



Needham Market Neighbourhood Plan 2020-2036: Regulation 14 Draft

Habitats Regulations Assessment (HRA): Screening Report – March 2020





Contents

1.	Introduction	5
1.1	The Purpose of This Report	5
1.2	The Needham Market Neighbourhood Plan	5
2.	Legislative Background	6
2.1	Habitats Regulations Assessment (HRA)	6
3.	HRA Screening	7
3.1	Habitat Regulations Assessment of Development Plans	7
3.2	Court Judgements and their consideration in this Report	7
3.3	Habitats (European) Sites	8
3.4	Method and Approach	10
3.5	Results of HRA Screening of Needham Market Neighbourhood Plan Policies	14
3.6	Other Plans & Projects: In-Combination Effects	21
4.	Conclusions	24
5.	References	25
	Appendix I	26
	Needham Market Neighbourhood Plan Area	26
	Appendix II	27
	Needham Market parish and Habitats Sites within 20km	27
	Appendix III	28
	Characteristics of Habitats Sites	28

List of Tables and Figures

Table 1:	Habitats Sites within 20km of the development to be considered in this assessment	9
Table 2:	Screening categorisation	12
Table 3:	Assessment of potential impacts.....	13
Table 4:	Summary of Findings from the HRA.....	14
Table 5:	Other plans or projects considered for in combination effects.....	22
Figure 1:	Stages of the Habitats Regulations Assessment screening process for NDPs.....	11



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Glossary of Acronyms

AA	Appropriate Assessment
DC	District Council
DPD	Development Plan Document
EA	Environment Agency
EC	European Commission
EU	European Union
Ha	Hectare
HRA	Habitats Regulations Assessment
IFCA	Inshore Fisheries Conservation Authority
IRZ	Impact Risk Zone (for SSSIs)
Km	Kilometre
LPA	Local Planning Authority
MSDC	Mid Suffolk District Council
NDP/NP	Neighbourhood Development Plan / Neighbourhood Plan
NE	Natural England
NPPF	National Planning Policy Framework
PRoW	Public Right of Way
RAMS	Recreational disturbance Avoidance and Mitigation Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SIP(s)	Site Improvement Plans(s)
SPA	Special Protection Area
SSSI	Site of Specific Scientific Interest
SuDS	Sustainable Drainage System
ZOI	Zone of Influence



1. Introduction

1.1 The Purpose of This Report

This report screens to determine whether the Needham Market Neighbourhood Plan Regulation 14 Draft 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 Stage 1 HRA is required when it is deemed that likely adverse significant effects may occur on protected Habitats (European) Sites as a result of the implementation of a plan/project, either alone or in combination with other plans and projects.

1.2 The Needham Market Neighbourhood Plan

The main purpose of the Plan is to set out and identify the best ways to direct local planning towards community wants and needs, while protecting the natural environment and cultural assets, ensuring a more sustainable future for the community. The Needham Market Neighbourhood Plan Second Pre-Submission (REG14) Draft Plan will set out planning policies for Needham Market Parish and within the confines of the Neighbourhood Plan boundary as defined (see Appendix 1).

Once formally 'made' or '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.



2. Legislative Background

2.1 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 Habitats Site, in terms of impacting the site's conservation objectives.

The first stage of HRA is the screening assessment of the impacts of a land use proposal against the conservation objectives of Habitats 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 and Habitats Sites in the NPPF (2019).

This HRA Screening Report has been undertaken in order to support the Needham Market Neighbourhood Plan which is being produced by Needham Market 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.

In line with the 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 Habitats Site.



3. HRA Screening

3.1 Habitat Regulations Assessment of Development Plans

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

This section of this Report aims to:

- Identify the Habitats sites within 20km of the Needham Market Neighbourhood Plan area.
- Summarise the reasons for designation and Conservation Objectives for each site to be considered in this assessment.
- Screen the Needham Market Neighbourhood Development Plan for its potential to impact upon a Habitats site.
- 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.

3.2 Court Judgements and their consideration in this Report

3.2.1 CJEU People Over Wind v Coillte Teoranta C-323/17

As previously mentioned, in line with the 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 Habitats Site.

This HRA Screening Report does not therefore consider mitigation measures within the assessment of Likely Significant Effects resulting from the Needham Market Neighbourhood Plan.

3.2.2 CJEU Holohan C- 461/17

This Court judgement now imposes more detailed requirements on the competent authority for any plans or projects at Appropriate Assessment stage:

1. [...] an 'Appropriate Assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.
2. [...] the competent authority is permitted to grant to a plan or project consent which



leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

3. [...] where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'Appropriate Assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

Within this Stage 1 HRA Screening report, the assessment will determine the requirement for whether or not a Stage 2 Appropriate Assessment is needed for the Needham Market Neighbourhood Development Plan.

3.3 Habitats (European) Sites

'Habitats sites' is the term used in the (revised) NPPF (2019) to describe the network of sites 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). 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 Habitats (Sites) 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 Habitats Sites in England. The following offers a description and explanation of SPAs, SACs and Ramsar Sites.

3.3.1 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: Deben Estuary SPA 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*.

Ramsar Sites (Wetlands of International Importance)

Ramsar Sites are designated to protect the biological and physical features of wetlands, especially for waterfowl Habitats. 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*.

3.3.2 Habitats Sites to be considered

There are five Habitats sites which lie within 20 km of Needham Market parish (SPA/Ramsar only as there are no SACs) and are shown on the map in Appendix 2. Part of the Plan area lies within the Zone of Influence for the Stour & Orwell SPA and Ramsar so these Habitats sites are screened in for this assessment for likely significant effects from the Needham Market Neighbourhood Plan.

Table 1: Habitats Sites within 20km of the development

SPA	Ramsar	SAC
Stour and Orwell Estuaries	Stour and Orwell Estuaries	
Deben Estuary	Deben Estuary	
Sandlings		

3.3.3 Conservation Objectives

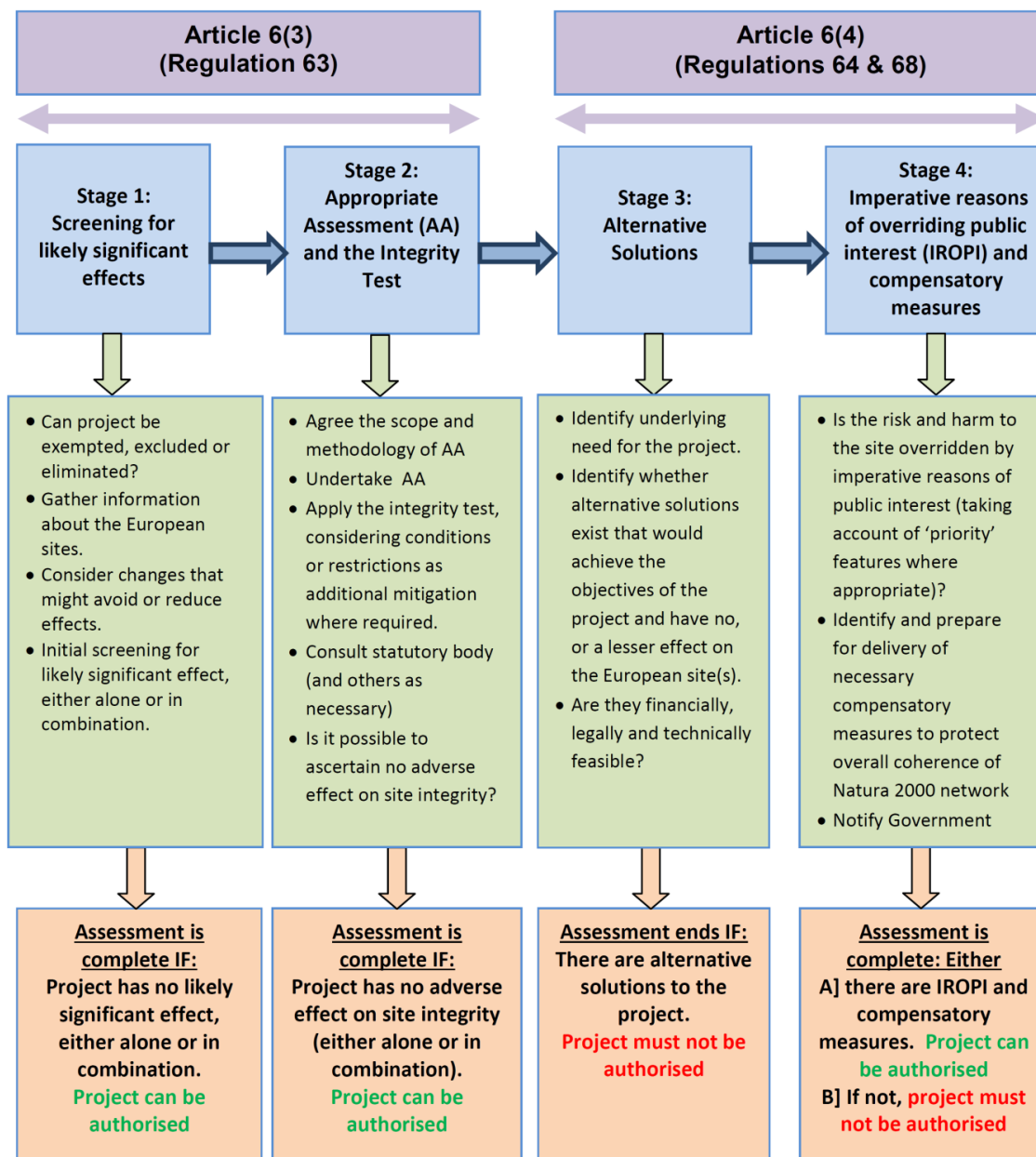
Information on each of the above Habitats sites has been obtained from the Natural England website.

The justification for the importance of each Habitats site and the reasons for designation-the Conservation Objectives and Designation Features- for each site are included in Appendix 3. It also reflects the Supplementary Advice for Conservation Objectives which describes the range of ecological attributes that are most likely to contribute to a site's overall integrity and key vulnerabilities to consider within Habitats Regulations assessments.



3.4 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 Habitats (European site or a European offshore marine site), either alone or in combination with other plans or projects.



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Figure 1: Outline of the Four Stage Approach to the Assessment of Plans under the Habitats Regulations



3.4.1 Stage 1: HRA screening

This screening stage identifies if alternatives are needed because any policies or projects will have an impact on a Habitats Site, amendments need to be made in Neighbourhood Development Plans. Table 3 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.

Each of the policies in the Needham Market Neighbourhood Plan has been screened to identify whether they would have any impact on a Habitats Site and allocated to a category as shown in Table 3.

Table 2: Screening categorisation

Category A: No negative effect
Policies or projects that will not be likely to have any negative effect on a Habitats site.
Category B: No Likely Significant Effect
Policies or projects that could have an effect but would not be likely to have a likely significant effect on a Habitats 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 a Habitats Site either on its own or in combination with other plans and projects and require revision or further assessment (Appropriate Assessment).

3.4.2 Potential impacts of the Needham Market Neighbourhood Plan on Habitats Sites

There are a wide range of potential impacts from development which can be summarised as -

- Land take by developments;
- Impact on protected species found within but which travel outside the protected sites (functionally linked land) may be relevant where development could result in effects on qualifying interest species within the Habitats 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.

Each policy in the neighbourhood plan will therefore be assessed against the above criteria in the table below.

Table 3: Assessment of potential impacts

Nature of potential impact	How the Needham Market Neighbourhood Plan (alone or in combination with other plans and project) could affect a Habitats site?	Why these effects are/ not considered likely to be significant?
Land take by development	The Plan area is outside the boundaries of the five Habitats sites within scope of this HRA.	N/A
Impact on protected species outside the protected sites	The Plan area does not contain any functionally linked land for use by designated features of the Habitats sites.	N/A
Recreational pressure and disturbance	Although parts of the Parish lies within the 13km Zone of Influence of the Suffolk Coast RAMS, there are no site allocations for development in the Needham Market Neighbourhood Plan. There is therefore no potential pathway for the Plan to impact on the Stour & Orwell Estuaries SPA & Ramsar sites which are within the scope of the HRA.	N/A
Water quantity and quality	It is considered that there is no pathway for development to result in impacts on water.	N/A
Changes in air & noise pollution levels	It is considered that there is no pathway for development to result in pollution impacts.	N/A



3.5 Results of HRA Screening of Needham Market Neighbourhood Plan Policies

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

- **POLICY NM1 – Housing Mix – Size, Type and Tenure**
- **POLICY NM2 – Securing Good Design and Layout**
- **POLICY NM3 – Encouraging commercial activity and employment opportunities**
- **POLICY NM4 – Reinforcing the town centre vitality and viability**
- **POLICY NM5 – Redevelopment Opportunities in the Town Centre**
- **POLICY NM6 – Community Infrastructure**
- **POLICY NM7 – Preserving the town's setting and retention of important views**
- **POLICY NM7 – The Historic Town Centre and Conservation Area**
- **POLICY NM8 – Reducing and Managing the Impact of Traffic**
- **POLICY NM9 – Encouraging safe walking and cycling**

This section considers each policy in turn and the results of the screening exercise is recorded in Table 4.

Table 4: Summary of Findings from the HRA screening

Policy	Will Policy have Likely Significant Effect on a Habitats Site?	Recommendations
<p>POLICY NM1 – Housing Mix – Size, Type and Tenure</p> <p>Development proposals that cater for a wide range of housing types enabling a mixed and inclusive community and reflecting the local population will be supported. In line with the latest evidence of need, the mix of housing should, where appropriate, include:</p> <ul style="list-style-type: none"> a) Housing for Older People (e.g. Retirement living housing, supported/sheltered) b) housing, bungalows and retirement complexes) 	No, Category A	No specific recommendations



<ul style="list-style-type: none"> c) Family housing 4-5 beds - both private and affordable d) Homes for first time buyers (e.g. 1-2 bed homes both affordable and private) e) Adaptable, 'life-time' homes f) Affordable housing g) Self-build <p>It should be noted that the above housing types may not be suitably accommodated on every site.</p>		
<p>POLICY NM2 – Securing Good Design and Layout</p> <p>The detailed design and appearance of new housing should contribute to the character of the area by reflecting the pattern of development in its surroundings and seek to enhance its quality.</p> <p>New housing developments should take account of the following:</p> <p>Layout</p> <ul style="list-style-type: none"> a) Proposed densities should be compatible with that existing in the immediate locality; b) The proposed heights of buildings should be appropriate to the character of the area; c) Proposals should avoid overdevelopment by ensuring that a residential plot can accommodate the needs of modern dwellings with usable garden space and that the rear garden can be accessed without going through the house; d) Provision should be made for enough external amenity space for refuse and recycling storage; e) Regard should be had to the guidance in Secure by Design to minimise the likelihood and fear of crime <p>Parking</p> <ul style="list-style-type: none"> f) Proposals should provide for adequate parking for residents and visitors, whilst seeking to minimise the visual impact of the car; 	<p>No, Category A</p>	<p>No specific recommendations</p>



g) Where garaging is proposed, it should be of sufficient dimensions to accommodate an average sized car, and also to allow access and egress.

h) Consideration should be given to accommodating the access needs for delivery drivers, including refuse, public transport vehicles, fire and other emergency services.

Wildlife and Landscaping

i) Proposals should include features to encourage and attract wildlife, create new habitats and enhance and extend existing wildlife corridors;

j) Proposals should minimise the loss of trees and hedgerows (e.g. to enable necessary road access and visibility splays);

k) Proposals should include soft well landscaped boundary edges where adjacent to open countryside or edge of settlement;

l) Significant landscaping areas including the use of native species in new planting

m) Provision should be for an appropriate quantity and quality of green spaces to serve the needs of the development in accordance with the latest adopted standards

Sustainability

n) Proposals should include features that allow for increased energy efficiency performance and renewable energy provision;

o) Provision should be made for features to enable integration with existing developments, in terms of footways and cycle connections;

p) Proposals should include the use of Sustainable Drainage Systems (SuDS) wetland and water features to protect against pollution, provide drainage and wider amenity, recreational and biodiversity benefits;

q) Electric charging points should be provided;



<p>r) High quality, fast broadband connections should be included.</p> <p>Landscaping plans will be required for all developments of more than five dwellings which should include details of their future maintenance.</p>		
<p>POLICY NM3 – Encouraging commercial activity and employment opportunities</p> <p>Proposals for new businesses/employment generating uses (B1, B2 and B8) will be directed towards the Lion Barn Estate. New development at Lion Barn, for new land or premises in the category B1, B2 or B8 will be expected to contribute to the construction and enhancement of the cycle path and footpath network linking the industrial areas and residential area of the town to ensure the proper integration of new development with the rest of the town and town centre.</p> <p>The expansion of existing businesses including small scale extensions will be supported provided they do not have a significant adverse impact upon the character of the area, adjoining uses, or the amenity of local residents, either, through their built form, proposed use or traffic generated</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>POLICY NM4 – Reinforcing the town centre vitality and viability</p> <p>In order to underpin the important function of Needham Market Town centre as a viable and attractive commercial centre, proposals for new retail, leisure and town centre uses will be supported and in particular, for</p> <ul style="list-style-type: none"> i. A1 Shops ii. A2 Financial and Professional Services iii. A3 Restaurants and Cafes iv. A4 Drinking Establishments v. A5 Hot food Takeaway <p>Development proposals that involve the change of use from existing Industrial or commercial premises (Use Classes B1, B2 B8) into A1 Shops, A3 Café. Restaurants; A4 Drinking Establishments or A5 Hot Food takeaway</p>	<p>No, Category A</p>	<p>No specific recommendations</p>



<p>outside of the identified Primary Shopping Areas will be refused.</p>		
<p>POLICY NM5 – Redevelopment Opportunities in the Town Centre</p> <p>Proposals for the redevelopment of unused or unused brownfield sites for mixed uses including small retail units, commercial uses, community spaces and housing in the town centre will be supported.</p> <p>Proposals that add to the range of tourist or visitor attractions or facilities, adding a positive visitor experience will be supported.</p> <p>Parking provision should be sufficient to cater for the needs of the development and should be safe, discreet and accessible without the need for traffic movements to add to town centre congestion.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>POLICY NM6 – Community Infrastructure</p> <p>Proposals providing for community space(s), that support health and social care services, new or improved school provision, meeting spaces, community cafés and other community infrastructure will be supported.</p> <p>New development will be expected to provide for necessary community infrastructure commensurate with the scale of the proposed development. These facilities should be clustered together to enable opportunities for shared spaces and promote accessibility.</p> <p>Existing community facilities</p> <p>Proposals that would result in the loss of an existing community building or facility will not be supported unless:</p> <ul style="list-style-type: none"> a) It can be demonstrated that the need for the building or facility no longer exists or it is no longer viable; b) It can be demonstrated that suitable alternative provision exists in an equally or more accessible location elsewhere within the parish and this would avoid a duplication of facilities; c) Suitable alternative provision will be delivered by new development. 	<p>No, Category A</p>	<p>No specific recommendations</p>



<p>New Community Facilities</p> <p>Support is given for proposals that promote and enhance community services for all sectors of the community. In particular support will be given to proposals that:</p> <ul style="list-style-type: none"> i. enable the expansion of the NM Country Practice; ii. ensure safe access to community facilities; iii. encourage new community activities and events in the town, and through this means to involve a wider variety of people in activities and as volunteers; iv. improve facilities for younger people in the town. v. incorporate natural spaces and green areas. 		
<p>POLICY NM7 – Preserving the town’s setting and retention of important views</p> <p>The visual scenic value of the landscape and countryside surrounding Needham Market including Needham Lake will be protected from development that may adversely affect its character.</p> <p>Important views into, from and within the town will be protected from inappropriate development.</p> <p>Development that significantly detracts from the following views (shown on Map 2), by failing to respect their distinctive characteristics, will not be supported.</p> <ul style="list-style-type: none"> a) View looking north-west up the High Street. b) View looking south-east up the High Street. c) Short views along Hawkes Mill Street looking west towards the mill complex. d) Short view along Coddendam Road looking north-west towards the mill complex. 	No, Category A	No specific recommendations
<p>POLICY NM7 –The Historic Town Centre and Conservation Area</p> <p>Developments within the historic town centre and the conservation area will only be supported where they respect the historic fabric and appearance of the</p>	No, Category A	No specific recommendations



<p>conservation area and protect the significant listed buildings, protected trees and other heritage assets.</p> <p>The established special character of the Conservation Area and its setting will be protected and reinforced.</p> <p>This will be achieved by:</p> <ul style="list-style-type: none"> a) Encouraging the retention and maintenance of buildings which contribute to the overall character of the Conservation Area. b) Ensuring that new development is sympathetic to the special qualities and character of the Conservation Area. c) Protecting the setting of the conservation area from development which adversely affects views into or out of the area <p>Proposals for new development within the conservation area should preserve and enhance the historic character and appearance of the area.</p> <p>Any development or alterations to the buildings should incorporate high quality materials which reflect the vernacular and local character of the area.</p> <p>Proposals that seek to enhance the streetscape and public realm through the appropriate use of high-quality lighting, railings, seating, litter bins, bollards, cycle racks and signage which enhance the area will be supported.</p> <p>Development proposals within the town centre and the conservation area should be subject to an archaeological assessment. Any assets discovered must be subject to detailed recording. Any developments proposed for the roads approaching the town should be in keeping with the nature of the Conservation area. Where new or reconfigured signage is proposed, consideration should be given to its size, design and siting to ensure that it does not detract from the character of the conservation area.</p> <p>The Conservation Area is shown in Appendix C of the Needham Market Neighbourhood Plan</p>		
<p>POLICY NM8 – Reducing and Managing the Impact of Traffic</p>	<p>No, Category A</p>	<p>No specific recommendations</p>



<p>The Town Council will work with the relevant authorities to promote the introduction of any necessary measures to minimise the effect of traffic through and within Needham Market. This will include:</p> <ul style="list-style-type: none"> a) the control of further industrial expansion in Policy NM3; and b) the delivery of on street cycling and walking facilities that favour young families and older people and that offers good access. 		
<p>POLICY NM9 – Encouraging safe walking and cycling</p> <p>Where new development takes place, opportunities should be taken to create new, footways and cycle routes. New footways and cycleways should connect to the town centre to enable easy access to facilities and services, to existing cycleways and should form part of a safe, accessible and coherent network in and around the town.</p> <p>Proposals for new development should demonstrate how they:</p> <ul style="list-style-type: none"> i. promote connections with other parts of the existing cycle and footpath networks; and ii. contribute to the delivery of public transport connections, on-street cycling and walking facilities for the town. 	<p>No, Category A</p>	<p>No specific recommendations</p>

3.5.1 Recommendations

There are no recommendations for the policies in this Regulation 14 draft Neighbourhood Development Plan as they have all been assigned to Category A (no negative effect) with no need to amend policy text.

As there is no Likely Significant Effect from the Plan alone, it is necessary to assess the likely effects from the Plan, in combination with other plans and projects; these are considered in Section 3.6.

3.6 Other Plans & Projects: In-Combination Effects

There are four relevant Plan level HRAs that has been carried out by Mid Suffolk DC or other organisations and these have been found, not to have an adverse effect on the integrity of Habitats sites being assessed



in-combination with other plans and projects. There are no Projects considered to be relevant to this section.

In the context of this HRA screening report, as the Needham Market Neighbourhood Plan does not allocate any sites for development, it does not require any mitigation measures and therefore there are no likely significant effects in combination with other plans and projects.

Table 5: 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	Habitats 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	It is considered that in combination likely significant effects are not predicted.
Suffolk Coastal District Council	Habitats Regulations Assessment of the Suffolk Coastal District Local Plan at Final Draft Plan Stage (Dec 2018)	It is recommended that the Suffolk authorities should be mindful of the potential issue for impacts from air quality and plan for more detailed analysis of risks across the county, to inform	Potential risk of traffic emissions to Habitats sites with features sensitive to air pollution. Recommendation that the Council commits to working with neighbouring



		the next plan reviews. This should include air quality modelling that incorporates a specific consideration of potential deposition rates within 200m of European sites.	authorities to gather more data to inform future Local Plan reviews.
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4. Conclusions

Subject to Natural England's review, this HRA Screening Report concludes that the Needham Market Neighbourhood Plan is not predicted to have any Likely Significant Effect on any Habitats site, either alone or in combination with other plans and projects.

The content of the Needham Market Neighbourhood Plan has therefore been **screened out** for any further assessment and Mid Suffolk DC can demonstrate its compliance with the UK Habitats Regulations 2017.



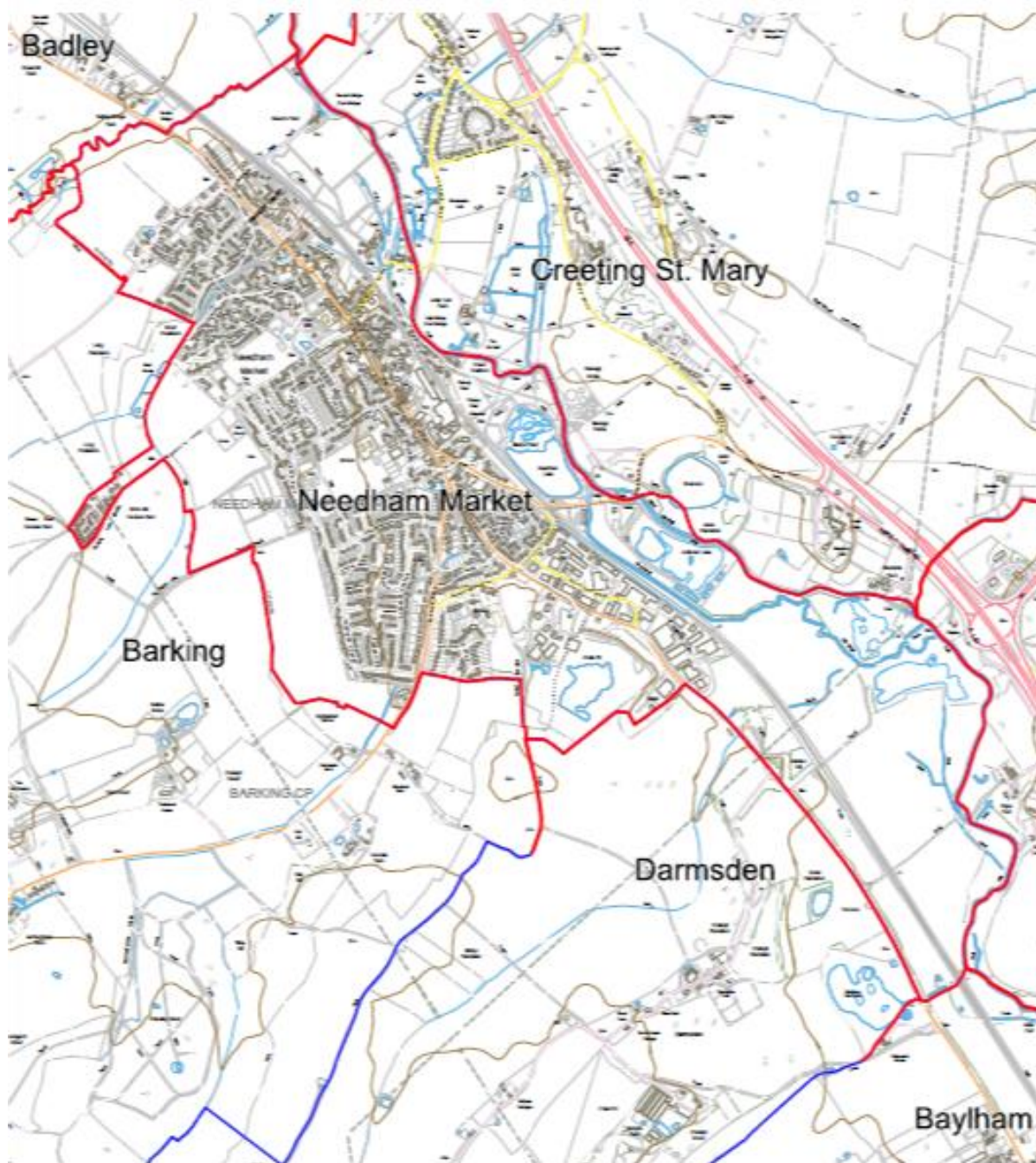
5. References

- Babergh and Mid Suffolk District Councils Joint Local Plan (2018)
- Natural England Conservation objectives for European Sites: East of England Website: <http://publications.naturalengland.org.uk/category/6581547796791296#content>
- Natural England Site Improvement Plans: East of England <http://publications.naturalengland.org.uk/category/4873023563759616>
- Place Services (June 2019) Babergh and Mid Suffolk District Councils Joint Local Plan Habitats Regulations Assessment including Appropriate Assessment
- Needham Market Parish Council (2020) Needham Market Neighbourhood Plan Regulation 14 Second Pre-Submission Consultation Version



Appendix I

Needham Market Neighbourhood Plan Area

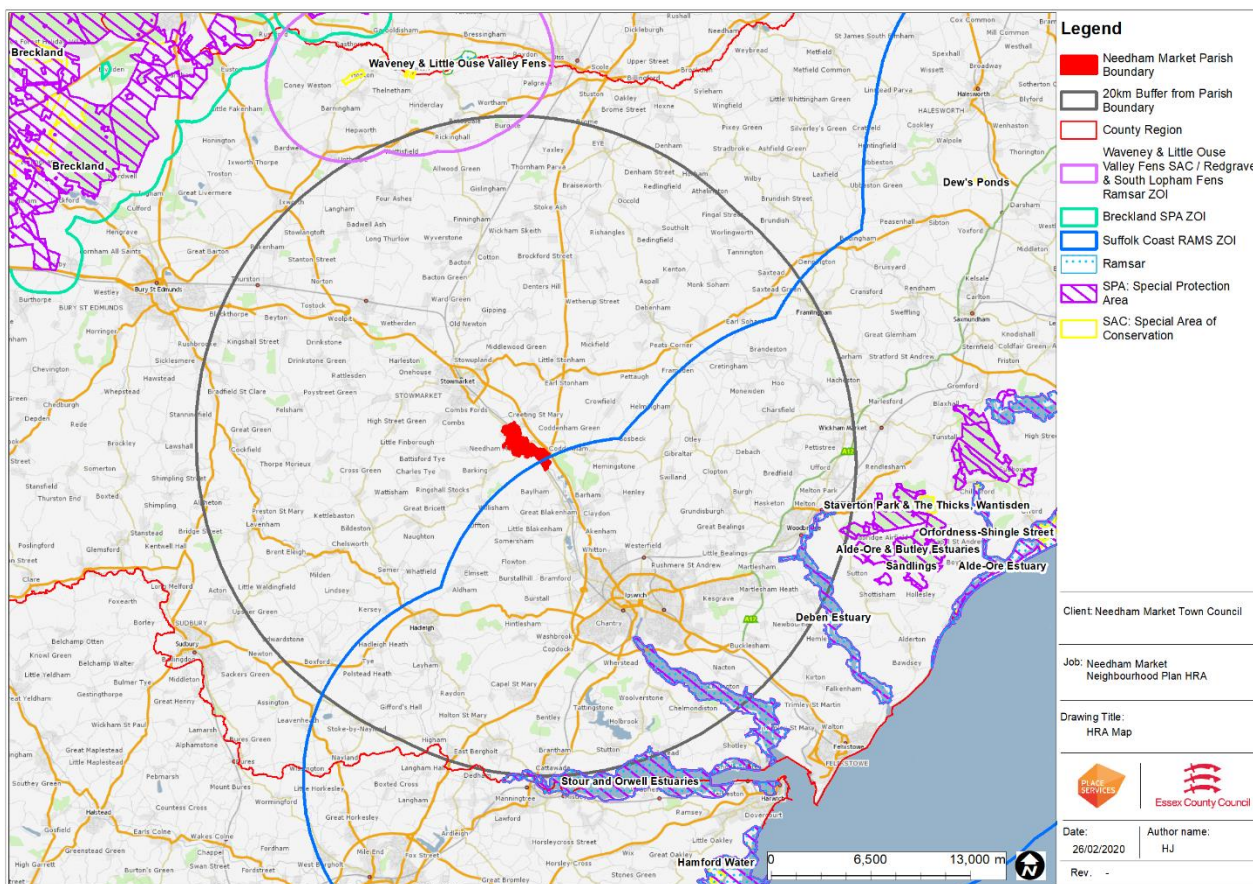


Source: Needham Market Neighbourhood Plan Second Pre-Submission (REG14) Consultation Version January 2020



Appendix II

Needham Market parish and Habitats Sites within 20km



Source: Place Services, 2020



Appendix III

Characteristics of Habitats Sites

This appendix contains information about the Habitats Sites included in the scoping for this HRA. Information about each site's area, the site descriptions, qualifying features and pressures and threats are drawn from Natural England's Site Improvement Plans (SIPs) and the Standard Data Forms or Ramsar Information Sheets available from the JNCC website. Site conservation objectives are drawn from Natural England's website and are only available for SACs and SPAs. Supplementary Advice has also been added to describe the range of ecological attributes that are most likely to contribute to a site's overall integrity and key vulnerabilities to consider within Habitats Regulations assessments.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
The Deben Estuary				
<p>The Deben Estuary lies within Suffolk Coastal District at the southern border of Suffolk. The estuaries include extensive mudflats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The mudflats hold <i>Enteromorpha</i>, <i>Zostera</i> and <i>Salicornia spp.</i> In summer, the site supports important numbers of breeding Avocet while in winter they hold major concentrations of water birds, especially geese, ducks and waders. The geese also feed, and waders roost, in surrounding areas of agricultural land outside the SPA.</p>				
<u>Deben Estuary SPA</u> EU Code: UK9009261	978.93	Qualifying species: <ul style="list-style-type: none"> A675, Dark-bellied brent goose <i>Branta bernicla</i> (Non-breeding); A132 Pied avocet, <i>Recurvirostra avosetta</i> (breeding) 	<p>With regard to the individual species and/or assemblage of species for which the site has been classified ("the Qualifying Features" listed below);</p> <p>Avoid the deterioration of the habitats of the Qualifying Features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of The Birds Directive.</p> <ul style="list-style-type: none"> ➤ Subject to natural change, to maintain or restore: ➤ The extent and distribution of the habitats of the qualifying features; 	Coastal squeeze: <p>The Deben Estuary coastline is undergoing widespread decline in the quality of saltmarsh, and an increase in lower marsh habitats at the expense of mid and upper marsh vegetation communities. This is likely due to impacts from climate change, such as rising sea level. Unless changes are made to the management of the coastline, Habitats supporting qualifying SPA birds will be lost or degraded through coastal squeeze, sedimentation and reduced exposure.</p> Public access/disturbance: <p>The Deben Estuary is subject to land and water-based activities, including boating and water sports; walking; wildfowling; and low flying aircrafts. These activities are likely to impact Habitats supporting breeding and overwintering water birds. A better understanding of which species and Habitats are most susceptible; which types of activity are most disturbing; and which locations and times of year are most sensitive is required to ensure the Estuaries are appropriately managed</p> Changes in species distribution: <p><i>Spartina anglica</i> is encroaching onto estuarine muds. This may reduce bird roosting and feeding areas of saltmarsh and mudflat.</p>



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
			<ul style="list-style-type: none"> ➤ The structure and function of the habitats of the qualifying features; ➤ The supporting processes on which the habitats of the qualifying features rely; ➤ The populations of the qualifying features; ➤ The distribution of the qualifying features within the site. 	<p>Air Pollution- Impacts of atmospheric nitrogen deposition:</p> <p>Modelled aerial deposits of nitrogen within Deben Estuary exceed the threshold limit above which the diversity of saltmarsh vegetation begins to be altered (possibly to reed) and adversely impacted. This is likely being caused by in combination impacts from land spreading and land use practices with high nutrient inputs e.g. outdoor pig farms.</p> <p>Water Pollution:</p> <p>Inappropriate water quality may impact on the supporting habitats of SPA birds. Eutrophication may be having an influence on reed growth and saltmarsh composition.</p> <p>Increased flood events could lead to habitat change/loss of diversity. Nutrient run off from farming operations could exacerbate the issue. Further monitoring and management of key issues are required.</p> <p>Fisheries: Commercial marine estuarine – In combination impacts from fisheries in European Marine Sites need to be monitored and appropriately managed to avoid potential threats to site condition.</p>
Deben Estuary Ramsar site EU Code: UK11017	978.93	Ramsar criterion 2 Supports a population of the mollusc <i>Vertigo angustior</i> (Habitats Directive Annex II (S1014); British Red Data Book Endangered). Martlesham Creek is one of only about fourteen sites in	None available	<p>Similar to Deben Estuary SPA (See above).</p> <p>A key threat identified by RIS was erosion.</p> <p>Erosion - English Nature provides advice to the Environment Agency and coastal local authorities in relation to flood and coastal protection management. This will inform the development of the Suffolk Estuaries strategies and the second-generation shoreline management plan.</p>



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		<p>Britain where this species survives</p> <p>Species with peak counts in winter:</p> <p>Dark-bellied brent goose, <i>Branta bernicla bernicla</i>, 1953 individuals, representing an average of 1.9% of the GB population (5-year peak mean 1998/9-2002/3)</p> <p><u>Species currently occurring at levels of national importance</u></p> <p>Species with peak counts in spring/autumn:</p> <p>Black-tailed godwit , <i>Limosa limosa islandica</i>, Iceland/W Europe 307 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9-2002/3) Common greenshank, <i>Tringa nebularia</i>, Europe/W Africa 22 individuals, representing an average of 3.6% of the GB</p>		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		<p>population (5 year peak mean 1998/9- 2002/3)</p> <p>Species with peak counts in winter:</p> <p>Bean goose, <i>Anser fabalis fabalis</i>, NW Europe - Wintering 5 individuals, representing an average of 1.2% of the GB population (Source period not collated)</p> <p>Common shelduck, <i>Tadorna tadorna</i>, NW Europe 832 individuals, representing an average of 1% of the GB population (5-year peak mean 1998/9- 2002/3)</p> <p>Pied avocet, Europe/Northwest Africa 167 individuals, representing an average of 4.9% of the GB population (5-year peak mean 1998/9- 2002/3)</p> <p>Spotted redshank, <i>Tringa erythropus</i>, Europe/W Africa 3 individuals, representing an average of</p>		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		<p>2.2% of the GB population (5-year peak mean 1998/9-2002/3) Common redshank, <i>Tringa totanus totanus</i>, 2124 individuals, representing an average of 1.8% of the GB population (5-year peak mean 1998/9- 2002/3)</p> <p>Nationally important species occurring on the site.</p> <p>Invertebrates: <i>Vertigo angustior</i> (Nationally Scarce) & <i>Vertigo pusilla</i> (Nationally Scarce)</p>		
<p>Sandlings</p> <p>The Sandlings SPA lies near the Suffolk Coast between the Deben Estuary and Leiston. In the 19th century, the area was dominated by heathland developed on glacial sandy soils. During the 20th century, large areas of heath were planted with blocks of commercial conifer forest and others were converted to arable agriculture. Lack of traditional management has resulted in the remnant areas of heath being subject to successional changes, with the consequent spread of bracken, shrubs and trees, although recent conservation management work is resulting in their restoration. The heaths support both acid grassland and heather-dominated plant communities, with dependant invertebrate and bird communities of conservation value. Woodlark <i>Lullula arborea</i> and Nightjar <i>Caprimulgus europaeus</i> have also adapted to breeding in the large conifer forest blocks, using areas that have recently been felled and recent plantation, as well as areas managed as open ground</p>				
Sandlings SPA	3,391.80	Qualifying species:	Ensure that the integrity of the site is maintained or restored as	Recreation pressure:



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
EU code: UK9020286		<ul style="list-style-type: none"> • <i>A224 Caprimulgus europaeus</i>; European nightjar (Breeding) • <i>A246 Lullula arborea</i>; Woodlark (Breeding) 	<p>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 nature, scale, timing and duration of some human activities can result in the disturbance of birds at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the population. Such disturbing effects can for example result in changes to feeding or roosting behaviour, increases in energy expenditure due to increased flight, abandonment of nest sites and desertion of supporting habitat (both within or outside the designated site boundary where appropriate). This may undermine successful nesting, rearing, feeding and/or roosting, and/or may reduce the availability of suitable habitat as birds are displaced and their distribution within the site contracts. Disturbance associated with human activity may take a variety of forms including noise, light, sound, vibration, trampling, and presence of people, animals and structures. This may become more of an issue as the population recovers and if an increase in development locally leads to an increase in recreational pressure in the Sandlings.</p> <p>Air pollution:</p> <p>The structure and function of the habitats which support this SPA feature may be sensitive to changes in air quality. Exceeding critical values for air pollutants may result in changes to the chemical status of its habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition and thereby affecting the quality and availability of nesting, feeding or roosting habitats</p>

The Stour and Orwell estuaries

These estuaries straddle the eastern part of the Essex/Suffolk border in eastern England. The estuaries include extensive mud-flats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The mud-flats hold *Enteromorpha*, *Zostera* and *Salicornia* spp. The site also includes an area of low-lying grazing marsh at Shotley Marshes on the south side of the Orwell. In summer, the site supports important numbers of breeding Avocet *Recurvirostra avosetta*, while in winter they hold major concentrations of waterbirds, especially



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
geese, ducks and waders. The geese also feed, and waders roost, in surrounding areas of agricultural land outside the SPA. The site has close ecological links with the Hamford Water and Mid-Essex Coast SPAs, lying to the south on the same coast.				
Stour and Orwell Estuaries SPA EU Code: UK9009121	3676.92	<p>Qualifying Species:</p> <p>Annex I species:</p> <p>Over winter:</p> <ul style="list-style-type: none"> Hen Harrier <i>Circus cyaneus</i> <p>Over winter:</p> <ul style="list-style-type: none"> Black-tailed Godwit <i>Limosa limosa islandica</i> Dunlin <i>Calidris alpina alpina</i> Grey Plover <i>Pluvialis squatarola</i> Pintail <i>Anas acuta</i> 	<p>With regard to the individual species and/or assemblage of species for which the site has been classified ("the Qualifying Features" listed below);</p> <p>Avoid the deterioration of the Habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.</p> <p>Subject to natural change, to maintain or restore:</p> <p>The extent and distribution of the Habitats of the qualifying features;</p>	<p>Coastal squeeze:</p> <p>Coastal defences are present along most of the Orwell coastline to mitigate for impacts from climate change, such as rising sea level. Unless changes are made to the management of the coastline, Habitats supporting qualifying SPA birds will be lost or degraded through coastal squeeze, sedimentation and reduced exposure.</p> <p>Public access/disturbance :</p> <p>Stour and Orwell Estuaries is subject to land- and water-based activities, including boating and water sports; walking; bait-digging; fishing; wildfowling; and military overflight training. These activities are likely to impact Habitats supporting breeding and overwintering water birds. A better understanding of which species and Habitats are most susceptible; which types of activity are most disturbing; and which locations and times of year are most sensitive is required to ensure the Estuaries are appropriately managed.</p> <p>Changes in species distribution:</p> <p>Declines in the number of bird species present at Orwell coastline have occurred. This</p>



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		<ul style="list-style-type: none"> • Redshank <i>Tringa totanus</i> • Ringed Plover <i>Charadrius hiaticula</i> • Shelduck <i>Tadorna tadorna</i> • Turnstone <i>Arenaria interpres</i> <p>Waterbird assemblages:</p> <ul style="list-style-type: none"> • Cormorant <i>Phalacrocorax carbo</i> • Pintail <i>Anas acuta</i> • Ringed Plover <i>Charadrius hiaticula</i> • Grey Plover <i>Pluvialis squatarola</i> • Dunlin <i>Calidris alpina alpina</i> 	<p>The structure and function of the Habitats of the qualifying features;</p> <p>The supporting processes on which the Habitats of the qualifying features rely;</p> <p>The populations of the qualifying features;</p> <p>The distribution of the qualifying features within the site.</p>	<p>is likely to be the result of changes in population and distribution on an international scale, due to climate change.</p> <p>Invasive species:</p> <p>An increase in <i>Spartina anglica</i> may be affecting the growth of <i>Spartina maritima</i>, a key habitat feature for qualifying bird roosting and feeding areas of saltmarsh and mudflat.</p> <p>Planning permission- general:</p> <p>The issue of development in combination with other factors is not fully understood. To ensure management is appropriate to the SPA a better understanding of the sensitivities relating to each habitat, species and location to different types of development is required. Difficult issues highlighted by the SIP include; a) Assessing the cumulative effects of numerous, small and often 'non- standard' developments. b) Development outside the SPA boundary can have negative impacts, particularly on the estuaries' birds. c) Assessing the indirect, 'knock-on' effects of proposals. d) Pressure to relax planning conditions on existing developments.</p> <p>Air pollution- impact from atmospheric nitrogen deposition:</p> <p>Atmospheric nitrogen deposition exceeds the relevant critical loads for coastal dune Habitats used by breeding terns and hence there is a risk of harmful effects.</p>



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		<ul style="list-style-type: none"> Black-tailed Godwit <i>Limosa limosa islandica</i> Redshank <i>Tringa tetanus</i> Shelduck <i>Tadorna tadorna</i> Great Crested Grebe <i>Podiceps cristatus</i> Curlew <i>Numenius arquata</i> Dark-bellied Brent Goose <i>Branta bernicla bernicla</i> Wigeon <i>Anas Penelope</i> Goldeneye <i>Bucephala clangula</i> 		<p>Inappropriate coastal management:</p> <p>Due to the presence of existing hard sea defences, such as sea walls there is little scope for adaptation to rising sea levels. Any freshwater Habitats behind failing seawalls are likely to be inundated by seawater, which would result in the loss of this habitat within the SPA.</p> <p>Fisheries- Commercial and estuarine:</p> <p>Commercial fishing activities can be very damaging to inshore marine Habitats and the bird species dependent on the communities they support. Any 'amber or green' categorised commercial fishing activities in Habitats Marine Sites are assessed by Kent and Essex Inshore Fisheries Conservation Authority (IFCA). This assessment takes into account any in-combination effects of amber activities and/or appropriate plans or projects.</p>



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		<ul style="list-style-type: none">Oystercatcher <i>Haematopus ostralegus</i>Lapwing <i>Vanellus vanellus</i>Knot <i>Calidris canutus</i>Turnstone <i>Arenaria interpres.</i>		



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