

Report

Habitats Regulations Assessment – Stage 1 & 2

For Hybrid Application (Whole Site)

Lanwades Woodland Park

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1 Introduction

1.1 Purpose and Structure

This Shadow Habitats Regulations Assessment (sHRA) report has been prepared by Sweco UK Ltd for Lochailort Investments Ltd and relates to the proposed residential-led, mixed use development, (hereafter 'the Project'), of the former Animal Health Trust Research Centre, Kentford, CB8 7UA, (hereafter 'the Project Site'), for which a hybrid application is being submitted.

The purpose of this sHRA report is to compile all relevant and necessary information required to determine the potential impact of the Project on nearby internationally designated sites so that the Competent Authority, in this case West Suffolk Council (WSC), have sufficient means to conclude their own Habitats Regulations Assessment. This has been laid out in the following stages:

- Section 2: Introduction
- Section 3: Development Description
- Section 4: Methodology
- Section 5: Internationally Designated Sites of Consideration
- Section 6: Conservation Objectives
- Section 7: Identification of Likely Impacts
- Section 8: Conclusions
- Section 9: Cumulative Impacts
- Section 10: Appropriate Assessment
- Section 11: HRA Technical Consideration
- Section 12: Shadow Appropriate Assessment Conclusion

1.2 Site Description

The site occupies an area of approximately 48.55 ha and is located around national grid reference TL 69444 66066, to the west of the village of Kentford, Suffolk.

Habitats on-site include modified grassland, introduced shrub, buildings and hardstanding, broadleaved and yew woodland and hedgerows. The site is surrounded by predominantly arable land with a residential development to the east, the B1506 road to the north and country lanes and arable fields with bands of woodland on all other sides.

1.3 Ecological Background

A UK Habitat Classification (UKHab) survey was undertaken in April 2024 by Sweco, with phase 2 surveys for breeding birds, bats and fungi also undertaken in 2024 by Sweco. Phase 2 surveys for bats are scheduled to be undertaken in spring and summer 2025.

A specialist stone curlew (*Burhinus oedicnemus*) survey was undertaken on 25 April 2025 to assess the site and the surrounding habitat within 1.5 km of the Project for its suitability to support stone curlew. The survey was undertaken by Graham Reilly BSc ACIEEM, Senior Ecologist at Wild Frontier Ecology since 2008, an experienced ornithologist who has previously spent 14 seasons working on the RSPB Stone Curlew Recovery Project.

The full survey report can be found in Appendix A. A summary of the results is provided below.

The data search for the RSPB returned no records of stone curlew from within 1.5 km of the Project Site and no stone curlew were observed during the survey. The vast majority of the land within the 1.5 km buffer consisted of tussocky grassland paddocks and fields with variable sward height, predominantly used for grazing and exercising racehorses. The remaining land use comprised weedy/stubble fields, bare uncultivated (bedded) fields, arable fields, residential areas and active construction sites.

The grassland paddocks were assessed to be unsuitable for nesting stone curlew due to the paddocks lacking a very short sward height preferred by stone curlew and due to them experiencing regular disturbance from humans. The uncultivated fields were small and isolated, and subject to regular disturbance from adjacent busy roads and agricultural activities. Although stone curlew occasionally use bedded crops for nesting, it was not considered likely that such suboptimal habitat would be used in an outlying area away from the major population area (Breckland SPA). The remaining arable fields were also drilled with unsuitable crops, with a lack of bare ground present which stone curlew require when incubating eggs.

Considering the lack of records and suitable habitat within 1.5 km of the site, stone curlews are extremely unlikely to be present as a breeding species within the vicinity of the Project.

1.4 Requirement for Habitats Regulations Assessment

A Habitats Regulations Assessment (HRA) is required for all projects which may directly or indirectly impact the designated features of a European site. European sites are internationally designated sites protected under the Habitats Directive 1992, which has been transposed into domestic legislation and policy through the implementation of the Conservation of Habitats and Species Regulations 2017 (as amended). These sites include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetlands.

A HRA can be split into two stages: the first stage is a screening assessment and the second stage is an 'Appropriate Assessment'. The purpose of a screening assessment is to establish whether the plan or project will have any Likely Significant Effects on any European sites. If the Competent Authority (in this instance, West Suffolk Council) determines that there are no Likely Significant Effects (including 'in combination' effects from other plans or projects), then no further assessment is necessary, and the plan or project can, subject to other issues being dealt with appropriately, be taken forward.

If, on the other hand, the Competent Authority determines that there are Likely Significant Effects, or there is reasonable doubt, then the HRA must continue to the more detailed Appropriate Assessment stage. The Appropriate Assessment assesses whether or not these effects will result in an adverse effect on the designated site's integrity.

The following key legislation forms the basis for Appropriate Assessment:

The Habitats Directive 1992

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment [...] the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site [...].”

Article 6(3)

The Conservation of Habitats and Species Regulations 2017 (as amended)

“A competent authority, before deciding to [...] give any consent [...] for a plan or project which a) is likely to have a significant effect on a European site [...] (either alone or in combination with other plans or projects), and b) is not directly connected with or necessary to the management of that site, must make an appropriate assessment of the implications of the plan or project for that site in view of that site’s conservation objectives.”

Regulation 63(1)

[...] In the light of the conclusions of the assessment, and subject to regulation 64 [(considerations of overriding public interest)] the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site [...].”

Regulation 63 (5)

If the Appropriate Assessment cannot conclude without reasonable scientific doubt that there will be ‘no adverse effects on the integrity’ of internationally designated sites, then the HRA proceeds to a third stage seeking alternative solutions with no or reduced adverse effects. If no suitable alternatives can be found, potentially damaging plans or projects can be permitted only if there are ‘Imperative Reasons of Overriding Public Interest’ (IROPI) as to why they should go ahead. In such cases compensatory measures are obligatory to ensure overall integrity of the network of internationally designated sites is maintained.

The Conservation of Habitats and Species Amendment (EU Exit) Regulations 2019

The Conservation of Habitat and Species Regulations (EU Exit) Regulations 2019 amendments to the Conservation of Habitats and Species Regulations 2017 do not have any substantive implications for the way Habitats Regulations Assessments are undertaken.

2 Development Description

Proposals are currently understood to involve the clearance of habitats on site to facilitate a residential development, with a school and care-home also proposed. At present, it is understood that there will broadly be two phases to the Project: a construction phase, and an operational phase.

2.1.1 Construction Phase

The Project will result in the demolition of the majority of the existing buildings on site, and clearance of vegetation on site, including the loss of modified grassland, wood-pasture and parkland, buildings and hardstanding, woodland and hedgerows. Some existing areas of woodland will be retained as part of the proposals. The construction phase will result in the construction of up to 558 residential units, a care home, a primary school, open space, play space, new access and associated infrastructure on the Western site; and 302 homes on the eastern part of the site alongside green infrastructure, play space, a 386sqm shop and a community hub (existing Listed visitors centre).

2.1.2 Operational Phase

Once operational, the site will operate as a residential area, with associated infrastructure and facilities to support to local residents long-term. It is assumed that the ongoing maintenance and management of the site will be secured through an estate management company or similar scheme.

3 Methodology

3.1 Habitats Regulations Assessment Stages

The guidance set out by the Department for Communities and Local Government [1] identifies assessment required under the following stages:

- Screening likely significant effects
The precautionary principle will be used in assessing whether effects may be significant and where there is any uncertainty the potential effects will be examined in greater detail.
- Detailed Appropriate Assessment and ascertaining the effect on site integrity
Where there are potential significant effects more detailed information will need to be considered to determine the impact of these effects on the internationally designated qualifying features and hence site integrity.
- Mitigation measures and alternative solutions
Where a project has been found to have an adverse effect on the integrity of a European site these should be mitigated where possible. Where the effect cannot be fully mitigated the project should not proceed, unless there are imperative reasons of overriding public interest involved.

This report covers both stage 1 (the screening assessment) and stage 2 (Appropriate Assessment).

3.2 Zone of Influence

The Zone of Influence (ZOI) of a project may be defined as area(s) over which ecological features may be affected by the biophysical changes caused by the proposed project and associated activities [2]. The ZOI can extend beyond the project site, for example, where there are ecological or hydrological links beyond the site boundaries.

Due to the size of the site, and the nature of the Project, a 5 km ZOI for European designates sites was considered appropriate.

4 Internationally Designated Sites of Consideration

Three internationally designated sites (European sites) were identified within 5 km of the site. These are:

- Breckland SPA – located approximately 2.2 km to the north-east.
- Fenland SAC – located approximately 4.4 km to the north-west.
- Chippenham Fen Ramsar Site – also located approximately 4.4 km to the north-west.

Breckland SPA supplementary documentation identifies a core 1.5 km buffer zone around the designated site, within which development is considered to have a potential impact. The scheme is located outside of this core buffer zone, however it advises that schemes outside may need to address potential impacts on species that may use these outer areas to breed but are still dependent on the main site [3].

There is no zone of influence assigned to Fenland SAC and Chippenham Fen Ramsar however it is thought to be fairly local. The site is designated primarily as a spring-fed calcareous basin mire which has resulted in a diversity of vegetation. It is home to a rich and specialised invertebrate assemblage, in part due to its transitional position between Fenland and Breckland. Furthermore, the site is home to one of the largest populations of Cambridge milk parsley (*Selinum carvifolia*), a red-listed vascular plant.

Table 4.1. Internationally designated sites within a 5 km zone of influence of the site

Site Name and Designation	Area (ha)	Distance and Direction from Site	Description
Breckland SPA UK9009201	39433.66	2.2 km to the north-east	<p>The site is designated for its nationally important populations of breeding birds, including:</p> <ul style="list-style-type: none"> - Stone curlew, 115 pairs – breeding accounting for 60.1% of GB total population (note that the supplementary guidance is from 2019 - more recent estimates put the population at around 144 pairs) - Nightjar (<i>Caprimulgus europaeus</i>), 415 males – breeding accounting for 12.2% of GB total population. - Woodlark (<i>Lullula arborea</i>), 430 pairs – breeding accounting for 28.7% of total GB population.
Fenland SAC UK0014782	619.25	4.4 km to the north-west	<p>The site is designated primarily for its extensive Molinia fen-meadows, which are rare and ecological distinctive in East Anglia, and for its large areas of calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>, which have a long and well-documented history of regular management. Qualifying features also present on site include spined loach (<i>Cobitis taenia</i>) and great crested newt (<i>Triturus cristatus</i>).</p>
Chippenham Fen Ramsar	112	4.4 km to the north-west	<p>The site is designed for the following three criteria [4];</p> <p><u>Ramsar criterion 1</u> A spring-fed calcareous basin mire with a long history of management, which is partly reflected in the diversity of present-day vegetation.</p> <p><u>Ramsar criterion 2</u> Rich invertebrate fauna composition, partly due to its transitional position between Fenland and Breckland. The species list is very long, including many rare and scarce invertebrates characteristic of ancient fenland sites in Britain.</p> <p><u>Ramsar criterion 3</u> The site supports diverse vegetation types, rare and scarce plants. The site is the stronghold of Cambridge milk parsley.</p> <p>A notable assemblage of breeding birds is present on site and includes common snipe (<i>Gallinago gallinago</i>), woodcock (<i>Scolopax rusticola</i>), nightingale (<i>Luscinia megarhynchos</i>), reed warbler (<i>Acrocephalus scirpaceus</i>), and common grasshopper warbler (<i>Locustella naevia</i>).</p>

5 Conservation Objectives & Supplementary Advice

5.1 Background

The screening for likely significant effects will consider the implications of the proposed development in the context of the conservation objectives and supplementary advice and guidance for the sites listed in Table 4.1. These conservation objectives and supplementary advice are outlined in Table 5.1.

Conservation Objectives are not produced for Ramsar wetland sites but measures outlined within the Information Sheet on Ramsar Wetlands (RIS) have been included.

Table 5.1. Conservation objectives for internationally designated sites.

Site Name and Designation	Conservation Objectives	Source
Breckland SPA (UK9009201)	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <ul style="list-style-type: none"> - 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. <p>The supplementary guidance provides greater details of the individual impacts each species or assemblage is susceptible to and assigns the following targets which must be followed. Developments will need to demonstrate that they do not contribute to an impact on any of these targets:</p> <p><u>Stone Curlew</u></p> <ul style="list-style-type: none"> • Maintain the size of the breeding stone curlew population above 144 breeding pairs, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent. • Ensure the frequency, duration and/or intensity of disturbance affecting nesting and/or foraging birds should not reach levels that significantly affect the stone curlew population. • Restore as necessary the concentrations and deposition of air pollutants to below the site-relevant Critical Load or Level values given for the supporting habitat of this feature of the site on the Air Pollution Information System. • Maintain the safe passage of breeding stone curlew moving between nesting and feeding areas. • Maintain management (whether within and/or outside the site boundary as appropriate) necessary to maintain the structure, function and supporting processes associated with the feature and its supporting habitat. • Maintain the distribution, abundance and availability of key prey items (e.g. beetles, grasshoppers, flies, earthworm, snails, and slugs) at prey sizes preferred by stone curlew. • Maintain the area of open and unobstructed terrain around nesting, roosting and feeding sites used by breeding stone curlews. • Maintain the proportion of short <2 cm to 5 cm grass heath vegetation. 	<p>[5]</p>

- Maintain bare/sparsely vegetated ground of between 5-20% within nesting areas on grass heath.
- Maintain the extent, distribution and availability of suitable breeding habitat which supports the breeding stone curlew feature for all necessary stages of its breeding cycle (courtship, nesting, feeding).
- Reduce the predation of and disturbance to breeding stone curlew caused by native and non-native predators.
- Maintain the feature's ability, and that of its supporting habitat, to adapt or evolve to wider environmental change, either within or external to the site.

Nightjar

- Restore the size of the breeding nightjar population to a level which is above 415 breeding/ pairs (indicated by churring males), whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.
- Ensure the frequency, duration and/or intensity of disturbance affecting nesting, roosting and/or foraging birds does not reach levels that significantly affect the breeding nightjar population.
- Maintain the safe passage of breeding nightjar moving between nesting and feeding areas.
- Maintain management or other measures (whether within and/or outside the site boundary as appropriate) necessary to maintain the structure, function and/or the supporting processes associated with the feature and its supporting habitats.
- Maintain the distribution, abundance and availability of key prey items (e.g. moths, beetles) at preferred prey sizes.
- Restore as necessary the concentrations and deposition of air pollutants to below the site-relevant Critical Load or Level values given for the supporting habitat of this feature of the site on the Air Pollution Information System.
- Restore the amount of open and unobstructed patches within nesting and foraging areas, including areas of clear-fell, windfall, wide tracks, open forest and heath.
- Restore the extent, distribution and availability of suitable breeding habitat which supports the feature for all necessary stages of its breeding. Maintain at least 12,752 ha in rotational forest management.
- Reduce predation of and disturbance to breeding nightjars caused by native and non-native predators.
- Restore the mix of vegetation (optimal conditions normally with vegetation mostly of 20-60 cm with frequent bare patches of >2 m², 10-20% bare ground and <50% tree/scrub cover overall; trees <2 m in height) throughout the nesting area.

Woodlark

- Restore the size of the breeding woodlark population to a level which is above 430 pairs, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.

	<ul style="list-style-type: none"> • Restore as necessary the concentrations and deposition of air pollutants to below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System. • Maintain management or other measures (whether within and/or outside the site boundary as appropriate) necessary to maintain the structure, function and/or the supporting processes associated with the feature and its supporting habitats. • Maintain the distribution, abundance and availability of key prey items (e.g. spiders, weevils, caterpillars) at preferred prey sizes. • Maintain the area of open and unobstructed terrain, typically within at least 0.2 km of nesting areas, with no increase in tall (>0.2 m) vegetation cover to >50% of the site overall. • Ensure the frequency, duration and/or intensity of disturbance affecting nesting, roosting, foraging, feeding, should not reach levels that significantly affect the breeding woodlark population. • Restore the extent, distribution and availability of suitable breeding habitat which supports the feature for all necessary stages of its breeding cycle (courtship, nesting, feeding). Maintain at least 12,752 ha in rotational forest management. • Reduce predation of and disturbance to breeding woodlark caused by native and non-native predators. • Restore the mix of trees, ground vegetation and bare ground (including frequency of bare patches of <0.5 ha within mosaic of short (<5 cm) to medium (10-20 cm) ground vegetation, and small clumps of shrubs or trees scattered throughout nesting and feeding areas. 	
Fenland SAC (UK0014782)	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> - The extent and distribution of qualifying natural habitats and habitats of qualifying species - The structure and function (including typical species) of qualifying natural habitats. - The structure and function of the habitats of qualifying species - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely. - The populations of qualifying species, and - The distribution of qualifying species within the site. 	[6]
Chippenham Fen Ramsar	<p>The RIS identifies the site has historically been susceptible to water diversion for irrigation/domestic/industrial use. Currently abstraction is still occurring but it is unclear if its effects are under control, as there is a lag in showing the management or regulatory regime to be successful. Currently the site is subjected to fortnightly water level analysis and regularly undertakes butterfly monitoring and invertebrate assessments April to September to assess impacts to invertebrate levels. Monitoring of fen vegetation and aquatic invertebrates has been carried out following the installation of a water compensation scheme in 1991.</p>	[4]

6 Identification of Likely Impacts

6.1 Background

Potential impacts upon internationally designated sites can be wide ranging; therefore, the scale of the existing issues and the potential for such impacts to increase as a result of the proposed development are carefully considered. It is also important to factor in any cumulative and synergistic effects to the assessment process as well as the duration, frequency, and reversibility of any such impacts.

Projects may have spatial implications which can have further reaching effects than those predicted to fall within the development footprint. Specifically, it is recognised that the distance between a proposed works area and a designated site in itself is not a definitive determinant as to the likelihood of an impact occurring or its severity. Site variables such as prevailing wind conditions, surface and groundwater flow direction, noise, and air quality impacts both during and post construction, and potential recreational impacts caused by the development, will all have an influence on the relative distance at which an impact can occur.

Additionally, the mobile nature of qualifying species of internationally designated sites, such as birds, must also be considered, since an adverse effect on the qualifying species of a site when using areas of habitat outside of the designated sites may still result in a significant adverse impact upon a site. Hence, works some distance away from an internationally designated site could still have effects on the site and, therefore, need to be considered as part of the screening process [1].

Direct and indirect impacts such as loss of habitat within the designated site, loss of supporting habitat outside of the designated site that qualifying species may rely on, disturbance, and recreational impacts are considered and are discussed further below.

A series of Site Improvement Plans (SIPs) published by Natural England for each internationally designated site outline priority issues for sites, the features they affect, and measures to address those issues as well as responsible parties.

Priority issues for the sites that are relevant to the site have been identified in Table 4.1 are given in Table 6.1 below. A detailed assessment has been undertaken, scoping out potential impacts and identifying where impacts will need to proceed through to appropriate assessment stage.

Site Improvement Plans are not produced for Ramsar wetland sites, though their features are typically captured within plans for Natura 2000 sites.

6.2 Loss of Habitat Within Designated Sites

The Project will not result in any loss of, or physical impact to any of the designated sites or their featured habitats.

The requirement to mitigate against direct loss of habitat caused by the development has therefore been screened out.

6.3 Loss of Supporting Habitat Outside Designated Sites

This subsection addresses potential loss of habitats outside the designated site(s), on or adjacent to the Project Site, which may be relied on by qualifying features or assemblages of the designates site(s) (Breckland SPA, Chippenham Fen Ramsar and Fenland SAC).

6.3.1 Breckland SPA

Breckland SPA is designated for its breeding populations of stone curlew, nightjar and woodlark, all species associated with the mosaic of heathland, arable and grassland habitats found at Breckland. No stone curlew, nightjar or woodlark were recorded on site during any of the breeding bird surveys in 2024. This is likely due to the habitat on site being suboptimal for all three species. Continuing management on site controls the habitats, and regular hay cuts of the meadow areas prevent succession into habitats that may better suit these birds. Furthermore, in relation to stone curlew, the site is enclosed and, in some areas, bisected by small blocks of mature woodland that provide easy vantage points for predators (raptors and corvids), further reducing the potential for the site to support stone curlew. The site also supports a large rookery around the main entrance road, and a large congregation of nesting crows on the north eastern woodland block, both of which further reduce the likelihood of ground nesting birds using the site, combined with the dense woodland blocks that runs across the site providing easy access for predators like foxes and badgers, both of which have been recorded on site during the site surveys. Further information on the likely presence of stone curlew on site or within the surrounding area has been provided below.

6.3.1.1 *Stone Curlew*

Information on the suitability of surrounding habitats within 1.5 km of the site for stone curlew is provided below. The assessment was made by Joshua Stafford BSc (Hons) MRSB, Principal Ecologist at Sweco with 14 years' experience in ecological consultancy, and in designing and leading ornithological surveys, including the breeding bird surveys undertaken on site in 2024.

Assessment of Habitats to the North

Directly north of the site lies St. Simons Stud, followed by the A14, which runs parallel to the stud. The paddocks within the stud are primarily used for horse grazing or hay production. Each field margin is lined with dense, mature trees, and the paddocks are bisected by mature woodland with, in most fields, additional clusters of mature trees. Many paddocks also contain field shelters for horses, as well as barn and stable buildings located throughout the site. The main stud area features a large complex of stables, barns, and housing, with multiple concrete access tracks crossing the site. Further north lies the A14 and beyond this lies the overground railway line and Kennett station followed by arable wheat or cereals fields adjacent to the Banks Mills industrial estate.

Studies by Green *et al.* [7] [8] found that stone curlews breed in short semi-natural dry grasslands and heaths (referred to throughout as heathland) and spring-sown arable farmland, particularly in areas with sandy soils containing stones or rubble. It was noted that these birds are most likely to breed in spring-sown arable fields if the crops grow tall and dense later in the summer and if the fields are in close proximity to short

semi-natural grassland or sheep pasture, while being located more than 3 km away from the nearest major road. Key characteristics of preferred nesting and foraging habitats include sparse vegetation and bare ground. The more recent study [9] using GPS trackers found that stone curlew by day are three times more likely to forage on disturbed grassland and by night are twice as likely to forage on disturbed grassland than unmodified grassland.

The grazed paddocks to the north do not meet these criteria. These paddocks are actively grazed by horses and are surrounded by woodland, with a close proximity to existing built-up environments, the overground railway and the A14 and other major roads. There are no bare ground patches within these fields and stones and rocks within the field will be actively removed as part of site management, as these pose a risk to horses. As such, the paddocks are unlikely to provide suitable nesting conditions for stone curlew. The mature woodland that borders all the field margins, and the clusters of mature trees, provide vantage points for corvids (a rookery and 18 crow nests were recorded in woodland on and adjacent to site) and raptors, as well as cover for badgers and foxes, resulting in an increased risk of predation for ground-nesting birds. Taking into account the previous points and the proximity to the A14, A11 and B1506, the habitat within St. Simons Stud is considered unsuitable for nesting stone curlew. Additionally, as these fields are currently managed as grazed paddocks and hay-cut fields, it is unlikely that their management will change in the coming years, meaning that further years of monitoring these habitats would be unlikely to result in any significant change in their use by stone curlew.

To the north of the study area lies the only potentially suitable habitat for nesting stone curlews: an arable field located north of the A14 and the overground rail line. However, this area is considered unsuitable due to its proximity to the village of Kennett and the ongoing construction works at Kennett Garden Village, which borders this field to the northeast. The construction site has active excavators and other machinery engaged in developing residential properties that back onto these arable fields. Additionally, the A14 and the Banks Mills industrial estate are located immediately adjacent to the arable land along the south, further encircling the land. Although the habitat itself may possess some suitability, its proximity to these significant disturbances greatly limits its potential to support stone curlews. This is further emphasized by surveys conducted by MLM Group (now Sweco) related to the Kennett Garden Village planning application (18/00752/ESO), which found no stone curlews present during the 2016 or 2017 surveys and concluded that the cropland in this area was unsuitable for stone curlews.

Assessment of Habitats to the East

To the east of the site lies the main village of Kentford, with existing residential development starting immediately adjacent to the site and extending approximately 1.5 km east towards the A14, which curves back around, ending just outside the village. Interspersed throughout this area are grassland paddocks, which increase to the south east. Here, the paddocks are associated with Lanwades Stud, whose main site is directly south of the Project Site. These paddocks resemble those of St. Simons Stud and are bordered by large, mature woodlands, along with blocks of woodland that extend from the River Kennett. The proximity of this mature woodland around the edges of these fields provides ideal vantage points for corvids and raptors, and offers cover for badgers and foxes. Scattered housing is also present throughout this area.

At the southeastern edge of the buffer, much of the land remains dedicated to grazing, but there are arable fields used for crops that could potentially support stone curlew populations. However, these fields are located much closer to the village of Gazeley, at a minimum distance of only 500 m from the nearest property, Gazeley Stud, and as such fall well within the 1.5 km impact zone around Gazeley.

Considering the size and nature of Kentford and Gazeley, and the existing 1.5 km impact zone around each village, the Lanwades Project does not increase the area that is already subject to disturbance and thus suboptimal for nesting. Furthermore, given the existing roads and public footpaths between the two villages, as well as the predominant land use comprising horse paddocks, woodland blocks, and equine and agricultural housing, it is unlikely that stone curlew would be nesting in this area.

Assessment of Habitats to the South

Immediately south of the site lies Lanwades Stud and BSAS Telecoms, located almost directly adjacent to the site boundary. The area immediately south consists of horse paddocks and mature woodland blocks, which then lead to Trinity Hall Cottages, a local school, and the village of Moulton, which begins approximately 1 km from the site and extends for another kilometre along the B1085 that starts by the site and runs south through the village.

As previously mentioned, the proximity of the village of Moulton and the existing residential developments adjacent to the site means that the fields between the site and Moulton are already experiencing impacts from these developments. Additionally, the land in this area primarily consists of grazed paddocks, barns, and stable buildings, making it unlikely to support stone curlew populations, for the reasons outlined above.

Assessment of Habitats to the West

Finally, to the west lies Moulton Paddock Studs, a prominent facility in the area that is home to over 200 horses. This extensive property features numerous paddocks, a large stable complex, barns, housing, offices, and a stately home, along with several major gallops and rides that are regularly utilized for exercising and training horses. The site is bordered by significant mature woodlands that line nearly all roads and access tracks, as well as the paddocks and field margins, likely influenced by the construction of Fidget Hall in the early 18th century.

While the paddocks themselves offer negligible nesting suitability for stone curlew, the larger gallops may present some potential due to their expansive open areas. However, these are in regular use and the grass in these regions appears to be regularly-managed to keep it short, with livestock fencing and mow lines present on aerial imagery. Additionally, several grass and sand tracks cross the area, mimicking raceways. The proximity to Newmarket and the A14 further reduces this area's suitability.

Given the level of activity at the site and the low suitability of the habitat for supporting stone curlew, along with existing impact zones already affecting this area, it is unlikely that stone curlew would utilize this location for nesting.

Furthermore, the western boundary of the site lies approximately 3.5 km from the Special Protection Area (SPA). A 1.5 km impact zone would extend from 3.5 km to 5 km away from the SPA. A study by the Zoological Society of London [9] utilized GPS tags to monitor stone curlew movements, revealing that 90% of foraging locations occurred within 1 km of nesting sites during the breeding season, although some birds did travel up to 4.1 km at night to forage in high-quality sites with abundant invertebrate populations, such as pig fields, spring-sown crops, and isolated manure piles. The primary conclusion of the paper emphasizes that conservation efforts should focus on promoting improved breeding attempts through enhanced foraging opportunities created by ground disturbance within 1 km of the nest. This aligns with earlier research [10] indicating that stone curlews travel about 3 km from their nests to feed at night and prefer nesting sites in short semi-natural grassland or sheep-grazed pastures that are more than 3 km away from major roads. Given these factors, it is unlikely that these areas would be utilized by stone curlews for nesting.

Foraging Value of Horse Paddocks

An important point that has not yet been addressed is the low level of invertebrate populations found in horse-grazed fields. Newmarket has a rich racing history and is home to many studs that produce horses competing at regional, national, and international levels. Due to the frequent movement of horses, standard medical treatments, including anthelmintics (drugs used to treat internal and external parasitic infections), must be administered regularly.

Recent studies [11] have shown that the most common anthelmintic treatments have significant negative impacts on earthworm populations, with nearly all treatments affecting soil invertebrates adversely, although some are notably more harmful than others. Tyler, *et al.* [10] found earthworms, soil-surface invertebrates and molluscs are the main prey of adult stone curlews and their chicks. As such, paddocks in general are likely to present a suboptimal foraging resource for stone curlews, before taking into account the other points raised above.

Specialist Stone Curlew Survey

As discussed already, a specialist stone curlew survey was undertaken in April 2025 to assess the site and the surrounding habitat within 1.5 km of the Project for its suitability to support stone curlew. The survey was undertaken by a suitably qualified ecologist, Graham Reilly, who has 14 seasons' experience working on the RSPB Stone Curlew Recovery Project.

The report concluded that it is extremely unlikely that stone curlews will be present as a breeding species within the vicinity of the Project due to a lack of suitable nesting habitat within 1.5 km of the Project and disturbance from human activities.

In addition, following consultation with Natural England using their Discretionary Advice Service, it was acknowledged that as the development is located over 1.5 km from the component parts of the Breckland SPA, Natural England does not consider the SPA to be negatively impacted by a scheme outside of this distance. Natural England's advice note, dated 09 April 2025, can be found in Appendix B.

In conclusion, the Project will not have any impact on supporting habitats for any of the qualifying features of Breckland SPA. As such the requirement to mitigate against loss of supporting habitat caused by the development to Breckland SPA has been screened out.

6.3.2 Fenland SAC

Fenland SAC is designated for its extensive molinia fen-meadows and calcareous fens and for its populations of spined loach and great crested newt. The site, and the surrounding area, does not support fen habitats and there are no waterbodies on site to support spined loach. The River Kennett is located approximately 400 m to the south-east of the site and does provide suitable habitat for spined loach, however the distance of the river from the site and the implementation of standard pollution prevention controls during the construction phase of the development means that spined loach are highly unlikely to be affected by the proposals.

The woodland habitat on site does provide some suitable habitat for great crested newt, however as there are no ponds on site, or within 500 m of the site, and the B1506 and A14 to the north-east and west and the River Kennett to the south act as significant barriers to dispersal for great crested newts onto site, great crested newt are not considered to be a constraint and will remain unaffected by the proposals.

6.3.3 Chippenham Fen Ramsar

Chippenham Fen Ramsar is designated for its mire habitat, rich invertebrate fauna, rare plants and a notable assemblage of breeding birds. As the project site does not support mire, fen or damp habitats, it is considered very unlikely that the invertebrate assemblage and the rare plant species (including Cambridge milk parsley) occur on site, and therefore these features are not considered further. The habitats on site do not provide suitable habitat for the Ramsar's breeding bird assemblages (common snipe, woodcock, nightingale, reed warbler, common grasshopper warbler), with the exception of woodcock, however none of the species were recorded on site during the breeding bird surveys undertaken in 2024, and therefore they are considered to be absent from site.

In conclusion, the Project will not have any likely significant effect on any supporting habitats of Chippenham Fen Ramsar and Fenland SAC. As such the requirement to mitigate against loss of supporting habitat caused by the development to these two designated sites has been screened out.

6.4 Disturbance

The project site will be subject to disturbance, during the construction phase from plant machinery and the movement of materials and during the operational phase from residential homeowners and disturbance associated with the school and nursing home, however, this is not expected to significantly exceed the existing levels of disturbance for the site. This is because at peak operation in 2017-2020, the Animal Health Trust had 250 staff on site, with many staying onsite in dorms and undertaking daily recreational activities with the animals on site. Moreover, the site was widely open to the public who were able to explore the grounds and use a number of the woodland area for recreational walks.

6.4.1 Recreational

As the proposed development will result in an increase in the number of residential units on site there could be a significant effect on the three breeding birds species Breckland SPA is designated for through recreational disturbance. Residents from the development may travel to Breckland SPA occasionally for recreational purposes such as exercise for their dogs, which could disturb breeding birds on site.

Chippenham Fen Ramsar and Fenland SAC are not considered to be under pressure / threat from public access / disturbance. The RIS highlights the limited public access to the site and restricted routes to a few footpaths and bridleways as to why the site experiences low level recreational pressure. Further there is no parking at the site and therefore access by future residents would require a two hour walk just to reach the site. With the Fenland SAC site improvement plan confirming this, recreation is not considered a threat to the site.

The Project has the potential to have likely significant effects on the qualifying features of Breckland SPA as a result of recreational disturbance during the operational phase of the development. There is no requirement to mitigate against recreational disturbance at Chippenham Fen Ramsar and Fenland SAC as this effect been screened out.

6.4.2 Noise and Visual

Although there will be a slight increase in noise during the construction and operational phase of the development and there will be a change in the visual impact of the site during the development, given the distance of the site from the designated sites, and the presence of the A14, a busy dual carriageway, between the site and the designated sites, and the fact the habitat within the 2 km buffer zone around the site is considered unlikely to support stone curlew no significant effects are anticipated.

Therefore, the requirement to mitigate against noise and visual impacts to designated sites and their qualifying features caused by the Project has been screened out.

6.5 **Air Pollution**

The construction and operational phase of the development will result in a slight, increase in vehicle movements on site given the historic animal health trust when in operation had significant staff and visitor pressure, and therefore a subsequent slight increase in NO_x concentrations locally. However, given the distance of the site from the designated sites, and the presence of the A14 dual carriageway between the site and the designated sites, it is considered unlikely that the Project would result in increases at the site beyond what is already present and therefore no significant effects on these sites are anticipated.

Therefore, the requirement to mitigate against air pollution impacts to internationally designated sites caused by the Project has been screened out.

6.6 **Water Pollution and Contamination**

All works during the construction phase of the development will adhere to standard pollution prevention controls detailed within a construction and environment management plan (CEMP), or similar document, required as standard for schemes of

this nature. This will prevent pollution and run off impacting any rivers in the local area, and subsequently finding its way into the water network, and onto a designated site.

In addition, the site is not hydrologically linked to any of the designated sites, further reducing the risk of pollution and contamination.

During the operational phase, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination.

Therefore, the requirement to mitigate against hydrological impacts to the designated sites caused by the Project during the construction or operational phase has been screened out.

Table 6.1. HRA Technical Consideration

Site Name and Designation	Risk / Pressure / Priority Issue(s)	Qualifying Feature(s) Affected	Potential Impact	Likely significant effect
Breckland SPA (UK9009201)	Loss of habitat	Stone curlew	There will be no direct loss of SPA habitat.	No
	Loss of supporting habitat	Stone curlew	The habitat on site, and within 2 km of the development, was found to be unsuitable for stone curlew during surveys undertaken by a stone curlew specialist in 2025. In addition, stone curlew were not recorded on site during breeding bird surveys undertaken in 2024. There is limited potential for stone curlew to use the grazed paddocks however this has been ruled out due to the woodland that surrounds and is scattered within the paddocks, which creates vantage points for predators.	No
	Disturbance	Stone curlew	<p>The proposed development will result in an increase in the number of residential units on site and although public open space will be provided on site for residents to exercise their dogs, it is anticipated that there will be an increase in recreational pressure on Breckland SPA from the new residents. Therefore, it is not possible to screen out recreational disturbance impacts.</p> <p>It is possible to screen out noise and visual disturbance impacts due to the distance of the site from the SPA, and the presence of the A14 dual carriageway between the site and the SPA.</p>	Yes
	Air pollution (risk of atmospheric nitrogen deposition)	Stone curlew	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from Breckland SPA, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SPA.	No
	Water pollution and contamination	Stone curlew	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As	No

			such there is no anticipated impact from water pollution or contamination.	
Breckland SPA (UK9009201)	Loss of habitat	Nightjar	There will be no direct loss of SPA habitat.	No
	Loss of supporting habitat	Nightjar	Nightjar like dense mature woodland in a coppice rotation, with a mixture of age categories and felled areas creating a mosaic of habitats within which to forage and nest. These habitats are not present on site and as such the site is unlikely to be used by this species. In addition, nightjar were not recorded on site during the breeding bird surveys in 2024.	No
	Disturbance	Nightjar	The proposed development will result in an increase in the number of residential units on site and although public open space will be provided on site for residents to exercise their dogs, it is anticipated that there will be an increase in recreational pressure on Breckland SPA from the new residents., Therefore it is not possible to screen out recreational disturbance impacts. It is possible to screen out noise and visual disturbance impacts due to the distance of the site from the SPA, and the presence of the A14 dual carriageway between the site and the SPA.	Yes
	Air pollution (risk of atmospheric nitrogen deposition)	Nightjar	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from Breckland SPA, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SPA.	No
	Water pollution and contamination	Nightjar	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination.	No
	Loss of Habitat	Woodlark	There will be no direct loss of SPA habitat.	No

Breckland SPA (UK9009201)	Loss of supporting habitat	Woodlark	Woodlark nest in heathlands. This habitat is not present on site and as such the site is unlikely to be used by woodlark. In addition, woodlark were not recorded on site during the breeding bird surveys undertaken in 2024.	No
	Disturbance	Woodlark	<p>The proposed development will result in an increase in the number of residential units on site and although public open space will be provided on site for residents to exercise their dogs, it is anticipated that there will be an increase in recreational pressure on Breckland SPA from the new residents., Therefore it is not possible to screen out recreational disturbance impacts.</p> <p>It is possible to screen out noise and visual disturbance impacts due to the distance of the site from the SPA, and the presence of the A14 dual carriageway between the site and the SPA.</p>	Yes
	Air pollution (risk of atmospheric nitrogen deposition)	Woodlark	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from Breckland SPA, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SPA.	No
	Water pollution and contamination	Woodlark	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination.	No
Fenland SAC (UK0014782)	Loss of habitat	Molinia fen-meadows on calcareous, peaty or clayey-silt-laden soils.	There will be no direct loss of SAC habitat.	No
	Loss of supporting habitat	Molinia fen-meadows on calcareous, peaty or clayey-silt-laden soils.	The site consists of an urban development and grazed paddocks, with no Molinia fen-meadow habitat present on site or adjacent to the site.	No

	Public access / disturbance	Molinia fen-meadows on calcareous, peaty or clayey-silt-laden soils.	The proposed change of use will result in an increase of residential dwellings above what was historically present on the site. However, Chippenham Fen (part of the Fenland SAC) is well managed, with limited public access, and is located over 4.4 km from the site. In addition, there is no parking at the site and therefore access by future residents would require a two hour walk just to reach the site. As such it is unlikely the proposed development would result in increased recreational pressures there. In addition, it is possible to screen out noise and visual disturbance impacts due to the distance of the site from the SAC, and the presence of the A14 dual carriageway between the site and the SAC.	No
	Air pollution (risk of atmospheric nitrogen deposition)	Molinia fen-meadows on calcareous, peaty or clayey-silt-laden soils.	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from the SAC, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SAC.	No
	Water pollution and contamination	Molinia fen-meadows on calcareous, peaty or clayey-silt-laden soils.	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination.	No
Fenland SAC (UK0014782)	Loss of habitat	Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>	There will be no direct loss of SAC habitat.	No
	Loss of supporting habitat	Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>	The site consists of urban development and grazed paddocks, with no calcareous fen habitat present within the site or adjacent to the site.	No
	Disturbance	Calcareous fens with <i>Cladium mariscus</i> and	The proposed change of use will result in an increase of residential dwellings above what was historically present on the site. However, Chippenham Fen (part of the Fenland SAC) is	No

		species of the <i>Caricion davallianae</i>	well managed, with limited public access, and is located over 4.4 km from the site. In addition, there is no parking at the site and therefore access by future residents would require a two hour walk just to reach the site. As such it is unlikely the proposed development would result in increased recreational pressures there. In addition, it is possible to screen out noise and visual disturbance impacts due to the distance of the site from the SAC, and the presence of the A14 dual carriageway between the site and the SAC.	
	Air pollution (risk of atmospheric nitrogen deposition)	Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> .	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from the SAC, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SAC.	No
	Water pollution and Contamination	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)	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination.	No
Fenland SAC (UK0014782)	Loss of habitat	Spined loach	There will be no direct loss of SAC aquatic habitat.	No
	Loss of supporting habitat	Spined loach	The site consists of urban development and grazed paddocks. This habitat is not present within the SAC, and nearest suitable habitat (River Kennett) is located at least 400m from the site. The implementation of stand pollution prevention controls during the construction phase will ensure there will be no impacts to the river.	No
	Disturbance	Spined loach	The proposed change of use will result in an increase of residential dwellings above what was historically present on the site. However, Chippenham Fen (part of the Fenland SAC) is well managed, with limited public access, and is located over 4.4 km from the site. In addition, there is no parking at the site and therefore access by future residents would require a two	No

			hour walk just to reach the site. As such it is unlikely the proposed development would result in increased recreational pressures there. In addition, it is possible to screen out noise and visual disturbance impacts due to the distance of the site from the SAC, and the presence of the A14 dual carriageway between the site and the SAC.	
	Air pollution (risk of atmospheric nitrogen deposition)	Spined loach	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from the SAC, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SAC.	No
	Water pollution and contamination	Spined loach	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination.	No
Fenland SAC (UK0014782)	Loss of habitat	Great crested newt	There will be no direct loss of SAC aquatic habitat.	No
	Loss of supporting habitat	Great crested newt	There are no ponds on site and no ponds within 500 m of the site. Significant barriers to great crested newt dispersal (roads and river) also surround the site.	No
	Disturbance	Great crested newt	The proposed change of use will result in an increase of residential dwellings above what was historically present on the site. However, Chippenham Fen (part of the Fenland SAC) is well managed, with limited public access, and is located over 4.4 km from the site. In addition, there is no parking at the site and therefore access by future residents would require a two hour walk just to reach the site. As such it is unlikely the proposed development would result in increased recreational pressures there. In addition, it is possible to screen out noise and visual disturbance impacts due to the distance of the site from the SAC, and the presence of the A14 dual carriageway between the site and the SAC.	No

	Air pollution (risk of atmospheric nitrogen deposition)	Great crested newt	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from the SAC, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SAC.	No
	Water pollution and contamination	Great crested newt	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination.	No
Chippenham Fen Ramsar	Loss of habitat	Spring-fed calcareous basin mire	There will be no direct loss of Ramsar habitat.	No
	Loss of supporting habitat	Spring-fed calcareous basin mire	The site consists of urban development and grazed paddocks, with no mire habitat present within the site or adjacent to the site.	No
	Disturbance	Spring-fed calcareous basin mire	The proposed change of use will result in an increase of residential dwellings above what was historically present on the site. However, Chippenham Fen is well managed, with limited public access, and is located over 4.4 km from the site. In addition, there is no parking at the site and therefore access by future residents would require a two hour walk just to reach the site. As such it is unlikely the proposed development would result in increased recreational pressures there. In addition, it is possible to screen out noise and visual disturbance impacts due to the distance of the site from the Ramsar, and the presence of the A14 dual carriageway between the site and the Ramsar.	No
	Air pollution (risk of atmospheric nitrogen deposition)	Spring-fed calcareous basin mire	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from the Ramsar, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SAC.	No

	Water pollution and contamination	Spring-fed calcareous basin mire	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination.	No
Chippenham Fen Ramsar	Loss of habitat	Invertebrate fauna	There will be no direct loss of Ramsar habitat that supports invertebrates.	No
	Loss of supporting habitat	Invertebrate fauna	The site consists of urban development and grazed paddocks, with no suitable habitat present to support rare invertebrate assemblages associated within the Ramsar.	No
	Disturbance	Invertebrate fauna	The proposed change of use will result in an increase of residential dwellings above what was historically present on the site. However, Chippenham Fen is well managed, with limited public access, and is located over 4.4 km from the site. In addition, there is no parking at the site and therefore access by future residents would require a two hour walk just to reach the site. As such it is unlikely the proposed development would result in increased recreational pressures there. In addition, it is possible to screen out noise and visual disturbance impacts due to the distance of the site from the Ramsar, and the presence of the A14 dual carriageway between the site and the Ramsar.	No
	Air pollution (risk of atmospheric nitrogen deposition)	Invertebrate fauna	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from the Ramsar, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SAC.	No
	Water pollution and contamination	Invertebrate fauna	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination on invertebrate assemblages at the Ramsar.	No

Chippenham Fen Ramsar	Loss of habitat	Rare plant species (Cambridge milk parsley).	There will be no direct loss of Ramsar habitat.	No
	Loss of supporting habitat	Rare plant species (Cambridge milk parsley).	The site consists of urban development and grazed paddocks, with no mire, fen or damp habitats present associated with the rare plant species found at the Ramsar.	No
	Disturbance	Rare plant species (Cambridge milk parsley).	The proposed change of use will result in an increase of residential dwellings above what was historically present on the site. However, Chippenham Fen is well managed, with limited public access, and is located over 4.4 km from the site. In addition, there is no parking at the site and therefore access by future residents would require a two hour walk just to reach the site. As such it is unlikely the proposed development would result in increased recreational pressures there. In addition, it is possible to screen out noise and visual disturbance impacts due to the distance of the site from the Ramsar, and the presence of the A14 dual carriageway between the site and the Ramsar.	No
	Air pollution (risk of atmospheric nitrogen deposition)	Rare plant species (Cambridge milk parsley).	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from the Ramsar, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SAC.	No
	Water pollution and contamination	Rare plant species (Cambridge milk parsley).	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination.	No
Chippenham Fen Ramsar	Loss of habitat	Notable breeding bird assemblage.	There will be no direct loss of Ramsar habitat.	No
	Loss of supporting habitat	Notable breeding bird assemblage.	The site consists of urban development and grazed paddocks, which do not provide suitable habitat for the Ramsar's breeding bird assemblages (common snipe, woodcock, nightingale, reed warbler, common grasshopper warbler), except for woodcock.	No

			However, breeding bird surveys were carried out in 2024, and none of the notable bird species were recorded on site.	
	Disturbance	Notable breeding bird assemblage.	The proposed change of use will result in an increase of residential dwellings above what was historically present on the site. However, Chippenham Fen is well managed, with limited public access, and is located over 4.4 km from the site. In addition, there is no parking at the site and therefore access by future residents would require a two hour walk just to reach the site. As such it is unlikely the proposed development would result in increased recreational pressures there. In addition, it is possible to screen out noise and visual disturbance impacts due to the distance of the site from the Ramsar, and the presence of the A14 dual carriageway between the site and the Ramsar.	No
	Air pollution (risk of atmospheric nitrogen deposition)	Notable breeding bird assemblage.	The proposed development is unlikely to result in any significant increase in atmospheric nitrogen deposition given the distance from the Ramsar, the previous usage of the site as a research facility, and the presence of the A14 dual carriageway between the site and the SAC.	No
	Water pollution and contamination	Notable breeding bird assemblage.	There is no hydrological connectivity from the development to the site and the scheme will not include any abstraction. Furthermore, existing drainage and sewage connections will be used, ensuring water is treated as it was historically on site. As such there is no anticipated impact from water pollution or contamination.	No

7 HRA Stage 1 Conclusion

The Project Site at Lanwades Country Park has been assessed for potential impacts on Breckland SPA located 2.2 km to the north-east, and Fenland SAC and Chippenham Fen Ramsar sites, both located 4.4 km to the north-west.

There will be no direct impact on any habitats at the above designated sites, or on any supporting habitats outside of the designated sites, during the construction phase of the Project. Noise and visual impacts to the above sites during the construction and operational phase of the Project have also been screened out.

As the development will result in an increased number of residential buildings and therefore an increase in the number of residents on site, there is a possibility that some residents will travel to Breckland SPA for recreational purposes, including to walk their dogs. This could lead to significant effect on the three bird species for which the site is designated for through disturbance.

As this risk cannot be fully addressed at screening, mitigation will be required to ensure the works can proceed. As such this assessment must proceed to Appropriate Assessment (Stage 2) and incorporate mitigation before reanalysing the impacts.

8 Cumulative Impact Assessment

An assessment of the West Suffolk Council, East Cambridgeshire District Council and Suffolk County Council planning portals, searching back two years has identified a limited number of developments within the local area. Nearly all of these are small scale conversions or extension alongside felling applications to remove TPO's or to demolish and build single residences.

There are three schemes which are of a nature, size and scale to have potential cumulative impacts. These are:

- Land Southwest of 98 to 138 Station Road Kennett Suffolk (18/00752/ESO), located 880 m to the north
- Land At Former St Felix School Fordham Road Newmarket Suffolk (DC/23/0864/FUL), located 4.9 km to the west
- Hatchfield Farm Fordham Road Newmarket Suffolk CB8 7XL (DC/13/0408/OUT), located 6 km to the west.

Land Southwest of 98 To 138 Station Road

The scheme is known as Kennett Garden Village and is a residential-led development with associated employment and community uses (including care home and/or sheltered housing) and a new primary school with a pre-school (nursery) facility, supporting infrastructure and open space/landscaping. The scheme is currently under construction.

A HRA screening assessment has been undertaken for the scheme, and it was concluded that all impacts to designated sites could be screened out due to the distance of the site from designated sites, and the provision of extensive green infrastructure to support on-site recreation, with no likely significant effects like to occur. As all effects were avoided there can be no residual effects to consider in combination.

Land At Former St Felix School

A planning application for 50 dwellings, garages, associated infrastructure including substation and foul water pumping station and public open space (following demolition of existing building and hard standing), new vehicular access onto Fordham Road following closure of existing southbound access and re-location of tennis courts.

As part of the proposals, the scheme has undertaken its own shadow HRA. Recreational disturbance was the only pathway considered at the screening stage, and it was concluded that this could be screened out due to the small size of the scheme, the distance from the scheme to designated sites, the lack of parking available at Ramsar sites and the inclusion of green infrastructure within the scheme itself. As all effects were avoided there can be no residual effects to consider in combination.

Hatchfield Farm

A planning application for up to 400 dwellings plus associated open space (including areas of habitat enhancement), foul and surface water infrastructure, two accesses onto the A142, internal footpaths, cycle routes and estate roads.

A HRA screening assessment has been undertaken for the scheme, and it was concluded that all impacts to designated sites could be screened out as standard good practice measures will be in place to protect watercourses during the development and recreational impacts could be screened out due to the distance of the site from designated sites. As all effects were avoided there can be no residual effects to consider in combination.

9 Appropriate Assessment

Following European Court of Justice Case law in 2018 (People over Wind), HRA screening should not take account of any avoidance or mitigation measures that have been integrated into the project specifically to protect SPA or SAC features. A precautionary approach must be taken in considering whether the project is likely to have significant effects on site features, both alone and in combination with any other relevant plans and projects that are likely to have residual effects on the site.

As mitigation cannot be included at a screening stage, and following the identification of likely impacts above, an Appropriate Assessment has been undertaken for those impacts which could not be screened out.

Following the assessment of impacts it has been concluded that there is potential impact from the proposed works on a qualifying feature of the Breckland SPA (all breeding bird species) through disturbance from increased recreational pressure, as this could not be screened out and will therefore need to be addressed further.

9.1 Disturbance

At the present, the Project Site has no public access. The Project will provide significant areas of green infrastructure to support on-site recreation, with the following provisions included:

- 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.

These provisions are in line with policy SP4 of the emerging West Suffolk Local plan, which states that all major residential developments of 50 homes or more located on greenfield sites should provide around 40 percent green infrastructure within the site.

The green infrastructure provided on site will be designed and managed with residents in mind, ensuring that there is a network of smaller and larger areas of greenspaces on site, with connections to existing greenspaces, such as retained areas of woodland on site. A sustainable drainage system (SuDS) will be included within the proposals and used to create wetland habitats for wildlife. The greenspaces on site will also provide space for residents to walk their dogs off lead and away from traffic, with a choice of clear open areas and more enclosed woodland areas.

The green infrastructure will be subject to ongoing management and monitoring to ensure that the green space continues to benefit residents and avoid the need for dog owners to travel to the nearby SPA.

As a result of the above mitigation, the Project is not expected to have a likely significant effect on the favourable conservation status of the three bird species for which the Breckland SPA is designated.

10 HRA Technical Consideration

Avoidance and/or Mitigation Measures					
Significant effect	Avoidance and/or mitigation measure	How will the measure avoid or reduce adverse impacts on the site	How, by whom and when will the measure be secured and implemented	Degree of confidence in likely success	Adverse effect predicted (Alone or in-combination)
Breckland SPA					
Disturbance caused by increased recreational pressure, including dogs	Provision of extensive areas of green infrastructure on site, for residents and dog walkers. Includes the provision of the following: <ul style="list-style-type: none"> • 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 	Encourage on-site recreation and reduce the likelihood of residents travelling further afield to the Breckland SPA to exercise and walk their dogs.	Developer will be responsible for provision of green infrastructure within the design of the scheme.	High	No

Avoidance and/or Mitigation Measures					
Significant effect	Avoidance and/or mitigation measure	How will the measure avoid or reduce adverse impacts on the site	How, by whom and when will the measure be secured and implemented	Degree of confidence in likely success	Adverse effect predicted (Alone or in-combination)
Breckland SPA					
	promote these areas for recreation <ul style="list-style-type: none"> • Dog waste bins • The long-term management and maintenance of these provisions 				

11 Conclusion of Appropriate Assessment

The development is not expected to have a likely significant effect on the favourable conservation status of the three bird species (stone curlew, nightjar and woodlark) for which the Breckland SPA is designated.

Given the provision of significant areas of green infrastructure to support on-site recreation, including areas where residents can exercise their dogs on site without the need to travel, circular walking routes on site, dog waste bins and information leaflets on local walking routes, the development is not expected to have a likely significant effect on the Breckland SPA.

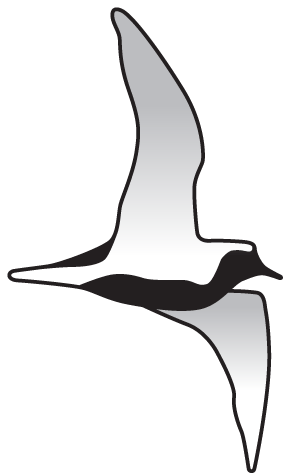
With these mitigation measures in place, there is judged to be no potential for likely significant effects on the Breckland SPA, either alone or in-combination with other developments.

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Appendix A – Stone Curlew Scoping Report

Report produced by Graham Riley BSc ACIEEM (Wild Frontier Ecology)



WILD FRONTIER ECOLOGY

Proposed Development at Lanwades,
Kennet, near Newmarket, Suffolk



Stone Curlew Scoping Report

April 2025

Report produced by	Report submitted to
Author: Graham Riley BSc ACIEEM	SWECO UK Ltd Grove House Mansion Gate Drive Leeds LS7 4DN Contact: Joshua Stafford
Quality control and senior review by: Robert Yaxley BSc (Hons) CEcol CEnv MCIEEM	
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Company Registered in England and Wales No: 4942219.

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Director: Robert Yaxley BSc (Hons) CEcol Cenv MCIEEM

The data which we have prepared and provided are accurate and have been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. We confirm that any opinions expressed are our best and professional bona fide opinions.



This report conforms to the British Standard 42020:2013 Biodiversity - Code of practice for planning and development.

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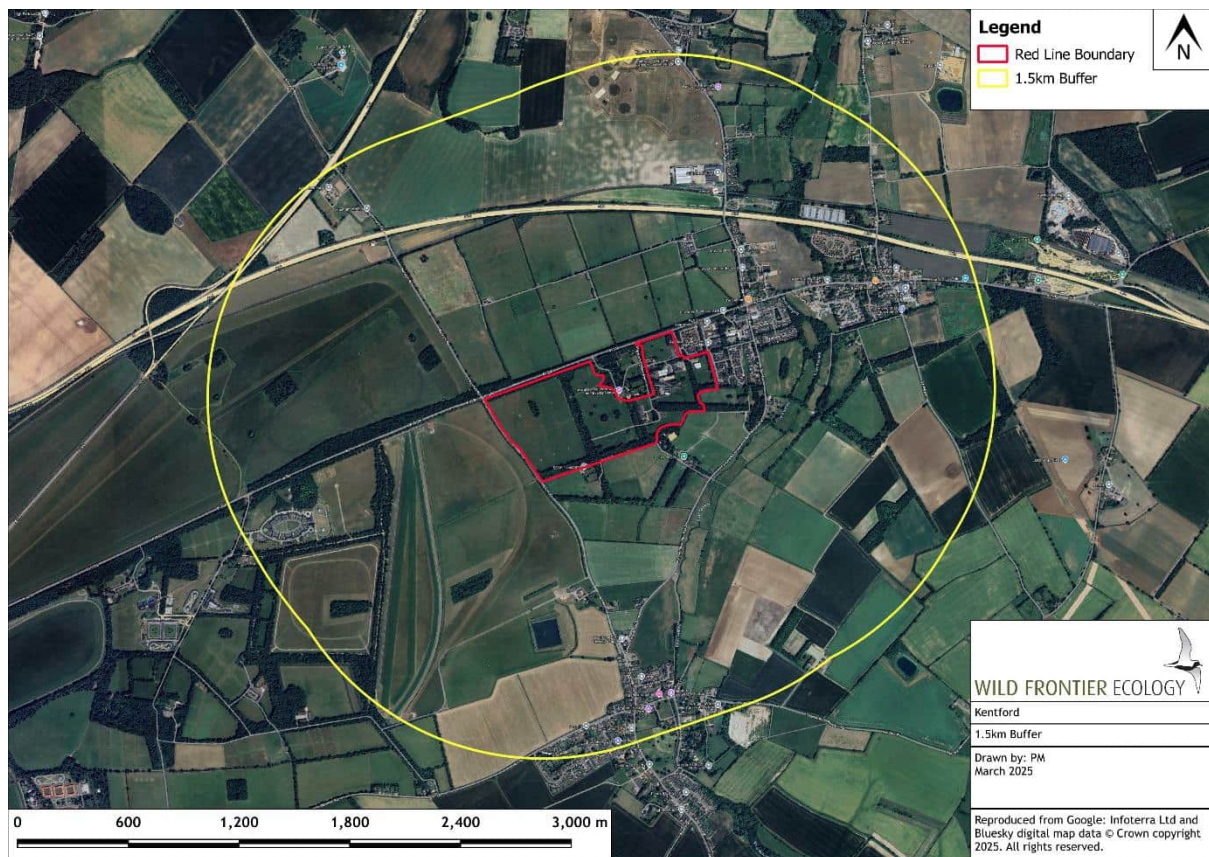
1. Background

Wild Frontier Ecology Ltd. (WFE) was commissioned by SWEKO UK Ltd to undertake a stone curlew scoping exercise in relation to a proposed residential housing scheme at Lanwades, Kentford near Newmarket, Suffolk CB8 7UA.

West Suffolk Council have requested three years of stone curlew survey data for the surrounding 1.5km radius (figure 1) of the proposed development boundary as the site lies just within 1km square cells where at least part of the cell is within 1,500m of the Breckland SPA (holding stone curlews). These 1km cells have significant data gaps as they are not within the traditional stone curlew nesting areas covered by the RSPB and therefore additional data may be requested regarding development proposals.

This scoping exercise comprises a data search with the RSPB (undertaken by SWEKO) and a habitat survey (within the 1.5km buffer) undertaken by WFE.

Figure 1: Proposed Development Footprint and 1.5km Buffer



2. Methods

2.1 Data Search

The RSPB was contacted by SWECO UK Ltd in February 2025 to obtain stone curlew nesting data within 1.5km of the proposed development site within the last 10 years.

2.2 Stone curlew habitat survey

The survey was undertaken by senior ecologist Graham Riley on 25th April 2025. The surveyor has extensive experience working with stone curlews having been part of the RSPB Eastern England Stone Curlew Recovery Project for 14 seasons between 1993 - 2006 and has subsequently completed many stone curlew projects while working for WFE. The survey involved appraising and mapping the habitats within the 1.5km buffer with regard to their suitability for nesting stone curlews as well as assessing the levels of human disturbance that these areas may be subjected to. Apart from within the proposal site itself this survey was undertaken from public roads.

Stone curlew habitat within eastern England comprises extensive undisturbed areas of short sward rabbit grazed grass heathland as well as large, spring sown bare fields, most notably sugar beet. Within the Breckland core area other spring sown crops such as maize, onions, linseed and carrots can also be utilised on occasion, but the preference is for bare ground which is why sugar beet is important as it is a relatively slow growing crop and retains good bare ground habitat until late spring/early summer.

3. Constraints

The survey was out of necessity undertaken from public roads due to a lack of access to the surrounding landholdings, and there were limited opportunities for pulling over on the busier routes. Also, due to the topography of the land some areas on the periphery of the buffer could not be viewed at all (unmapped areas in figure 2). Therefore, the habitat mapping is not comprehensive within the entire buffer area, but it is considered that the majority of the habitats could be viewed adequately for the purposes of the survey.

4. Results

4.1 Data Search

The RSPB returned no records of nesting stone curlew within 1.5 km of the development site and provided a confirmation letter of zero records on 22nd April 2025. The closest of two records returned from outside of the buffer comprised a nesting pair 1.65km to the west of the site from 2022.

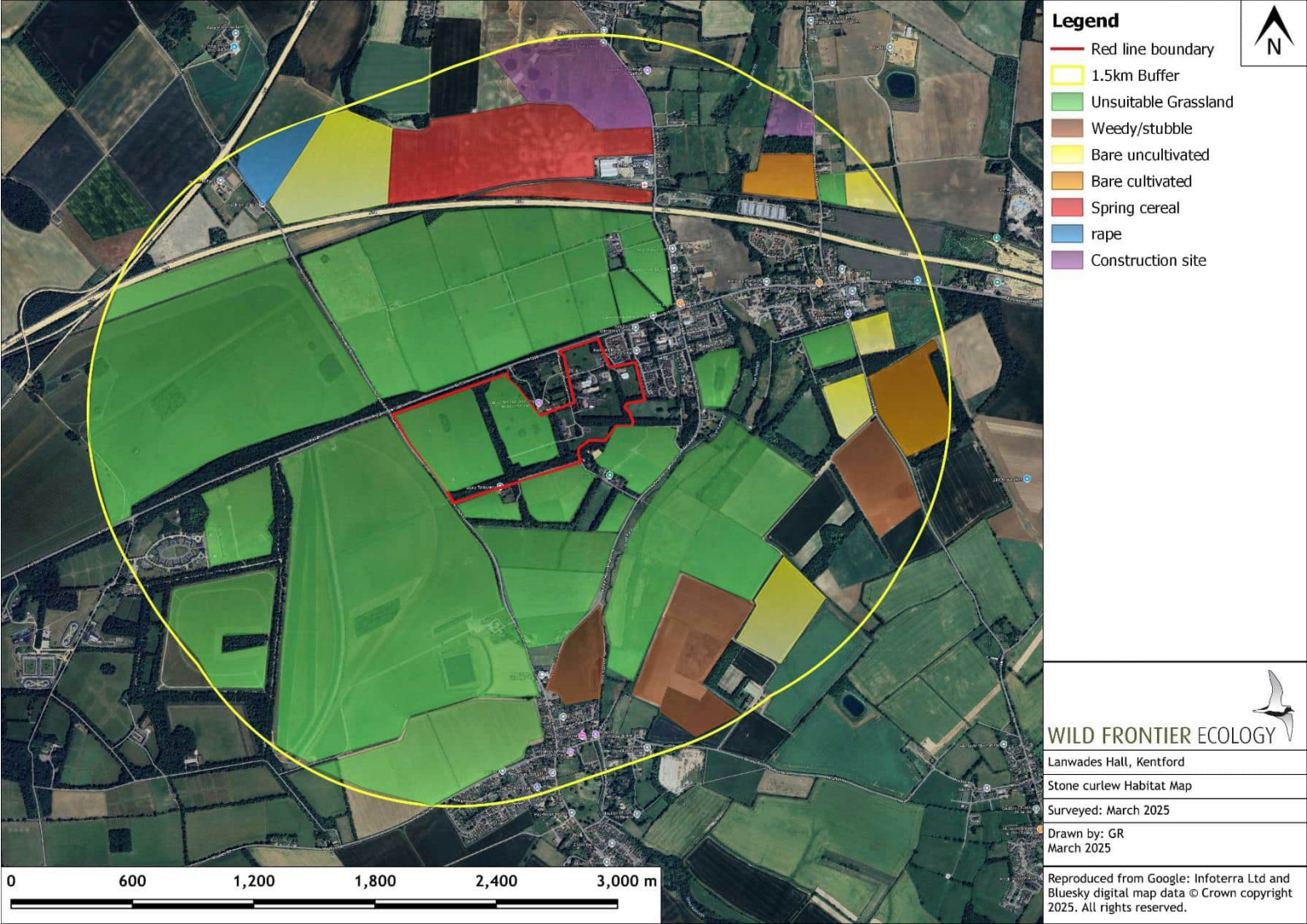
4.2 Habitat Survey

The observable habitats within the 1.5km buffer have been mapped and are presented within figure 2 below.

The vast majority of the land within the buffer was comprised of grassland paddocks and fields, predominantly used for grazing and exercising racehorses. The grass sward was variable in length and generally tussocky showing little sign of recent grazing activity.

The remainder of the land use within the buffer comprised a mixture of weedy/stubble fields, bare uncultivated and bare cultivated (bedded) fields, spring cereal, oilseed rape and active construction sites. The A14 runs east-west through the northern section of the buffer and the A11 just penetrates the buffer in the far north-western corner. The village of Moulton lies within the southernmost part of the buffer while the village of Kentford occupies a sizeable area in the central/eastern section.

Figure 2. Stone curlew habitat map



5. Discussion

There were no areas observed within the grassland paddocks/fields that contained suitable habitat for nesting stone curlews, which have a preference for very short sward, rabbit grazed heathland, ideally with bare and flinty areas. It is considered likely that these grass paddocks also experience regular disturbance which would also discourage stone curlew nesting activity due to their aversion to the presence of humans. At best, some areas could be utilised as foraging habitat, but no nesting habitat was found to be present within the areas viewable from roads.

The bare uncultivated fields were either small and isolated or adjacent to disturbance sources i.e. busy trunk roads (A14 and A11) and the two settlements. They are also likely to be cultivated in the coming days/weeks causing more disturbance and then drilled with potentially unsuitable crops. The bare cultivated fields observed were all bedded which is not the preference for nesting stone curlews, although they occasionally use bedded crops such as onions and carrots within the core area of Breckland. It is not considered likely that such suboptimal habitat would be used in an outlying area away from the major population centre. The remaining fields were drilled with unsuitable crops such as rape and spring cereals which were already at a stage where no bare ground was present. The weedy/stubby fields are also unsuitable as they don't provide enough bare ground and unbroken site-lines that stone curlews require when incubating eggs. These fields will also likely be cultivated later in the spring. The final land use type observed comprised the active construction sites (housing) present to the north of the A14, and these are wholly unsuitable due to the extreme ongoing disturbance from vehicles/machinery and human workers etc.

The fields that were not viewable during the survey were generally on the edge of the buffer, small in size and/or close to disturbance sources such as settlements and major trunk roads. Even if they were drilled with suitable crops such as sugar beet it is considered unlikely that they would prove attractive to a prospecting pair of stone curlews outside of the traditional nesting area.

6. Conclusion

The stone curlew scoping exercise comprised a habitat survey of a 1.5km buffer around the Lanwades proposed residential development site and a data search with the RSPB.

The data search provided no nesting stone curlew records within the 1.5km buffer during the last 10 years and the habitat survey found there to be no observable suitable nesting habitat within the buffer. Therefore, it is concluded that it is extremely unlikely that stone curlews will be present as a breeding species within the near vicinity of the proposed housing development within the 2025 nesting season.

7. Appendix 1 Photos



Photo 1. Grassy paddock in the north of the 1.5km buffer



Photo 2. Grassy paddock within the proposal site



Photo 3. Grassy paddock in the west of the buffer area



Photo 4. Bare uncultivated field in the east of the buffer area



Photo 5. Rape field and bare uncultivated field in the north-west corner of the buffer area



Photo 6. Bare cultivated field (bedded) in the east of the buffer area



Photo 7. Stubble/weedy field with wide grassy margin in the south of the buffer area

Appendix B – Natural England Advice Note

Date: 09 April 2025
Our ref: 504994



Joshua Stafford
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joshua.stafford@sweco.co.uk

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CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Joshua Stafford

Discretionary Advice Service (Charged Advice) DAS A018276

Development proposal and location: 860 Residential Units, Lanwades County Park, Kentford, CB8 7UU

Thank you for your consultation on the above dated 5 March 2025, which was received on the same date.

This advice is being provided as part of Natural England's Discretionary Advice Service. Sweco UK Limited has asked Natural England to provide advice upon:

- Advice on potential impacts on designated sites and on information for a draft Habitats Regulations Assessment

This advice is provided in accordance with the Quotation and Agreement dated 12 March 2025.

The following advice is based upon the information within:

- The parameter site boundary and land use plans provided on 7 March 2025 (dated January 2025, Woods Hardwick)

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.

Recreational Disturbance

The proposed development falls within the IRZ ([SSSI IRZ User Guidance.pdf](#)) of Breckland Farmland Special Site of Scientific Interest (SSSI), a component part of Breckland SPA, where the impact of recreational disturbance as a result of a new residential development of this size should be assessed. Whilst recreational disturbance has a number of impacts on designated sites (i.e. trampling, litter), one of the most significant impacts is the visual and noise disturbance of birds for which the SPAs are designated (although other site features are also affected). These birds are sensitive to disturbance from recreational walkers, cyclists, and in particular dogs off leads.

Natural England advises that onsite Green Infrastructure can be included within the development to provide mitigation for the increased recreational disturbance from the proposal. The following advice

is provided to support the development of any subsequent planning applications relating to Lanwades County Park development.

Green Infrastructure (GI)

The [Suitable Accessible Natural Green Space \(SANGS\) guidance](#) can be helpful in designing GI; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although 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 encourage you to incorporate the principles and standards in [Natural England's GI Framework](#) for this development. The GI Framework aims to support local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure.

Quantity of greenspace

Natural England advise that 8ha of semi-natural greenspace is provided per 1000 population wherever possible. We also refer you to [Natural England's accessible greenspace standards](#). In particular:

- Neighbourhood standard – 10ha within 1km
- Local Standard – 2ha within 300m
- Doorstep Standard – 0.5ha within 200m

Natural England's [green infrastructure mapping](#) can help in determining where these criteria are met, and where additional provision is required. We would advise that all new housing should be able to meet at least the doorstep and local standard.

You may also wish to refer to policy SP4 of the emerging West Suffolk Local Plan which states that all major residential development of 50 homes or more located on greenfield sites should provide around 40 percent green infrastructure within the site.

Quality of greenspace

In order for any on-site provision to be meaningfully used by residents, and therefore be acceptable mitigation, it must be well designed, managed and maintained. This means giving consideration to location and length of footpaths and cycle paths, provision of bins (including dog waste) and benches, and ensuring that there is sufficient useable greenspace that can reasonably be accessed by residents. Consideration should also be given to how the greenspace will be managed and maintained for the lifetime of the development.

The following additional advice is offered for improving the provision of high-quality green infrastructure within the proposed development.

- **Network of spaces:** Natural England advises that you create a green network throughout the development using smaller and larger areas of greenspaces, as well as providing connectivity with existing greenspaces. We refer you to Natural England's [Accessible Green Space Standards](#) when considering the adequacy of the provision. These can also be mapped using the Green Infrastructure Map. It is our advice that these standards are also considered when ensuring that sufficient green space is provided within the development.

- **Existing features:** Natural England notes that the site contains existing areas of woodland, including the priority habitat deciduous woodland. We advise that existing features, such as these, are retained and enhanced alongside providing additional green space.
- **Living Streets:** If you propose to include street trees, Natural England refers you to the [urban tree manual](#) from Forest Research, and advises you to ensure that all planting is done in accordance with British Standard BS 8545:2014 to ensure the trees can reach their full potential and deliver a wide range of benefits.
- **Sustainable drainage systems (SuDS):** Natural England support the inclusion of SuDS to manage surface water disposal, these systems can be used to create wetland habitats for wildlife in an attractive aquatic setting. The CIRIA guidance (susdrain.org) provides useful information about integrating SUDs and biodiversity. The maintenance of SuDS should be provided for the lifetime of the project.
- **Management:** Ongoing management and monitoring of greenspace and landscaping is an important part of ensuring that the green space continues to deliver multiple benefits for the community. This should be considered in future design stages and should be clearly set out in any planning application. You may find it useful to refer to [Guide 9: Long-Term Stewardship - Town and Country Planning Association](#) (tcpa.org.uk).
- **Multifunctionality:** A key component of GI is it's multifunctionality. Green space can benefit communities by providing space for exercise leading to improvement in mental and physical wellbeing, reducing flood risk, improving air quality and providing space for communities to gather and connect.
- **Accessibility:** Natural England advises that, when designing GI, consideration should be given to the accessibility and inclusivity of the space being provided. In order for the community to fully benefit from the multi-functionality of GI, all users need to be able to access greenspace, and feel safe and confident to do so. Natural England advises that this should be considered through future design phases, and should include provision of accessible signage and information about sites.
- **Active Travel:** We would advise that, as far as is possible, any roads and access through the site are cycle and pedestrian friendly. By encouraging more active travel from residents and discouraging the use of cars, more recreation can be retained close to the development site, away from the designated sites.
- **Provision for dog walking:** Dog owners require space to walk their dogs off lead close to home and away from traffic, once or twice per day. If the onsite green space does not give adequate dog walking provision, most owners will travel elsewhere. Well-designed GI should positively accommodate off-lead exercising of dogs, in areas where this causes the least conflict with other resident's interests such as cycling, children's play equipment, sports activities and people seeking to minimise contact with dogs. We recommend that the developer consults relevant guidance and best practice documents such as [Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value](#) and incorporates these principles within proposed application designs.

Information to residents

Natural England advise that another suitable mitigation measure may be to provide information to new residents of the development on the nearby greenspaces they can use, including those which could be suitable for dog walking.

Habitats Regulations Assessment

When preparing the shadow HRA for the planning application, we advise that as much detail as possible of all features proposed to act as mitigation are clearly stated within the appropriate assessment and provided at as early a stage as possible. This includes, but is not limited to:

- The quantity and location within the site of greenspace proposed
- The length of walking routes proposed
- Connections to existing PRoW
- Indicative locations of off lead dog areas including dog waste bins
- Indicative locations of children's play areas
- Signage proposed for SANG
- Green corridors with active travel routes connecting parcels of greenspace
- Improvement of existing PRoW

In addition, Natural England advises that provision of the greenspaces will need to be in place prior to occupation.

Breckland Special Protection Area (SPA) – stone curlew

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. As this development is located over 1.5km from the component parts of Breckland SPA designated for stone curlew, Natural England does not consider the SPA to be impacted in this way.

However, Stone Curlew are a protected species listed in Schedule 1 of the Wildlife and Countryside Act 1981 and as such any negative impacts to birds outside of the SPA need to be considered under this legislation. Natural England has produced [standing advice](#) to help planning authorities understand the impact of particular developments on protected species. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species [licence](#) may be required in certain cases.

If you have any queries relating to the advice in this letter please contact me at alice.canningtye@naturalengland.org.uk.

This letter concludes Natural England's Advice within the Quotation and Agreement dated 14 March 2025.

☐ The advice provided in this letter has been through Natural England's Quality Assurance process

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion

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 any projects in Breckland". Footprint Ecology.

does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Yours sincerely

Alice Canning Tye
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