



Haughley Neighbourhood Plan 2016 - 2036 Pre-Submission Plan

Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA):

Screening Report – July 2018





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1. Introduction

1.1 The Purpose of This Report

This screening report is an assessment of whether or not the contents of the Haughley Neighbourhood Plan 2016-2036 Pre-Submission requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/ EC and associated Environmental Assessment of Plans and Programmes Regulations. A SEA is required if the Neighbourhood Plan is deemed to have a likely significant effect on the environment.

This report will also screen to determine whether the Neighbourhood Plan requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) and (4) of the EU Habitats Directive and with Regulation 63 of the Conservation of Habitats and Species Regulations 2017. A HRA is required when it is deemed that likely adverse significant effects may occur on protected European Sites (Natura 2000 sites) as a result of the implementation of a plan/project.

1.2 The Haughley Neighbourhood Plan 2016-2036 Pre-Submission Document

For the purposes of the Neighbourhood Plan, the words “Haughley Parish“ shall mean that part of the Parish of Haughley lying to the north of the A14 and including part of the Parish of Harleston to the north of the A14.

The Neighbourhood Plan will set out planning policies for Haughley and within the confines of the Haughley Parish boundary. Once formally adopted, a Neighbourhood Plan carries the same legal weight as Local Development Plans adopted up by the Local Planning Authority (LPA), in this case Mid Suffolk District Council.

The Neighbourhood Plan states that the Vision for the Plan is:

‘By 2036 Haughley Parish will be a connected, viable and attractive rural area with a strong heritage and community spirit. It will have a range of homes and essential public services (including high speed broadband connection) that meet the growing needs of the community and are in keeping with the area. The natural and historic environment will be protected and enhanced. Haughley Parish will be a safe and sustainable rural community where people want to live and use into the future.

To deliver this Vision, the following Objectives have been established for the Plan:

OBJECTIVE 1	To ensure that new housing in Haughley is provided in a suitable range of tenures, types and sizes so that local people of all ages can continue to live in a suitable home and local housing needs are met, while retaining the rural character of the village and Parish.
OBJECTIVE 2	To preserve and enhance the historic built environment of Haughley.
OBJECTIVE 3	To enhance Haughley's role as a Core Village by protecting and improving existing facilities and services.



OBJECTIVE 4	To ensure that sustainable development is secured for this and future generations by protecting key environmental assets (e.g. green spaces and landscapes) and taking account of constraints (e.g. flooding).
OBJECTIVE 5	To ensure that traffic and transport issues in Haughley are tackled, including enhanced provision for walking and cycling.

1.3 The Mid Suffolk Core Strategy (2008) & Focused Review (2012)

The adopted Mid Suffolk Core Strategy (2008) & Focused Review (2012) contain current strategic planning policy for the District and thus Haughley. The Core Strategy was originally adopted in 2008 and includes a number of policies related to a strategy for growth in the District, the delivery of growth and the provision of infrastructure. A Sustainability Appraisal was carried out for the Core Strategy as well as 'Appropriate Assessment' in accordance with the Habitats Directive and Regulations.

The Core Strategy categorised Haughley (excluding Haughley Green within the Neighbourhood Plan area) as a 'Key Service Centre'. It establishes that towns should be the main focus for development in the District, and that Key Service Centres are the main focus for development outside of the towns. Policy CS1 Settlement Hierarchy of the Core Strategy states that,

'The majority of new development (including retail, employment and housing allocations) will be directed to towns and key service centres'.

Policy CS8 of the Core Strategy provides the outline for housing distribution across Mid-Suffolk. Housing numbers for the 2010-2025 period are provided within the policy table. A total of 3,830 homes were proposed for the 15 year period, with 500 of these being located within Key Service Centres.

1.4 The Emerging Mid Suffolk Local Plan

Work has been underway for a new Joint Local Plan with Babergh and Mid Suffolk District Council. At the time of writing, a Regulation 18 stage consultation had most recently closed on the 10th November 2017. This was accompanied by a Sustainability Appraisal.

The Regulation 18 stage Local Plan identifies Haughley as a Core Village, with a 'District Centre' role related to its defined Principal Shopping Area. A number of strategic options were explored relevant to Haughley. These were:

- County Town Focus – 20% district growth in Core Villages
- Market town / rural area balance – 20%-25% district growth in Core Villages
- Transport corridor focus – 30% district growth in Core Villages
- New Settlement focus – 15% district growth in Core Villages

The emerging Local Plan has reviewed Settlement Boundaries. The Plan states that,

'The Councils have taken the approach that Urban Areas, Market Towns and Core Villages will have new growth identified and allocated in the new Local Plan through the allocation of new housing sites... Maps identifying 'committed boundaries' and potential SHELAA sites can be viewed in Appendix 3 and 4'



Within Appendix 4, there is included a map of Haughley. The map shows three potential development sites adjacent to the existing settlement boundary of the village, and also illustrates proposed extensions to the settlement boundary.

Regarding Neighbourhood Plans, the emerging Local Plan states that,

'Neighbourhood plans can be brought forward at any time and can be developed before or at the same time as the local planning authority is producing its Local Plan. It is for the local planning authority to work closely with neighbourhood planning groups to minimise any conflicts between policies in the neighbourhood plan and the emerging Local Plan.'

'There is an opportunity for local communities to bring forward sites for development in neighbourhood plans in parallel with the developing local plan process and in accordance with the emerging level of growth agreed with the local planning authority and share evidence the evidence being prepared by the Local Planning Authority and vice versa.'

The Local Plan at the current stage of process (at the time of writing) outlines high level options with initial preference for approaches included, however there is currently an absence of draft policy wording at this stage. With this in mind, the emerging Local Plan is unlikely to have any identifiable conflict with any of the content within the emerging Haughley Neighbourhood Plan regarding the principle of development. Indeed, the Neighbourhood Plan is being prepared at a comparably advanced stage to that of the Local Plan and its evidence base.



2. Legislative Background

2.1 Strategic Environmental Assessment (SEA)

Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment states that,

'Environmental assessment is an important tool for integrating environmental considerations into the preparation and adoption of certain plans and programmes which are likely to have significant effects on the environment.'

(10) All plans and programmes which are prepared for a number of sectors and which set a framework for future development consent of projects listed in Annexes I and II to Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment(7), and all plans and programmes which have been determined to require assessment pursuant to Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna(8), are likely to have significant effects on the environment, and should as a rule be made subject to systematic environmental assessment. When they determine the use of small areas at local level or are minor modifications to the above plans or programmes, they should be assessed only where Member States determine that they are likely to have significant effects on the environment.

(11) Other plans and programmes which set the framework for future development consent of projects may not have significant effects on the environment in all cases and should be assessed only where Member States determine that they are likely to have such effects.'

The Haughley Neighbourhood Plan may influence frameworks for future development, or become used ancillary to those plans and programmes that do set such a framework, and as such it has been determined that the principle of the Neighbourhood Plan should be screened for the necessary application of the SEA Directive.

The Report from the Commission to The Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions states, on the application and effectiveness of the Directive on Strategic Environmental Assessment (Directive 2001/42/EC), that

'the following P&P, and modifications to them, are covered when prepared and/or adopted by an authority[2] and required pursuant to legislative, regulatory or administrative provisions:

- P&P prepared for certain sectors and which set the framework for future development consent in respect of projects under the Environmental Impact Assessment-EIA-Directive.*
- P&P requiring an assessment under the Habitats Directive (92/43/EEC).*
- P&P setting the framework for development consent in respect of projects (not limited to those listed in the EIA Directive; see above) and determined by "screening" as being likely to have significant environmental effects.'*

This report represents this screening process in regard to the content and influence of the Haughley Neighbourhood Plan.



2.2 Habitats Regulations Assessment (HRA)

Under the provisions of the EU Habitats Directive and translated into English law by the Habitats Regulations (*The Conservation of Habitats and Species Regulations 2017*), a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any European Site, in terms of impacting the site's conservation objectives.

HRA is the screening assessment of the impacts of a land use proposal against the conservation objectives of European sites. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. European sites are also known as Natura 2000 sites.

This HRA Screening Report has been undertaken in order to support the Haughley Neighbourhood Plan which is being produced by Haughley Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012.

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA.

In line with the recent Court judgement (CJEU *People Over Wind v Coillte Teoranta C-323/17*), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Natura 2000 site.



3. SEA Screening

3.1 When is SEA Required?

Planning Practice Guidance – Strategic environmental assessment requirements for neighbourhood plans (Paragraph: 026 Reference ID: 11-026-20140306) states that,

'In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a strategic environmental assessment. Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is commonly referred to as a "screening" assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.

If likely significant environmental effects are identified, an environmental report must be prepared in accordance with paragraphs (2) and (3) of regulation 12 of those Regulations.

One of the basic conditions that will be tested by the independent examiner is whether the making of the neighbourhood plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive).

To decide whether a draft neighbourhood plan might have significant environmental effects, it must be assessed (screened) at an early stage of the plan's preparation according to the requirements set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. These include a requirement to consult the environmental assessment consultation bodies.

Each consultation body will be able to advise on particular topics relevant to its specific area of expertise and responsibility, and the specific information that it holds.

Where it is determined that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), a statement of reasons for the determination should be prepared. A copy of the statement must be submitted with the neighbourhood plan proposal and made available to the independent examiner.'

Articles 2 and 3 of the SEA Directive set out the circumstances in which an SEA is required. Table 1 sets out the assessment of whether the principle of the Haughley Neighbourhood Plan will require a full SEA.

Table 1: Exploring whether the Principle of the Plan would warrant SEA

Q	Criteria	Response	Outcome	Commentary
1	Is the Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through legislative procedure by Parliament or Government	Yes	Go to question 2	The Neighbourhood Plan has been prepared for adoption through legislative procedure.
2	Is the Plan required by legislative, regulatory or <u>administrative provision</u> Typical characteristics of "administrative provisions" are that they are publicly available, prepared in a formal way, probably involving consultation with interested parties. The administrative provision must have sufficient formality such that it counts as a "provision" and it must also use language that plainly requires rather than just encourages a Plan to be prepared.	Yes	Go to question 3	The Neighbourhood Plan would be considered as falling within the category of an 'administrative provision'.
		No	DOES NOT REQUIRE SEA	
3	Is the Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Yes to both criteria	Go to question 5	The Neighbourhood Plan has been prepared for town and country planning and sets a framework for future development consent
		No to either criteria	Go to question 4	
4	Will the Plan, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	Yes	Go to question 5	N/A
		No	Go to question 6	
5	Does the Plan determine the use of small areas at local level, OR is it a minor modification of a	Yes to either criteria	Go to question 8	The policies of the Neighbourhood Plan can be considered to determine the

Q	Criteria	Response	Outcome	Commentary
	Plan likely to require assessment under the Habitats Directive?	No to both criteria	Go to question 7	use of small areas at local level commensurate with their status in determining local planning applications. The Neighbourhood Plan also allocates land for development purposes.
6	Does the Plan set the framework for future development consent of projects (not just projects in the Annexes of the EIA Directive)?	Yes	Go to question 8	N/A
		No	DOES NOT REQUIRE SEA	
7	Is the Plans sole purpose to serve national defence or civil emergency, OR is it a financial or budget Plan, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7	Yes to any criteria	DOES NOT REQUIRE SEA	N/A
		No to all criteria	REQUIRES SEA	
8	Is it likely to have a significant effect on the environment?	Yes	REQUIRES SEA	Likely significant effects are explored in more detail elsewhere in this Screening Report.
		No	DOES NOT REQUIRE SEA	

The following section looks at the criteria for assessing the effects of the Neighbourhood Plan and the identified effects of the Neighbourhood Plan in line with the criteria. Crucially, it will determine whether there are any likely significant effects on the environment.

3.2 Criteria for Assessing the Effects of the Neighbourhood Plan

Criteria for determining the likely significant effects on the environment, referred to in Article 3(5) of Directive 2001/42/EC are set out below.

Annex II of SEA Directive 2001/42/EC – Significant Effects

1. The characteristics of plans and programmes, having regard, in particular, to

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
- environmental problems relevant to the plan or programme,
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

- the probability, duration, frequency and reversibility of the effects,
- the cumulative nature of the effects,
- the transboundary nature of the effects,
- the risks to human health or the environment (e.g. due to accidents),
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
- the value and vulnerability of the area likely to be affected due to:
 - * special natural characteristics or cultural heritage,
 - * exceeded environmental quality standards or limit values,
 - * intensive land-use,
 - * the effects on areas or landscapes which have a recognised national, Community or international protection status.

3.3 Likely Significant Effects on the Environment resulting from the Neighbourhood Plan

The following assessment will consider the likelihood of the Haughley Neighbourhood Plan Pre-Submission Document (at the time of writing) to have significant effects on the environment.

Table 2: Assessment of Likely Significant Effects on the Environment

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>The Plan sets out relevant policies which will be used to determine proposals for development within the Neighbourhood Area once adopted. Policy HAU2 of the Plan provides policy criteria for appropriate housing developments within the Plan area. Policies HAU3, HAU4 and HAU5 respond to housing allocations within the Plan area, including housing quantum potential for each allocation and further policy criteria specific to these sites. The combined quantum of these allocations is between 141 and 179 dwellings.</p> <p>Paragraphs 11.13 and 11.14 Pre-Submission Plan state that, <i>'Mid Suffolk District Council made a call for sites during 2014 and 2016 which were assessed. From that assessment, the land east of King George V Playing Field, site SS0270 which is situated in Station Road east of Millfields; site SS0047, which is situated south of Fishponds Way and north of the River Gipping tributary; and site SS0149 which is situated north of Fishponds Way and north of the River Gipping tributary and east of Abbeyfields, were considered suitable for development by Mid Suffolk District Council, who sought views on the sites during the initial Joint Local Plan consultation in August 2017. The consultation did not allocate any sites at that time as the strategy for the distribution of growth had not been determined.</i></p> <p><i>However, it was felt important that an independent and professional assessment was made of the possible development sites. Also, it was felt equally important that an independent and professional consultation was obtained in order to provide Masterplanning and Design guidelines that could be utilised for any allocated development sites and any future further development sites during the period of the Neighbourhood Plan. Financial assistance was sought from Locality and AECOM was commissioned to undertake producing a Masterplanning and Design Guidelines Report and a Site Assessment Report.'</i></p> <p>It should be noted that the Local Plan has not yet formally included the assessments of the above mentioned within an emerging Sustainability Appraisal, encompassing the requirement for Strategic Environmental Assessment. As the Neighbourhood Plan seeks to allocate sites in advance of the emerging Local Plan process of the District Council, any subsequent significant effects on the</p>



<p>Criteria for determining the likely significance of effects (Annex II SEA Directive)</p>	<p>Likelihood and summary of significant effects</p>
<p>The degree to which the plan or programme influences other plans or programmes including those in a hierarchy.</p>	<p>environment from development of these sites have not yet been formally identified in a manner which is consistent with the requirements of the SEA Directive. In addition, the assessment work undertaken to date does not meet the full requirements of Strategic Environmental Assessment as set out in the SEA Directive.</p> <p>As such, the allocation of these sites within the Plan ensures that significant effects on the environment can not be ruled out, particularly where the ranges of potential dwelling capacities can be considered broad.</p> <p>It should be noted however that alternative sites were also subject to assessment as part of the work undertaken by AECOM. This goes some way to forming a significant part of the Strategic Environmental Assessment that would be required.</p> <p>The Neighbourhood Plan provides policies for the Plan area, relevant to a local level only. The Plan is in general conformity to policies CS1, CS5 and CS9 of the Mid Suffolk adopted Core Strategy.</p> <p>Despite this, the Neighbourhood Plan allocates land for development purposes outside of the established Haughley Settlement Boundary identified within the adopted Mid Suffolk Core Strategy, albeit on land that is adjacent to the Settlement Boundary. This land, as defined in the adopted Mid Suffolk Core Strategy, is within the ‘countryside’ as defined.</p> <p>To this extent, the Neighbourhood Plan does influence the emerging Babergh and Mid Suffolk Local Plan, which is currently at the Regulation 18 stage, in so far as it deviates from the approach of Policy CS2 in the adopted Mid Suffolk Core Strategy, which outlines that within the ‘countryside’ development will be restricted to defined categories that the Neighbourhood Plan cannot reasonably be seen to fall within.</p> <p>The emerging Babergh and Mid-Suffolk Local Plan recognises however that many of the settlements (within Babergh Mid Suffolk) have already expanded beyond defined settlement boundaries and that these have been / are being reviewed through the plan-making process. Further, the Councils have taken the approach that Core Villages will have new growth identified and allocated in the new Local Plan through the allocation of new housing sites. The allocation of land for housing purposes within the Neighbourhood Plan can be seen as contributing to that process.</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>Neighbourhood Plans are required to contribute to the achievement of sustainable development. The Neighbourhood Plan policies seek to ensure environmental considerations are taken into account. The Neighbourhood Plan is compatible and does not conflict with adopted Mid Suffolk Core Strategy policies CS5 and CS9 which have been subject to a thorough process of plan preparation and accompanying Sustainability Appraisal.</p> <p>The following policies exist within the Neighbourhood Plan relevant to environmental protection:</p> <ul style="list-style-type: none"> • Policy HAU14 Protection of Local Green Spaces; and • Policy HAU15 Protection of the Rural Landscape <p>Policy HAU2 also states that proposals will be supported where they make a positive contribution to the surrounding environment and rural landscape. In addition, Policy HAU1 Haughley Spatial Strategy is consistent with aspirations in regard to the protection and enhancement of local features of ecological and historic importance however it is only this policy that specifically mentions the protection of such characteristics within the Plan area. Whereas site allocation policies consider protection relevant to these specific sites, the policies contained within the Plan are arguably insufficient in ensuring that potential effects on the environment are minimised from any development that might come forward within the plan period that is additional to the Plan's site allocations.</p>
<p>Environmental problems relevant to the plan.</p>	<p>The Neighbourhood Plan reflects a small area.</p> <p>The policy content of the adopted Core Strategy will additionally apply to any proposals within the Neighbourhood Plan area. These policies have been subject to Sustainability Appraisal And Habitats Regulations Assessment Screening within the context of the Core Strategy. The potential environmental problems relevant to the Neighbourhood Plan area include:</p> <ul style="list-style-type: none"> • There are a large number of listed buildings within the Plan area, particularly within the Old Street / Duke Street area of Haughley village forming part of the Conservation Area. • Notable listed buildings include the Grade I Listed Church of St Mary the Virgin and the Grade II* listed New Bells Farmhouse. • Haughley Castle is a Scheduled Monument within the Plan area and adjacent to the development boundary of Haughley. • South of the main village lies the northern side of a valley formed by a tributary of the River Gipping. This wooded valley is within Flood Zones 2 and 3. • The plan area contains a large number of priority habitats, including in large areas surrounding the main village



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>development boundary. These include traditional orchard, deciduous woodland, wood pasture and parkland Priority habitats, mixed mainly conifer woodland, broadleaved woodland, young tree woodland and good quality semi-improved grassland (non-Priority). A large area of land to the south west of the development boundary (west of The Folly) is also identified as an area of ‘no main habitat but additional habitat exists.’</p> <ul style="list-style-type: none"> • The Neighbourhood Plan Area is within a Groundwater Source Protection Zone – Total Catchment (Zone 3). • The Plan area contains Grade 2 agricultural land (‘very good’) around the main village of Haughley. This represents the best and most versatile land within the wider District.
<p>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).</p>	<p>The content of the Neighbourhood Plan is not in conflict with those relevant planning documents within the wider district and county area related to waste management or water protection.</p>
<p>The probability, duration, frequency and reversibility of the effects on the following factors:</p> <p style="text-align: center;">Sustainability Theme</p> <ul style="list-style-type: none"> - Biodiversity - Population - Human health 	<p>The following impacts have been identified within this Screening Assessment:</p> <p>There are no wildlife designations within the Plan area. Although there are a high number of priority habitats in the Plan area covering a large amount of land, none of the Plan’s allocations would result in any loss of these features. The Plan’s allocations to the south of the development boundary are adjacent to deciduous woodland associated with the river valley. Although there may be some level of impact on biodiversity, significant effects that would warrant the application of the SEA Directive can be ruled out.</p> <p>The Neighbourhood Plan identifies and allocates 3 sites which are considered suitable for residential development. The combined quantum of these allocations, as allocated within Policies HAU3, HAU4 and HAU5 is between 141 and 179 dwellings. There are therefore likely to be a degree of impact on the current population and also in general as a result of new development. This is likely to be realised in relation to infrastructure capacities such as schools and utilities. As this information is not available, effects can not be ruled out.</p> <p>The Plan does not allocate any land for development purposes that could have any implications regarding human health although the</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>allocation land to the west of Fishponds Way is adjacent to a waste water treatment plant which could have some degree of impacts regarding noise and odour. Policy HAU5 ensures that this should be assessed as part of any planning application. The Plan seeks to safeguard all green spaces within the Plan area in Policy HAU14 in order to ensure that this space is preserved for the purposes of health and well-being. Additionally, site allocation policies seek sufficient outdoor green space be incorporated into schemes.</p> <p>It can be considered that no significant effects will occur upon Human health in the Neighbourhood Plan area. Any potential impacts regarding contamination of any future proposals are best addressed at the 'project level', through the development management process and in adherence to relevant policies at the LPA level.</p>
- Fauna	<p>The impacts of the Neighbourhood Plan on fauna are not considered significant. It is possible that developments that could be forthcoming within the Plan area could have negative impacts on protected species; however these cannot be identified as strategically significant to warrant Strategic Environmental Assessment at the Plan level. Such issues are more appropriate to be considered on a case-by-case application basis at the development management stage in consideration of the Neighbourhood Plan policies and relevant policies contained within Mid Suffolk's adopted Core Strategy and emerging Local Plan (commensurate the level of weight those policies would have at the time of application).</p>
- Flora	<p>An area of Priority Habitat Deciduous Woodland exists adjacent to proposed site allocations to the south of the development boundary. No such areas are likely to be lost as a result of development. There will be no likely effects on Flora that can be significant to warrant the application of the SEA Directive.</p>
- Soil	<p>The Neighbourhood Plan area is within Grade 2 and Grade 3 Agricultural Land ('very good' and 'good to moderate' respectively). Grade 2 Agricultural Land represents the best and most versatile agricultural land within the wider District. Such losses can be expected through the Plan's site allocations and as such negative effects can be expected.</p>
- Water	<p>The Neighbourhood Plan Area is within a Groundwater (Source) Protection Zone – Total Catchment (Zone 3). Source Protection Zones (SPZs) respond to sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The Neighbourhood Plan allocates land for residential development purposes. Residential land uses are not considered to give rise to ground water pollutants (e.g. give rise to hazardous</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>substances such as pesticides, oils, petrol and diesel, solvents, arsenic, mercury or chromium VI; or non-hazardous substances such as ammonia or nitrates).</p> <p>The HRA Screening element of this report determines that Haughley is outside the Zone of Influence of any N2k sites regarding impacts on water quantity and quality.</p>
- Air	<p>No AQMAs or other identified air quality issues exist within or in close proximity to the Neighbourhood Plan area. The Plan does allocate land for development purposes, but these are not considered to contribute to any cumulative air quality impacts. As such, no significant effects on air quality have been deemed likely.</p>
- Climatic factors	<p>The majority of the Neighbourhood Plan area is within Flood Zone 1; however a tributary of the River Gipping is present south of the development boundary. The presence of the tributary ensures that a significant amount of land is within Flood Zones 3 and 2 associated with this water course. The Plan's allocations are not within any land identified within Flood Risk Zones 2 or 3, but all are adjacent to such land. Nevertheless, no significant effects have been identified.</p>
- Material assets	<p>The content of the Neighbourhood Plan is not considered to have any significant impacts on material assets due to the extent / size of the Neighbourhood Plan Area. Such issues are more appropriate to be considered on a case-by-case basis at the development management stage and in accordance with relevant development management policies contained within Mid Suffolk's adopted Core Strategy.</p>
- Cultural heritage	<p>A large amount of Listed Buildings exist within the Neighbourhood Plan area, the majority of these are within the Conservation Area, which forms a significant part of the settlement boundary. The Plan allocates 3 sites for development. Although no allocation contained within these policies is within the immediate curtilage of a Listed Building, there is some potential for harm to a number of isolated Listed Buildings, particularly site SS0270 which is in relatively close proximity to the Grade II listed Hill Farmhouse and SS0047 which is in close proximity to the Grade II listed The Firs. It should be noted however that Policy HAU9 exists to ensure that the significance of heritage assets is preserved and where possible enhanced through proposals. Detail on any individual impacts of schemes would be a development management matter, on a case-by-case basis, and not strategic in scope to warrant the application of SEA at the plan-level. There is considered to be no likely significant effect on cultural heritage / the historic environment that would specifically warrant the application of the SEA Directive and a commitment to undertake a SEA.</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>- Landscape</p> <p>The cumulative nature of the effects.</p> <p>The trans boundary nature of the effects.</p> <p>The risks to human health or the environment (e.g. due to accidents).</p>	<p>The Neighbourhood Plan area is within Natural England's South Norfolk and High Suffolk Claylands (NCA) profile. The overall character is of a gently undulating, chalky glacial till plateau, frequently open views confined by occasional hedges and trees, with some woodland present.</p> <p>The Suffolk Landscape Character Assessment indicates that Haughley and Haughley Green fall within the landscape character type of Ancient Plateau Claylands. This assessment states that for this landscape typology <i>'this is quite open landscape with the potential of any form of development to be visibility intrusive if it has been designed without sufficient screening or an appropriate landscape design plan.'</i> It adds that <i>'to maintain the character and condition of the landscape any major developments will enter into a Section 106 Legal Agreement for landscaping.'</i></p> <p>Policies within the Plan ensure that dwellings on the edge of the development area provide suitable landscaping options to assimilate into the character area. To this extent, the Plan ensures that potential landscape implications of proposals are suitably considered and significant effects minimised.</p> <p>The Plan allocates land for development purposes which has not been subject to any cumulative assessment of impacts through any formal or legally required purpose. Environmental protection policies exist within the Plan for the purpose of ensuring that individual schemes are unlikely to result in inappropriate development, however cumulative significant effects on the environment can not be ruled out at this stage.</p> <p>The findings of the HRA Screening element of this Report do not indicate any trans boundary effects.</p> <p>There is limited risk to human health or the environment as a result of the Neighbourhood Plan. This is in consideration of the above screening requirements related to sustainability themes. The Neighbourhood Plan is primarily focused on housing, whilst retaining the character of Haughley. This land use is unlikely to give rise to any accidents that can be considered to have a significant risk to human health or the environment.</p>
<p>The magnitude spatial extent of the effects (geographical area and size of the population likely to be affected).</p>	<p>The spatial extent of development resulting from the Neighbourhood Plan is identified within policies HAU3, HAU4 and HAU5 as within a broad range of between 141 and 179 dwellings. Although the magnitude of effects can be considered small in the wider District context, proportionately the scale and location of development proposed (in relation to one another and the existing village of Haughley) is significant. The magnitude and spatial extent of effects</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> - special natural characteristics or cultural heritage - exceeded environmental quality standards - intensive land use 	<p>would be best explored through application of the SEA Directive.</p> <p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has been assessed as potentially having significant effects on environmental quality standards as a result of intensive land use that would warrant further assessment through SEA.</p>
<p>The effects on areas or landscapes which have a recognised national, community or international protection status.</p>	<p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has been assessed as not having any significant effects on areas or landscapes which have a recognised national, community or international protection status.</p>



4. HRA Screening

4.1 Habitat Regulations Assessment of Development Plans

This section forms a plan level Habitats Regulations Assessment (HRA) as required by Regulation 63 of The Conservation of Habitats and Species Regulations 2017.

Under the provisions of the EU Habitats Directive and translated into English law by the Habitats Regulations (The Conservation of Habitats and Species Regulations 2017), a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any European Site, in terms of impacting the site's conservation objectives.

HRA is the screening assessment of the impacts of a land use proposal against the conservation objectives of European sites. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. European sites are also known as Natura 2000 sites.

This HRA Screening Report has been undertaken in order to support the Haughley Neighbourhood Plan which is being produced by Haughley Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012. The area covered by the Plan is shown in Appendix 1.

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA.

This section of this Report aims to:

- Identify the European sites within 20km of Haughley.
- Summarise the reasons for designation and Conservation Objectives for each site to be considered in this assessment.
- Screen the Haughley Neighbourhood Plan for its potential to impact upon a European(or Natura) site (N2k).
- Assess the potential for in combination effects from other projects and plans in the area.
- Identify if there are any outstanding issues that need further investigation.



4.2 Natura 2000 Sites

Natura 2000 is the centrepiece of EU nature and biodiversity policy. It is an EU wide network of nature protection areas. The aim of the network is to assure the long-term survival of Europe's most valuable and threatened species and habitats.

The sites are designated under the European Union (EU) Birds Directive (Council Directive 79/409/EEC on the Conservation of Wild Birds) and the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora).

The Birds Directive requires the establishment of Special Protection Areas (SPAs) for birds. The Habitats Directive similarly requires Special Areas of Conservation (SACs) to be designated for other species, and for habitats. Wetlands of International Importance (Ramsar sites) are also part of the Natura 2000 network. This is because all SPAs and SACs are comprised of Sites of Special Scientific Interest (SSSIs) and all Ramsar sites in England are SSSIs. Together, SPAs, SACs and Ramsar Sites make up the Natura 200 network in England.

4.2.1 Explanation of SPAs, SACs and Ramsar Sites

Special Protection Areas (SPAs)

SPAs are areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries. Example: The Deben Estuary is internationally important for wintering waterfowl. Legislation: EU Birds Directive.

Special Areas of Conservation (SACs)

SACs are areas designated to protect habitat types that are in danger of disappearance, have a small natural range, or are highly characteristic of the region; and to protect species that are endangered, vulnerable, rare, or endemic. Example: Waveney and Little Ouse Valley Fens for calcareous fens, *Molinia* meadows and Desmoulin's whorl snail. Legislation: EU Habitats Directive.

Wetlands of International Importance (Ramsar Sites)

Ramsar Sites are designated to protect the biological and physical features of wetlands, especially for waterfowl habitats. For example, Redgrave and South Lopham Fens is an extensive example of lowland base-rich valley, remarkable for its lack of fragmentation which supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. Ramsar sites often overlap with SACs and SPAs and UK planning policy determines that they should be accorded the same importance when developments are proposed. Legislation: Ramsar Convention (1971) – Wetlands of International Importance.

4.2.2 European Sites to be considered

There are three European sites which lie within 20 km of Haughley parish. No European Sites lie within 13km of Haughley parish, which is the largest Zone of Influence for any N2k site in Suffolk and the distance recently confirmed by Natural England as the zone of influence to identify potential recreational impacts on coastal statutory sites in Suffolk.

Table 3: European Sites within 20km of the development

SPA	SAC	Ramsar
None	Waveney & Lt Ouse Valley Fens	Redgrave & South Lopham Fens

The locations and boundaries of the above sites are shown on the map in Appendix 2.

There are therefore no European sites to be considered to be within scope for this assessment.

4.3 Method and Approach

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the ‘basic conditions’ set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA screening report; this is necessary to ensure the making of the neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects.

There are only two stages for Neighbourhood Plans as the CJEU ruling means that mitigation measures cannot be considered at HRA screening. The outcomes of the two stages are described in more detail in the following table. This document relates only to Stage 1 of the HRA process.

Table 4: Stages of the Habitats Regulations Assessment process for Neighbourhood Plans

Stage	Tasks	Outcome
Stage 1 HRA Screening	<ul style="list-style-type: none"> • Description of the policies or projects • Identification of potential effects on a European site • Assessing the effects on a European site either alone or in combination with other plans or projects 	<p>Where effects are unlikely, prepare a ‘finding of no significant effect’ report.</p> <p>Where effects judged likely, or lack of information to prove otherwise, go to Stage 2.</p>
Stage 2 Revision of the plan to	<ul style="list-style-type: none"> • If impacts considered to affect 	Approve the plan.

Stage	Tasks	Outcome
remove likely significant effects	qualifying features, those policies (and projects) that are likely to result in significant effects on any European site should be removed from the plan.	If effects remain after alternative solutions been considered, the plan cannot be made. <i>People over Wind CJEU ruling (April 2018) means that it is not possible to consider mitigation measures when screening for impacts.</i>

4.3.1 Stage 1: HRA Screening

The screening stage identifies if alternatives are needed because any policies or projects will have an impact on a European Site, amendments need to be made in Neighbourhood Development Plans. Table 6 identifies the different categories assigned to each policy in the plan: Category A identifies those policies or projects that may not result in a Likely Significant Effect and are considered to have No Negative Effect. Category B identifies those policies or projects that will have No Likely Significant Effect. Category C identifies those policies or projects that might have Likely Significant Effect and thus upon a European Site either alone or in combination with other plans or projects. Section 4 considers each policy or projects and the results of the screening exercise recorded.

Table 5: Screening categorisation

Category A : No negative effect
Policies or projects that will not be likely to have any negative effect on a European site.
Category B : No Likely Significant Effect
Policies or projects that could have an effect but would not be likely to have a <i>significant</i> negative effect on a European site alone or in combination. This conclusion could only be reached if the effects, even in combination and taking the precautionary principle into account, are considered trivial.
Category C : Likely Significant Effect
Policies or projects which are predicted to have a likely significant effect on their own or in combination with other plans and projects.

4.3.2 Potential impacts of Haughley Neighbourhood Plan on Natura 2000 sites

There are a wide range of impacts and these can be summarised as -

- Land take by developments;
- Impact on protected species found within but which travel outside the protected sites may be relevant where development could result in effects on qualifying interest species within the European site, for example through the loss of feeding grounds for an identified species.



- Increased disturbance, for example from recreational use resulting from new housing development and / or improved access due to transport infrastructure projects;
- Changes in water availability, or water quality as a result of development and increased demands for water treatment, and changes in groundwater regimes due to increased impermeable areas;
- Changes in atmospheric pollution levels due to increased traffic, waste management facilities etc. Pollution discharges from developments such as industrial developments, quarries and waste management facilities.

In line with the HRA for Mid Suffolk District Council Core Strategy, each policy will be assessed against the criteria in the table below.

Table 6: Assessment of potential impacts

Nature of potential impact	How the Haughley Neighbourhood Plan (alone or in combination with other plans and project) could affect a Natura 2000 site?	Why these effects are not considered significant?
Land take by development	Haughley is outside the boundaries of any N2k sites	N/A
Impact on protected species outside the protected sites	Haughley is outside the Zone of Influence of any N2k sites	N/A
Recreational pressure and disturbance	Haughley is outside the Zone of Influence of any N2k sites	N/A
Water quantity and quality	Haughley is outside the Zone of Influence of any N2k sites	N/A
Changes in pollution levels	Haughley is outside the Zone of Influence of any N2k sites	N/A



4.4 Results from HRA Screening of Draft Neighbourhood Plan Policies

The Screening exercise explores whether there will be any Likely Significant Effect resulting from the Plan's policies. These Policies are:

- Policy HAU1 Haughley Spatial Strategy
- Policy HAU2 Housing Developments within Settlement Boundaries
- Policy HAU3 New Homes at Land East of King George V Playing Field
- Policy HAU4 Allocation of Site SS0270 in Station Road East of Millfields for Development
- Policy HAU5 Allocation of Part of the Site SS0047 south of Fishponds Way for Development
- Policy HAU6 Sites for Commercial and Industrial Development
- Policy HAU7 Protection of Employment and Existing Businesses
- Policy HAU8 Broadband
- Policy HAU9 Development Affecting Haughley's Built Heritage Assets
- Policy HAU10 Possible New Development in the Conservation Area
- Policy HAU11 Development Design and Character
- Policy HAU12 Protection of Local Community Facilities
- Policy HAU13 Provision of new Retail and Community Facilities
- Policy HAU14 Protection of Local Green Spaces
- Policy HAU15 Protection of the Rural Landscape
- Policy HAU16 Paths and Bridleways

Additionally, this Screening exercise explores the implications of the Plan's Community Needs and Desires (CNDs). These correspond to the use of land for a number of purposes. These are listed as:

- CND1 Haughley Crawford's School
- CND2 King George V Playing Field and Ron Crascall Pavilion
- CND3 Cemetery Space
- CND4 Traffic Calming Haughley Crawford's School
- CND5 Fishponds Way Footpath
- CND6 Haughley Green Footpath
- CND7 Central Haughley Traffic Flow and Safety

Each of the policies and CNDs in the Haughley Neighbourhood Plan has been screened to identify whether they would have any impact on a European Site. This assessment can be found in the following table.

Table 7: Assessment of potential impacts

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
Policy HAU1 Haughley Spatial Strategy	<p>Settlement Boundaries are identified on the Proposals Map PM2, PM3 and PM4. Within these boundaries, development shall be permitted where;</p> <ul style="list-style-type: none"> • It is of a scale, density and character appropriate to the location; • Retention of the site in its present state does not form an essential part of the local character; • Development would protect and enhance local features of green space, landscape, ecological or historic importance; and • There is the necessary infrastructure capacity to support the development. <p>Outside Settlement Boundaries, only development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside or where supported by other policies in this Plan will be permitted.</p>	No, Category A	No specific recommendations
Policy HAU2 Housing Developments within Settlement Boundaries	<p>Within the Settlement Boundaries, as defined on the Proposals Maps, PM2, PM3 and PM4, there is a general presumption in favour of residential development.</p> <p>Proposals will be supported where;</p> <ul style="list-style-type: none"> • They reflect the role and function of Haughley village and relate well to the existing layout of the village, • They are of a high standard of design and make a positive contribution to the surrounding environment and rural landscape, • They do not result in the loss of a community facility in Haughley village, • They contribute to maintaining an appropriate mix of tenures, types and sizes of dwelling in Haughley village. In particular, bungalows and smaller dwellings of one or two bedrooms will be encouraged, • Sites including affordable housing should integrate both affordable housing and market 	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>housing across a site. Under current planning legislation, affordable housing can be sought on sites of more than 10 homes. Development that leads to concentrations of different types and tenures of homes in separate groups will not be supported,</p> <ul style="list-style-type: none"> • Each new dwelling should provide parking space at least to minimum MSDC standards, as contained within the Suffolk Guidance for Parking updated 2015, • The planning and design guidelines contained in the independent AECOM Masterplanning and Design Guidelines Report (See Supporting Document SD2) are to be followed. <p>The scale and nature of all schemes must ensure an appropriate level of services, facilities and infrastructure, including primary school capacity, are available or can be provided to serve the proposed development.</p>		
Policy HAU3 New Homes at Land East of King George V Playing Field	<p>Land east of King George V Playing Field, as identified on the Proposal Map PM2, is allocated for up to 98 homes providing the following are part of the development;</p> <ul style="list-style-type: none"> • A raised table zebra crossing with associated signs and road markings is provided crossing Green Road to Haughley Crawford's School from King George V Playing Field, • The housing density is no higher than 23 dwellings per hectare (dph), • The mix of dwelling types and sizes across all tenures including bungalows, • The development will include 35% of affordable housing to address local housing needs, • Sufficient outdoor green space with high standard landscaping is included, • New pedestrian linkages to enable residents to walk to all facilities in the village centre without walking along Green Road, • Each new dwelling will include adequate parking space at least to minimum standards, as contained within the Suffolk Guidance for 	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	Parking updated 2015.		
Policy HAU4 Allocation of Site SS0270 in Station Road East of Millfields for Development	<p>This site has the potential to deliver between 18-31 new homes. The variation in the housing yield is dependent upon the medium constraint of the existing overhead power line either remaining or being buried underground.</p> <p>Development of the site must follow the stipulations contained in Policy HAU1, Policy HAU2 and follow the guidelines within the AECOM Site Assessment Report and the AECOM Masterplanning and Design Guidelines Report and providing the following are part of the development;</p> <ul style="list-style-type: none"> • The housing density is no higher than 23 dwellings per hectare (dph), • The mix of dwelling types and sizes across all tenures including bungalows, • The development will include 35% of affordable housing to address local housing needs, • Sufficient outdoor green space with high standard landscaping is included, • New pedestrian linkages to enable residents to walk to all facilities in the village centre, • Each new dwelling will include adequate parking space at least to minimum standards, as contained within the Suffolk Guidance for Parking updated 2015. 	No, Category A	No specific recommendations
Policy HAU5 Allocation of Part of the Site SS0047 south of Fishponds Way for Development	<p>This site has the potential to deliver between 25-50 new homes. The minor constraints of the developed tree line, proximity to flood risk and proximity to the sewerage works must be fully assessed.</p> <p>Development of the site must follow the stipulations contained in Policy HAU1, Policy HAU2 and follow the guidelines within the AECOM Site Assessment Report and the AECOM Masterplanning and Design Guidelines Report and providing the following;</p> <ul style="list-style-type: none"> • The housing density is no higher than 23 dwellings per hectare (dph), • The mix of dwelling types and sizes across 	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>all tenures including bungalows,</p> <ul style="list-style-type: none"> • The development will include 35% of affordable housing to address local housing needs, • Sufficient outdoor green space with high standard landscaping is included, • New pedestrian linkages to enable residents to walk to all facilities in the village centre, • Each new dwelling will include adequate parking space at least to minimum standards, as contained within the Suffolk Guidance for Parking updated 2015. • A new footpath will be provided as part of the development from the River Gipping tributary along Fishponds Way to the Eve Balfour Way junction on Fishponds way, suitable for all pedestrians, buggies, wheelchairs, horses and cyclists. 		
<p>Policy HAU6 Sites for Commercial and Industrial Development</p>	<p>Commercial and industrial developments will be supported where they are situated on the brownfield sites of;</p> <ul style="list-style-type: none"> • The ex-Little Chef building adjacent to the Travelodge Hotel situated on the south side of the old A14, • The previous commercial areas of Haughley Park, • The Tothill site surrounding and adjacent to the BP Garage and retail outlets on the north side of the Old A14 leading towards Stowmarket <p>as identified on the Proposals Maps PM5 and PM6.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy HAU7 Protection of Employment and Existing Businesses</p>	<p>Proposals for non-employment use on sites and premises used and/or designated on the Proposals Maps PM5 and PM6 for employment purposes, will only be permitted where;</p> <ul style="list-style-type: none"> • It will not result in a loss of employment provision in the Neighbourhood Plan area, • There is sufficient supply of alternative and suitable employment land available within the Neighbourhood Plan area or in adjacent towns 	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>and villages to meet local employment job growth requirements,</p> <ul style="list-style-type: none"> • It can be demonstrated that the current employment use is not economically viable nor likely to become viable. Where appropriate, supporting financial evidence should be provided including any efforts to advertise the premises for sale for a minimum of 12 months, • The existing use has created over-riding environmental problems (e.g. noise, odours or traffic) and permitting an alternative use would be a substantial environmental benefit that would outweigh the loss of an employment site, • An alternative use or mix of uses would assist in urban regeneration and offer greater benefits to the community in meeting local businesses and employment needs, • It is for an employment related support facility such as employment training/education, workplace crèche or industrial estate café, • An alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment site. 		
Policy HAU8 Broadband	All new dwellings and business buildings shall incorporate a suitable infrastructure to enable high speed broadband to be connected.	No, Category A	No specific recommendations
Policy HAU9 Development Affecting Haughley's Built Heritage Assets	<p>To ensure the conservation and enhancement of Haughley's historic environment, proposals should;</p> <ul style="list-style-type: none"> • Preserve or enhance the significance of the Heritage Assets of the village, their setting and the wider village, • Retain buildings and spaces, the loss of which would cause harm to the character or appearance of the Conservation Area, • Contribute to the local distinctiveness, built form and scale of Heritage Assets through the use of appropriate design, materials and workmanship, • Be of an appropriate scale, form, height, 	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>massing, alignment and detailed design which respects the village's character, appearance and its setting,</p> <ul style="list-style-type: none"> • Demonstrate a clear understanding of the significance of the asset and other wider context in which the Heritage Asset sits, alongside assessment of the potential impact of the development on the Heritage Asset and its context, and • Provide clear justification for any works that would lead to harm or substantial harm to a Heritage Asset yet be of substantial public benefit, through detailed analysis of the asset and the proposal. <p>In particular, development proposals will be supported where they;</p> <ul style="list-style-type: none"> • Achieve continuity in street frontage building lines set on the back edge of the pavement, • Maintain the historic pattern of development by respecting the historic grain associated with historic plots and the historic morphology of development in the immediate area, • Reflect the proportion of solid to void found in the elevations of traditional buildings and employ robust detailing, avoiding the use of applied features or detailing, • Reinforce local identify by the use of the traditional materials used in the Conservation Area, • Re-use traditional buildings which contribute to townscape quality. 		
Policy HAU10 Possible New Development in the Conservation Area	<p>All new development within the Conservation Area (as identified on the Proposals Map PM2) and/or within the setting of a listed building (see Appendix 1. "Listed Buildings within Haughley Parish") will be expected to enhance the positive attributes of the Heritage Asset.</p> <p>Development that will harm a Heritage Asset or the setting of a Heritage Asset will not be supported unless substantial public benefits outweigh the harm.</p>	No, Category A	No specific recommendations



Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
<p>Policy HAU11 Development Design and Character</p>	<p>All new development will be expected to enhance the positive attributes of the village and local design features. Development will not be supported where it has a detrimental impact on the character of the area in which it is located.</p> <p>New development will be supported when, where relevant, it;</p> <ul style="list-style-type: none"> • Demonstrates consideration has been given to the use of brownfield sites/conversion of existing buildings, • Is capable of being connected to essential infrastructure services with capacity, • Does not have a detrimental effect on residential amenity by reason of noise or other nuisance, • Does not have a severe cumulative adverse effect on the safe and efficient operation of the existing transport and road infrastructure, • Does not result in the loss of an area which makes a significant contribution to public amenity by virtue of its open space character, appearance and function, • Includes measures that encourage walking and cycling, wherever possible, • Makes a contribution to local identity and sense of place, • Is suitable in terms of overall design and appearance of the proposed development (including size, scale, density, layout, access) when assessed in relationship with surrounding buildings, spaces and other features of the street scene, • Uses, and where appropriate re-uses, local and traditional materials, • Contributes to reducing carbon emissions, where possible, • Includes adequate parking space to at least legal minimum standards contained within the Suffolk Guidance for Parking updated 2015, and private and public amenity for future residents. 	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
Policy HAU12 Protection of Local Community Facilities	<p>Proposals for the change of use of social or community facilities, such as the Co-op store, Post Office, pub, Village Hall, Maxwell Charnley Community Room, Ron Crascall Pavilion, leisure and sports facilities, education facilities and religious buildings as would result in the loss of such facilities, will not be supported unless;</p> <ul style="list-style-type: none"> • Equivalent or better provision for the facility to be lost is made elsewhere within the Settlement Boundary, or • It can be demonstrated through active marketing, that there is no longer a demand for the facility. 	No, Category A	No specific recommendations
Policy HAU13 Provision of new Retail and Community Facilities	<p>Development proposals for new, expanded or improved retail, commercial and community facilities will be supported when;</p> <ul style="list-style-type: none"> • They do not have an adverse impact on residential amenity, • Their design enhances the character of the immediate surroundings and is sympathetic to the locally distinctive nature of traditional design in the village, • They do not lead to traffic management problems, • They encourage walking and cycling, • Off-road car parking in the central part of Haughley village is included as part of the proposed facility. 	No, Category A	No specific recommendations
Policy HAU14 Protection of Local Green Spaces	<p>Football pitch and children's play area (King George V Playing Field), Village green, Haughley Green Cricket, Church graveyard, Gallowsfield Wood, Haughley Castle Motte and Bailey. See Supporting Document SD4 "Local Green Space Appraisal".</p>	No, Category A	No specific recommendations
Policy HAU15 Protection of	Within Settlement Boundaries, visually important open spaces, per the MSDC	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
the Rural Landscape	1998 Local Plan, as identified on the Proposals Map PM2, will be protected because of their contribution to the character or appearance of their surroundings and their amenity value to the local community.		
Policy HAU16 Paths and Bridleways	New housing and business developments shall encourage usage of, and provide linkage to, the network of existing paths and bridleways in and around Haughley Parish.	No, Category A	No specific recommendations
CND1 Haughley Crawford's School	It is recommended that Haughley Parish Council approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council to seek ways to improve the current condition and suitability of Haughley Crawford's School building, recreational facilities and possible integration of the pre-school including the identification of a new suitable site.	No, Category A	No specific recommendations
CND2 King George V Playing Field and Ron Crascall Pavilion	It is recommended that Haughley Parish Council approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council to investigate and actively pursue ways to improve and expand the provision of sports, recreational and social facilities within the King George V Playing Field and Ron Crascall Pavilion.	No, Category A	No specific recommendations
CND3 Cemetery Space	It is recommended that on an annual basis, Haughley Parish Council will review, with advice and guidance from St Mary's Church, any possible requirement for new cemetery space.	No, Category A	No specific recommendations
CND4 Traffic Calming Haughley Crawford's School	It is recommended that Haughley Parish Council approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council concerning the provision of traffic calming measures between Haughley Crawford's School and King George V Playing Field with urgent consideration given to a raised platform pedestrian crossing and moving the 30mph speed limit in Green Road to the north side of the proposed new development east of King George V Playing Field.	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
CND5 Fishponds Way Footpath	It is recommended that the Parish Council will approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council to investigate and actively pursue the upgrading of the footpath and provision of a footpath where none currently exists between Tothill and the Eve Balfour Way junction on Fishponds Way making it suitable for all pedestrians, buggies, wheelchairs, horses and cyclists.	No, Category A	No specific recommendations
CND6 Haughley Green Footpath	It is recommended that the Parish Council will approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council to investigate and actively pursue the provision of a footpath to the side of the road through Haughley Green.	No, Category A	No specific recommendations
CND7 Central Haughley Traffic Flow and Safety	It is recommended that Haughley Parish Council approach Babergh and Mid Suffolk District Councils and/or Suffolk County Council to undertake additional studies to improve traffic flow and safety through the centre of Haughley village, giving consideration to the provision of designated parking areas. In the event of any development within Haughley village, the developer must give consideration to constructively investigate the possibility of creating off-site parking in order to serve facilities.	No, Category A	No specific recommendations

Each of the site allocations identified for residential development in the Haughley Neighbourhood Plan Pre-Submission Document have no potential for impacts on any N2k sites.

4.4.3 Recommendations

There are no recommendations for the site allocation policies in this draft Neighbourhood Plan as they have all been assigned to Category A. There will therefore be no need for any development subsequently coming forward to be subject to a project level HRA and secure sufficient mitigation measures, to avoid a Likely Significant Effect on any N2k sites. As such there is no requirement to progress to Appropriate Assessment.

The in-combination effects from other plans and projects are considered in the following section.

4.5 Other Plans and Projects – In-combination Effects

There are no relevant Plan level HRAs that have been carried out by Babergh & Mid Suffolk DCs or other organisations and none have been found to have a likely significant effect on the European sites being assessed.

In the context of this HRA, the relevant other plans to be considered are listed below in combination with Haughley Neighbourhood Plan HRA.

Table 8: Other plans or projects considered for in combination effects

Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
Mid Suffolk District Council	Core Strategy Habitats Regulations Assessment (Appropriate Assessment) October 2007)	The HRA found no likely significant effects from the Plan on the Breckland SAC/SPA and Waveney and Little Ouse Valley Fens SAC.	It is considered that in combination likely significant effects are not predicted.
St Edmundsbury Borough Council	Core Strategy HRA screening (2010)	The HRA found no potential for in combination effects as no other current plans or projects that are likely to lead to significant effects on the Breckland SAC/SPA or the Waveney and Little Ouse Valley Fens SAC have been identified, or where impacts have been identified they have been adequately mitigated.	It is considered that in combination likely significant effects are not predicted.
Babergh District Council	Habitat Regulations Assessment of Core Strategy 2011	The Core Strategy aims to minimise impacts on the Orwell and Stour estuaries, a European-designated site which supports species that are susceptible to disturbance. The principal potential impact on the European sites as a result of development proposed under the Core Strategy relates to increased recreational pressure.	It is considered that in combination likely significant effects are not predicted.



Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
		The Strategy therefore sets out a series of measures to ensure that the policies will not have a significant effect on the European sites.	
Suffolk Coastal District Council	Suffolk Coastal Core Strategy and Development Management Policies Document HRA (2011)		It is considered that in combination likely significant effects are not predicted.

This is due to the Parish of Haughley lying outside the Impact Risk Zone for any N2k sites, this HRA screening concludes that it is possible to rule out likely significant effects. There is therefore no need for an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017.

References

- Atkins (2011) Habitats Regulations Assessment for Babergh District Council Core Strategy
- Habitats Regulations Assessment (Appropriate Assessment) for Mid Suffolk District Council Core Strategy(2007)
- Atkins (2010) St. Edmundsbury Borough Council Core Strategy HRA screening
- Babergh District Council (2014) Local Plan Core Strategy and Policies
- Haughley Neighbourhood Plan 2016-2036 Pre-Submission Plan (May 2018)
- Natural England Conservation objectives for European Sites: East of England Website
- The Landscape Partnership (2011) Suffolk Coastal District Council Habitats Regulations Assessment for Core Strategy and Development Management Policies Document



5. Conclusions

5.1 Strategic Environmental Assessment (SEA)

The Neighbourhood Plan has been prepared for town and country planning purposes and sets a framework for future development consent. The policies of the Neighbourhood Plan can be considered to determine the use of small areas at local level commensurate with their status in determining local planning applications.

It is considered that the Plan may have a significant effect on the environment due to the scale and quantum of growth proposed in relation to the size of the existing settlement and the environmental characteristics of the area. As such, any proposal subsequently coming forward could result in significant effects. Additionally, in regard to the allocation of sites for development purposes, the formal requirements of the SEA Directive have not yet been met including the consideration of alternatives. This is due to the Plan's scheduled progression ahead of that of the Local Plan and therefore any reliance on the Local Plan's Sustainability Appraisal not being applicable until the Local Plan is found sound.

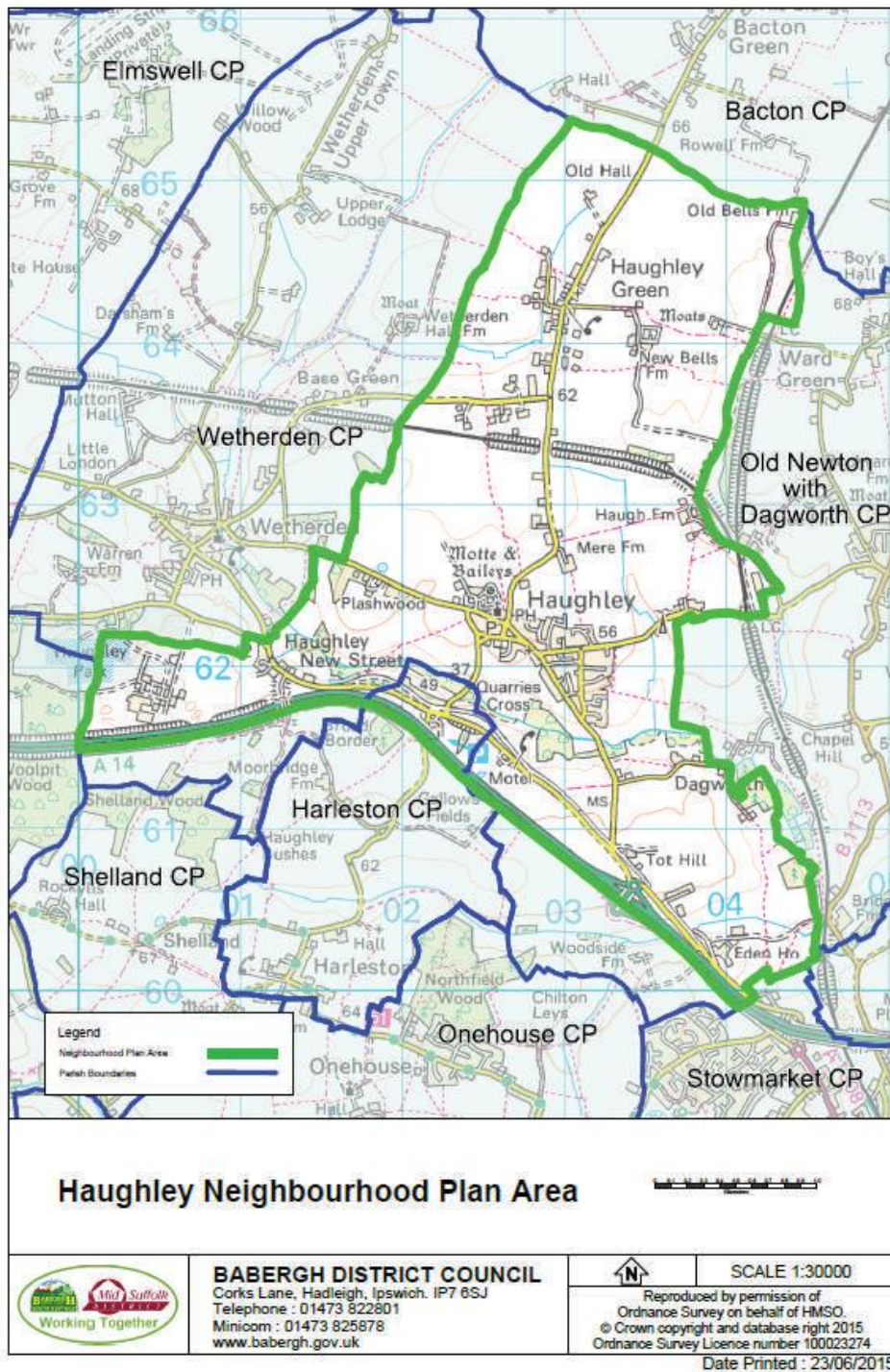
As such, the content of the Haughley Neighbourhood Plan has therefore been **screened in** for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC. The next step for the Neighbourhood Plan is to undertake a Strategic Environmental Assessment (SEA) to accompany the Neighbourhood Plan, in order to meet this element of the basic conditions test.

5.2 Habitats Regulations Assessment (HRA)

Subject to Natural England's review, this HRA screening report indicates that the Haughley Neighbourhood Plan is not predicted to have any likely significant effects on a European site. The requirement for the Plan to undertake further assessment under the Habitats Regulations 2017 is therefore **screened out**.

Appendix 1

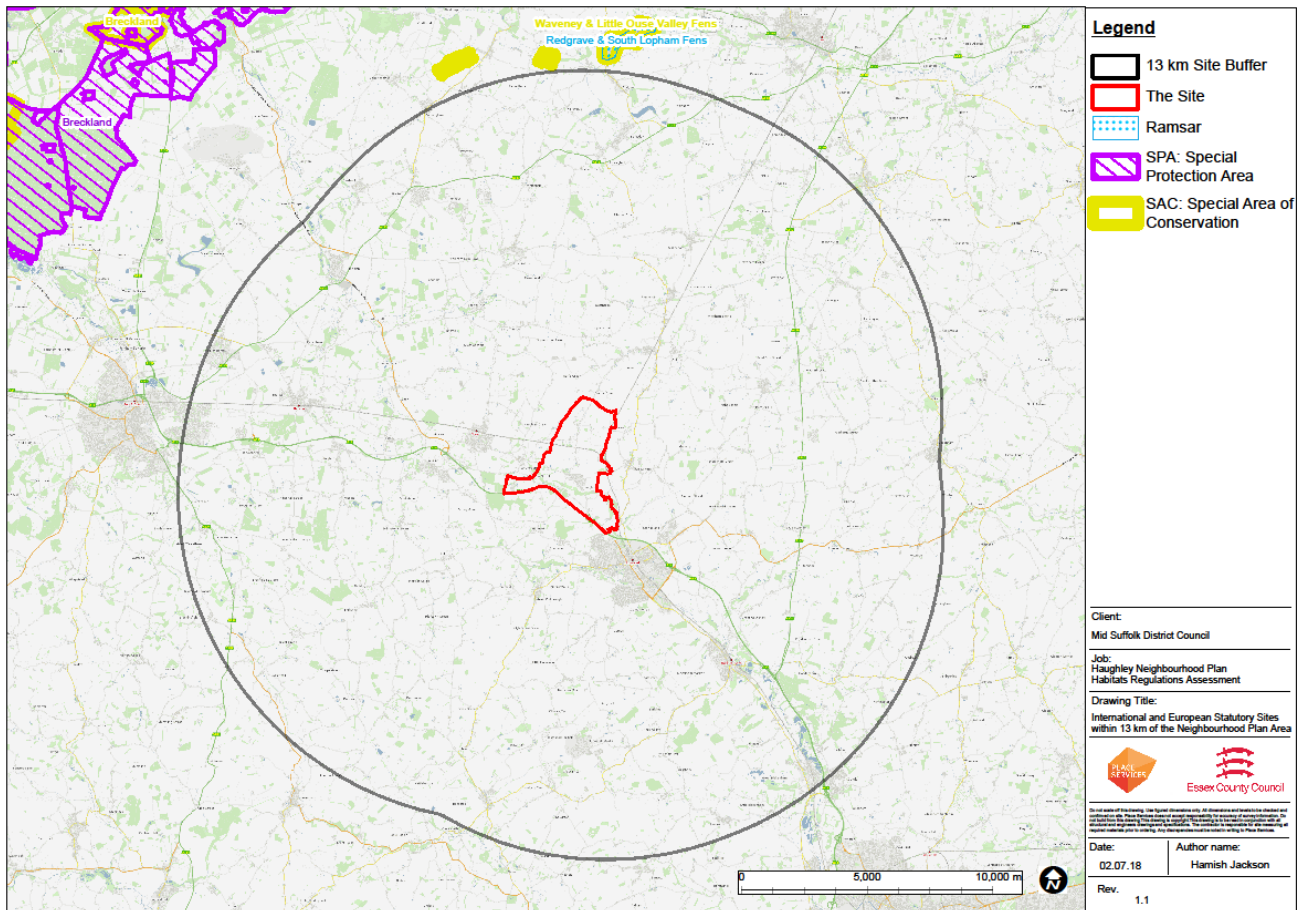
The Neighbourhood Plan area for Haughley



Source: Mid Suffolk District Council, 2015

Appendix 2

Haughley Parish and Locations of the European (Natura 2000) sites within 13km



Source: Place Services, 2018



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