmundsbury Core Strategy 2010			

<table>
<tr><th>Modification reference number</th><th>Location in submission draft document</th><th>Policy number or paragraph reference</th><th>Proposed modification</th><th>Reason for modification</th><th>Assessment</th></tr>
<tr><td></td><td></td><td></td><td>The former St Edmundsbury Core Strategy was adopted in 2010. The following ~~saved~~ policies are superseded ~~or deleted~~ on adoption of the West Suffolk Local Plan.

<table>
<tr><th>Policy heading</th><th>Where policy is superseded by the West Suffolk Local Plan</th></tr>
<tr><td>Policy CS1 Spatial strategy</td><td>SP9 The spatial strategy</td></tr>
<tr><td>Policy CS2 Sustainable development</td><td>SP1 The climate and environment emergency and sustainable development
SP2 Health and wellbeing
SP3 Design
LP9 Designing for health and wellbeing and impacts of new development
LP10 Well-designed spaces
LP12 Design codes</td></tr>
<tr><td>Policy CS3 Design and local distinctiveness</td><td>SP2 Health and wellbeing
SP3 Design</td></tr>
<tr><td>Policy CS4 Settlement hierarchy and identity</td><td>SP9 The spatial strategy
SP10 Housing needs</td></tr>
<tr><td>Policy CS5 Affordable housing</td><td>SP10 Housing needs
LP20 Affordable housing</td></tr>
<tr><td>Policy CS6 Gypsies, Travellers and travelling show people</td><td>SP10 Housing needs
LP24 Provision for Gypsies and Travellers and travelling showpeople</td></tr>
<tr><td>Policy CS7 Sustainable transport</td><td>SP15 Infrastructure
LP57 Active and sustainable travel
LP58 Rights of way
LP59 Transport assessments, transport statements and travel plans</td></tr>
<tr><td>Policy CS8 Strategic transport improvements</td><td>SP15 Infrastructure
LP57 Active and sustainable travel
LP58 Rights of way
LP59 Transport assessments, transport statements and travel plans</td></tr>
<tr><td>Policy CS9 Employment and local economy</td><td>SP12 Strategic employment
LP36 Safeguarding employment</td></tr>
<tr><td>Policy CS10 Retail, leisure and cultural office provision</td><td>SP13 Retail and other complimentary town centre uses
LP40 Town centres
LP31 Community facilities and services
LP32 Leisure and cultural facilities</td></tr>
<tr><td>Policy CS11 Bury St Edmunds strategic growth</td><td>AP3 Land north of Rougham Tower Avenue, Bury St Edmunds ~~(strategic)~~
AP4 West Bury St Edmunds ~~(strategic)~~
AP5 North-east Bury St Edmunds ~~(strategic)~~
AP6 South-east Bury St Edmunds ~~(strategic)~~</td></tr>
<tr><td>Policy CS12 Haverhill strategic growth</td><td>AP13 North-west Haverhill ~~(strategic)~~
AP14 North-east Haverhill ~~(strategic)~~</td></tr>
<tr><td>Policy CS13 Rural areas</td><td>SP9 The spatial strategy
LP18 Development in the countryside</td></tr>
</table></td><td></td><td></td></tr>
</table>

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment

Policy CS14 Community infrastructure capacity and tariffs	LP31 Community facilities and services
Policy CS15 Plan, monitor and manage	~~Deleted~~ **Paragraphs 1.57-1.59**

Bury Vision 2031

The former St Edmundsbury Bury Vision was adopted in 2014. The following ~~saved~~ policies are superseded ~~or deleted~~ on adoption of the West Suffolk Local Plan.

Policy heading	Where policy is superseded by the West Suffolk Local Plan
Policy BV1 Presumption in favour of sustainable development	~~Deleted~~ ***This policy was published by the Planning Inspectorate and was required to be included in all Local Plans. There is no longer a requirement to include this policy and no policy to supersede it.***
Policy BV2 Housing development in Bury St Edmunds	~~LP17 Housing settlement boundaries~~ **SP9 The Spatial Strategy**
Policy BV3 Strategic site – North West	~~Deleted~~ **SP9 The Spatial Strategy**
Policy BV4 Strategic site – Moreton Hall	~~Deleted~~ **SP9 The Spatial Strategy**
Policy BV5 Strategic site – West	AP4 West Bury St Edmunds ~~(strategic)~~
Policy BV6 Strategic site – North East	AP5 North-east Bury St Edmunds ~~(strategic)~~
Policy BV7 Strategic site – South East	AP6 South-east Bury St Edmunds ~~(strategic)~~
Policy BV8 Station Hill development area	~~Deleted~~ **SP9 The Spatial Strategy**
Policy BV9 Tayfen Road	~~Deleted~~ **SP9 The Spatial Strategy**
Policy BV10 Housing on brownfield sites	~~Deleted~~ **SP9 The Spatial Strategy**
Policy BV11 Land at Ram Meadow	~~Deleted~~ **SP9 The Spatial Strategy**
Policy BV12 New and existing local centres and community facilities	LP41 Local centres LP31 Community facilities and services
Policy BV13 Strategic site – extension to Suffolk Business Park	AP12 Suffolk Business Park extension
Policy BV14 General employment areas	SP12 Strategic employment
Policy BV15 Alternative business development	SP12 Strategic employment
Policy BV16 British Sugar site	SP12 Strategic employment
Policy BV17 Out of centre retail proposals	SP13 Retail and other complimentary town centre uses
Policy BV18 Community infrastructure levy and allowable solutions	~~Deleted~~ **SP15 Infrastructure**
Policy BV19 Land west of Rougham Road	AP9 Land west of Rougham Road, Bury St Edmunds
Policy BV20 Rougham Airfield	~~Deleted~~ **AP3 Land north of Rougham Tower Avenue, Bury St Edmunds**

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment

Policy BV21 Allotments	LP34 Allotments
Policy BV22 West Suffolk Hospital	AP10 West Suffolk Hospital
Policy BV23 West Suffolk College	~~Deleted – protected under~~ SP15 Infrastructure
Policy BV24 Safeguarding educational establishments	~~Deleted – protected under~~ SP15 Infrastructure
Policy BV25 Conserving the setting and views from the historic core	LP56 Conserving the setting and views from the historic core
Policy BV26 Green infrastructure	SP4 Green infrastructure
Policy BV27 Town Centre masterplan	~~Deleted~~ **LP11 Masterplans**

Haverhill Vision 2031

The former St Edmundsbury Haverhill Vision was adopted in 2014. The following ~~saved~~ policies are superseded ~~or deleted~~ on adoption of the West Suffolk Local Plan.

Policy heading	Where policy is superseded by the West Suffolk Local Plan
Policy HV1 Presumption in favour of sustainable development	~~Deleted~~ *This policy was published by the Planning Inspectorate and was required to be included in all Local Plans. There is no longer a requirement to include this policy and no policy to supersede it.*
Policy HV2 Housing development in Haverhill	~~Deleted~~ **SP9 The Spatial Strategy**
Policy HV3 Strategic site – North West	AP13 North-west Haverhill ~~(strategic)~~
Policy HV4 Strategic site – North East	AP14 North-east Haverhill ~~(strategic)~~
Policy HV5 Housing on greenfield sites	~~Deleted~~ **SP9 The Spatial Strategy**
Policy HV6 Housing on brownfield sites	~~Deleted~~ **SP9 The Spatial Strategy** **AP15 Wisdom Toothbrush Factory, Colne Valley Road, Haverhill**
Policy HV7 Mixed use redevelopment brownfield sites a Wisdom Factory, Duddery Hill b Chauntry Mill, High Street c Rear of Argos/Post Office d Cleales/Town Hall Car Park e Brook Service Road/Car Park	AP15 Wisdom Toothbrush Factory, Colne Valley Road, Haverhill ~~Deleted~~ ~~Deleted~~ ~~Deleted~~ ~~Deleted~~
Policy HV8 New and existing local centres and community facilities	LP41 Local centres LP31 Community facilities and services
Policy HV9 General employment areas	SP12 Strategic employment
Policy HV10 Strategic employment site – Hanchett End	~~Deleted~~ **SP9 The Spatial Strategy**

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment

Policy HV11 Out of centre retail proposals	SP13 Retail and other complimentary town centre uses
Policy HV12 Haverhill North West relief road	AP13 North-west Haverhill ~~(strategic)~~
Policy HV13 Community infrastructure levy and allowable solutions	~~Deleted~~ **SP15 Infrastructure**
Policy HV14 Allotments	LP34 Allotments
Policy HV15 Safeguarding educational establishments	~~Deleted – protected under~~ SP15 Infrastructure
Policy HV16 Castle Manor Academy	~~Deleted – protected under~~ SP15 Infrastructure
Policy HV17 Further education facility	~~Deleted – protected under~~ SP15 Infrastructure
Policy HV18 Green infrastructure	SP4 Green infrastructure
Policy HV19 Town Centre masterplan	~~Deleted~~ **LP11 Masterplans**

Rural Vision 2031

The former St Edmundsbury Rural Vision was adopted in 2014. The following saved policies are superseded or deleted on adoption of the West Suffolk Local Plan.

Policy heading	Where policy is superseded by the West Suffolk Local Plan
Policy RV1 Presumption in favour of sustainable development	~~Deleted~~ ***This policy was published by the Planning Inspectorate and was required to be included in all Local Plans. There is no longer a requirement to include this policy and no policy to supersede it.***
Policy RV2 Neighbourhood plans and development orders	SP11 Neighbourhood plans SP9 The Spatial strategy
Policy RV3 Housing settlement boundaries	~~LP17 Housing settlement boundaries~~ **SP9 The Spatial Strategy**
Policy RV4 Rural employment areas	SP12 Strategic employment
Policy RV5 Protection of special uses	SP16 Existing special operational uses
Policy RV6 Park Farm Ingham	AP66 Park Farm (St Genevieve Lakes), Ingham
Policy RV7 Allotments	LP34 Allotments
Policy RV8 Safeguarding educational establishments	~~Deleted – protected under~~ SP15 Infrastructure
Policy RV9 Green infrastructure in rural areas	SP4 Green infrastructure
Policy RV10 Barrow	~~Deleted~~ **SP9 The Spatial Strategy**
Policy RV11 Clare a Land east of The Granary b Land off Cavendish Road	~~Deleted~~ **SP9 The Spatial Strategy** AP27 Land north of Cavendish Road, Clare
Policy RV12 Ixworth a Reeves Farm, Stow Road b Land off Crown Lane c Land west of A143 and south of A1088	~~Deleted~~ **SP9 The Spatial Strategy** ~~Deleted~~ **AP30 Land off Crown Lane and west of A143** ~~AP29 Land at Bardwell Road, Ixworth~~ **AP30 Land off Crown Lane and west of A143**

<table>
<tr><th>Modification reference number</th><th>Location in submission draft document</th><th>Policy number or paragraph reference</th><th>Proposed modification</th><th>Reason for modification</th><th>Assessment</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>Policy RV13 Kedington
a Stourmead complex
b Land at Limes Cottage and adjoining land</td><td><s>Deleted</s> SP9 The Spatial Strategy
AP31 Land at junction of Hall Road and Mill Road, Kedington</td></tr>
<tr><td>Policy RV14 Stanton</td><td><s>Deleted – existing site allocation policies</s> SP9 The Spatial Strategy</td></tr>
<tr><td>Policy RV15 Barningham</td><td><s>Deleted – existing site allocation policies</s> SP9 The Spatial Strategy</td></tr>
<tr><td>Policy RV16 Cavendish</td><td><s>Deleted – existing site allocation policies</s> SP9 The Spatial Strategy</td></tr>
<tr><td>Policy RV17 Chedburgh
a Queens Lane</td><td>AP56 Land at Queens Lane, Chedburgh</td></tr>
<tr><td>Policy RV18 Great Barton</td><td><s>Deleted – existing site allocation policies</s> SP9 The Spatial Strategy</td></tr>
<tr><td>Policy RV19 Great Thurlow</td><td><s>Deleted – existing site allocation policies</s> SP9 The Spatial Strategy</td></tr>
<tr><td>Policy RV20 Great and Little Whelnetham</td><td><s>Deleted – existing site allocation policies</s> SP9 The Spatial Strategy</td></tr>
<tr><td>Policy RV21 Hopton</td><td>AP46 Land off Bury Road, Hopton</td></tr>
<tr><td>Policy RV22 Ingham</td><td><s>Deleted – existing site allocation policies</s> SP9 The Spatial Strategy</td></tr>
<tr><td>Policy RV23 Risby</td><td><s>Deleted – existing site allocation policies</s> SP9 The Spatial Strategy</td></tr>
<tr><td>Policy RV24 Rougham</td><td>AP50 Land west of Kingshall Street, Rougham</td></tr>
<tr><td>Policy RV25 Wickhambrook</td><td><s>Deleted – site allocation policies</s> SP9 The Spatial Strategy</td></tr>
</table>
Policies Map Book

Policies map books dated 2015 and 2019 have been superseded by the policies map 2024. For changes to housing settlement boundaries, please refer to the housing settlement boundary review report.
</td><td></td><td></td></tr>
<tr><td>MM133</td><td>Page 451 to 457</td><td>Appendix B</td><td>Appendix <s>B</s> C: Schedule of strategic <s>and non-strategic</s> residential, employment and mixed-use allocations

Delete column five ‘strategic and non-strategic'</td><td>See council’s matter 1 response.</td><td>No Likely Significant Effect.

This is a change to designation (removal of non-strategic), it does not</td></tr>
</table>

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification	Reason for modification	Assessment
					introduce or change development plans and as such has no impact on the HRA.
MM134	Page 458 to 459	Appendix C	**Appendix ~~C~~ D: Masterplans** **Community engagement** During the preparation of a masterplan, early community involvement will be required to ensure local residents, business owners and other stakeholders are involved in design development through a set programme of design workshops, site visits and wider engagement events. The approaches to community engagement should be set out in the masterplan to demonstrate design development in line with community involvement. **Document format and detail** A masterplan should consist of a host document which provides the vision, principles and design development of a site. The masterplan document should include a series of parameter plans and an illustrative masterplan~~,~~ which**, where appropriate** conveys the requirements set out below. **Vision and principles** • A masterplan should be accompanied by a clear and definitive vision for the site. This can be portrayed as a clear vision statement outlining what the masterplan will set out to achieve for the site and surrounding community. • A series of principles should be presented as part of the masterplan approach. The principles should provide definitive topic-based approaches which can be carried through the design process ensuring core values and approaches are maintained and delivered. These can be focused on sustainability targets, environmental goals, or design quality aspirations. **Land use and layout** e. Provide a balanced mix of residential, commercial, recreational, and green spaces to reflect local needs and policy requirements. • Logical transitions between different land uses, ensuring coordination and coherence. • Diverse housing types to accommodate various income levels and demographics. • Spaces for community facilities and services to reflect local needs and policy requirements. **Movement and accessibility** • Prioritise pedestrian and cycle routes, ensuring safe and convenient movement **for all users and ensuring appropriate walking distances to public transport infrastructure**.	See council's matter 10 response. In response to inspectors' action point AP29 contained in IN12.	No Likely Significant Effect. This Appendix provides further details of masterplans, it does not introduce or change development plans and as such has no impact on the HRA.

<table>
<tr><th>Modification reference number</th><th>Location in submission draft document</th><th>Policy number or paragraph reference</th><th>Proposed modification</th><th>Reason for modification</th><th>Assessment</th></tr>
<tr><td></td><td></td><td></td><td>• Promotion of sustainable transportation options, such as pedestrian pathways, cycling paths, and public transit connectivity.
• Provide efficient public transport solutions, integrated with the wider transport network.
• Ensure vehicular access without compromising pedestrian safety and comfort.

Green and blue infrastructure

• Designate areas for public spaces, open spaces, play, and other communal spaces in line with local need and policy.
• Green infrastructure approach to steer site arrangement, ensuring existing corridors and habitats steer layout. Opportunities for wider connectivity should be demonstrated as part of the design process.
• Water conservation and sustainable urban drainage systems to be integrated and fully considered at masterplan stage.

Context and character

• Identify and integrate local heritage assets and historically significant sites.
• Reflect the local settlement pattern, architectural style, materials, and cultural elements in the design.

Sustainability, resilience and climate change

• Consideration and integration of green and renewable energy sources.
• Design principles and measures to be taken to minimise climate change risks.

Infrastructure and facilities

• Adequate provision for essential facilities such as schools, healthcare, and community centres to be considered as part of the local need and policy requirements.
• Clear planning for utilities, including water, electricity, fibreoptic, and waste management.

Phasing and implementation

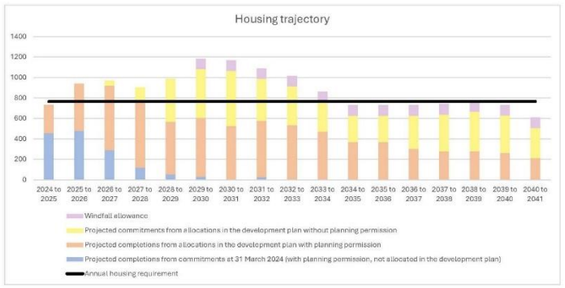
Plans to provide a clear phasing proposal for development taking into consideration landownership and buildability. Periodic review mechanisms to assess the effectiveness of the masterplan and make necessary adjustments. Ensure that the masterplan can adapt to future changes, including technological advancements, demographic shifts, and unforeseen challenges.</td><td></td><td></td></tr>
<tr><td>MM135</td><td>Page 462 to 464</td><td>Appendix E</td><td>Appendix ~~E~~ F: Housing commitments sites with planning permission (for 10 or more homes) at 1 April 202~~43~~

<table>
<tr><th>Planning application references</th><th>Site and location</th><th>Total homes permitted</th><th>Remaining homes to be built at 1 April 202~~43~~</th><th>Status</th></tr>
<tr><td>DC/18/1993/OUT and DC/21/2212/RM</td><td>Land adjacent 1 St John's Street (also known as Lamble Close), Beck Row</td><td>60</td><td>~~60~~ 49</td><td>Commenced</td></tr>
</table></td><td>See council's matter 15 . To reflect the housing supply report D10</td><td>No Likely Significant Effect.

This is an analysis of commitments sites with planning permission, it does not</td></tr>
</table>

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification					Reason for modification	Assessment
			~~DC/19/1939/OUT~~	~~Bird in Hand Hotel, The Street, Beck Row~~	~~16~~	~~16~~			introduce or change development plans and as such has no impact on the HRA.
			DC/19/1616/OUT and DC/22/1608/RM	Land at Gas House Drove, Brandon	9	9			
			SE/06/2414 and DC/20/0907/FUL	Hardwick Industrial Estate, Bury St Edmunds	123	66	Commenced		
			DC/14/1881/HYB and DC/17/1006/RM	Moreton Hall (Lark Grange), Bury St Edmunds	500	~~169~~ **125**	Commenced		
			DC/15/1520/FUL and DC/22/0207/VAR	Burlington Mill, Station Hill, Bury St Edmunds	42	42	**Commenced**		
			DC/19/1712/FUL	28-34 Risbygate Street, Bury St Edmunds	49	~~49~~ **8**	**Completed after 1 April 2024** ~~Commenced~~		
			DC/13/0932/HYB and DC/17/0595/RM	Bury St Edmunds (north-west) (Marham Park), Bury St Edmunds	1137	~~227~~ **104**	Commenced		
			~~SE/12/0451/FULCA, DC/17/1645/CLE and DC/19/1588/VAR~~	~~Land at Suffolk Records Office, Raingate Street, Bury St Edmunds~~	~~14~~	~~14~~			
			DC/15/2483/OUT and DC/22/1804/RM	South-east Bury St Edmunds	1250	1250	**Commenced**		
			DC/19/2456/HYB **and APP/F3545/W/22/3297751**	North-east Bury St Edmunds	1375	1375			
			DC/22/1267/FUL ~~(granted after 1 April 2023)~~	Former gasworks, Tayfen road, Bury St Edmunds	171	171			
			DC/17/1252/FUL	Land off Cavendish Road, Clare	53	53	**Commenced**		
			DC/21/2094/OUT	Townsend nursery, Snow Hill, Clare	20	20			
			F/12/0552/OUT and DC/14/0942/RM	Land at Burwell Road, Exning	120	10	Commenced		
			DC/21/0152/FUL	Land south of Burwell Road, Exning	205	~~169~~ **102**	Commenced		
			DC/17/2539/FUL	5 High Street, Haverhill	14	14	**Commenced**		
			DC/16/1252/OUT and DC/21/1383/FUL	Social Services, Camps Road, Haverhill	34	34	**Commenced**		
			SE/09/1283, ~~and~~ DC/16/2836/RM**, DC/20/0615/RM and DC/21/0110/RM**	North-west Haverhill	circa 980	~~891~~ **607**	Commenced		
			DC/16/0473/OUT and DC/22/1398/RM	Brickfields Drive, Haverhill	30	30			
			DC/15/2151/OUT and DC/19/0834/RM	North-east Haverhill (Great Wilsey Park)	2500	~~2417~~ **2354**	Commenced		
			APP/F3545/W/20/3256979, DC/19/1711/OUT and DC/22/0469/RM	Land west of Three Counties Way, Haverhill	145	145	Commenced		

Modification reference number	Location in submission draft document	Policy number or paragraph reference	Proposed modification					Reason for modification	Assessment
			DC/15/2298/FUL and DC/22/1257/VAR	Land east of Bury Road, Hopton (Village Hall)	37	37	Commenced		
			DC/14/1751/OUT and DC/21/2490/RM	Land at junction of Hall Road and Mill Road, Kedington	40	40			
			DC/14/0585/OUT and DC/17/2476/RM	Meddler Stud, Bury Road, Kentford	63	~~7~~ **4**	Commenced		
			DC/13/0660/FUL, DC/19/1392/VAR and DC/22/1480/VAR	Land off Briscoe Way, Lakenheath	67	67	Commenced		
			F/13/0394/OUT**,** ~~and~~ NMA(1)/13/0394 **and DC/21/1294/RM**	Land west of Eriswell Road, Lakenheath	**139** ~~140~~	**139** ~~140~~	**Commenced**		
			F/13/0345/OUT and DC/20/2066/RM	Rabbithill Covert, Station Road, Lakenheath	81	81			
			DC/14/2096/HYB	Land north of Station Road, Lakenheath	375	375			
			DC/18/1492/HYB	Matthews nursery, Dumpling Bridge Lane, Lakenheath	**27** ~~29~~	**27** ~~29~~			
			~~DC/19/0507/FUL~~	~~Garage areas Emmanuel Close, Mildenhall~~	~~11~~	~~11~~			
			~~DC/15/0754/FUL and DC/17/0973/VAR~~	~~146a High Street, Newmarket~~	~~46~~	~~8~~	~~Commenced~~		
			~~DC/17/1614/FUL~~	~~Oakfield Surgery, Vicarage Road, Newmarket~~	~~10~~	~~3~~	~~Completed after 1 April 2023~~		
			DC/20/1025/FUL	Former Police Station, Vicarage Road, Newmarket	15	15			
			DC/13/0408/OUT and DC/22/0420/RM	Land at Hatchfield Farm, Newmarket	400	400	**Commenced**		
			DC/21/1242/OUT and APP/F3545/W/22/3303347	**Land off High Street, Black Bear Lane and Rowley Drive, Newmarket**	**123**	**123**			
			DC/19/2128/FUL	Land off Turnpike Road, Red Lodge	25	25	**Commenced**		
			DC/19/2347/FUL	**Land east of Warren Road, Red Lodge**	**141**	**141**	**Commenced**		
			~~DC/19/1405/OUT~~	~~Land to the west Kingshall Street, Rougham~~	~~13~~	~~13~~			
			DC/18/0614/FUL	Land east of Beeches Road, West Row	46	~~46~~ **41**	Commenced		
			DC/21/2337/OUT	Beeches Road, West Row	~~106~~ **100**	~~106~~ **100**			
			DC/22/2228/FUL	**Land off Friday Street, West Row**	**7**	**7**			
MM136	Page 465 to 467	Appendix F	**Appendix ~~F~~ G: West Suffolk Local Plan housing trajectory ~~2020 to 2040~~ 2024 to 2041** *Replace trajectory with updated version*					See council's matter 15. In response to inspectors' action	No Likely Significant Effect.

<table>
<tr><th>Modification reference number</th><th>Location in submission draft document</th><th>Policy number or paragraph reference</th><th>Proposed modification</th><th>Reason for modification</th><th>Assessment</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><th></th><th>2024 to 2025</th><th>2025 to 2026</th><th>2026 to 2027</th><th>2027 to 2028</th><th>2028 to 2029</th><th>2029 to 2030</th><th>2030 to 2031</th><th>2031 to 2032</th><th>2032 to 2033</th><th>2033 to 2034</th><th>2034 to 2035</th><th>2035 to 2036</th><th>2036 to 2037</th><th>2037 to 2038</th><th>2038 to 2039</th><th>2039 to 2040</th><th>2040 to 2041</th></tr>
<tr><td>Projected completions from commitments at 31 March 2024 (with planning permission, not allocated in the development plan)</td><td>457</td><td>479</td><td>292</td><td>118</td><td>52</td><td>30</td><td>0</td><td>25</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>Projected completions from allocations in the development plan with planning permission</td><td>276</td><td>460</td><td>627</td><td>651</td><td>514</td><td>576</td><td>526</td><td>550</td><td>533</td><td>472</td><td>368</td><td>368</td><td>303</td><td>280</td><td>280</td><td>264</td><td>211</td></tr>
<tr><td>Projected commitments from allocations in the development plan without planning permission</td><td>0</td><td>0</td><td>50</td><td>135</td><td>422</td><td>478</td><td>541</td><td>412</td><td>383</td><td>290</td><td>260</td><td>260</td><td>325</td><td>360</td><td>385</td><td>365</td><td>297</td></tr>
<tr><td>Windfall allowance</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td></tr>
<tr><td>Annual housing requirement</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td><td>765</td></tr>
</table>


</td><td>point AP20 contained in IN11.</td><td>This Appendix provides background information, it does not introduce or change development plans and as such has no impact on the HRA.</td></tr>
<tr><td>MM137</td><td>Page 468</td><td>Appendix G</td><td>Appendix ~~G~~ H: Neighbourhood plan housing requirements for designated neighbourhood areas

Where a neighbourhood plan plans to meet its housing need, the minimum housing requirement for the period 1 April 202~~3~~4 to 31 March 204~~0~~1 for each designated neighbourhood area is set out below. The neighbourhood housing requirement figures summarise the housing land supply identified from site allocations in this plan. There is no requirement for neighbourhood plans to allocate additional sites, but they may choose to do so in accordance with policy SP11.

Barningham 37 homes
Barrow cum Denham 165 homes
Barton Mills ~~10~~12 homes
Freckenham 10 homes
Horringer cum Ickworth 10 homes
Ixworth and Ixworth Thorpe 290 homes
Lakenheath ~~792~~789 homes
Mildenhall 1,353 homes
Newmarket 988 homes
West Row ~~161~~155 homes
Wickhambrook 40 homes

For Hargrave, Withersfield and Worlington neighbourhood plan areas there is no housing requirement for the period 1 April 202~~3~~4 to 31 March 204~~0~~1.</td><td>In response to inspectors’ action point AP4 contained in IN10.</td><td>No Likely Significant Effect.

This is a change to designation (removal of non-strategic), it does not introduce or change development plans and as such has no impact on the HRA.</td></tr>
</table>

G.3 Conclusion

Following the analysis of the proposed Main Modifications to the WSLP it can be concluded that they will not lead to likely significant effects on Habitats sites, alone or in combination with other plans and projects, and do not undermine the conclusions of the HRA of the WSLP.