

Sue Ives Matter 1b Statement

Firstly, with regard to Matter 1b (Legal Compliance (Habitats Regulations Assessment) - 1.8 Is the Habitats Regulations Assessment robust and does the plan include all the recommendations identified in the assessment as necessary to ensure compliance with the Habitats Regulations?) I note that Section 2 of the HRA (Place Services, Oct 2020) states:

2.3.2 There are a wide range of potential impacts and the following impacts summarised below, were considered most likely to cause a Likely Significant Effects:

- Loss of functionally linked land (land outside the SPA and Ramsar site). Impact on site features (species) which travel outside the protected sites may be relevant where development could result in effects on qualifying interest species within the Habitats Sites, for example through the loss of feeding grounds for an identified species.
- Increase of any type of disturbance, for example from recreational use resulting from new housing development and / or improved access due to transport infrastructure projects;
- Changes in water quality as a result of new development and greater pressure on water treatment services,
- Changes in water quantity as a result of increased surface runoff or increased groundwater extraction;
- Changes in atmospheric pollution levels due to increased traffic, waste management facilities etc. Pollution discharges from developments such as industrial developments, quarries and waste management facilities.

Section 2 also includes:

2.3.12 Furthermore, **greater pressure on water treatment services due to new development**, especially housing, may increase the risk of effluent entering aquatic environments. This is because the allocation of large numbers of new homes in certain locations may result in the capacity of existing available infrastructure being exceeded, a situation that could potentially cause service failures to water and wastewater customers. Wastewater treatment within the Districts is currently handled by Anglian Water and they are aiming to produce a Drainage and Wastewater Management Plan (DWMP) in 2024 to ensure that a long-term strategy is in place for the safe disposal of wastewater. Therefore, a Water Cycle Study (July 2020), including an Addendum to Water Cycle Study (October 2020) has been drafted by JBA Consulting to allow the Joint Local Plan to have a sufficient evidence base in this aspect. This study assesses the potential issues relating to **future development** within Babergh and Mid Suffolk and the impacts on water supply, wastewater collection and treatment and water quality. **Therefore, future pressures upon water treatment services can be predicted within the Joint Local Plan**, including any Likely Significant Effects to the identified Habitats Sites.

2.3.27 There are number of atmospheric pollutants which can result in direct or indirect impacts to Habitats sites. These impacts are usually caused when the qualifying features are plants, soils and wetland habitats. However, some species may also be indirectly impacted from air pollution causing changes in habitat composition. The primary contributor to atmospheric pollution is transport related activities. Therefore, the main pollutants to atmospheric pollution are considered to be oxides of nitrogen (NOx) or sulphur dioxide (SO2) from traffic emissions. **However, high intensities of agricultural practices are also considered to have a significant impact to air pollution.** Potential impacts from pollutants and their sources have been highlighted within Table 4. (NB. Table 4 makes specific reference to pollutants from 'poultry farming').

2.3.30 The leading cause of **increased Nitrogen deposition at these Habitats Sites has been identified locally from agricultural practices, i.e. land spreading**, outdoor pigs, high nutrient inputs on fields. This may result in protected habitats being altered, which may in turn, may impact the SPA Birds which rely on these specific habitats.

Concerning the question of whether the HRA is robust, I wish to draw your attention to my previous submissions and in particular reference 1711, which details issues of water supply, waste water and poultry litter disposal and air, water and soil pollution generated by Intensive Poultry Units (IPUs). I have highlighted the fact that the increasing number of developments of IPUs and their impact has not been considered in the evidence base eg: "Whilst the Water Cycle Study 2020 states that "ESW would support the use of water recycling at Eye Airfield, where a growing agglomeration of food processing industries has led to a high growth in water demand", the study makes no mention of the water demand associated with the expansion of new and existing IPU feeder sites elsewhere in the district, which will be required to supply an increasing number of birds to the meat processing factory on Eye Airfield. This omission means that the baseline information is flawed and not sound." The HRA uses the same data source, which, by implication, suggests that it too, is not robust.

I would be grateful if you could make the Examiners aware of my comments on this point.

Secondly, the revised Examination Programme sets out a hearing date of 12th Oct for Matter 1a (question 1.3) - Consultation ie "Has consultation on the plan been carried out in accordance with the Councils' Joint Statement of Community Involvement (and its Addendum) and the requirements of the 2004 Act (as amended) and the 2012 Regulations?" which suggests that all other questions relating to Matter 1a are deemed to have been dealt with. However, I watched the live YouTube screening of the hearing, which was cut short due to technical difficulties and I was left thinking that all aspects of the legal issues had not been dealt with fully and had assumed that the session would be reconvened. I know that Chris Edwards is of the same opinion and I realise that he has emailed you to this effect. Can you please explain, so that I/we may better understand?

Finally (and related to my comment above), as my submissions are relevant to Q1.4 and the revised Examination Programme includes Q1.4 in the hearing for Matter 4, I politely request that I may be allowed to attend the hearing in order to be able to contribute to the discussion. The original programme detailed that the implications for soundness related to this question would be dealt with under 'other matters' and as such, I would be grateful if you could clarify whether Q1.4 (in the

hearing on Matter 4) will address the legal compliance of the SA or the implications of the SA for the soundness of the Plan or both?