



Thorndon Neighbourhood Plan 2018-2036: Regulation 14 Draft

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





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Report version control:

Version	Date	Author	Description of changes
1.1	10/03/2020	Zara Hanshaw	Drafted
1.2	18/03/2020	Sue Hooton	Reviewed internally
1.3	19/03/2020	Zara Hanshaw	Issued



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 Regulation 14 draft Thorndon 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 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 Thorndon 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 Regulation 14 draft Neighbourhood Development Plan will set out planning policies for Thorndon 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 Thorndon Neighbourhood Plan which is being produced by Thorndon 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 13km of the Thorndon Neighbourhood Plan area.
- Summarise the reasons for designation and Conservation Objectives for each site to be considered in this assessment.
- Screen the Thorndon 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 Thorndon 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 Thorndon 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 two Habitats sites (SPA/SAC/Ramsar) which lie within 13 km of Thorndon parish which is the largest Zone of Influence for Habitats sites in Suffolk. These are shown on the map in Appendix 2. However, the Plan area is not within the Zone of Influence for any of these Habitats sites.

Table 1: Habitats Sites within 13km of the development

SPA	SAC	Ramsar
	Waveney & Little Ouse Valley Fens	Redgrave & South Lopham Fens

As the Plan area is not within the Zones of Influence for any of these Habitats sites, none screened in for assessment for any likely significant effects resulting from the Regulation 14 Draft Thorndon Neighbourhood Plan.

3.3.3 Conservation Objectives

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

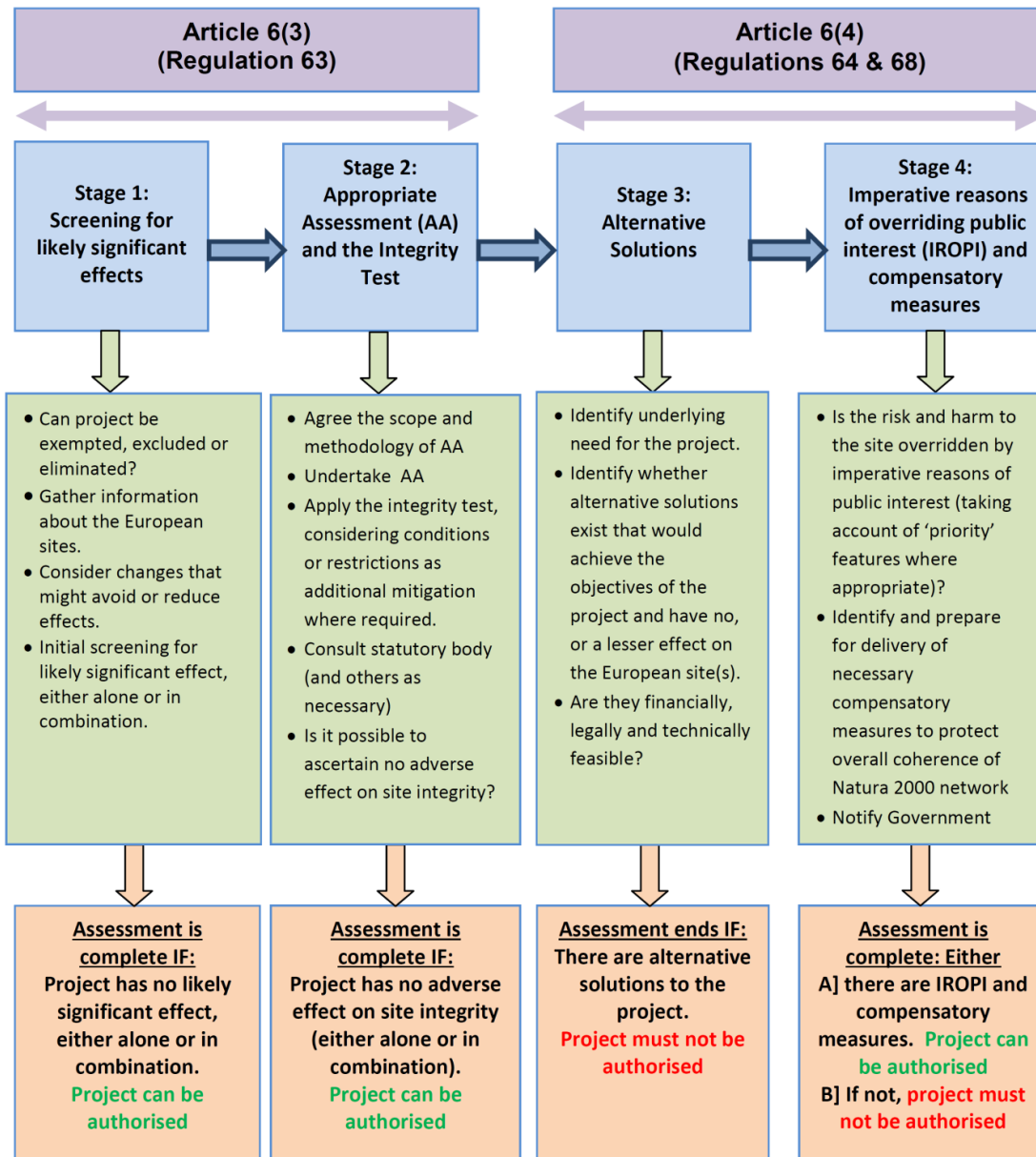
The justification for the importance of each Habitats site and the reasons for designation-the Conservation Objectives and Designation Features- for each site are included in Appendix 3. It also reflects the Supplementary Advice for Conservation Objectives which describes the range of ecological attributes 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 Thorndon 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 Thorndon 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 Thorndon 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 two Habitats sites within scope of this HRA although both are screened out.	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	HRA / AA work undertaken at the Local Plan level indicates that there is no potential pathway for development in the Plan area to impact on the SAC, SPA & Ramsar sites within the scope of the HRA as the Parish lies outside the 13km Zones of Influence of all Habitats sites within the Suffolk Coast RAMS.	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 Thorndon 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 THN 1 - Spatial Strategy
- Policy THN 2 - Housing Development
- Policy THN 3 - Land at the Kerrison Centre
- Policy THN 4 - Land west of Hall Road
- Policy THN 5 - Land at Brambledown south of Stoke Road
- Policy THN 6 - Land North of, and surrounding, 37 The Street
- Policy THN 7 - Land East of Fen View
- Policy THN 8 - Affordable Housing on Rural exception Sites
- Policy THN 9 - Housing Mix
- Policy THN 10 - Measures for New Housing Development
- Policy THN 11 - Area of Local Landscape Sensitivity
- Policy THN 12 - Dark Skies
- Policy THN 13 - Local Green Spaces
- Policy THN 14 - Biodiversity
- Policy THN 15 - Buildings of Local Significance
- Policy THN 16 - Heritage Assets
- Policy THN 17 - Thorndon Special Character Area
- Policy THN 18 - Design Considerations
- Policy THN 19 - Sustainable Construction Practices
- Policy THN 20 - Protecting existing services and facilities

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 THN 1 – Spatial Strategy</p> <p>The Neighbourhood Plan area will accommodate development commensurate with Thorndon’s designation as a Secondary Village in the adopted Core Strategy and emerging designation as a Hinterland Village in the Joint Local Plan.</p> <p>The focus for new development will be within the Settlement Boundary, as defined on the Policies Map.</p> <p>Proposals for development located outside the Settlement Boundary will only be permitted for those that are essential for the operation of agriculture, horticulture, forestry, outdoor recreation and other exceptional uses, where:</p> <ul style="list-style-type: none"> i) it can be satisfactorily demonstrated that there is an identified local need for the proposal; and ii) it cannot be satisfactorily located within the Settlement Boundaries. 	No, Category A	No specific recommendations
<p>Policy THN 2 – Housing Development</p> <p>This Plan provides for around 100 additional dwellings to be developed in the Neighbourhood Plan area between 2018 and 2036. This growth will be met through:</p> <ul style="list-style-type: none"> i. the implementation of planning permissions that had not been completed as at 1 April 2018; and ii. site allocations identified in Policies THN 3, THN 4, THN 5, THN 6 and THN 7 in the Plan and identified on the Policies Map; and iii. small brownfield “windfall” sites and infill plots within the Settlement Boundary that come forward during the plan period and are not identified in the Plan; and iv. in exceptional circumstances, dwellings outside the Settlement Boundary where it can be demonstrated that the dwelling is essential for the operation of agriculture, horticulture, forestry, outdoor recreation and other exceptional uses for which it can satisfactorily be demonstrated that it needs to be located in the countryside. 	No, Category A	No specific recommendations



<p>In addition, proposals for the conversion of redundant or disused agricultural barns outside the Settlement Boundaries into dwellings will be permitted where:</p> <ul style="list-style-type: none"> a) the building is structurally sound and capable of conversion without the need for extension, significant alteration or reconstruction; and b) the proposal is a high-quality design and the method of conversion retains the character and historic interest of the building; and c) the proposal would lead to an enhancement to the immediate setting of the building, and the creation of a residential curtilage and any associated domestic paraphernalia would not have a harmful effect on the character of the site or setting of the building, any wider group of buildings, or the surrounding area. 		
<p>Policy THN 3 – Land at the Kerrison Centre</p> <p>A site of 1.22 hectares at the former Kerrison Centre, as identified on the Policies Map, is allocated for approximately 22 dwellings including 35% affordable dwellings, subject to proposals meeting the following requirements:</p> <ul style="list-style-type: none"> a) dwellings shall be limited to a maximum height of two storeys. b) the retention of existing trees protected by preservation orders c) the provision of an access path to the Local Green Space to the east identified in Policy THN 12 	No, Category A	No specific recommendations
<p>Policy THN 4 – Land west of Hall Road</p> <p>A site of 0.25 hectares west of Hall Road, as identified on the Policies Map, is allocated for three dwellings comprising two, two-storey dwellings and one single storey dwelling.</p>	No, Category A	No specific recommendations
<p>Policy THN 5 – Land at Brambledown south of Stoke Road</p> <p>A site of 0.35 hectares at Brambledown, south of Stoke Road, as identified on the Policies Map, is allocated for up to four dwellings to be accessed from Stoke Road. The development should:</p> <ul style="list-style-type: none"> i. include at least two dwellings with two bedrooms; 	No, Category A	No specific recommendations



<ul style="list-style-type: none"> ii. retain vehicular access to Brambledown; and iii. retain and enhance existing trees and hedgerows around the site boundaries <p>The development will not be permitted to be commenced before 2026</p>		
<p>Policy THN 6 – Land North of, and surrounding, 37 The Street</p> <p>A site of 0.37 hectares north of, and surrounding, 37 The Street as identified on the Policies Map, is allocated for up to six dwellings. The development should:</p> <ul style="list-style-type: none"> i. include at least three dwellings with a maximum of two bedrooms; ii. provide a new vehicular access from The Street which should enable a link to land to the north (Policy THN5); and iii. where possible, retain existing trees and hedgerows and enhance the landscape through the planting of native species trees and hedgerows. <p>The development will not be permitted to be commenced before 2026.</p>	No, Category A	No specific recommendations
<p>Policy THN 7 – Land East of Fen View</p> <p>A site of 0.7 hectares east of Fen View as identified on the Policies Map, is allocated for up to six dwellings. The development should:</p> <ul style="list-style-type: none"> i. include at least three dwellings with a maximum of two bedrooms; ii. provide a new vehicular access from Fen View and, subject to highways safety, considerations, enable a vehicle and/or pedestrian link to land to the south (Policy THN5); and iii. where possible, retain existing trees and hedgerows and enhance the landscape through the planting of native species trees and hedgerows. <p>The development will not be permitted to be commenced before 2026.</p>	No, Category A	No specific recommendations
<p>Policy THN 8 – Affordable Housing on Rural exception Sites</p>	No, Category A	No specific recommendations



Proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase (as defined by paragraph 71 of the NPPF) on rural exception sites outside the Settlement Boundaries, where housing would not normally be permitted by other policies, will be supported where there is a proven local need and provided that the housing:

- i. remains affordable in perpetuity; and
- ii. is for people that are in housing need because they are unable to buy or rent properties in the village at open-market prices; and
- iii. is offered, in the first instance, to people with a demonstrated local connection, as defined by the Mid Suffolk Choice Based Lettings Scheme. Where there is no need, a property should then be offered to those with a demonstrated need for affordable housing in neighbouring villages.

These restrictions should be delivered through a legal agreement attached to the planning consent for the housing. Applications for such development will be considered in relation to the appearance and character of the surrounding area, the potential impact on residential amenity and highway safety.

To be acceptable, proposals should demonstrate that a local need exists which cannot be met by applying normal planning policy for the provision of affordable homes in association with market housing.

Any application for affordable housing in respect of this policy should be accompanied by a detailed need and the accommodation proposed should contribute to meeting this proven need.

In exceptional circumstances, a small number of market homes will be permitted where it can be demonstrated:

- a) that no other means of funding the construction of the affordable homes is available; and
- b) the market housing is subsidiary to the affordable housing element of the proposal and the amount of market housing required is, as demonstrated through a viability assessment, the minimum required to deliver the affordable housing.

Where sites for affordable housing in the countryside are brought forward with an element of market housing, both housing tenures should be built to the same design



standards and contribute towards the character of the area.		
<p>Policy THN 9 – Housing Mix</p> <p>In all housing developments of ten or more homes, there shall be an emphasis on providing a higher proportion of two-bedroomed homes within the scheme, unless it can be demonstrated that:</p> <ul style="list-style-type: none"> i. the particular circumstances relating to the tenure of the housing dictate otherwise; or ii. the latest publicly available housing needs information for the Plan area identify a need for a different mix. <p>The provision of bungalows will also be supported where the proposal would not have a detrimental impact on the character of the area in the vicinity of the site.</p>	No, Category A	No specific recommendations
<p>Policy THN 10 – Measures for New Housing Development</p> <p>All new dwellings shall achieve appropriate internal space through adherence to the latest Nationally Described Space Standards.</p> <p>Dwellings should also make adequate provision for the covered storage of all wheelie bins and cycles. Cycle parking provision shall be in accordance with the adopted cycle parking standards.</p>	No, Category A	No specific recommendations
<p>Policy THN 11 – Area of Local Landscape Sensitivity</p> <p>Development proposals in the Area of Local Landscape Sensitivity, as identified on the Policies Map, will be permitted only where they:</p> <ul style="list-style-type: none"> i. protect and enhance the special landscape qualities of the area; and ii. are designed and sited so as to harmonise with the landscape setting. 	No, Category A	No specific recommendations
<p>Policy THN 12 – Dark Skies</p> <p>While ensuring that new developments are secure in terms of occupier and vehicle safety, dark skies are to be preferred over lighting. Any future outdoor lighting systems should have a minimum impact on the environment, minimising light pollution and adverse effects on wildlife subject to highway safety, the needs of particular individuals or groups, and security. Schemes should reduce the consumption of energy by promoting efficient</p>	No, Category A	No specific recommendations



<p>outdoor lighting technologies, keeping the night-time skies dark and reducing glare.</p>		
<p>Policy THN 13 – Local Green Spaces</p> <p>The following Local Green Spaces are designated in this Plan and identified on the Policies Map.</p> <ol style="list-style-type: none"> 1. Kerrison Playing Field 2. Fen View Play Area and Open Space 3. Kerrison Set Aside Land 4. All Saints’ Churchyard 5. The Bowling Green <p>Development on these sites will only be permitted in exceptional circumstances. Permitted development rights, including the operational requirements of infrastructure providers, are not affected by this designation</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy THN 14 - Biodiversity</p> <p>Except in exceptional circumstances, development proposals should avoid the loss of, or substantial harm to, important trees, hedgerows and other natural features such as ponds. Where such losses or harm are unavoidable:</p> <ol style="list-style-type: none"> i. the benefits of the development proposal must be demonstrated clearly to outweigh any impacts; and ii. suitable mitigation measures, that may include equivalent or better replacement of the lost features, will be required. <p>It is expected that the mitigation proposals will form an integral part of the design concept and layout of any development scheme, and that development will be landscape-led and appropriate in relation to its setting, context and ongoing management.</p> <p>Where new access is created, or an existing access is widened through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity.</p> <p>Development proposals will be supported where they provide a net gain in biodiversity through, for example,</p> <ol style="list-style-type: none"> a) the creation of new natural habitats including ponds; 	<p>No, Category A</p>	<p>No specific recommendations</p>



<ul style="list-style-type: none"> b) the planting of additional trees and hedgerows (reflecting the character of Thorndon’s traditional hedgerows), and; c) restoring and repairing fragmented biodiversity networks 		
<p>Policy THN 15 – Buildings of Local Significance</p> <p>The retention and protection of buildings of local significance, including buildings, structures, features and gardens of local interest and as identified on the Policies Map, will be secured.</p> <p>Proposals for any works that would lead to the loss of, or substantial harm to, a building of local significance should be supported by an appropriate analysis of the significance of the asset together with an explanation of the wider public benefits of the proposal.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy THN 16 – Heritage Assets</p> <p>To ensure the conservation and enhancement of the village’s heritage assets, proposals must:</p> <ul style="list-style-type: none"> a. preserve or enhance the significance of the heritage assets of the village, their setting and the wider built environment, including views into, within and out of the conservation area as identified on the Policies Map; b. retain buildings and spaces, the loss of which would cause harm to the character or appearance of the conservation area; c. contribute to the village’s local distinctiveness, built form and scale of its heritage assets, as described in the Landscape Appraisal and Built Character Assessment, through the use of appropriate design and materials; d. be of an appropriate scale, form, height, massing, alignment and detailed design which respects the area’s character, appearance and its setting, in line with the AECOM Design Guidelines for Thorndon. e. demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits, alongside an assessment of the potential impact of the development on the heritage asset and its context; and f. provide clear justification, through the submission of a heritage statement, for any works that could harm a heritage asset yet be of wider substantial public benefit, through detailed analysis of the asset and the proposal. 	<p>No, Category A</p>	<p>No specific recommendations</p>



<p>Proposals will not be supported where the harm caused as a result of the impact of a proposed scheme is not justified by the public benefits that would be provided.</p> <p>Where a planning proposal affects a heritage asset, it must be accompanied by a Heritage Statement identifying, as a minimum, the significance of the asset, and an assessment of the impact of the proposal on heritage assets. The level of detail of the Heritage Statement should be proportionate to the importance of the asset, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.</p>		
<p>Policy THN 17 – Thorndon Special Character Area</p> <p>A Special Character Area is identified on the Policies Map. Within this area, as well as having regard to the need to preserve or enhance the significance of the heritage assets in or adjoining the area, consideration should be given as to how a proposal enhances the distinct characteristics of the identified area.</p> <p>A proposal will not be supported where the harm caused as a result of the impact of a proposed scheme is not justified by the public benefits that would be provided.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy THN 18 – Design Considerations</p> <p>Proposals for new development must reflect the local characteristics and circumstances in the Neighbourhood Plan area and create and contribute to a high quality, safe and environment.</p> <p>Planning applications should, as appropriate to the proposal, demonstrate how they satisfy the requirements of the Development Design Checklist in Appendix 3 of the Plan and, as appropriate to the proposal.</p> <p>In addition, proposals will be supported where they:</p> <ul style="list-style-type: none"> a. recognise and address the key features, characteristics, landscape/building character, local distinctiveness and special qualities of the area and/or building and, where necessary, prepare a landscape character appraisal to demonstrate this; b. maintain or create the village’s sense of place and/or local character avoiding, where possible, cul-de-sac developments which do not reflect the lane hierarchy and form of the settlement; c. do not involve the loss of gardens, important open, green or landscaped areas, which make a 	<p>No, Category A</p>	<p>No specific recommendations</p>



<p>significant contribution to the character and appearance of that part of the village;</p> <p>d. taking mitigation measures into account, do not affect adversely:</p> <ul style="list-style-type: none"> i. any historic character, architectural or archaeological heritage assets of the site and its surroundings, including those locally identified Buildings of Local Significance listed in Appendix 2; ii. important landscape characteristics including trees and ancient hedgerows and other prominent topographical features as set out in the Landscape Appraisal; iii. identified important views into, out of, or within the village as identified on the Policies Map; iv. sites, habitats, species and features of ecological interest; v. the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated; and/or residential amenity; <p>e. not locate sensitive development where its users and nearby residents would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented;</p> <p>f. produce designs that respect the character, scale and density of the locality;</p> <p>g. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that all vehicle parking is provided within the plot and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement;</p> <p>h. wherever possible ensure that development faces on to existing lanes, retaining the rural character and creates cross streets or new back</p>		
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<p>streets in keeping with the settlement’s hierarchy of routes</p> <ul style="list-style-type: none"> i. not result in water run-off that would add-to or create surface water flooding j. where appropriate, make adequate provision for the covered storage of all wheelie bins and for cycle storage in accordance with adopted cycle parking standards. k. include suitable ducting capable of accepting fibre to enable superfast broadband; and l. provide one electric vehicle charging point per new off-street parking place created. 		
<p>Policy THN 19 – Sustainable Construction Practices</p> <p>Proposals that incorporate current best practice in energy conservation will be supported where such measures are designed to be integral to the building design and minimise any detrimental impact on the building or its surroundings. Development proposals should demonstrate:</p> <ul style="list-style-type: none"> a. how they maximise the benefits of solar gain in site layouts and orientation of buildings; b. incorporate best practice in energy conservation and be designed to achieve maximum achievable energy efficiency; c. maximise the benefits of solar gain in site layouts and the orientation of buildings; d. avoid fossil fuel-based heating systems; and e. incorporate sustainable design and construction measures and energy efficiency measures including, where feasible, ground/air source heat pumps, solar panels and grey/rainwater harvesting; 	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy THN 20 – Protecting existing services and facilities</p>	<p>No, Category A</p>	<p>No specific recommendations</p>



<p>Proposals that would result in the loss of valued facilities or services which support a local community (or premises last used for such purposes) will only be permitted where:</p> <ol style="list-style-type: none"> a. it can be demonstrated that the current 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; and b. it can be demonstrated, through evidenced research, that there is no local demand for the use and that the building/site is not needed for any alternative social, community or leisure use; or c. alternative facilities and services are available, or replacement provision is made, of at least equivalent standard, in a location that is accessible to the community it serves with good access by public transport or by cycling or walking. 		
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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, as the Regulation 14 draft Thorndon Neighbourhood Plan does allocate sites for development but does not require any mitigation measures 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 the next plan reviews. This should include air quality modelling that incorporates a specific consideration of potential deposition rates	<p>Potential risk of traffic emissions to Habitats sites with features sensitive to air pollution.</p> <p>Recommendation that the Council commits to working with neighbouring authorities to gather more data to inform future Local Plan reviews.</p>



		within 200m of European sites.	
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4. Conclusions

Subject to Natural England's review, this HRA Screening Report concludes that the Regulation 14 draft Thorndon 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 Thorndon 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.



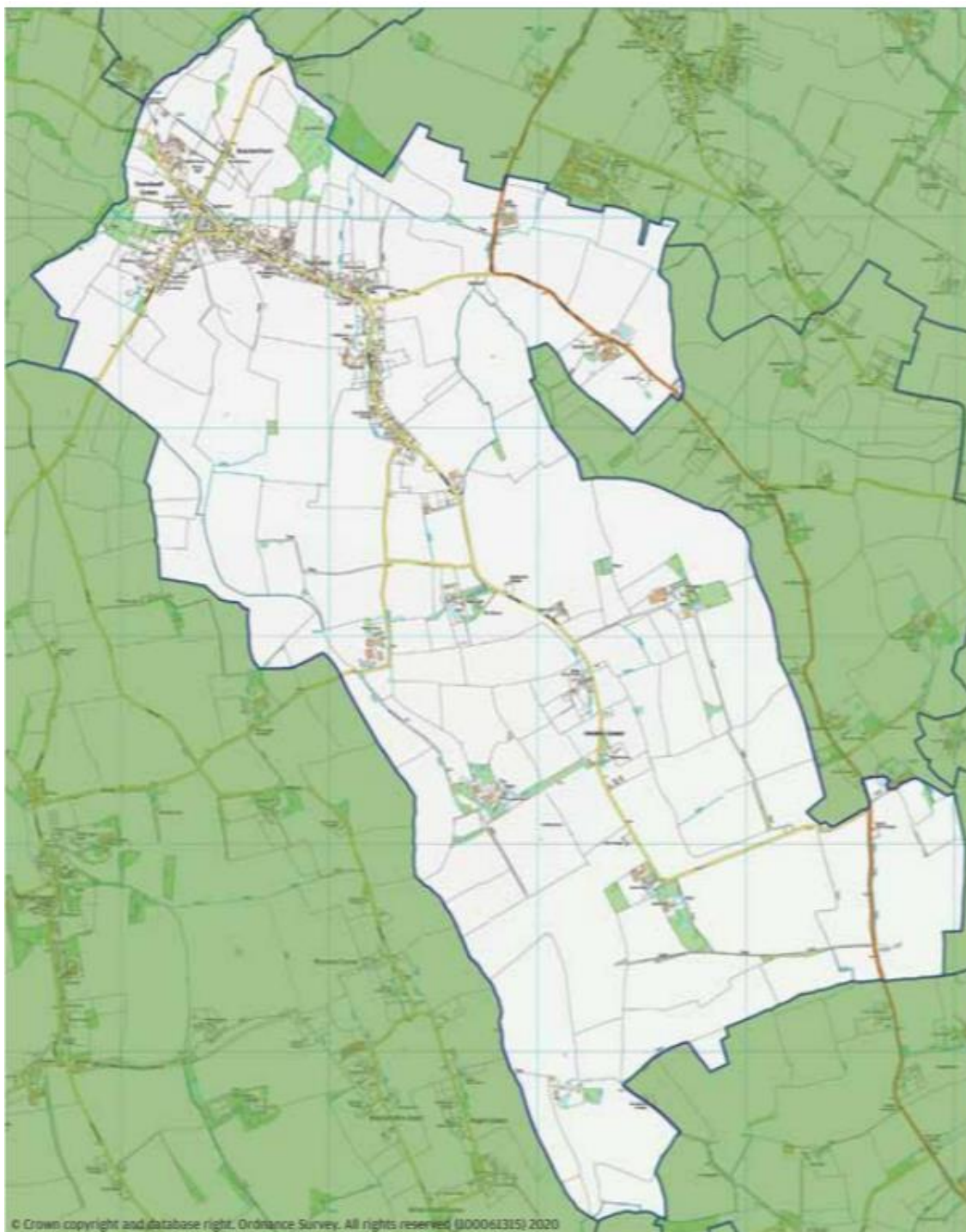
5. References

- 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
- Thorndon Parish Council (2019) Thorndon Neighbourhood Development Plan Regulation 14 Draft)



Appendix I

Thorndon Neighbourhood Plan Area

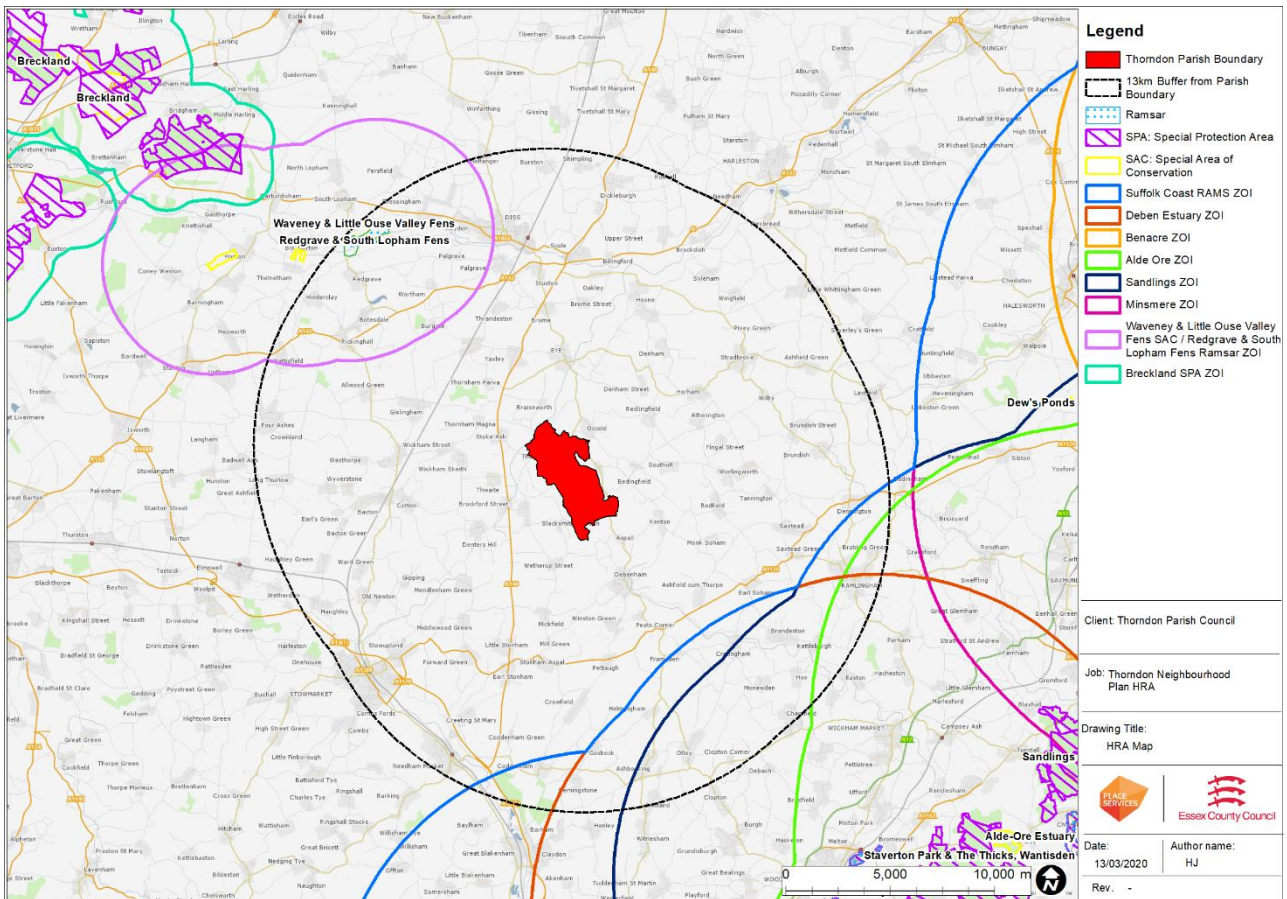


Source: Regulation 14 Draft Thorndon Neighbourhood Development Plan (Thorndon Parish 2020)



Appendix II

Thorndon parish and Habitats Sites within 13km



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
Waveney & Little Ouse Valley Fens				
<p>This site occurs in the East Anglian centre of distribution of calcareous fens and contains very extensive great fen-sedge <i>Cladium mariscus</i> beds, including managed examples, as well as stands in contact zones between small sedge mire and species-poor <i>Cladium</i> beds. The habitat type here occurs in a spring-fed valley fen.</p> <p>Purple moor-grass – meadow thistle (<i>Molinia caerulea</i> – <i>Cirsium dissectum</i>) fen-meadows are associated with the spring-fed valley fen systems. The <i>Molinia</i> meadows occur in conjunction with black bog-rush – blunt-flowered rush (<i>Schoenus nigricans</i> – <i>Juncus subnodulosus</i>) mire and calcareous fens with great fen-sedge. Where the fen-meadow is grazed it is more species-rich, with frequent southern marsh-orchid <i>Dactylorhiza praetermissa</i>.</p> <p>A population of Desmoulin's whorl snail <i>Vertigo moulinsiana</i> occurs in a valley fen at Weston Fen</p>				
Waveney & Little Ouse Valley Fens SAC	193.18 ha	<p>Qualifying habitats:</p> <ul style="list-style-type: none"> H6410. <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caeruleae</i>); Purple moor-grass meadows H7210. Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>; Calcium-rich fen dominated by great 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> ➤ The extent and distribution of qualifying natural habitats and habitats of qualifying species ➤ The structure and function (including typical species) of qualifying natural habitats ➤ The structure and function of the habitats of qualifying species 	<p>Inappropriate scrub control:</p> <p>Historically sections of the fen have been allowed to scrub over. These now form wet woodland and scrub with glades containing the remnants of the qualifying features.</p> <p>The aim is to ensure the site includes the same area of <i>Cladium</i> fen (H7210 Calcium-rich fen dominated by great fen sedge (saw sedge)) present at the time of designation.</p> <p>Inappropriate water levels</p> <p>Concerns have been expressed about water levels in the SAC. Some areas such as Redgrave and Lopham Fens have already been worked on. Others (Blo' Norton and Thelnetham Fens) are currently being investigated through the Water Level Management Plan process. Historical evidence suggests that water levels have significantly dropped over time and as a result habitats and features have been damaged. Parts of the fen supported swing moor habitats, and these are a poor representation of their former selves.</p> <p>Air Pollution- impact of atmospheric nitrogen deposition:</p>



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		fen sedge (saw sedge) Qualifying species: <ul style="list-style-type: none"> S1016. <i>Vertigo moulinsiana</i>; Desmoulin's whorl snail 	<ul style="list-style-type: none"> The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely The populations of qualifying species, and, The distribution of qualifying species within the site. 	Nitrogen deposition exceeds site relevant critical loads. Water pollution Poor water quality arising from agricultural run-off particularly from nearby outdoor poultry and pig units causes nutrient enrichment and can lead to a reduction in biodiversity.
Redgrave & South Lopham Fens The site is an extensive example of lowland base-rich valley, remarkable for its lack of fragmentation. The diversity of the site is due to the lateral and longitudinal zonation of the vegetation types characteristic of valley mires, such as dry birch woodland, scrub and carr, floristically rich fen grassland, mixed fen, wet heath and areas of reed and saw sedge. The site supports many rare and scarce invertebrates, including a population of the fen raft spider <i>Dolomedes plantarius</i>				
Redgrave & South Lopham Fens Ramsar	127.09 ha	Ramsar criterion 1 The site is an extensive example of spring-fed lowland base-rich valley, remarkable for its lack of fragmentation. Ramsar criterion 2 The site supports many rare and scarce invertebrates, including a population of the fen raft spider <i>Dolomedes plantarius</i> .	N/A	N/A



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		Ramsar criterion 3 The site supports many rare and scarce invertebrates, including a population of the fen raft spider <i>Dolomedes plantarius</i> . The diversity of the site is due to the lateral and longitudinal zonation of the vegetation types characteristic of valley mires		



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March 2020



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