

# Habitats Regulations Assessment

for

St Edmundsbury Borough Council  
Bury St Edmunds Vision 2031  
document

September 2014

## Quality control

### Habitats Regulations Assessment Screening

for

St Edmundsbury Borough Council  
Bury St Edmunds Vision 2031 document

Checked by Project Manager:	Approved by:
Signature: 	Signature: 
Name: Nicholas Sibbett	Name: Jo Parmenter
Title: Principal Ecologist	Title: Director
Date: September 2014	Date: September 2014

The Landscape Partnership Ltd is a practice of Chartered Landscape Architects, Chartered Town Planners and Chartered Environmentalists, registered with the Landscape Institute and a member of the Institute of Environmental Management & Assessment & the Arboricultural Association

#### **The Landscape Partnership**

*Registered office*  
Greenwood House  
15a St Cuthberts Street  
Bedford  
MK40 3JB

Registered in England No. 2709001

# Contents

<b>1</b>	<b>Introduction.....</b>	<b>1</b>
1.1	The plan being assessed.....	1
1.2	Appropriate Assessment requirement.....	2
1.3	Appropriate Assessment process .....	3
1.4	European sites.....	3
<b>2</b>	<b>European sites potentially affected.....</b>	<b>5</b>
2.1	European sites within the Bury St Edmunds Vision 2031 area or St Edmundsbury Borough.....	5
2.2	European sites outside the Site Allocations Development Plan area .....	8
2.3	Other relevant plans or projects affecting these sites .....	8
<b>3</b>	<b>Possible likely significant effects.....</b>	<b>9</b>
3.1	Introduction to possible likely significant effects .....	9
3.2	Consideration of likely significant effects .....	9
3.3	Assessment of increases in recreational pressure .....	10
3.4	Policies which may result in reduced visitor pressure on European sites .....	11
3.5	Conclusion of screening.....	11
3.6	In-combination effects of individual site allocations .....	11
3.7	In-combination effects of all development within St Edmundsbury .....	11
<b>4</b>	<b>Consultations.....</b>	<b>13</b>
4.1	Consultation comments received .....	13
4.2	Response to the consultations.....	13
<b>5</b>	<b>Summary.....</b>	<b>14</b>
5.1	Summary of the assessment .....	14
5.2	Summary of Conclusions .....	14

# Appendices

1. Policies assessed
2. Screening of policies
3. Natural England letter of 26th April 2012
4. Suffolk Wildlife Trust letter of 30th April 2012
5. Natural England letter of 9<sup>th</sup> August 2013
6. Natural England letter of 21<sup>st</sup> May 2014

# 1 Introduction

## 1.1 The plan being assessed

- 1.1.1 The Bury St Edmunds Vision 2031 Local Plan Document contains options for the future growth of Bury St Edmunds including town centre sites and concept plan options for five strategic growth areas on the periphery of the town. It combines plans for all service provision in the town into a single holistic vision, so that service-providers work together to achieve agreed aims and reduce wastage and duplication. It is orientated towards the future: it considers the issues and options for Bury St Edmunds to 2031, so that the foundations can be laid along the way.
- 1.1.2 Bury St Edmunds Vision 2031 Local Plan Document has been compiled by St Edmundsbury Borough Council, working with many other partners, and it combines strategic service planning with land-use planning to ensure a joined-up approach shaping how the town will function. It will form part of the Council's Local Plan and will set out both the Council's vision for the future of Bury St Edmunds and the statutory planning policy for the town. The plan has been compiled after widespread consultation so that it reflects the views of local people. In planning terms, the Bury St Edmunds Vision 2031 Local Plan Document is an 'Area Action Plan'.
- 1.1.3 The Bury St Edmunds Vision 2031 Local Plan Document does not include rural parts of the Borough or the town of Haverhill. Separate 'Rural Vision 2031' and 'Haverhill Vision 2031' Local Plan Documents are being progressed separately. It is consistent with the Council's Core Strategy which was adopted in December 2010.
- 1.1.4 The determination of likely significant effect under Regulation 102(1) of the Conservation of Habitats and Species Regulations 2010, of St Edmundsbury's Bury St Edmunds Vision 2031 Submission Document (area action plan DPD) was reported in June 2013<sup>1</sup>. It was concluded that the Bury Vision 2031 Submission Document would have no likely significant effect on any European site. The Submission Document was submitted to the Secretary of State on 24 October 2013 and the hearing sessions closed on Wednesday 12 February 2014.
- 1.1.5 On 28<sup>th</sup> February 2014 St Edmundsbury Borough Council submitted their proposed Main Modifications and Additional Modifications to the Inspector examining the Document. On 7<sup>th</sup> March 2014 the Inspector advised that seven of the Additional Modifications should be Main Modifications, with reasons. The Inspector later advised on changes to the proposed main modifications and further main modifications that he considered would be needed to make the Vision 2031 documents legally-compliant and sound. These modifications were also subject to Habitats Regulations Assessment<sup>2</sup> which found that there was no likely significant effect upon any European site.
- 1.1.6 The Inspector's report on his Examination of the Vision 2031 Development Plan Documents, including all modifications, was received on 14<sup>th</sup> July 2014 (Planning Inspectorate, 14<sup>th</sup> July 2014, Report on the Examination into Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031). This report concluded that Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031 provide an appropriate basis for the allocation of sites for development in the Borough until 2031, and related matters, provided that a number of modifications were made. The modifications all concerned matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal [SA] of them. The modifications were subject to public consultation over a six-week period. In a few cases the Inspector amended the detailed wording in the light of the responses. It was recommended that the modifications be included in the Vision 2031 documents after considering all the representations made in response to consultation on them.

---

<sup>1</sup> The Landscape Partnership (June 2013) Habitats Regulations Assessment Screening for St Edmundsbury Borough Council Bury St Edmunds Vision 2031 Submission Document

<sup>2</sup> The Landscape Partnership (April 2014) Habitats Regulations Assessment for St Edmundsbury Borough Council Bury St Edmunds Vision 2031 Main modifications. April 2014

1.1.7 This Habitats Regulations Assessment is the determination of likely significant effect under Regulation 102(1) of the Conservation of Habitats and Species Regulations 2010, of St Edmundsbury's Bury St Edmunds Vision 2031 Local Plan Document. This includes all modifications and is the Adoption document.

## 1.2 Appropriate Assessment requirement

1.2.1 The Appropriate Assessment process is required under the Conservation of Habitats and Species Regulations 2010. These regulations are often abbreviated to, simply, the 'Habitats Regulations'.

1.2.2 Regulation 102 states that

(1) Where a land use plan—

(A) is likely to have a significant effect on a European site in Great Britain or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site,

the plan-making authority for that plan shall, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.

(2) The plan-making authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.

(3) They shall also, if they consider it appropriate, take the opinion of the general public, and if they do so, they shall take such steps for that purpose as they consider appropriate.

(4) In the light of the conclusions of the assessment, and subject to regulation 103 (considerations of overriding public interest), the plan-making authority or, in the case of a regional spatial strategy, the Secretary of State shall give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

(5) A plan-making authority shall provide such information as the Secretary of State or the Welsh Ministers may reasonably require for the purposes of the discharge of the obligations of the Secretary of State or the Welsh Ministers under this Part.

(6) This regulation does not apply in relation to a site which is—

(a) a European site by reason of regulation 10(1)(c); or

(b) a European offshore marine site by reason of regulation 15(c) of the 2007 Regulations

(site protected in accordance with Article 5(4) of the Habitats Directive).

1.2.3 The plan-making authority, as defined under the Regulations, is St Edmundsbury Borough Council. This report is to determine, under Regulation 102(1), whether Main Modifications to the Bury St Edmunds Vision 2031 Local Plan Document are likely to have a significant effect upon any European site. A significant effect could be positive or negative, permanent or temporary, apply to one or more European sites, and could arise from one or more policies or proposals within the Plan. The significant effect could be caused by the plan itself, or could be caused by a combination of the Plan with other plans or projects. Determination of likely significant effect does not require that an effect is identified in detail, but that an effect is likely to occur and further investigations are needed; it does not automatically mean that harm will definitely be caused.

1.2.4 If a likely significant effect is determined for all or part of the Plan, including modifications, an Appropriate Assessment is then required before St Edmundsbury Borough Council may decide to adopt the Plan. The Appropriate Assessment process is set out below.

## 1.3 Appropriate Assessment process

1.3.1 The Appropriate Assessment process involves a number of steps, which are set out sequentially below.

### ***Likely significant effect***

1.3.2 The Council, in consultation with Natural England should decide whether or not the plan is likely to have a significant effect on any European site. This is a 'coarse filter' and any effect, large or small, positive or negative, should be considered.

### ***Connected to management of the site***

1.3.3 The Council should decide whether the plan is connected to the nature conservation management of the European sites. Invariably, for a development plan, this is not the case.

### ***Screening***

1.3.4 The combination of decisions on likely significant effect and connections to management is often called 'screening'. If the plan is likely to have a significant effect, and is not connected to the management of the site, an Appropriate Assessment is required.

### ***Scoping***

1.3.5 The whole plan must be assessed, but a 'scoping' exercise helps decide which parts of the plan have potential to give rise to significant effects and therefore where assessment should be prioritised. Natural England is an important consultee in this process.

### ***Consultations***

1.3.6 Natural England is a statutory consultee, and has been consulted at earlier stages. The public may also be consulted if it is considered appropriate, for example if the appropriate assessment is likely to result in significant changes to the plan.

### ***Iterations and revision***

1.3.7 The process is iterative; the conclusions of the first assessment may result in changes to the plan, and so a revision of the assessment would be required. If the revised assessment suggests further plan changes, the iteration will continue.

1.3.8 Iterative revisions typically continue until it can be ascertained that the plan will not have an adverse affect on the integrity of any European site.

1.3.9 There are further provisions for rare cases where over-riding public interest may mean that a land-use plan may be put into effect, notwithstanding a negative assessment, where there are no alternatives to development; but these provisions are not expected to be routinely used.

### ***Guidance and good practice***

1.3.10 This Habitats Regulations Assessment has taken account of published guidance and good practice including: Department for Communities and Local Government, 2006, *Planning for the Protection of European Sites: Appropriate Assessment under The Conservation (Natural Habitats &c.) (Amendment) (England and Wales) Regulations 2006: Guidance for Regional Spatial Strategies and Local Development Documents*; Office of the Deputy Prime Minister (ODPM), Circular 06/2005, Department for Environment Food and Rural Affairs Circular 01/2005, *Biodiversity and Geological Conservation: Statutory obligations and their impact within the planning system*; and Royal Society for the Protection of Birds, 2007, *The Appropriate Assessment of Spatial Plans in England: A guide to why, when and how to do it*.

## 1.4 European sites

1.4.1 European sites are those sites which are of nature conservation importance in a European context. They are often known as Natura 2000 sites across Europe, and are legally registered as Special Protection Areas (for bird sites) and Special Areas of Conservation (for species other than birds, and habitats). These are usually abbreviated as SPA and SAC respectively.

Wetlands of International Importance, designated under the Ramsar Convention, are usually abbreviated as Ramsar sites and are of global importance.

1.4.2 Although the Appropriate Assessment process only legally applies to European sites, Government Policy in the National Planning Policy Framework (2012) is to apply the same protection to Ramsar sites.

1.4.3 As the interest features of the Ramsar sites are usually very similar to the interest features of the SPA and / or SAC designations, both geographically and ecologically, the assessment below, for clarity does not always repeat Ramsar site names. The assessment does however consider Ramsar sites fully, and if an assessment for a Ramsar site was found to differ from that for the respective SPA / SAC, this would be clearly identified.

## 2 European sites potentially affected

### 2.1 European sites within the Bury St Edmunds Vision 2031 area or St Edmundsbury Borough

2.1.1 Any European sites (including Ramsar sites) within the Bury St Edmunds Vision 2031 area or the remaining part of the Borough would be potentially affected by the Bury St Edmunds Vision 2031 Local Plan Document. The Bury St Edmunds Vision 2031 area contains no European sites, but European sites elsewhere in the Borough are listed below.

European site name	Location	Brief reasons for designation
Breckland SPA	north-west part of the Borough (also in Forest Heath District, Breckland District and Kings Lynn & West Norfolk Borough). Nearest point approx 5km east of Bury St Edmunds	stone-curlew, woodlark and nightjar birds on arable land, heathland and forestry.
Breckland SAC	north-west part of the Borough (also in Forest Heath District, Breckland District). Nearest point approx 10km north-west of Bury St Edmunds	heathland, grassland, wet woodland, sand dunes, great crested newt
Waveney – Little Ouse valley Fens	parts of Market Weston, Hopton and Thelnetham parishes (also in South Norfolk District). Nearest point approx 20km north-east of Bury St Edmunds.	wetland habitat

2.1.2 In June 2012, Natural England published conservation objectives for European sites<sup>3</sup>. The conservation objectives for the sites potentially affected by the Bury St Edmunds Vision 2031 Local Plan Document are tabulated below.

<sup>3</sup> <http://www.naturalengland.org.uk/ourwork/conservation/designations/sac/eastofengland.aspx>

European site name	Conservation Objectives
Breckland SAC	<p>With regard to the natural habitats and/or species for which the site has been designated ("the Qualifying Features" listed below);</p> <p><b>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</b></p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> <li>▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species;</li> <li>▪ The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;</li> <li>▪ The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;</li> <li>▪ The populations of qualifying species;</li> <li>▪ The distribution of qualifying species within the site.</li> </ul> <p><b>Qualifying Features:</b>                      H2330. Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands; Open grassland with grey-hair grass and common bent grass of inland dunes                      H3150. Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i>-type vegetation; Naturally nutrient-rich lakes or lochs which are often dominated by pondweed                      H4030. European dry heaths                      H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>); Dry grasslands and scrublands on chalk or limestone                      H91E0. Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>); Alder woodland on floodplains*                      S1166. <i>Triturus cristatus</i>; Great crested newt</p>
Breckland SPA	<p>With regard to the individual species and/or assemblage of species for which the site has been classified ("the Qualifying Features" listed below);</p> <p><b>Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.</b></p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> <li>▪ The extent and distribution of the habitats of the qualifying features;</li> <li>▪ The structure and function of the habitats of the qualifying features;</li> </ul>

European site name	Conservation Objectives
	<ul style="list-style-type: none"> <li>▪ The supporting processes on which the habitats of the qualifying features rely;</li> <li>▪ The populations of the qualifying features;</li> <li>▪ The distribution of the qualifying features within the site.</li> </ul> <p><b>Qualifying Features:</b>                      A133 <i>Burhinus oedicanus</i>; Stone-curlew (Breeding)                      A224 <i>Caprimulgus europaeus</i>; European nightjar (Breeding)                      A246 <i>Lullula arborea</i>; Woodlark (Breeding)</p>
Waveney and Little Ouse Valley Fens SAC	<p>With regard to the natural habitats and/or species for which the site has been designated (“the Qualifying Features” listed below);</p> <p><b>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</b></p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> <li>▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species;</li> <li>▪ The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;</li> <li>▪ The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;</li> <li>▪ The populations of qualifying species;</li> <li>▪ The distribution of qualifying species within the site.</li> </ul> <p><b>Qualifying Features:</b></p> <p>H6410. <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>); Purple moor-grass meadows</p> <p>H7210. Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>; Calcium-rich fen dominated by great fen sedge (saw sedge)*</p> <p>S1016. <i>Vertigo moulinsiana</i>; Desmoulin’s whorl snail</p>

## 2.2 European sites outside the Site Allocations Development Plan area

2.2.1 European sites in neighbouring Districts are also potentially affected by development within the Bury St Edmunds Vision 2031 area. A 20km radius from the boundary of St Edmundsbury was chosen to identify European sites potentially affected by the Bury St Edmunds Vision 2031 Local Plan Document.

European site name	Location	Brief reasons for designation
Redgrave and South Lopham Fens SAC	22km north-east of Bury St Edmunds (Mid Suffolk District)	wetland habitat
Rex Graham Reserve SAC	14km north-west of Bury St Edmunds (Forest Heath District)	orchid-rich grassland
Norfolk Valley Fens SAC	nearest component site is 35km north of Bury St Edmunds (Breckland District and others)	wetland habitat
Devil's Dyke SAC	21km west of Bury St Edmunds (East Cambridgeshire District)	orchid-rich grassland
Fenland SAC	nearest component site is 18km east of Bury St Edmunds (East Cambridgeshire District)	wetland habitat
Chippenham Fen Ramsar site	18km east of Bury St Edmunds (East Cambridgeshire District)	wetland habitat
Wicken Fen Ramsar site	27km east of Bury St Edmunds (East Cambridgeshire District)	wetland habitat

2.2.2 Other European sites, at greater distance, are considered to be at sufficient distance that no potential impact would occur from the Bury St Edmunds Vision 2031 Local Plan Document.

## 2.3 Other relevant plans or projects affecting these sites

2.3.1 In addition to a potential effect from the Bury St Edmunds Vision 2031 Local Plan Document, the European sites might also be affected by a number of plans or projects, including other Local Plan documents of St Edmundsbury, the Local Plan documents of other neighbouring Local Authorities, existing developments and proposed developments, management carried out by land managers with the consent of Natural England and third party effects such as recreation, etc.

2.3.2 In the context of this Habitats Regulation Assessment, the most relevant other plans or projects to be considered are

- St Edmundsbury Borough Council's Haverhill Vision 2031
- St Edmundsbury Borough Council's Rural Vision 2031

2.3.3 These plans are considered as part of this determination of likely significant effect of the Bury St Edmunds Vision 2031 Local Plan Document. Plans or projects in neighbouring Districts / Boroughs / Counties have been assessed at the Core Strategy stage<sup>4</sup> and further assessment is not necessary.

<sup>4</sup> Atkins (2010) St Edmundsbury Core Strategy Habitats Regulations Assessment: Screening

### 3 Possible likely significant effects

#### 3.1 Introduction to possible likely significant effects

3.1.1 Possible likely significant effects arising from development resulting from the Bury St Edmunds Vision 2031 Local Plan Document need to be considered to determine their effect on any European site. The matters to be considered are

- Land-take from any European site
- Development within 1500m of part of Breckland SPA (supporting stone-curlew) or 400m of Breckland SPA (supporting woodlark and nightjar), according to Core Strategy policy CS2
- Development which would result in harmful recreational pressure to a European site
- An increase in air pollution from new roads close to SAC sites
- Increased water use requiring water companies to abstract water which would result in a wetland European site drying unacceptably

3.1.2 These matters may be more or less relevant to the Bury St Edmunds Vision 2031 Local Plan Document depending upon their size, characteristics and location. St Edmundsbury's Core Strategy contains Policy CS1 'St Edmundsbury Spatial Strategy' and Policy CS2 'Sustainable Development' which provide protection to Breckland SPA and other European, national and local sites designated for nature conservation. The Bury Vision 2031 Local Plan Document sits within the context of the over-arching Core Strategy.

3.1.3 Various options for different layouts within each strategic allocation had previously been assessed. The different options, for similar amounts and types of development, do not make any difference to the assessment of their impacts, due to the distance of the sites from European sites.

#### 3.2 Consideration of likely significant effects

3.2.1 There is no allocation or policy resulting in land-take from a European site so this matter would have no likely significant effect upon any European site.

3.2.2 There is no allocation nor policy resulting in development within 1500m of any part of Breckland SPA (supporting stone-curlew) or 400m of Breckland SPA (supporting woodlark and nightjar); Bury St Edmunds is around 5km from the nearest point of Breckland SPA. The St Edmundsbury Core Strategy suggests that development outside these 1500m and 400m buffer zones would not be likely to have a significant effect upon any European site. The allocations are consistent with the adopted Core Strategy (2010), which itself underwent Habitats Regulations Assessment and so the Bury Vision 2013 Local Plan Document would have no impact upon the birds which form the qualifying features of the SPA.

3.2.3 Development of sites may potentially cause increased air pollution as a result of increased traffic in the area, such as on new roads. Air pollution associated with road traffic generally reduces to background levels within 200m of the road<sup>5</sup>. There is no modification resulting in development, including new roads, within 200m of a European site so air pollution would have no likely significant effect upon any European site. There are no allocations for employment sites which are anticipated to generate a significant source of pollution; any planning applications which might result in air pollution being emitted would need to be accompanied by a separate assessment of the impacts of that pollution.

3.2.4 A Water Cycle study forms part of St Edmundsbury's evidence base for their Local Plan<sup>6</sup>. This 2009 Study highlighted that there should be sufficient water resources available to supply the study area in the future provided that new developments meet water efficiency standards, and

<sup>5</sup> Highways Agency DMRB Volume11, Section3, Part 1, *Air Quality* (revised May 2007, Ref HA 207/07).

<sup>6</sup> Hyder Consulting (August 2009) *Forest Heath District Council and St Edmundsbury Borough Council SFRA and Water Cycle Study*

provided that Anglian Water Services can implement their draft Water Resource Management Plans. The Core Strategy highlights in Policy CS2 the maximising of water efficiency. Anglian Water's (2010) *Water Resource Management Plan* confirmed that it was able to meet demand in an environmentally acceptable manner. It is considered that the main modifications would not increase the amount of overall water usage by any noticeable amount compared to the Submission Document version of the plan, and the main modifications would have no likely significant effect on any European site.

3.2.5 Of the potential impacts listed, the possibility of an increase in harmful recreational pressure requires further assessment.

3.2.6 The list of policies assessed in in Appendix 1 and screening of individual policies is given in Appendix 2.

### 3.3 Assessment of increases in recreational pressure

3.3.1 In July 2010, a study was made of visitors to Breckland SPA, in particular studying visitors to car parks within Thetford Forest (a component of the SPA)<sup>7</sup> and to West Stow Country Park. Key points found from the study were that

- Most people (91%) drove to the car parks studied. Half of all the visitors lived within 8.8km of the area they visited, and those people tended to visit at least once a week. People who lived over 10km distant visited infrequently, with less than 1 visit per 1000 households per day.
- Around 8% of visitors to the car parks surveyed had come from Bury St Edmunds (55 people out of 677 interviewed).
- Most people visited small 'honeypot' areas (small in relation to the size of the SPA).
- Visitor levels were lower than to many other similar European sites elsewhere in southern England and there was no evidence of harm being caused to European sites.

3.3.2 The nearest car parks to Bury St Edmunds within the SPA would be at West Stow Country Park, North Stow, King's Forest, and Cavenham Heath NNR. Within 10km radius of central Bury St Edmunds are the car parks at West Stow Picnic Site and West Stow Country Park.

3.3.3 In 2009, there were 17,880 houses in Bury St Edmunds<sup>8</sup>. An increase in 6,350 houses from 2009 – 2031 as determined by the Core Strategy and located in the Bury St Edmunds Vision 2031 Local Plan Document, would be an increase of 35% of houses, including all the strategic locations and smaller allocations within the town. Assuming that the number of people in a household of the new houses reflects the existing number of people per household, and that their behaviour is similar to existing residents, an increase in people leaving Bury St Edmunds to visit the SPA would correspondingly increase by 35%.

3.3.4 With 8% of all visitors to sites in the study area being from Bury St Edmunds, an increase of 35% of people in Bury St Edmunds would result in an increase of just under 3% of people to the study area, according to the results of this study. Distances of travel are measured from the centre of Bury St Edmunds as an average of strategic locations around the town; good road links within and out of Bury St Edmunds mean that driving from, for example, eastern Bury St Edmunds to the north-west is not especially more onerous than driving from western Bury St Edmunds in the same direction and so it seems inappropriate to measure each separate strategic location and smaller allocation separately.

3.3.5 However, it is unlikely that visitors will increase uniformly across the SPA. It is expected that the number of visitors will increase disproportionately at sites close to Bury St Edmunds, especially those within 10km which are West Stow Country Park and West Stow Picnic Site, and minor informal parking locations (e.g. wide verges to roads or entrances to Fire Routes). West Stow Country Park is well managed for visitors, with large and the busiest areas of the park

<sup>7</sup> Fearnley, H., Liley, D. and Cruickshanks, K. (2010). *Visitor survey results from Breckland SPA*. Footprint Ecology

<sup>8</sup> Suffolk County Council (2010) *Housing Stock For Suffolk's Districts And Parishes 2001 - 2010*

outside the SPA, and with marked trails for visitors through the SPA portion of the Country Park. Anecdotal evidence is that visitor numbers reduced since car park charges were introduced in April 2012, although numbers may have subsequently risen to around previous levels. West Stow Picnic Site provides pedestrian access to Thetford Forest, and there is no evidence that SPA bird numbers are being negatively affected by this; certainly the current level of use at the picnic site is much less than at other recreational sites in the Forest which are not in unfavourable condition.

- 3.3.6 It is considered that a small increase in visitors to Breckland SPA are likely to be concentrated in areas closer to Bury St Edmunds, although not in sufficient extra numbers to cause any harm to the SPA. There is likely to be no significant effect upon the features for which the SPA was designated.

### **3.4 Policies which may result in reduced visitor pressure on European sites**

- 3.4.1 Bury St Edmunds Vision 2031 Local Plan Document includes several policies which provide alternative recreational opportunities or improved quality of existing recreational opportunities. These are

- Policy BV3 and BV5 – BV7 (strategic allocations) contain scope for a buffer including some amenity and recreational use.
- Policy BV19 (Land west of Rougham Road ) which allocates 15ha of land for outdoor use as amenity public open space for informal outdoor recreation
- Policy BV16 (British Sugar Site – Areas North of Compiegne Way ) which safeguards the River Lark corridor and the adjoining fishing pond and meadow, for appropriate management in the long term,
- Policy BV26 protects, maintains and enhances existing green infrastructure, which includes the creation of new habitats, extends the coverage and connectivity of the strategic green infrastructure network and provides new community parklands on the strategic growth areas in the town.

- 3.4.2 St Edmundsbury's Rural Vision 2031 Local Plan Document also contains Policy RV6 'Park Farm Ingham' which allocates 86 hectares of land at Park Farm, Ingham for leisure, recreation and tourism. The site would provide areas of public open space and recreational open space, which is likely to be used as an alternative convenient local greenspace by some residents of surrounding villages and some residents of Bury St Edmunds.

- 3.4.3 These policies will individually and collectively, when implemented, provide alternative places for countryside recreation and therefore intercept some visitors who may otherwise have travelled to the SPA for recreation.

### **3.5 Conclusion of screening**

- 3.5.1 It is concluded that each individual site allocation or policy within the St Edmundsbury Borough Council Bury St Edmunds Vision 2031 Local Plan Document is not likely to have a significant effect on any European site, and that no individual site appropriate assessment is necessary.

### **3.6 In-combination effects of individual site allocations**

- 3.6.1 In combination effects, particularly the effect of increased recreational pressure from all site allocations, is considered in Section 3.3 above. No further in-combination effects are considered to be significant.

### **3.7 In-combination effects of all development within St Edmundsbury**

- 3.7.1 St Edmundsbury's Core Strategy underwent Appropriate Assessment, and was found to be sound following an Examination in Public. The Bury St Edmunds Vision 2031 Local Plan Document adds further detail, but does not increase the amount of development planned for

the Bury St Edmunds area. The cumulative effect of all development has already been assessed through the Core Strategy process and does not require further assessment.

## **4 Consultations**

### **4.1 Consultation comments received**

- 4.1.1 St Edmundsbury Borough Council consulted publicly on the Bury Vision 2031 preferred options document in March and April 2012. Two respondents commented on the Appropriate Assessment screening.
- 4.1.2 Natural England, in its letter of 26<sup>th</sup> April 2012 said that it was generally satisfied with the methodology and assessment presented in the report and believed this is in line with the requirements of the Conservation (of Habitats and Species) Regulations 2010. Whilst Natural England did not disagree with the conclusion that any increase in visitor numbers is unlikely to result in a significant effect, it suggested that consideration is also given to the mitigating effects of alternative strategic and local green infrastructure which the Plan is promoting through development. This letter is reproduced in Appendix 3.
- 4.1.3 Suffolk Wildlife Trust, in its letter of 30<sup>th</sup> April 2012, made various nature conservation comments but did not specifically refer to the Appropriate Assessment screening. This letter is given in Appendix 4.
- 4.1.4 Consultation on the Bury St Edmunds Vision 2031 submission document took place between June and August 2013. Natural England, in its letter of 9 August 2013, stated that they were satisfied with the methodology and assessment presented in the report and believed it met the requirements of the Conservation (of Habitats and Species) Regulations 2010. This letter is given in Appendix 5.
- 4.1.5 No further substantial comments were received on consultation on the Main Modifications in spring 2014. Natural England commented on 21<sup>st</sup> May 2014 (Appendix 6) on modifications but made no comment on the Habitats Regulations Assessment of the modification.

### **4.2 Response to the consultations**

- 4.2.1 The Bury Vision 2031 Submission Document was amended in 2013 to include a new Policy BV28 'Green Infrastructure in Bury St Edmunds' to draw together the policy on this issue. The Habitats Regulations Assessment of the Submission document was amended at that time to add further emphasis on addressing the recommendations for the policies as requested by Natural England. There were no recommendations by any consultees which remained unaddressed at that time and no subsequent recommendations requiring to be addressed.

## 5 Summary

### 5.1 Summary of the assessment

- 5.1.1 The Bury St Edmunds Vision 2031 Local Plan Document contains options for the future growth of Bury St Edmunds including town centre sites and concept plan options for five strategic growth areas on the periphery of the town.
- 5.1.2 There is no allocation or policy resulting in land-take from a European site so this matter would have no likely significant effect upon any European site. There is no allocation nor policy resulting in development within 1500m of any part of Breckland SPA (supporting stone-curlew) or 400m of Breckland SPA (supporting woodlark and nightjar); Bury St Edmunds is around 5km from the nearest point of Breckland SPA. The St Edmundsbury Core Strategy suggests that development outside these 1500m and 400m buffer zones would not be likely to have a significant effect upon any European site.
- 5.1.3 There is no allocation or policy resulting in development, including new roads, which would cause air pollution have a likely significant effect upon any European site. The Water Cycle study forming part of St Edmundsbury's evidence base highlighted that there should be sufficient water resources available to supply the study area in the future provided that new developments meet water efficiency standards.
- 5.1.4 The possibility of an increase in harmful recreational pressure required further assessment. In July 2010, a study was made of visitors to Breckland SPA, in particular studying visitors to car parks within Thetford Forest (a component of the SPA) and to West Stow Country Park. An increase in people leaving Bury St Edmunds to visit the SPA would increase visitor pressure on the SPA by around 3%, with most people visiting honeypot sites such as West Stow Country Park. The SPA in this location is managed for visitor access. It is considered that a small increase in visitors to Breckland SPA are likely to be concentrated in areas closer to Bury St Edmunds, although not in sufficient extra numbers to cause any harm to the SPA
- 5.1.5 Bury St Edmunds Vision 2031 Local Plan Document includes several policies which provide alternative recreational opportunities or improved quality of existing recreational opportunities. These are Policy BV21 (Land west of Rougham Hill), Policy BV16 (British Sugar Site: Areas North of Compiegne Way) and Policy BV26 which protects, maintains and enhances existing green infrastructure. St Edmundsbury's Rural Vision 2031 Local Plan Document also contains Policy RV6 'Park Farm Ingham' which allocates 86 hectares of land at Park Farm, Ingham for leisure, recreation and tourism. These policies will individually and collectively, when implemented, provide alternative places for countryside recreation and therefore intercept some visitors who may otherwise have travelled to the SPA for recreation.
- 5.1.6 There is likely to be no significant effect upon the features for which the SPA was designated from recreational pressure.

### 5.2 Summary of Conclusions

- 5.2.1 It is concluded that the Bury Vision 2031 Local Plan Document would have no likely significant effect on any European site alone or in combination with any other plans or projects.

# ***Appendix 1***

**Bury St Edmunds Vision 2031: Final policies showing tracked changes from previous versions**

**POLICY BV1 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT**

When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise – taking into account whether:

- any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- specific policies in that Framework indicate that development should be restricted.

*Note: This policy has been published by the Planning Inspectorate and is required to be included in all Local Plans.*

**POLICY BV2: HOUSING DEVELOPMENT WITHIN BURY ST EDMUNDS**

Within the housing settlement boundary for Bury St Edmunds (defined on the Policies Map) planning permission for new residential development, residential conversion schemes, residential redevelopment and replacement of existing dwellings with a new dwelling will be ~~permitted~~ granted where it is not contrary to other planning policies.

**POLICY BV3: STRATEGIC SITE – NORTH-WEST BURY ST EDMUNDS**

76.5 Ha of land at north-west Bury St Edmunds as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy ~~and is identified on the concept statement.~~

A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).

Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.

#### **POLICY BV4: STRATEGIC SITE – MORETON HALL, BURY ST EDMUNDS**

34.1 Ha of land at Moreton Hall, Bury St Edmunds as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy ~~and is identified on the concept statement.~~

Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.

#### **POLICY BV5: STRATEGIC SITE – WEST BURY ST EDMUNDS**

54.3 Ha of land at West Bury St Edmunds as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy ~~and is identified on the concept statement.~~ This allocation includes a site for the provision of a sub-regional health campus (relocation of West Suffolk Hospital).

A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).

Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement

unless a material change in circumstances indicates otherwise.

**POLICY BV6: STRATEGIC SITE – NORTH-EAST BURY ST EDMUNDS**

~~66.5~~ 89.5 Ha of land at north-east Bury St Edmunds as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core ~~Strategy and is identified on the concept statement.~~

A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).

Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.

**POLICY BV7: STRATEGIC SITE – SOUTH-EAST BURY ST EDMUNDS**

~~70~~ 74.9 Ha of land at south-east Bury St Edmunds as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core ~~Strategy and is identified on the concept statement.~~

A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).

Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.

**POLICY BV8: STATION HILL DEVELOPMENT AREA - BURY ST EDMUNDS**

The site bounded by Out Northgate, Tayfen Road and the Ipswich - Cambridge railway line is allocated for redevelopment that should seek to deliver the following:

- a. residential (300 units indicative);
- b. offices and other B1 employment;
- c. leisure uses;
- d. small scale retail uses to serve local needs;
- e. parking ancillary to these uses and to supplement the requirements of the railway station;
- f. an improved public transport interchange; and
- g. strategic landscaping and public realm improvements.

Small scale retail development shall be interpreted as units not exceeding 150 sq. metres in net floor area.

The amount of land available for development, phasing arrangements, location of uses, access arrangements, mix and design and landscaping will be informed by a masterplan for the site.

Applications for planning permission will only be ~~considered~~ determined once the masterplan has been adopted by the local planning authority. The developer will be expected to prepare the masterplan which should be prepared in accordance with the content of the adopted concept statement for the site unless a material change in circumstances indicates otherwise.

The rail sidings are identified in the Suffolk Minerals Local Plan as a strategic site for the handling of minerals. Proposals for development which limits the use of the rail sidings will not be granted until satisfactory alternative provision is made or it has been demonstrated that there is no demand for rail sidings in the area.

#### **POLICY BV9: TAYFEN ROAD – BURY ST EDMUNDS**

Land at Tayfen Road, Bury St Edmunds, identified on the Policies Map, is allocated for redevelopment that should seek to deliver the following:

- a. retail warehousing floorspace;
- b. foodstore; (around 1,500sq metres (gross));
- c. leisure uses;
- d. residential (100 units indicative); and
- e. strategic landscaping and public realm improvements.

The amount of land available for development, any phasing arrangements, mix and location of uses, access arrangements, design and landscaping will be informed by the masterplan for the

site.

Applications for planning permission will only be ~~considered~~ determined once the masterplan, ~~or any significant amendments to it~~ has been adopted by the local planning authority. The developer will be expected to prepare the masterplan which should be prepared in accordance with the content of the adopted concept statement for the site unless a material change in circumstances indicates otherwise.

#### POLICY BV10: HOUSING ON BROWNFIELD SITES - BURY ST EDMUNDS

The following brownfield sites are allocated for residential development.

		Indicative Capacity	Site Area (ha) Gross
a	Bury St Edmunds Garden Centre	30	1.75
b	Land at Jacqueline Close	30	2.0
c	Hospital Site, Hospital Road	45	1.5
d	Shire Hall	25	1.3
e	Weymed Site	14	0.27
f	Land at School Yard	32	0.64
G	Almoners Barn, Cullum Road	12	0.24
Mixed Use Site (including residential)			
h	Garages and Bus Depot, Cotton Lane	50	0.7

These sites are identified on the Policies Map

Please note, allocations reflect situation as at 1 April 2012

#### POLICY BV11: LAND AT RAM MEADOW

3.84 (net) Ha of land at Ram Meadow is allocated for mixed use development which may include residential development and commercial uses, public open space and car parking ~~and an access~~

~~road to Compiegne Way~~. Numbers and distribution of uses and access arrangements will be informed by a more detailed development brief for the site.

The following studies should be undertaken prior to the preparation of the site development brief;

- a. A ~~a~~-transport assessment;
- b. A ~~a~~-full site specific ecological survey; and
- c. A ~~a~~-site specific flood risk assessment.

A wildlife management plan should be produced as part of any application for development on the site. This should include details of any required ecological mitigation measures.

#### **POLICY BV12: NEW AND EXISTING LOCAL CENTRES AND COMMUNITY FACILITIES**

Existing local centres are identified at:

- a) Barton Road
- b) Cadogan Road
- c) Glastonbury Road
- d) Hardwick Precinct
- e) Lake Avenue Parade
- f) Moreton Hall
- g) The Parade, Ridley Road
- h) St Olaves Precinct
- i) Stamford Court

Sites for new local centres will be provided at:

- j) North West Bury St Edmunds strategic site
- k) Moreton Hall strategic site
- l) North-East Bury St Edmunds strategic site
- m) South-East Bury St Edmunds strategic site

The locations of the new local centres will be identified through the masterplan process.

#### **POLICY BV13: STRATEGIC SITE – EXTENSION TO SUFFOLK BUSINESS PARK, MORETON HALL, BURY ST EDMUNDS**

68.28 ha of land east of Suffolk Business Park, Bury St Edmunds (but excluding the Rougham Industrial Estate General Employment Area) is

allocated for Employment Uses (Use Classes B1 and B8).

This is a long-term allocation, development of which is likely to extend beyond this plan period. Prior to the commencement of development, a relief road linking Bedingfeld Way with the A14 Rookery Crossroads must be completed and available for use in accordance with Core Strategy Policies CS11 and CS14.

The amount of land available for development, location of uses, access arrangements, phasing of development, linkages to the airfield site, design and landscaping have been informed by a masterplan for the site.

A travel plan should be prepared and implemented to reduce dependency on access to the business park by the private car.

Developers will be expected to enter into a legal obligation to implement relevant sections of the road, drainage and service infrastructure in advance of business units on the site being occupied.

~~An investigation of the extent and quality of the mineral resource at the site will be required prior to any planning permission being granted to enable a judgement to be reached on the case for prior extraction of the minerals to avoid sterilisation.~~

#### **POLICY BV14: GENERAL EMPLOYMENT AREAS – BURY ST EDMUNDS**

The following areas are designated as General Employment Areas

		Use class
a	Anglian Lane	(B1,B8)
b	Barton Road	(B1,B8)
c	Blenheim Park	(B1,B2,B8)
d	British Sugar, Hollow Road	(B1,B2,B8)
e	Suffolk Business Park	(B1,B8)
f	Chapel Pond Hill	(B1,B2,B8)
g	Eastern Way	(B1,B2,B8)
h	Enterprise Park, Etna Road	(B1,B8)
i	Mildenhall Road	(B1,B2,B8)

j	Moreton Hall	(B1,B2,B8)
k	Northern Way	(B1,B2,B8)
l	Western Way	(B1,B2,B8)
m	Greene King, Friars Lane	(B1,B2,B8)
n	Rougham	(B1,B2,B8)

Within the General Employment Areas, the following land is available for development as of 1 April 2012:

	<u>Developable site area (hectares)</u>
Anglian Lane	0.40
Blenheim Park	0.77
Suffolk Business Park*	5.51
Chapel Pond Hill	0.88
Eastern Way	0.20
Mildenhall Road	4.29
Northern Way	0.34
<b>TOTAL AREA AVAILABLE</b>	<b>12.39</b>

\* Development at Suffolk Business Park will comprise the following:

- a) light industrial, research and office use;
- b) units for new and small firms involved in high technology and related activities; and
- c) extensive landscaping, particularly around the perimeter of the site.

Note: References to Classes B1, B2 and B8 are as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended).

Proposals for industrial and business development within the use classes identified for each of the General Employment Areas in the table above will be permitted providing that parking, access, travel and general environmental considerations can be met.

#### **POLICY BV15: ALTERNATIVE BUSINESS DEVELOPMENT WITHIN GENERAL EMPLOYMENT AREAS**

Within the following General Employment Areas, opportunities for the redevelopment or re-use of sites and buildings for alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes will be considered favourably where they;

- a) do not conflict with policies elsewhere within the Development Plan;
- b) seek to maximise the sites' potential for economic growth and/or

support the continued operation of the existing businesses and industrial activities; and  
c) do not generate potential conflict with existing or proposed general industrial (Use Class B2) activities.

a	Barton Road
b	Blenheim Park
c	British Sugar, Hollow Road
d	Eastern Way
e	Mildenhall Road
f	Northern Way
g	Western Way

**POLICY BV16: BRITISH SUGAR LAGOONS BRITISH SUGAR SITE – AREAS NORTH OF COMPIEGNE WAY**

~~The local planning authority will encourage the long-term improvement of the lagoons, residue beds, spoil and landscaped areas of the British Sugar site, as identified on the Policies Map, should they no longer be necessary for the operational requirements of the factory. Other than uses associated with the factory, appropriate forms of alternative use such as recreation and nature conservation uses will be considered across the site. The area adjoining the River Lark forms an important link in the creation of the ‘Lark Valley Green Corridor’ (identified in the Green Infrastructure Study). Any development should include the safe and secure provision of this corridor.~~

~~As well as the above uses, the land south of Compiègne Way is appropriate for employment (B2 General Industrial) uses.~~

~~The amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by a development brief for the site prepared by the landowner. Applications for planning permission will only be considered once the development brief has been adopted by the local planning authority.~~

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/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.

The River Lark corridor and the adjoining fishing pond and meadow, identified on the Policies Map as a Local Wildlife Site, form an important link in the creation of the 'Lark Valley Green Corridor' (identified in the Green Infrastructure Strategy). This area will be safeguarded for appropriate management in the long term.

#### **POLICY BV17: BURY-ST-EDMUNDS-RETAIL-PARK-Out of Centre Retail Proposals**

~~A site is identified on the Policies Map bounded by Bedingfeld Way and the A14 and including Greyfriars Road, as the St Edmundsbury Retail Park:~~

~~In addition to the policies elsewhere in this plan, proposals~~ **Proposals** for ~~all~~ retail floorspace outside defined centres ~~on this site~~ will only be permitted where they comply with ~~judged against~~ the following criteria:  
~~a the need for the proposal;~~

~~b~~ a that a sequential approach has been adopted in selecting the site demonstrating that ~~all potential~~ there are no suitable, viable and available sites ~~have been evaluated~~ in defined centres or edge-of-centre locations; ~~and~~

~~e~~ b proposals for additional floorspace in excess of 1,000 square metres gross will be required to demonstrate that the proposal will not have a significant adverse impact of the proposal on the vitality and viability of Bury St Edmunds ~~town centre~~ Primary Shopping Area and local centres, taking into account ~~including~~ the cumulative impact of recently completed developments and unimplemented planning permissions, ~~taking into account~~ the results of a shopping impact study ~~retail impact assessment~~ and/or where appropriate an environmental assessment; ~~and~~

c that the site is accessible by a choice of means of transport.

~~Proposals for additional floorspace in excess of 1,000 square metres gross will be required to submit an impact assessment with planning applications. This threshold is set in accordance with the recommendations of the Retail Appraisal and paragraph 26 of the NPPF.~~

A retail site is identified on the Policies Map bounded by Bedingfeld Way and the A14 and including Greyfriars Road, (known as the St Edmundsbury Retail Park). Proposals for additional floorspace on this site will be judged against criteria (a) and (b) of this policy.

### ~~Policy BV18: District Heating~~

~~It is required that new development in a decentralised energy opportunity area (which, should they be identified, will be defined in a forthcoming SPD on decentralised energy generation) should, unless it can be demonstrated to the satisfaction of the Local Planning Authority that it would be unfeasible or unviable, contribute to the establishment of a strategic decentralised energy network(s) in suitable locations according to the following protocol:~~

- ~~1. Developments should connect up to any available decentralised energy network.~~
- ~~2. Where a network does not (yet) exist, developments should consider installing a network to serve the site. The network should connect to or be compatible with connection to an area-wide network at a future date.~~

~~The following general principles also apply to all development:~~

- ~~3. Development of all sizes should seek to make use of available heat, biomass and waste heat.~~
- ~~4. New development should be designed to maximise the opportunities to accommodate a decentralised energy solution, considering density, mix of use, layout and phasing.~~

### ~~POLICY BV19~~**POLICY BV18** – Community Infrastructure Levy and Allowable Solutions

Money raised through the CIL and, in future, from Allowable Solutions may be required to contribute towards energy efficiency and carbon dioxide reduction projects identified by the council in future, It may also contribute towards the development of the strategic district heating networks. Further details will be set out in the forthcoming CIL Charging Protocol and a future Allowable Solutions SPD.

### ~~POLICY BV20~~**POLICY BV19: LAND WEST OF ROUGHAM ROAD**

15 Ha of land to the west of Rougham Road is allocated for use as amenity public open space for informal outdoor recreational recreation use and associated facilities. Any development on the land will be limited to development 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 BV25. ~~The amount of land and distribution of uses will be informed by a detailed development brief that shall have regard to the following requirements:~~

- ~~a) the area of land taken for buildings and hard landscaping shall be kept to the minimum required to make open space recreational uses viable;~~  
~~b) buildings should be located adjoining Rougham Road;~~

Initiatives will be supported that promote:

- a) public access to the land for informal outdoor recreation;  
~~e) b) the provision of a cycle route and footpath shall be provided linking Rougham Road and cycle route 51; and~~  
c) the provision of new areas of habitat and biodiversity opportunities in appropriate locations across the site.  
~~d) development should not have a detrimental impact on the setting of the Bury St Edmunds town centre conservation area in accordance with Policy BV26.~~

#### **POLICY ~~BV24~~BV20: ROUGHAM AIRFIELD**

Land at Rougham Airfield, as identified on the Policies Map, is safeguarded for:

- airfield uses;
- sporting and recreational uses; ~~and~~
- leisure activities, including entertainment and the creative arts;  
and
- showground and outdoor events.

Proposals for new buildings on the site associated with these uses will be conditioned so that they cannot be brought into use until the Eastern Relief Road (Core Strategy Policies CS11 and CS14) is constructed.

#### **POLICY ~~BV22~~BV21: ALLOTMENTS**

Proposals that will result in the loss of allotments will not be allowed unless:

- ait can be demonstrated that there is no local demand for the allotment; or
- b suitable alternative allotment provision ~~mitigation~~ can be identified and made available.

Any replacement provision should take account of the needs of the locality, accessibility and suitability.

Sites for the provision of additional allotments will be identified, where appropriate, in masterplans and development briefs.

**POLICY ~~BV23~~BV22: WEST SUFFOLK HOSPITAL AND ST NICHOLAS' HOSPICE**

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) additional and adequate car parking is provided;
- c) a travel plan to reduce dependency on access to the Hospital Site by the private motor car is prepared and implemented; and
- d) the proposal would not have an unacceptable impact on the amenity of the hospital site and the surrounding area.

**POLICY ~~BV24~~BV23: WEST SUFFOLK COLLEGE**

Within the site shown on the Policies Map at Out Risbygate (known as the College Site), permission for the expansion of educational premises and associated uses will be permitted where:

- a the proposal would not have an unacceptable impact on the amenity of the college site and the surrounding area;
- b the travel plan to reduce dependency on access to the college site by the private motor car is updated as necessary and implemented;
- c additional car parking is provided; and
- d the wooded area referred to as the Copse in the masterplan and identified on the Policies Map shall be retained and protected from development.

The amount of land available for development, location of uses, access arrangements, design and landscaping has been informed by a masterplan for the site. Applications for planning permission will be required to adhere to the requirements of the masterplan.

**POLICY ~~BV25~~BV24: SAFEGUARDING EDUCATIONAL ESTABLISHMENTS**

Existing and proposed schools and educational establishments will be safeguarded for educational and community use. Development will be considered favourably where:

- i) a. the development is for buildings and/or facilities ancillary to, or enhancing the educational or community use; or
- ii) b. the facility which would be lost as a result of the proposed development would be replaced by an establishment of an equivalent or better quality, in a suitable location; or
- iii) c. there is clear evidence through a quantified and documented assessment that now, and in the future, the site will no longer be needed for its current purpose and there is no community need for the site.

**POLICY ~~BV26~~BV25: CONSERVING THE SETTING AND VIEWS FROM THE HISTORIC CORE**

The council will seek to preserve or enhance the townscape and landscape setting of the Bury St Edmunds Town Centre Conservation Area. Special care will be taken to ensure that views from and into this historic centre remain-unspoilt with particular regard to the vista along Abbeygate Street and from the water meadows of the Lark and Linnet.

**Policy ~~BV27~~BV26: Green Infrastructure in Bury St Edmunds**

In and around the town of Bury St Edmunds the integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced, which includes the creation of new habitats, through the implementation of the St Edmundsbury Green Infrastructure Strategy.

Opportunities to extend the coverage and connectivity of the strategic green infrastructure network should be undertaken in association with new development, where appropriate.

Green Infrastructure projects will:

- a Enhance the character of the Green Infrastructure Action Zones identified in the Green Infrastructure Strategy;
- b enhance and extend, where practical, the wetland landscape character of the urban River Lark and River Linnet;
- c provide new community parklands on the strategic growth areas in the town, the areas for which will be determined at the concept and masterplan stage; ~~and~~
- d connect multifunctional green infrastructure routes/corridors in the

**town to existing and future green spaces; and**  
**e promote access to, and appreciation of, local history and heritage**  
**assets within the landscape as part of a multi-functional approach.**

The council will work with its partners to develop the green infrastructure network and implement proposed network improvements including those set out in the Green Infrastructure Strategy.

Planning permission for development that would harm the Green Infrastructure network will only be granted if it can incorporate measures that avoid the harm arising or sufficiently mitigate its effects.

#### **POLICY ~~BV28~~BV27: BURY ST EDMUNDS TOWN CENTRE MASTERPLAN**

A detailed masterplan will be prepared for Bury St Edmunds town centre to provide the context for the future development of the ~~central~~ area and provide the framework for individual development proposals to come forward.

The masterplan will also address:

- town centre traffic management, including car parking;
- the quality of the environment;
- art and the public realm; and
- town centre uses.

Applications for planning permission for sites, other than already identified for development in this Plan, and which would have a strategic impact on the development of the masterplan will only be ~~considered~~ determined once the masterplan has been adopted as planning guidance by the local planning authority following public consultation.

## ***Appendix 2***

## Appendix 2. Screening of policies.

<b>Policy</b>	<b>Screening required</b>	<b>Result of Screening</b>	<b>Recommendations required to be implemented, to provide no likely significant effect upon European site</b>
	<p><i>Yes – might have an effect upon European site.</i></p> <p><i>No – no possible influence on European site</i></p>	<p><i>Yes – is likely to have a significant effect upon a European site.</i></p> <p><i>No – is not likely to have a significant effect upon a European site</i></p>	
POLICY BV1 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT	No	-	n/a
POLICY BV2: HOUSING DEVELOPMENT WITHIN BURY ST EDMUNDS	Yes	No	n/a
POLICY BV3: STRATEGIC SITE – NORTH-WEST BURY ST EDMUNDS	Yes	No	n/a
POLICY BV4: STRATEGIC SITE – MORETON HALL, BURY ST EDMUNDS	Yes	No	n/a
POLICY BV5: STRATEGIC SITE – WEST BURY ST EDMUNDS	Yes	No	n/a
POLICY BV6: STRATEGIC SITE – NORTH-EAST BURY ST EDMUNDS	Yes	No	n/a
POLICY BV7: STRATEGIC SITE – SOUTH-EAST BURY ST EDMUNDS	Yes	No	n/a
POLICY BV8: STATION HILL DEVELOPMENT AREA - BURY ST EDMUNDS	No	-	n/a
POLICY BV9: TAYFEN ROAD – BURY ST EDMUNDS	No	-	n/a

<b>Policy</b>	<b>Screening required</b>	<b>Result of Screening</b>	<b>Recommendations required to be implemented, to provide no likely significant effect upon European site</b>
	<p><i>Yes – might have an effect upon European site.</i></p> <p><i>No – no possible influence on European site</i></p>	<p><i>Yes – is likely to have a significant effect upon a European site.</i></p> <p><i>No – is not likely to have a significant effect upon a European site</i></p>	
POLICY BV10: HOUSING ON BROWNFIELD SITES - BURY ST EDMUNDS	No	-	n/a
POLICY BV11: LAND AT RAM MEADOW	No	-	n/a
POLICY BV12: NEW AND EXISTING LOCAL CENTRES AND COMMUNITY FACILITIES	No	-	n/a
POLICY BV13: STRATEGIC SITE – EXTENSION TO SUFFOLK BUSINESS PARK, MORETON HALL, BURY ST EDMUNDS	No	-	n/a
POLICY BV14: GENERAL EMPLOYMENT AREAS – BURY ST EDMUNDS	No	-	n/a
POLICY BV15: ALTERNATIVE BUSINESS DEVELOPMENT WITHIN GENERAL EMPLOYMENT AREAS	No	-	n/a
POLICY BV16: BRITISH SUGAR SITE – AREAS NORTH OF COMPIEGNE WAY	No	-	n/a
POLICY BV17: OUT OF CENTRE RETAIL PROPOSALS	No	-	n/a

<b>Policy</b>	<b>Screening required</b> <i>Yes – might have an effect upon European site.</i> <i>No – no possible influence on European site</i>	<b>Result of Screening</b> <i>Yes – is likely to have a significant effect upon a European site.</i> <i>No – is not likely to have a significant effect upon a European site</i>	<b>Recommendations required to be implemented, to provide no likely significant effect upon European site</b>
POLICY BV18 – COMMUNITY INFRASTRUCTURE LEVY AND ALLOWABLE SOLUTIONS	No	-	n/a
POLICY BV19: LAND WEST OF ROUGHAM ROAD	No	-	n/a
POLICY BV20: ROUGHAM AIRFIELD	No	-	n/a
POLICY BV21: ALLOTMENTS	No	-	n/a
POLICY BV22: WEST SUFFOLK HOSPITAL AND ST NICHOLAS' HOSPICE	No	-	n/a
POLICY BV23: WEST SUFFOLK COLLEGE	No	-	n/a
POLICY BV24: SAFEGUARDING EDUCATIONAL ESTABLISHMENTS	No	-	n/a
POLICY BV25: CONSERVING THE SETTING AND VIEWS FROM THE HISTORIC CORE	No	-	n/a
POLICY BV26: GREEN INFRASTRUCTURE IN BURY ST EDMUNDS	No	-	n/a
POLICY BV27: BURY ST EDMUNDS TOWN CENTRE MASTERPLAN	No	-	n/a

# ***Appendix 3***

Date: 26<sup>th</sup> April 2012  
Our ref: 47223  
Your ref:



Natural England  
Consultation Service  
Hornbeam House  
Electra Way  
Crewe Business Park  
CREWE  
CW1 6GJ

T: 0300 060 3900

Ian Poole  
Planning Policy and Specialist Services Manager  
St Edmundsbury Borough Council  
Bury St Edmunds

## **BY E-MAIL ONLY**

Dear Mr Poole

### **St Edmundsbury Borough Council Local Development Framework – Publication of Preferred Options Bury St Edmunds Vision 2031**

Thank you for your letter dated 29<sup>th</sup> February 2012 consulting Natural England on the above LDF Preferred Options Publication. Our comments on this are as follows:

As you know, Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We are generally very supportive of this document and particularly welcome proposals to protect and enhance the natural and built environment and to increase the provision of green open space and access to the countryside. We note and welcome recognition of the importance of addressing the challenges of climate change and the need to mitigate and adapt to this through, for example, renewable energy and water efficiency measures.

The document needs to replace reference to the draft NPPF with reference to the NPPF; the newly adopted document includes key amendments, including greater protection and enhancement of the natural environment. Section 11 of the NPPF provides useful guidance for local authorities in preparing Local Plans which will contribute to the conservation and enhancement of the natural environment.

This document recognises the importance of the natural environment for people and wildlife, seeking to ensure that all new development will respect Breckland Special Protection Area (SPA), Special Area of Conservation (SAC) and Sites of Special Scientific Interest (SSSI). We would recommend that this wording is tightened to identify that '*....all new development will seek to protect and enhance Breckland Special Protection Area....*' in line with statutory and national policy requirements.

Natural England supports the Plan's objectives and aspirations, particularly in relation to the historic and natural environment, travel, landscape, health and well being and sustainability and climate change.

Natural England  
Foundry House  
3 Millsands  
Riverside Exchange  
Sheffield S3 8NH

[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

We welcome proposals to protect, maintain and enhance the natural environment, including designated sites and areas of local importance for wildlife. We particularly welcome proposals to promote the management, understanding of and connectivity between these areas and to engage the local community. The section on green infrastructure recognises the need to plan positively for green infrastructure as part of sustainable development and climate change mitigation and adaptation. We are pleased that GI, as part of development, will seek to be multi-functional and be based on the objectives and aspirations of the Green Infrastructure Strategy, including the need for high quality GI linkages. Reference should be made to the crucial role of well designed multi-functional accessible GI in diverting additional recreational pressure, through growth, away from more sensitive areas such as European sites and SSSIs.

### **Sustainability Appraisal**

The Sustainability Appraisal has not identified negative impacts on any national or European designated conservation sites although a number of site allocations are within close proximity to a number of these statutory sites. Whilst we welcome recognition that future development should protect, maintain and enhance the natural environment we believe Section 14 of the Plan should be strengthened to ensure development proposals seek to minimise impacts on biodiversity and provide net gains where possible. This can be achieved by ensuring planning permission is refused if significant harm to biodiversity cannot be avoided, mitigated or compensated for (Section 11 of the NPPF provides further detail).

### **Habitats Regulations Assessment**

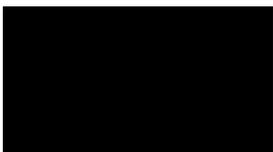
We are generally satisfied with the methodology and assessment presented in the report and believe this is in line with the requirements of the Conservation (of Habitats and Species) Regulations 2010..

The HRA considers the potential negative effects of increased recreational pressure, associated with increases in housing as a result of the Plan, on areas of Breckland SPA. Whilst we do not disagree with the conclusion that any increase in visitor numbers is unlikely to result in a significant effect we would suggest that consideration is also given to the mitigating effects of alternative strategic and local green infrastructure which the Plan is promoting through development. The provision of sufficient high quality accessible green space is a crucial factor in diverting additional recreational pressure away from more sensitive sites, including European sites and also SSSIs and other sensitive areas.

You should refer to our response to the Core Strategy for further comments on specific policies and sites.

For any correspondence or queries relating to this consultation only, please contact me using the details below. For all other correspondence, please contact the address above.

Yours sincerely



Janet Nuttall CEnv MIEEM  
Planning and Conservation Advisor  
Land Use Operations  
Cambridge

T: 0300 060 1239  
F: 0300 060 2115

**[janet.nuttall@naturalengland.org.uk](mailto:janet.nuttall@naturalengland.org.uk)**

## ***Appendix 4***

Ian Poole  
Planning Department  
St. Edmundsbury Borough Council  
West Suffolk House  
Western Way  
Bury St. Edmunds, IP33 3YU

30/04/2012

Dear Mr Poole,

**RE: St Edmundsbury Borough Council Local Development Framework – Publication of Preferred Options Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Areas Vision 2031**

Thank you for consulting us on the above documents, we have the following comments:

**Comments relating to all three Vision 2031 Preferred Options documents (Bury St Edmunds; Haverhill and Rural)**

The comments detailed in this response should be read in conjunction with those provided at the Historic and Natural Environment Vision focus group held on the 22<sup>nd</sup> March 2012.

All documents should be updated to reflect the passing of the Localism Act (2011) and the introduction of the National Planning Policy Framework (NPPF) (2012).

**Comments relating to the Map Books accompanying the Vision 2031 documents**

Neither the maps nor their respective keys identify any Local Nature Reserves (LNRs) which are present within the Borough. This is particularly relevant to Haverhill where the Railway Walks LNR passes through the centre of the town. All maps should be updated to include LNRs where relevant.

**Bury St Edmunds Vision 2031 Preferred Options Document**

Paragraph 1.50 – We support the reference to local biodiversity within this paragraph. However, we recommend that the paragraph is slightly revised because as currently worded it includes it appears to only support the protection and enhancement of biodiversity where this increases access into the countryside or provides the provision of green open space. We consider that it is important that this vision part of the document establishes that biodiversity should be protected and enhanced as a core part of Vision 2031.

Paragraph 3.1 (h) – We support the reference to the town having enhanced and new green infrastructure by 2031.

Policy BV6 (Strategic Site South East Bury St Edmunds) – This site is located adjacent to the River Lark. Any development should be suitably designed so as to ensure that there is no adverse effect on the river, this should include an appropriate natural green space buffer between any development and the river.

Policy BV11 (Ram Meadow) – We object to the allocation of this area for mixed use development and car parking for the following reason. The site forms an important part of the River Lark corridor through the town and development here is likely to result in the

reduction of this green corridor. We are particularly concerned about the proposed access road from Compiegne Way which run the full length of the site, destroying habitat and severing the connection between the main north-south running ditch and the River Lark. The site is known to support water vole (*Arvicola amphibius*) and fragmentation of this site is likely to adversely impact on this species. We recommend that the allocation of this site for development is not included as part of this document and that a more appropriate use is identified to secure the future of this area and to implement the management recommendations made in our 2010 survey report (Suffolk Wildlife Trust report, 2010).

Policy BV21 (Land West of Rougham Hill) – Whilst we recognise that the allocation of this, currently agricultural, site is primarily for recreational use we note that policy BV21 also includes provision for built facilities associated with this use. This site is adjacent to the River Lark and has the potential to form a valuable green space within the river corridor, therefore any built development should be carefully sited and designed so as to ensure that it has no adverse impact on the natural environment, including lighting and recreational pressure.

Paragraph 14.7 (h) – This action relates to the provision of a new country park to the north of the town. We recommend that more detail is included within the document relating to this proposal to help ensure that its implementation will be achieved.

Paragraphs 14.12 to 14.14 – We support the references to the importance of green infrastructure and the St Edmundsbury Green Infrastructure Strategy (2009) contained within these paragraphs. However, whilst as drafted the Vision 2031 includes reference to a number of green infrastructure projects, we query through what mechanisms these projects will be implemented? We consider that in order for this document to be sufficiently robust further detail relating to the implementation of the green infrastructure strategy should be included, as currently worded the document appears to be little more than a reiteration of the aspirations of the green infrastructure strategy.

Monitoring – The document does include any reference as to how the delivery of the proposals and the effectiveness of the policies will be monitored. We would recommend that a suitable chapter identifying the necessary monitoring requirements is included within the document.

### **Haverhill Vision 2031 Preferred Options Document**

Policy HV2 (Strategic Site North West Haverhill) – It should be ensured that the implementation of this policy accords with the measures identified within the adopted Masterplan to protect the Ann Suckling's Way County Wildlife Site (CWS).

Policy HV4 (a) (Land South of Chapelwent Road) – This site is adjacent to Haverhill Disused Railway Line CWS. The site should be subject to a reptile survey prior to any development being considered. The combination of rough grassland and hedgerows also make this site suitable for nesting and foraging birds.

Policy HV7 (b) (Chivers Road/Chimswell Way) – Any development at this site should retain the bramble present at the site.

Policy HV18 (Hollands Road/Duddery Hill) - The site should be subject to a reptile survey prior to any development being considered.

Paragraphs 14.9 to 14.12 – We support the references to the importance of green infrastructure and the St Edmundsbury Green Infrastructure Strategy (2009) contained within these paragraphs. However, whilst as drafted the Vision 2031 includes reference to a number of green infrastructure projects, we query through what mechanisms these projects will be

implemented? We consider that in order for this document to be sufficiently robust further detail relating to the implementation of the green infrastructure strategy should be included, as currently worded the document appears to be little more than a reiteration of the aspirations of the green infrastructure strategy.

Monitoring – The document does include any reference as to how the delivery of the proposals and the effectiveness of the policies will be monitored. We would recommend that a suitable chapter identifying the necessary monitoring requirements is included within the document.

### **Rural Vision 2031 Preferred Options Document**

Paragraph 3.11 (ii) – Update reference to Knettishall Heath, the site is now owned and managed by Suffolk Wildlife Trust and not Suffolk County Council.

Policy RV1 (Neighbourhood Plans) – This policy appears to largely repeat national planning policy and legislations (NPPF and the Localism Act). We query the inclusion of such a policy and recommend that it should be removed if it does not add further local clarification to the situation.

Policy RV4 (Protection of Special Uses) – This policy should include reference to the Breckland Special Area of Conservation (SAC) as part of this site, along with part of the Breckland Special Protection Area (SPA), is located within the perimeter of Barnham Camp. It is noted that this amendment was identified in the Rural Vision 2031 Habitats Regulations Assessment (HRA) and we therefore recommend that the policy and supporting text are amended in line with the recommendations of the HRA.

Section 18 (Historic and Natural Environment) including Policy RV5 (Green Infrastructure in the rural areas) - We support the references to the importance of green infrastructure and the St Edmundsbury Green Infrastructure Strategy (2009) contained within these section, particularly within policy RV5. However, whilst as drafted the document includes reference to a number of green infrastructure projects, we query through what mechanisms these projects will be implemented? We consider that in order for this document to be sufficiently robust further detail relating to the implementation of the green infrastructure strategy should be included, as currently worded the document appears to be little more than a reiteration of the aspirations of the green infrastructure strategy.

Barrow RV6 (a) – This site has the potential to support amphibians, bats and a range of bird species, we therefore recommend that appropriate ecological surveys are carried out at this site.

Barrow RV6 (b) – This site features a central hedge which links to Willsummer Wood, which is designated as a County Wildlife Site (CWS). Any development of this site should include a suitable buffer of this hedge to ensure that it is not adversely affected by development, the indicative housing numbers included within this document should take such a buffer in to account.

Clare RV7 (a) – We note that the reptile survey carried out in support of a planning application for this site (Ref: SE/12/0461) recorded an exceptional population of common lizard (*Zootoca vivipara*) on the site, this species is both a UK and Suffolk Biodiversity Action Plan species. The survey report identified that such a population is likely to be of county importance and we therefore query whether the allocation of this site for development is appropriate given its nature conservation value. Should this site remain as an allocation appropriate mitigation may require several years to implement and it is therefore questionable whether the site can be delivered in the short term?

Clare RV7 (b) – The margins of this site have the potential to support both reptiles and roosting bats, we therefore recommend that surveys for these groups of species are carried out at this site.

Ixworth RV8 (a) - This site has the potential to support roosting bats, we therefore recommend that detailed bat surveys are carried out at this site. It is also known that the site supports nesting swifts (*Apus apus*), any development here should make suitable alternative provision to replace any nest sites which may be lost.

Kedington RV9 (b) - We are currently awaiting the results of an ecological survey of this site. We therefore request that we be allowed to make further comments when we are in receipt of the survey information, this is likely to be by the end of May 2012.

Stanton RV10 (a) – It is understood that a development proposal for this site is currently the subject of a planning appeal. Although the existing proposal did not include the development of the rough grassland in the north of the site, should any development be proposed here in the future we recommend that reptile surveys are carried out.

Cavendish RV12 (a) – Protected species have been recorded on this site (please refer to Suffolk Wildlife Trust survey, 2010). Opportunities for retaining protected species on site should be explored.

Hopton RV16 (a) – We note that the Rural Vision 2031 Habitats Regulations Assessment (HRA) has recommended additional wording for policy RV16 (a) in order to seek to minimise any adverse effects on the Waveney-Little Ouse Valley Fens Special Area of Conservation (SAC) which could occur from increased recreational pressure and increased sewage and surface water resulting from the proposed development. These amendments do not appear in the Preferred Options document and we request that they are included within the final version of the document.

Risby RV18 (a) – The veteran oak tree in the south west corner of this site should be buffered from any development. It is also noted that this is located within one of the Breckland Special Protection Area (SPA) buffer zones identified in Policy CS2 of the St Edmundsbury Core Strategy Development Plan Document.

Wickhambrook RV20 (a) – We are currently awaiting the results of a further ecological survey of this site. We therefore request that we be allowed to make further comments when we are in receipt of the survey information, due to a botanical survey being required this is likely to be by the end of May 2012 (to allow the survey to be carried out during the optimum period).

Monitoring – The document does include any reference as to how the delivery of the proposals and the effectiveness of the policies will be monitored. We would recommend that a suitable chapter identifying the necessary monitoring requirements is included within the document.

Yours sincerely



James Meyer  
Conservation Planner

# ***Appendix 5***

Date: 9<sup>th</sup> August 2013  
Our ref: 89724  
Your ref:



Natural England  
Consultation Service  
Hornbeam House  
Electra Way  
Crewe Business Park  
CREWE  
CW1 6GJ

T: 0300 060 3900

Ian Poole  
Place Shaping Manager  
St Edmundsbury Borough Council  
Bury St Edmunds

## **BY E-MAIL ONLY**

Dear Mr Poole

### **Bury St Edmunds Vision 2031 Local Plan Submission Consultation**

Thank you for your letter dated 17<sup>th</sup> June 2013 consulting Natural England on the Bury St Edmunds Vision 2031 Local Plan Submission documents. Our comments below are in addition to those made in our response at the Preferred Options consultation, in our letter dated 26<sup>th</sup> April 2012.

As you know, Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We are generally supportive of this document and particularly welcome proposals to protect and enhance the natural and built environment and to increase the provision of green open space and access to the countryside. We note and welcome recognition of the importance of addressing the challenges of climate change and the need to mitigate and adapt to this through, for example, renewable energy and water efficiency measures. Natural England supports the Plan's objectives and aspirations, particularly in relation to the historic and natural environment, travel, landscape, health and well being and sustainability and climate change.

### **General comments**

This document recognises the importance of the natural environment for people and wildlife, including Breckland Special Protection Area (SPA) and Special Area of Conservation (SAC) and the need to ensure any impact on the natural environment is minimised.

The Habitat Regulations Assessment (HRA) has concluded that a small increase in visitors to Breckland SPA is likely to be concentrated in areas closer to Bury St Edmunds, although not in sufficient extra numbers to cause any harm to the SPA. Although the SPA does not fall within the area covered by the Bury St Edmunds Vision document, impact on the SPA resulting from the

Natural England  
Foundry House  
3 Millsands  
Riverside Exchange  
Sheffield S3 8NH

[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

growth of the town will continue to be carefully considered in appraising proposals for new development. Additionally the HRA identifies that a number of Vision policies include the requirement for Green Infrastructure provision which will help to divert additional recreational pressure away from more sensitive sites.

We welcome recognition of the need to plan positively for green infrastructure as part of sustainable development and climate change mitigation and adaptation. We are pleased that GI, as part of development, will seek to be multi-functional and based on the objectives and aspirations of the Green Infrastructure Strategy, including provision of high quality GI linkages; for example, Policy BV 16 British Sugar Lagoons seeks to safeguard areas of the Lark Valley Green Corridor adjacent to the site. Relevant policies should also encourage developers to incorporate biodiversity and green infrastructure enhancements as far as possible, in accordance with the NPPF.

### **Policies BV26 and BV27**

Section 14 Historic and Natural Environment includes Aspiration 26 to ensure that the historic and natural environment is managed, protected, maintained and enhanced. We welcome this and recognition of the importance of the natural environment, including European designated sites such as Breckland SPA and SAC, for people and biodiversity, including the unusual Breckland landscape and associated flora and fauna. The area also supports several nationally and locally designated sites including SSSIs, as highlighted in the Sustainability Appraisal; these sites and the need to protect and enhance these as part of development should be recognised within this section of the Vision.

We welcome the actions identified to ensure the natural environment aspiration is delivered, particularly enabling provision of a new country park to the north of the town where there is currently limited access to open areas and working with partners to manage open spaces and woodland in ways that protect their wildlife, whilst allowing the public to enjoy them.

Natural England supports Policy BV27 as far as it seeks to protect and enhance green infrastructure, including green linkages, across the plan area, in accordance with the GI Strategy. We welcome that planning permission for development that would harm the Green Infrastructure network will only be granted if it can incorporate measures to avoid harm or sufficiently mitigate its effects. We trust that this requirement relates to designated sites; however, specific reference would be welcomed.

We would expect all development to be subject to ecological assessment and to aspire to net biodiversity gain where possible, in accordance with NPPF requirements. A specific reference to this in the Vision would be welcomed.

We support the preparation of Concept Statements for Strategic Sites and welcome the inclusion of objectives to protect and enhance biodiversity, green infrastructure and landscape and the incorporation of SUDS. Proposals to development other sites should include similar objectives.

### **Sustainability Appraisal**

The Sustainability Appraisal has not identified negative impacts on any national or European designated conservation sites although a number of site allocations are within close proximity to a number of these statutory sites and/or have the potential to support wider biodiversity. Whilst we welcome recognition in the Sustainability Appraisal that future development should protect, maintain and enhance the natural environment we believe Section 14 of the Plan could be strengthened to ensure development proposals seek to minimise impacts on biodiversity, including designated sites, and provide net gains where possible, in line with the NPPF.

## **Habitats Regulations Assessment**

As mentioned in our previous response we are generally satisfied with the methodology and assessment presented in the report and believe this meets the requirements of the Conservation (of Habitats and Species) Regulations 2010.

Natural England agrees with the conclusion of the HRA that a small increase in visitors to Breckland SPA is likely to be concentrated in areas closer to Bury St Edmunds, although not in sufficient extra numbers to have a significant effect on the SPA. We are pleased to note that our previous advice to consider the mitigating effects of alternative strategic and local green infrastructure in helping to divert additional recreational pressure away from more sensitive sites has been addressed through amendments to a number of plan policies. The provision of sufficient high quality accessible green space in all development, where possible, should be recognised in Section 14 of the Vision.

You should refer to our response to the Core Strategy for further comments on specific policies and sites.

I hope you will find these comments helpful. For any correspondence or queries relating to this consultation only, please contact me using the details below. For all other correspondence, please contact the address above.

Yours sincerely

Janet Nuttall Planning and Conservation Advisor  
Land Use Operations

T: 0300 060 1239

**[janet.nuttall@naturalengland.org.uk](mailto:janet.nuttall@naturalengland.org.uk)**

# ***Appendix 6***

Date: 21 May 2014  
Our ref: 118299  
Your ref: [Click here to enter text.](#)



Ian Poole  
Place Shaping Manager  
St Edmundsbury Borough Council  
Bury St Edmunds

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Mr Poole

**Vision 2031 Local Plan Examination - Main Modifications Consultation**

Thank you for consulting Natural England on the above in your letter of 14<sup>th</sup> April 2014. Our comments are provided below.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Bury Vision 2031 Main Modifications**

We generally welcome the proposed modifications including additional wording, within relevant policies, to identify that buffers are included on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS). Natural England welcomes the delivery of multi-functional informal open space as part of development; however, we would recommend that this should include reference to biodiversity. The additional wording could also be strengthened to better encourage its provision within development.

**Rural Vision 2031 Main Modifications**

We have no substantive comments to make on any of the proposed main modifications.

**Haverhill 2031 Main Modifications**

We generally welcome the proposed modifications including additional wording to Policy HV4 to identify that, in relation to land at north-east Haverhill, a buffer is included on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS). Natural England welcomes the delivery of multi-functional informal open space as part of development; however we would recommend that this should include reference to biodiversity. The additional wording could also be strengthened to better encourage its provision within development.

As requested we have not reiterated previous comments provided in our responses to the individual submission documents, in our letters dated 9<sup>th</sup> August 2013.



You will be aware that we have previously advised the Examination Programme Officer that Natural England is satisfied to rely on our written representations on the Vision documents and we do not intend to appear at the examination.

I hope these comments are helpful. For any queries relating to the specific advice in this letter only please contact Janet Nuttall on 0300 060 1239. For any new consultations, or to provide further information on this consultation please send your correspondence to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Janet Nuttall  
Sustainable Land Use and Regulation  
Area 08 Essex, Beds, Northants, Cambs and Herts

