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Dear Mr Burton

King's Lynn and West Norfolk Local Plan 2021-2040: Main Modifications Part 1 consultation (August – October 2024)

Thank you for your consultation on the above dated 07 August 2024 which was received by Natural England on the same date.

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.

1) Main Modifications

i) MM45 - Paragraph 6.5.2-6.5.3 (page 114)

The policy modifications state within paragraph 6.5.2, that European sites will be protected and, where possible enhanced, in accordance with the Norfolk Green Infrastructure and Recreational Avoidance & Mitigation Strategy (GIRAMS). We highlight that the purpose of the measures identified within the GIRAMS strategy is to mitigate for the increase in recreational pressure on European sites as a result of new growth, and it is not an enhancement strategy for European sites. Natural England welcome the possible enhancement of European sites, however, we advise that further explanation is required to explain how this is intended, given that GIRAMS is not an enhancement strategy for European sites.

ii) MM46 - New sub-section "Biodiversity Net Gain (BNG)" and MM47 Policy LP19 – Environmental Assets – Green Infrastructure, Landscape Character, Biodiversity and Geodiversity

Natural England supports the inclusion of an Biodiversity Net Gain sub Section to Policy LP19 – Environmental Assets – Green Infrastructure, Landscape Character, Biodiversity and Geodiversity.

We welcome the policy's approach to setting out that development should clearly comply with the mitigation hierarchy (as outlined in paragraph 186 of the [NPPF](#)). However, we recommend that the policy should make it clear that any mitigation and/or compensation requirements for European sites, other statutory designated sites or irreplaceable habitats should be dealt with separately from mandatory biodiversity net gain provision.

We also recommend that the policy should clearly set out the approach to on-site and off-site delivery across the plan area. On-site net gain provision should be considered before delivery off-site, in line with the [Biodiversity Gain Hierarchy](#). On site provision can also help to provide biodiversity gains close to where a loss may have taken place or is proposed and can increase access to nature for local communities.

Additionally, with regard to off-site provision, we advise that the policy should describe and identify the priorities for habitat creation or enhancement in different parts of the plan area in line with paragraph 185 of the NPPF and informed by the emerging Local Nature Recovery Strategy (LNRS) for Norfolk. Identifying these priorities on the Proposals Map will help demonstrate the relationship between development sites and opportunities for biodiversity net gain. Further guidance on identifying and mapping ecological networks can be found in [Planning Practice Guidance for the natural environment](#).

In light of this, we recommend that your Authority clearly set out a policy for LNRS, in line with the main modification for BNG, to demonstrate that your Authority will work in collaboration with the other Norfolk Authorities in the preparation of the LNRS, in your role as 'supporting authority', as set out in the LNRS regulations. This will make sure that the Norfolk LNRS takes account of your area's natural recovery priorities and plans as it is developed, enabling more efficient targeting of these priorities through offsite BNG.

iii) MM51 – Paragraph 6.9.6, MM52 – New Paragraph and MM53 - Policy LP23 – Green Infrastructure

Natural England supports the inclusion of wording within the above policies to strengthen the Authority's position on the provision of onsite green infrastructure (GI) for housing developments in relation to minimising recreational disturbance to designated sites.

We welcome the reference, within MM51 and MM52, to the [Suitable Accessible Natural Green Space \(SANGS\) guidance](#). However, SANGS/GI provision, as a mitigation measure for recreational disturbance, is not assessed within the accompanying Habitats Regulations Assessment (HRA) (see Section 3 below). We also advise that Natural England's [Green Infrastructure Standards](#) (part of Natural England's [Green Infrastructure Framework](#)) are referred to within the policy wording, when defining what good GI 'looks like' and how to plan it strategically to deliver multiple benefits for people and nature. our

We previously advised (our ref 359996, dated 28 September 2021) that larger residential developments of 50 units or more include onsite GI. Our updated advice now is that GI provision (as a recreational disturbance mitigation measure) should be based on where a project level HRA cannot rule out likely significant effects of recreational disturbance from the proposal alone, rather than a specific threshold. We advise that MM53 is amended to reflect this.

iv) MM57 - Paragraphs 6.13.2 and 6.13.7-6.13.9

Natural England support the amendments to the supporting text to Policy LP27 to acknowledge the replacement of the Authority's previous mitigation scheme for recreational disturbance with GIRAMS.

'Dersingham Bog SAC/ Ramsar site'

Natural England welcomes the inclusion of additional wording within the supporting text for Policy LP27 that considers the impact of air pollution from development on designated sites. However, we refer you to our advice within section 3) iv) below, for the need for further air quality assessment to other designated sites within the district, in addition to Roydon Common & Dersingham Bog Special Area of Conservation (SAC) and Dersingham Bog Ramsar. Consequently, should this additional assessment demonstrate that adverse effects to other designated sites cannot be ruled out, this policy wording may need further amendment.

'Nutrient Neutrality (River Wensum Catchment)'

Natural England supports the inclusion of the new paragraph within MM57 to cover nutrient neutrality in the supporting text for Policy LP27. However, currently, this wording only considers nutrient neutrality with regard to new development having an adverse effect on the River Wensum SAC (which is subject to nutrient neutrality for Phosphorus only). Instead, we advise this policy

should also consider adverse effects to The Broads SAC (which is subject to nutrient neutrality for Phosphorus and Nitrogen), and Broadland Ramsar.

The River Wensum is a tributary of the River Yare, and the Yare Broads and Marshes SSSI is a component part of The Broads SAC, so while The Broads SAC may not be within the boundary of the borough, there is hydrological connectivity, and therefore a potential impact pathway between areas within the borough and The Broads SAC, and Broadland Ramsar.

Natural England advises that the policy wording should be explicit that when considering a plan or project, delivering new overnight accommodation and that may give rise to additional nutrients within the affected catchments, the Authority will be required to undertake a HRA. The policy should also be clear that where the HRA cannot rule out a likely significant effect (alone or in-combination, and without consideration of any mitigation measures at this stage), an Appropriate Assessment will be required, in line with [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site). It should be clearly set out that the Authority will only grant permission if they have made certain at the time of Appropriate Assessment that the plan or project will not adversely affect the integrity of a habitats site i.e. where no reasonable scientific doubt remains as to the absence of effects.

We would also recommend that the policy clearly define the types of development that are subject to the nutrient neutrality strategic solution for the sake of clarity.

v) MM58 – Policy 27 – Habitats Regulation Assessment

‘Development proposals in the Breckland SPA’

Natural England does not currently support the modification to point 6 of policy LP27 in relation to development within 1500m of Breckland Special Protection Area (SPA), and likely significant effects to stone curlew. We also advise that consideration should be made to the 400m constraint zone around Breckland SPA for woodlark and nightjar. We refer you to our advice within section 3) i) below.

‘Nutrient Neutrality (River Wensum Catchment)’

As per our comments for MM57, Natural England supports the inclusion of a new paragraph on nutrient neutrality, however, we do not concur with the specific policy wording, and we advise you refer to our advice for policy MM57, and section 3) iii) below.

The Policy wording currently states, “*Proposals with the potential to adversely affect the nutrient neutrality of the River Wensum Catchment will need to satisfactorily demonstrate nutrient neutrality by assessing impacts, identifying appropriate mitigation and providing for monitoring the impacts of development on the integrity of the Wensum Catchment Special Area of Conservation”.*

We do not concur with the underlined sections of this statement. We highlight that it is adverse effects on the ‘water quality’ that is relevant to the River Wensum SAC (also noting our advice above that nutrient neutrality also applies to The Broads SAC), rather than “the nutrient neutrality of the River Wensum”, and we highlight that proposals only need to demonstrate nutrient neutrality if they would result in an increase in overnight accommodation and the nutrient neutrality methodology can be applied, rather than all proposals within the affected catchment.

‘Roydon Common and Dersingham Bog SAC/Dersingham Bog Ramsar’

As per our comments for MM57, Natural England welcomes the inclusion of policy wording considering the impacts of air pollution to designated sites, however, we advise you refer to our advice for policy MM57 and section 3) iv) below, as this policy may need to consider additional designated sites rather than only Roydon Common & Dersingham Bog SAC and Dersingham Bog Ramsar.

vi) MM89, MM92, MM100, MM103, MM347 and MM349

Natural England welcomes the above modifications to policies E1.5; E1.6, E1.9, E1.10, G113.1, G113.2 to clearly define that a project level HRA will be required for each allocation.

vii) MM116, MM185 and MM200

Natural England highlight that the policy wording within the above modifications for policies E2.1, G29.1, G35.1 does not specifically state that a project level HRA will be required for each specific allocation. Therefore, we advise that each of these modifications is expanded upon to include this.

viii) MM193 Policy G31.1 and paragraphs 12.7.1.1- 12.7.1.9 and MM294 Policy G42.1 and paragraphs 14.7.1.1- 14.7.1.5

As per the above advice on nutrient neutrality, the amended wording to Policy G31 within paragraph 12.7.1.5, and Policy G42.1 within paragraph 14.7.1.5 only mentions the River Wensum SAC nutrient neutrality catchment, and not The Broads SAC/Broadland Ramsar catchment. Therefore, we advise this needs amending. Additionally we advise that it is clearly specified that a project level HRA will be required for each allocated site, as this is not currently made clear.

2) Sustainability Appraisal

We note the conclusions set out in the Sustainability Appraisal and have no further comments to make. We advise that you refer to our advice in our previous letter (our ref 359996, dated 28 September 2021).

3) Habitats Regulations Assessment (HRA)

Natural England notes that your Authority, as competent Authority, has commissioned an Appropriate Assessment (AA) (*'Habitats Regulations Assessment (HRA) of King's Lynn and West Norfolk Borough Local Plan 2021 – 2040 at Main Modifications'*, dated 24th June 2024, Footprint Ecology), in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the AA stage of the HRA process, and a competent Authority should have regard to Natural England's advice.

The AA concludes that your Authority is able to ascertain that the Local Plan (hereby referred to as 'the Plan') will not result in adverse effects on the integrity of any of the sites in question. Having considered your assessment, and the measures proposed to mitigate for any adverse effects, Natural England's advice is that your assessment is not sufficiently rigorous or robust to justify this conclusion and therefore it is not possible to ascertain that the Plan will not result in adverse effects on the integrity of the sites in question.

We advise that the following additional work on the assessment is required to enable it to be sufficiently rigorous and robust.

i) Appropriate Assessment: General urban effects and avoidance of buildings (Stone Curlew and buildings) (Section 5, pages 45 – 52)

Relevant policies at main modifications:

LP01 Spatial Strategy Policy

LP27 Habitats Regulations Assessment

Natural England agrees with the continued inclusion of the 1,500 metre buffer around components of Breckland SPA which support or are capable of supporting nesting stone curlew, a qualifying species of the SPA, within policy LP27. This zone was originally put in place to ensure that any impacts to stone curlew are assessed. The [Conservation Objectives](#) of the SPA are to ensure integrity of the site by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site

Stone curlew nest density has been shown to be negatively impacted by the built environment, with lower nest densities found up to 1.5km from settlements¹. The precise mechanisms causing this are not fully understood. For example, it is not a straightforward line-of-sight issue, as reduced nest density occurs beyond woodland that screens any visual development effects². It is likely to be a combination of the visual impact caused by buildings in the environment, increased recreational disturbance, noise and light pollution, and disturbance (including predation) by domestic pets.

Breckland Farmland Site of Special Scientific Interest (SSSI), the component SSSI for those parts of the SPA designated for stone curlew within your Authority area, is currently in [Unfavourable – Declining condition](#).

Natural England has previously advised your Authority of the types of development where a likely significant effect on the SPA can be ruled out ([Natural England's guidance on impacts of small-scale development to the Breckland Special Protection Area](#)), and we also refer you back to our previous advice (our ref 359996, dated 28 September 2021) with regard to stone curlew and Breckland SPA. Natural England do not support the modifications to policy LP27 (as referred to within paragraphs 5.7, and 5.8 of the HRA and MM58) in relation to new development within the 1500m buffer being 'masked' by existing development. Natural England highlight that Clarke and Liley (2013) states (Paragraph 9.57) that there is no evidence to suggest that screening/masking will reduce the impact of buildings on stone curlew.

Paragraph 5.7 of the HRA refers to securing alternative stone curlew habitat or the provision of 'offsetting land', as a mitigation measure to avoid adverse impacts on Breckland SPA (however, we note the wording that is referred to within the HRA in relation to alternative habitat, appears to have been removed from Policy LP27 within the Schedule of Main Modifications Part 1 (July 2024) document). Our view is that there is a risk that this could be compensation, but whilst Natural England may offer comment on the ecological appropriateness of this measure, it is not for Natural England's role to advise on the legal interpretation. It is for the Local Authority, in their capacity as the competent authority, to determine the legal status of this measure in accordance with the Conservation of Habitats and Species Regulations 2017.

Allocation G35.1 in Feltwell

The AA identifies (Paragraph 5.9) one allocation (G35.1) for 50 dwellings in Feltwell within the 1500m buffer. The HRA concludes that with reference to Policy LP27 (Paragraph 5.10 and 5.27), the project level HRA for allocation G35.1 should be able to rule out adverse effects on integrity of Breckland SPA with regard to stone curlew, as a consequence of its location. Based on the above advice with regard to masking/screening, Natural England does not concur with this.

The AA states (Paragraph 5.10), '*The fields that are in particularly close proximity [to G35.1] and are within the SPA are small and unlikely to be key areas for breeding Stone Curlew. The supporting text for the allocation (12.9.1.4) states that the site is surrounded on all sides by development and therefore completely masked from the SPA*'. We advise that the project level HRA should use up-to-date nest records (which may be available from the RSPB) and/or carry out new surveys when assessing likely significant effects of the proposal on stone curlew. In addition, we advise that impacts to stone curlew extend to 1.5km, therefore assessment of impacts to stone curlew are required to this distance, not just those fields that are in 'close proximity'.

¹ Sharp, J., Clarke, R.T., Liley, D. & Green, R.E. (2008). "The effect of housing development and roads on the distribution of stone curlews in the Brecks. Evidence to support the Appropriate Assessment of development plans and projects in Breckland". Footprint Ecology.

² Clarke, R. & Liley, D. (2013). "Further assessments of the relationship between buildings and stone curlew distribution". Footprint Ecology

Woodlark and Nightjar

We highlight that woodlark and nightjar are also qualifying features of Breckland SPA. Natural England currently consider that there could be a likely significant effect on these species up to 400m from the SPA. Therefore, a 400m constraint zone has been adopted around those parts of Breckland SPA designated for woodlark or nightjar (as referred to in our previous advice (our ref 359996, dated 28 September 2021) with regard to Breckland SPA, and [Policy CS12 of your Authority's existing Core Strategy](#)). However, we highlight that this zone has not been considered within policy LP27 with regard to Breckland SPA (or any other policy, however, we do note it is considered within paragraphs 5.15 to 5.25 of the HRA), in the same way that likely significant effects to stone curlew have been considered. Therefore, we advise that policy LP27 should be revised to indicate that for proposed developments within the 400m zone, a project level HRA will be required to assess disturbance impacts to woodlark and nightjar.

ii) Appropriate assessment: Recreational impacts (Section 6, pages 53 – 64)

Relevant policies at main modifications:

- Policy LP01 Spatial Strategy
- LP19 Environmental Assets – Green Infrastructure, Landscape Character, Biodiversity and Geodiversity
- LP23 Green Infrastructure
- LP27 Habitats Regulations Assessment
- LP38 King's Lynn Policy

The AA concludes (Paragraph 6.27) for all individual allocations, adverse effects on integrity can be ruled out alone for all European sites with regard to recreational impacts, however, when considered in-combination with the overall growth within the Plan and growth of neighbouring Authorities, this cannot be ruled out. It is concluded that the residual impacts of the individual allocations will be mitigated by a financial contribution paid towards the Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (GIRAMS). With regard to the in-combination effects of the allocated sites, Natural England concurs with the AA conclusions, however, we do not necessarily concur that for all the individual allocations, adverse impacts can be ruled out alone on the basis of GIRAMS, and further consideration is required.

Natural England consider that larger residential developments within the zone of influence of European sites, or some smaller residential developments that are in very close proximity to designated sites, are not able to fully mitigate the adverse impacts on European designated sites with a contribution to GIRAMS alone. Natural England advise that for these developments a project level HRA will be required to assess the impacts of recreational disturbance, and where required, whether the open space / GI of the development is of sufficient quantity and quality to deflect recreational disturbance pressure off nearby designated sites.

Provision of well-designed open space / green infrastructure (GI), that is proportionate to its scale may be required to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary and / or bespoke mitigation measures. Therefore, we welcome the wording included within main modification 52, with reference to policy LP23 – Green Infrastructure, which sets out this requirement for larger residential developments to deliver GI proportionate to the scale of the development. However, this modification has not been considered within the AA with regard to recreational disturbance impacts.

The Suitable Accessible Natural Green Space (SANGS) guidance can be helpful in designing on-site GI; it should be noted that although this document is specific to the SANGS creation for the Thames Basin Heaths, the broad principles are more widely applicable. We advise that as a minimum, provisions should typically include:

High-quality, informal, semi-natural areas

Circular dog walking routes of 2.7 km within the site and/or with links to surrounding public rights of way (PRoW)

- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- The long-term maintenance and management of these provisions

We also advise that Natural England's [Green Infrastructure Standards](#) (of [Natural England's Green Infrastructure Framework](#)) are considered when delivering GI, which define what good GI 'looks like' and how to plan it strategically to deliver multiple benefits for people and nature.

iii) Appropriate Assessment: Water related impacts (Section 7, pages 65 – 78)

Relevant policies at main modifications:

- Policy LP01 Spatial Strategy
- New Policy Residential development on windfall sites
- New Policy Neighbourhood Plans
- LP27 Habitats Regulations Assessment
- LP38 King's Lynn Policy

Water Supply

The AA recognises (Table 7) the following European sites as facing pressures from water abstraction:

- Norfolk Valley Fens Special Area of Conservation (SAC)
- River Wensum SAC
- Roydon Common & Dersingham Bog SAC
- Dersingham Bog Ramsar
- Roydon Common Ramsar

The AA (Paragraph 7.13) identifies that a separate HRA for Anglian Water's 2024 Water Resources Management Plan (WRMP), which explores supply and demand for water resources for the planning period between 2025 - 2050, has already been undertaken. The WRMP HRA is able to ascertain beyond reasonable scientific doubt that the proposed WRMP will not adversely affect the integrity of any Habitat Site alone or in combination with other plans or projects. Consequently, the AA for the Plan (Paragraph 7.14) adopts the conclusion of the WRMP HRA with regard to the above European sites from abstraction impacts, on the basis that '*no material information has emerged which would render the reasoning 'out of date', and the analysis underpinning the reasoning is sufficiently rigorous and robust*'.

The WRMP relies on both supply side measures from Anglian Water and on significant demand management and water efficiency for individual dwellings. Consequently, for Natural England to concur with the AA with regard to water abstraction, we expect that the proposed allocated sites within the Plan are aligned with the water efficiency aspect of the WRMP. Therefore, the allocated sites should demonstrate that dwellings, as a minimum, achieve the 110 litres per person per day water efficiency standard. To fully contribute to the long term sustainability of water resource use and management, 85 litres per person per day is recommended.

Nutrient Neutrality

We advise that the HRA requires further consideration of likely significant effects of allocated sites on The Broads SAC and Broadland Ramsar in relation to Nutrient Neutrality.

Paragraph 7.56 of the AA identifies two allocations (G31.1 and G42.1) that fall within the catchment of the River Wensum SAC, which is subject to the [Nutrient Neutrality Strategic solution](#) for Phosphorus only. The AA concludes (Paragraph 7.59) that, "*policy wording [included within the Local Plan] ensures that these [allocated sites] will only come forward if they can demonstrate nutrient neutrality. As such any risks to the River Wensum SAC are eliminated*". However, we highlight that the River Wensum is a tributary of the River Yare, with the Yare Broads and Marshes SSSI being a component part of The Broads SAC, which is subject to Nutrient Neutrality for both

Phosphorus and Nitrogen. Therefore, the allocated sites within the Plan also have hydrological connectivity with The Broads SAC, and the potential impact of this is not currently considered within the HRA.

We advise that for any proposals that deliver new overnight accommodation within the catchment of the River Wensum SAC, and The Broads SAC (and where the [Nutrient Neutrality methodology](#) applies), a project level HRA will be required, and where the HRA cannot rule out a likely significant effect (alone or in-combination, and without consideration of any mitigation measures at this stage), an AA will be required. We advise that the HRA/AA is informed by:

A completed Nutrient Budget for the scheme

A Nutrient Mitigation Strategy with details on the measure(s) that will be applied to secure phosphorus and/or nitrogen neutrality in line with the [Nutrient neutrality Principles](#), or details of the strategic mitigation solution that the scheme will secure mitigation credits from.

iv) Appropriate Assessment: Air Quality (Section 8, pages 79 – 100)

Relevant policies at main modifications:

Policy LP01 Spatial Strategy

LP27 Habitats Regulations Assessment

The AA concludes that adverse effects on integrity can be ruled out, alone or in-combination for air quality impacts for the following sites:

North Norfolk Coast SAC/SPA/Ramsar,
The Wash and North Norfolk Coast SAC
Breckland SAC/SPA
Ouse Washes SAC/SPA/Ramsar

Based on the information presented within the AA with regard to traffic increases along relevant sections of road being below the 1,000 average annual daily traffic (AADT) threshold, Natural England concurs with the assessment conclusions for these sites with the exception of Breckland SAC/SPA. With regard to the Dersingham Bog SSSI component of Roydon Common & Dersingham Bog SAC and Dersingham Bog Ramsar (but not the Roydon Common SSSI component), the AA concludes it is not possible to rule out adverse effects on the integrity of the site for air quality impacts. Natural England also concurs with this assessment conclusion, however, we do not concur with the justification for ruling out impacts to the Roydon Common SSSI component of the SAC and Roydon Bog Ramsar. Please see below for further information.

Dersingham Bog Ramsar and Dersingham Bog SSSI (Roydon Common & Dersingham Bog SAC)

The AA concludes it is not possible to rule out adverse effects on the integrity of the Dersingham Bog SSSI component of the SAC as a result of the site currently being in exceedance of the critical levels/loads for multiple qualifying features (Table 10), and there being uncertainty in growth and traffic forecasts from allocations in the Plan (Paragraph 8.44).

Consequently in order to address this uncertainty, Policy LP27 of the Plan refers to the preparation of an air quality strategy, which development must be consistent with. It is stated that this will ensure that development can only come forward when adverse effects on integrity can be ruled out (Paragraph 8.45). Natural England would welcome an opportunity to comment on the strategy.

Roydon Common Ramsar and Roydon Common SSSI (Roydon Common & Dersingham Bog SAC)

We highlight that impacts to the Roydon Common SSSI component of the SAC and Roydon Common Ramsar appear to have been discounted with limited evidence. The reason given for this in the assessment (Paragraph 8.36) is that the only roads within 200m of the site are 'very minor roads' and these not being 'relevant to the assessment'.

The AA appears to have only assessed the impact of A-roads within 200m upon European sites,

which is not consistent with Natural England's [NEA001 guidance](#). We advise that all roads within 200m of a European site should be considered within the HRA, and for a road within this distance to be excluded from further assessment in the AA, sufficient evidence should be provided to demonstrate that there will not be likely significant effects as a consequence of the allocations in the Plan (i.e. traffic numbers being below 1,000 AADT, or emissions being <1% of the critical load or level). Consequently, we advise further assessment, with consideration of these thresholds, is required for the Roydon Common SSSI component of Roydon Common & Dersingham Bog SAC.

Breckland SPA

In line with the advice above, we highlight that there are multiple roads in the south of the district within 200m of Breckland SPA that do not appear to have been considered in the assessment (Map 6). Therefore, we advise that further assessment is required.

The AA states (Paragraph 8.53) that "*The relevant section of road predominantly passes through farmland (with some small shelter belts and areas of conifer woodland)... The areas are subject to intensive management and the impacts of road traffic on Nitrogen for these areas will be inconsequential*". However, it is not clear which section of road is being referred to. We highlight that there are sections of road adjacent to the Breckland Forest SSSI component of Breckland SPA which may be utilised by the designated features, which is not agricultural land, and these areas have not been assessed in the AA.

Additionally, where for the other designated sites assessed in the AA for air quality impacts, the qualifying features for these sites have been assessed against the relevant data, including the critical levels and loads, on [the Air Pollution Information System](#) (APIS) (Tables 9, 10 and 11), this has not been done for the qualifying features of Breckland SPA.

We concur with the assessment conclusions that air quality impacts to the Breckland Farmland SSSI component of Breckland SPA can be ruled out, on the basis of these areas being subject to intensive agricultural management, and therefore the impacts of Nitrogen (both atmospheric and deposited) will be inconsequential.

Breckland SAC

The AA concludes (Paragraph 8.51) that there are no credible risks to Breckland SAC from air pollution, as there are no main road sections that run within 200m of Breckland SAC within the Borough. However, we highlight that there are roads within the Borough that are within 200m of the Weeting Heath SSSI component part of the SAC which are not considered within the AA. Additionally, as with Breckland SPA, there has also been no assessment of the designated site with regard to the APIS.

4) Other advice

We hope our comments are helpful. If you have any queries relating to the advice in this letter please contact me using the details provided below.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Natural England would be happy to provide additional advice through our Discretionary Advice Service.

Yours sincerely

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