



# Debenham Neighbourhood Plan 2016 - 2036 Pre-Submission Draft

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

### **Screening Report – January 2018**



Essex County Council

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# 1. Introduction

## 1.1 The Purpose of This Report

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

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

## 1.2 The Debenham Neighbourhood Plan 2016-2036 Draft Pre-Submission Document

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

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

*'Debenham will strive to celebrate its proud heritage, develop a vibrant economy, and support a thriving community. Our community will endeavour to ensure that it remains at ease with itself.'*

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

OBJECTIVE 1	To provide new and appropriate housing that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Joint Local Plan.
OBJECTIVE 2	To ease and improve the traffic flow and parking around, and in the village.
OBJECTIVE 3	To support initiatives which enhance the diversity of the local economy.
OBJECTIVE 4	To protect and enhance the unique and special character of Debenham for residents and visitors.
OBJECTIVE 5	To ensure that with any new housing growth, appropriate infrastructure is provided in a timely manner.

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

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

The Core Strategy categorised Debenham as a 'Key Service Centre'. It establishes that towns should be the main focus for development in the District, and that Key Service Centres are the main focus for development outside of the towns. Policy CS1 Settlement Hierarchy of the Core Strategy states that,

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

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

## 1.4 The Emerging Mid Suffolk Local Plan

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

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

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

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

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

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

Regarding Neighbourhood Plans, the emerging Local Plan states that,

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



*conflicts between policies in the neighbourhood plan and the emerging Local Plan.*

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

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

## 2. Legislative Background

### 2.1 Strategic Environmental Assessment (SEA)

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

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

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

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

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

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

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

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

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

## 2.2 Habitats Regulations Assessment (HRA)

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

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

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

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

## 3. SEA Screening

### 3.1 When is SEA Required?

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

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

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

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

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

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

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

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

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

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

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

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

## 3.2 Criteria for Assessing the Effects of the Neighbourhood Plan

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

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

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

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

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

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

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

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

**Table 2: Assessment of Likely Significant Effects on the Environment**

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>The Plan sets out relevant policies which will be used to determine proposals for development within the Neighbourhood Area once adopted. Policy DEB1 of the Plan provides policy criteria for appropriate housing developments within the Parish. Policies DEB2, DEB3 and DEB4 outline housing allocations within the Plan area, including housing quantum potential for each allocation and further policy criteria specific to these sites. The combined quantum of these allocations is between 112 and 262 dwellings.</p> <p>Paragraph 4.17 of the Draft Pre-Submission Plan states that, <i>'following advice from MSDC, in July 2017, the Parish Council resolved to undertake its own assessment of all seven sites identified in MSDC's call for sites exercise. Financial assistance was sought from Locality, and AECOM was commissioned to undertake the site assessments.'</i></p> <p>The call-for-sites exercise of the District Council's emerging Local Plan, has led to the assessment of these sites within the District's SHELAA (August 2017). Nevertheless, the Local Plan has not yet formally included these assessments within an emerging Sustainability Appraisal, encompassing the requirement for Strategic Environmental Assessment. As the Neighbourhood Plan seeks to allocate these sites in advance of the emerging local Plan process of the District Council, any subsequent significant effects on the environment from development of these sites have not yet been formally identified in a manner which is consistent with the requirement in the SEA Directive. In addition, the assessment work undertaken to date does not meet the full requirements of Strategic Environmental Assessment as set out in the SEA Directive.</p> <p>As such, the allocation of these sites within the Plan ensures that significant effects on the environment can not be ruled out, particularly where the ranges of potential dwelling capacities can be considered broad.</p> <p>It should be noted however that alternative sites were also subject to assessment as part of the work undertaken by AECOM. This goes some way to forming a significant part of the Strategic Environmental Assessment that would be required.</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The degree to which the plan or programme influences other plans or programmes including those in a hierarchy.</p>	<p>The Neighbourhood Plan provides policies for the plan area, relevant to a local level only. The Plan is in general conformity to policies CS1, CS5 and CS9 of the Mid Suffolk adopted Core Strategy.</p> <p>Despite this, the Neighbourhood Plan allocates land for development purposes outside of the established Debenham Settlement Boundary identified within the adopted Mid Suffolk Core Strategy, albeit on land that is adjacent to the Settlement Boundary. This land, as defined in the adopted Mid Suffolk Core Strategy, is within the 'countryside' as it is outside of the settlement boundary.</p> <p>To this extent, the Neighbourhood Plan does influence the emerging Babergh and Mid Suffolk Local Plan, which is currently at the Regulation 18 stage, in so far as it deviates from the approach of Policy CS2 in the adopted Mid Suffolk Core Strategy, which outlines that within the 'countryside' development will be restricted to defined categories that the Neighbourhood Plan can not reasonably be seen to fall within.</p> <p>The emerging Babergh and Mid-Suffolk Local Plan recognises however that many of the settlements (within Babergh Mid Suffolk) have already expanded beyond defined settlement boundaries and that these have been / are being reviewed through the plan-making process. Further, the Councils have taken the approach that Core Villages will have new growth identified and allocated in the new Local Plan through the allocation of new housing sites. The allocation of land for housing purposes within the Neighbourhood Plan can be seen as contributing to that process.</p>
<p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>Neighbourhood Plans are required to contribute to the achievement of sustainable development. The Neighbourhood Plan policies seek to ensure environmental considerations are taken into account. The Neighbourhood Plan is compatible and does not conflict with adopted Mid Suffolk Core Strategy policies CS5 and CS9 which have been subject to a thorough process of plan preparation and accompanying Sustainability Appraisal.</p> <p>The following policies exist within the Plan:</p> <ul style="list-style-type: none"> <li>• Policy DEB6 - Sustainability</li> <li>• Policy DEB16 - Landscaping</li> <li>• Policy DEB17 - Green Spaces</li> <li>• Policy DEB18 – Public Open Spaces</li> <li>• Policy DEB20 – Public Realm</li> <li>• Policy DEB21 –Conservation</li> <li>• Policy DEB23 – Nature Conservation</li> </ul> <p>The policies contained within the Plan in isolation are considered to be sufficient to ensure that effects on the environment are minimised.</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)		Likelihood and summary of significant effects
Environmental problems relevant to the plan.		<p>The Neighbourhood Plan reflects a small area and the Plan's policy content seeks to address any perceived environmental issues.</p> <p>The policy content of the adopted Core Strategy will additionally apply to any proposals within the Neighbourhood Plan area. These policies have been subject to Sustainability Appraisal And Habitats Regulations Assessment Screening within the context of the Core Strategy. The potential environmental problems relevant to the Neighbourhood Plan area include:</p> <ul style="list-style-type: none"> <li>• A number of areas on the Priority Habitat Inventory exist throughout the Plan area, including deciduous woodland and floodplain grazing marsh.</li> <li>• The central high-street of the village and a considerable area of land around it are designated as a Conservation Area. This includes the Grade I Listed Church of St Mary's.</li> <li>• Inclusive of the Conservation Area, there are approximately 80-90 listed buildings in the Plan area as well as non- listed buildings and features of local importance.</li> <li>• Running west-east, lies the River Deben. Throughout the plan area there is land designated within Flood Zones 2 and 3.</li> <li>• The Neighbourhood Plan Area is within a Groundwater Source Protection Zone – Total Catchment (Zone 3).</li> </ul>
The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).		The content of the Neighbourhood Plan is not in conflict with those relevant planning documents within the wider district and county area related to waste management or water protection.
The probability, duration, frequency and reversibility of the effects on the following factors:		The following impacts have been identified within this Screening Assessment:
Sustainability Theme	- Biodiversity	<p>In broad compliance with the Plan's policies, any development that is acceptable in principle would not significantly impact on the nature in the Plan area. Policy DEB23 – Nature Conservation protects important natural features throughout the Plan area, including; mature trees, species rich hedgerows, ponds and existing areas of woodland. This policy also aims to improve the connectivity of existing wildlife sites and green spaces. The Plan area is within two SSSI Impact Risk Zones; however no impacts are predicted relevant to the content of the Plan. As a result, there can not be considered to be likely significant effects that would warrant the application of the SEA Directive and the undertaking of a SEA Environmental Report.</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
- Population	<p>The Neighbourhood Plan identifies and allocates 3 sites which are considered suitable for residential development. The combined quantum of these allocations, as allocated within Policies DEB2, DEB3 and DEB4 is between 112 and 262 dwellings. The maximum yield of these sites as identified by Mid Suffolk District Council in their SHELAA is 424 dwellings.</p>
- Human health	<p>The Plan does not allocate any land for development purposes that could have any implications regarding human health. The Plan seeks to designate and safeguard all green spaces within Debenham in Policy DEB17 – Green Spaces in order to ensure that this space is preserved for the purposes of health and well-being.</p> <p>Proposals for developments on Local Green Spaces will be repelled except in very special circumstances. Policy DEB18 – Public open Spaces, states that any development larger than 5 or more dwellings must provide or contribute to open space suitable for informal recreation.</p> <p>The combination of these policies suggests that no significant effects will occur upon Human health in the Neighbourhood Plan area.</p> <p>Any potential impacts regarding contamination of any future proposals are best addressed at the ‘project level’, through the development management process and in adherence to relevant policies at the LPA level.</p>
- Fauna	<p>The impacts of the Neighbourhood Plan on fauna are not considered significant. It is possible that developments that could be forthcoming within the Plan area could have negative impacts on protected species; however these cannot be identified as strategically significant to warrant Strategic Environmental Assessment at the Plan level. Such issues are more appropriate to be considered on a case-by-case application basis at the development management stage in consideration of Policies DEB1, DEB16 and DEB23 of the Neighbourhood Plan and relevant policies contained within Debenham’s adopted Core Strategy.</p>
- Flora	<p>An area of Priority Habitat Deciduous Woodland exists adjacent to proposed Housing Development within policies DEB2 and DEB3. The area of Woodland is categorised as Broadleaved, and is not likely to be lost as a result of development (either the Plan’s housing allocations or as a result of any policy approaches). The Neighbourhood Plan also contains policies DEB16, DEB17 and DEB18 which ensure the protection of the assets and that significant effects do not occur. There will be no likely effects on Flora.</p>
- Soil	<p>The entirety of the Neighbourhood Plan area is within Grade 3 Agricultural Land (‘good to moderate’). This does not represent the</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>best and most versatile agricultural land within the wider District. Agricultural land is to be built upon through Policies DEB 2, DEB3 and DEB4; there will be a total loss of 7.5 HA of agricultural land, if all proposed housing developments are to be undertaken. The Plans policies for residential development will be located on the periphery of the existing settlement boundary.</p>
- Water	<p>The Neighbourhood Plan Area is within a Groundwater (Source) Protection Zone – Total Catchment (Zone 3). Source Protection Zones (SPZs) respond to sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The Neighbourhood Plan allocates land for residential development purposes within policies DEB2, DEB3 and DEB4. Residential land uses are not considered to give rise to ground water pollutants (e.g. give rise to hazardous substances such as pesticides, oils, petrol and diesel, solvents, arsenic, mercury or chromium VI; or non-hazardous substances such as ammonia or nitrates).</p> <p>Despite this, the HRA element of this Screening Report identifies that there are impact pathways for changes in water quality in the tributaries and upper reaches of the River Deben. The Plan's allocated sites for development would therefore require mitigation measures to be embedded in developments to avoid significant impacts. The HRA concludes that safeguards would therefore need to include a commitment to ensure that development does not result in changes in water quality. In the absence of these safeguards within the currently drafted policy, likely significant effects can not be ruled out at this stage.</p>
- Air	<p>No AQMAs or other identified air quality issues exist within or in close proximity to the Neighbourhood Plan area. The Plan does allocate land for development purposes, but at an insignificant scale. As such, no significant effects on air quality have been deemed likely.</p>
- Climatic factors	<p>The majority of the Neighbourhood Plan area is within Flood Zone 1; however three tributaries of the River Deben converge in the eastern part of the built up area, running west-east through the village. The presence of the tributaries ensures that a significant amount of land is within Flood Zones 3 and 2 associated with these water courses. The Plan's allocations are not within any land identified within Flood Risk Zones 2 or 3, but all are adjacent to such land. Nevertheless, no significant effects have been identified.</p>
- Material assets	<p>The content of the Neighbourhood Plan is not considered to have any significant impacts on material assets due to the extent / size of the Neighbourhood Plan Area. Such issues are more appropriate to be considered on a case-by-case basis at the development management stage and in accordance with relevant development</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>- Cultural heritage</p>	<p>management policies contained within Mid Suffolk's adopted Core Strategy.</p> <p>Approximately 80-90 Listed Buildings exist within the Neighbourhood Plan area, the majority of these are within the Conservation Area, which forms a significant part of the settlement boundary. Additionally, the Grade I Listed Church of St Mary is included within the Settlement Boundary and it should be noted that Grade I Listed buildings represent only 2.5% of all Listed Buildings nationwide. The Plan allocates 3 sites for development in policies DEB2, DEB3 and DEB4. Although no allocation contained within these policies is within the immediate curtilage of a Listed Building, there is some potential for harm to a number of isolated Listed Buildings, particularly site SS0902 which is in relatively close proximity to the Grade II listed Cherry Tree Farmhouse. It should be noted however that Policy DEB21 – Conservation exists to ensure that the significance of heritage assets is preserved and where possible enhanced through proposals. Detail on any individual impacts of schemes would be a development management matter, on a case-by-case basis, and not strategic in scope to warrant the application of SEA at the plan-level. There is considered to be no likely significant effect on cultural heritage / the historic environment that would specifically warrant the application of the SEA Directive and a commitment to undertake a SEA.</p>
<p>- Landscape</p> <p>The cumulative nature of the effects.</p>	<p>The Neighbourhood Plan area is within Natural England's South Norfolk and High Suffolk Claylands (NCA) profile. The overall character is of a gently undulating, chalky glacial till plateau, frequently open views confined by occasional hedges and trees, with some woodland present. The Suffolk Landscape Character Assessment indicates that Debenham falls within the landscape character type of Rolling Valley Claylands (Gentle valley sides with occasional steep slopes. Clay soils which are frequently workable for cultivation). This assessment states that for this landscape typology <i>'due to the rolling landscape, development in this area is considered to have a significant visual impact. All developments must take into consideration the cultural and historic importance of this area and the potential visual impact on Conservation Areas.'</i> Policy DEB16 ensures that dwellings on the edge of the development area provide suitable landscaping options to assimilate into the character area. To this extent, the Plan ensures that potential landscape implications of proposals are suitably considered and significant effects minimised.</p> <p>The Plan allocates land for development purposes which has not been subject to any cumulative assessment of impacts through any formal or legally required purpose. Environmental protection policies exist within the Plan for the purpose of ensuring that individual schemes are unlikely to result in inappropriate development, however</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
The trans boundary nature of the effects.	<p>it cumulative significant effects on the environment can not be ruled out at this stage.</p> <p>The findings of the HRA Screening within this Report indicate that there could be trans boundary effects related to water quality associated with the Deben Estuary Sandlings SPA and Deben Estuary Ramsar.</p>
The risks to human health or the environment (e.g. due to accidents).	<p>There is limited risk to human health or the environment as a result of the Neighbourhood Plan. This is in consideration of the above screening requirements related to sustainability themes. The Neighbourhood Plan is primarily focused on housing, whilst retaining the character of Debenham. This land use is unlikely to give rise to any accidents that can be considered to have a significant risk to human health or the environment.</p>
The magnitude spatial extent of the effects (geographical area and size of the population likely to be affected).	<p>The spatial extent of development resulting from the Neighbourhood Plan is identified within policies DEB2, DEB3 and DEB4 as within a broad range of between 112 and 262 dwellings. Further, effects identified within HRA Screening indicate that the spatial extent of water quality effects could be experienced over a wide geographic area. The magnitude and spatial extent of effects would be best explored through application of the SEA Directive.</p>
<p>The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> <li>- special natural characteristics or cultural heritage</li> <li>- exceeded environmental quality standards</li> <li>- intensive land use</li> </ul>	<p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has been assessed as potentially having significant effects on environmental quality standards as a result of intensive land use that would warrant further assessment through SEA.</p>
The effects on areas or landscapes which have a recognised national, community or international protection status.	<p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has been assessed as not having any significant effects on areas or landscapes which have a recognised national, community or international protection status.</p>

## 4. HRA Screening

### 4.1 Habitat Regulations Assessment of Development Plans

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

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

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

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

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

This section of this Report aims to:

- Identify the European sites within 20km of Debenham.
- Summarise the reasons for designation and Conservation Objectives for each site to be considered in this assessment.
- Screen the Debenham draft Neighbourhood Plan for its potential to impact upon a European site (Natura 2000).
- Assess the potential for in combination effects from other projects and plans in the area.
- Identify if there are any outstanding issues that need further investigation.

## 4.2 Natura 2000 Sites

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

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

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

### 4.2.1 Explanation of SPAs, SACs and Ramsar Sites

#### **Special Protection Areas (SPAs)**

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

#### **Special Areas of Conservation (SACs)**

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

#### **Wetlands of International Importance (Ramsar Sites)**

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

## 4.2.2 European Sites to be considered

There are three European sites which lie within 20 km of Debenham parish. No European Sites lie within 13km of Debenham. This is the distance recently confirmed by Natural England as the zone of influence to identify potential recreational impacts on coastal statutory sites in Suffolk.

**Table 3: European Sites within 20km of the development**

SPA	SAC	Ramsar
Deben Estuary Sandlings	None	Deben Estuary

After consideration, it was concluded that the parish lies outside the 13km Zone of Influence for the Sandlings SSSI and any likely recreational disturbance impacts on the Sandlings SPA. However there is an impact pathway for the Deben Estuary SPA and the Deben Estuary Ramsar site as tributaries and upper reaches of the River Deben flow through the parish of Debenham so these N2K sites should therefore be assessed for 'likely significant effects' from this draft Neighbourhood Plan. The locations and boundaries of the above sites are shown on the map in Appendix 2.

There are therefore two European sites to be considered to be within scope for this assessment – Deben Estuary SPA and Deben Estuary Ramsar site.

## 4.3 Method and Approach

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

The three stages and their outcomes are described in more detail in the following table. This document relates only to Stage 1 of the HRA process.

**Table 4: Stages of the Habitats Regulations Assessment process**

Stage	Tasks	Outcome
Stage 1 HRA Screening	<ul style="list-style-type: none"> <li>• Description of the policies or projects</li> <li>• Identification of potential effects on a European site</li> <li>• Assessing the effects on a European site either alone or in</li> </ul>	<p>Where effects are unlikely, prepare a 'finding of no significant effect' report.</p> <p>Where effects judged likely, or lack of information to prove otherwise, go to Stage 2.</p>

Stage	Tasks	Outcome
	combination with other plans or projects	
Stage 2 Assessment of alternative solutions	<ul style="list-style-type: none"> <li>• If impacts considered to affect qualifying features, identify alternative options that avoid adverse impacts on the integrity of a European site.</li> <li>• If no alternatives available, define and evaluate mitigation measures</li> </ul>	If effects remain after alternative solutions been considered, consider whether the policies (and projects) should proceed with compensatory measures or the policies (and projects) be removed from the plan (Stage 3)
Stage 3 Compensatory measures	<ul style="list-style-type: none"> <li>• In the unlikely event that it is not possible to adapt policies (and projects) sufficiently or remove them to avoid any adverse impact on the integrity of a European site, then it would be necessary to establish whether there are any imperative reasons of overriding public interest that mean the policies (and projects) should progress.</li> <li>• Notify the Secretary of State who will consider this and what compensatory measures will be required for the adverse impacts on site integrity</li> </ul>	Plan approved.

#### 4.3.1 Stage 1: HRA Screening

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

**Table 5: Screening categorisation**

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

#### 4.3.2 Stage 2: Assessment of alternative solutions

This part of the assessment process examines alternative ways of achieving the objectives of the policy or project that avoid adverse impacts on the integrity of the European site.

#### 4.3.3 Stage 3: Compensatory Measures

In the unlikely event that it is not possible to adapt policies (and projects) sufficiently to avoid any adverse impact on the integrity of a European Site, then it would be necessary to establish whether there are any imperative reasons of overriding public interest that mean the policies (and projects) should progress. The next stage is to notify the Secretary of State who will consider this and what compensatory measures will be required for the adverse impacts.

#### 4.3.4 Potential impacts of Debenham Neighbourhood Plan on Natura 2000 sites

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

- Land take by developments;
- Impact on protected species found within but which travel outside the protected sites may be relevant where development could result in effects on qualifying interest species within the European site, for example through the loss of feeding grounds for an identified species.
- Increased disturbance, for example from recreational use resulting from new housing development and / or improved access due to transport infrastructure projects;
- Changes in water availability, or water quality as a result of development and increased demands for water treatment, and changes in groundwater regimes due to increased impermeable areas;
- Changes in atmospheric pollution levels due to increased traffic, waste management

facilities etc. Pollution discharges from developments such as industrial developments, quarries and waste management facilities.

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

**Table 6: Assessment of potential impacts**

Nature of potential impact	How the Debenham Neighbourhood Plan (alone or in combination with other plans and project) could affect a Natura 2000 site?	Why these effects are not considered significant?
Land take by development	Debenham is outside the boundaries of the Deben Estuary SPA and Deben Estuary Ramsar site within 13km	N/A
Impact on protected species outside the protected sites	Debenham is outside the Zone of Influence of the Deben Estuary SPA and Deben Estuary Ramsar site within 13km	N/A
Recreational pressure and disturbance	Debenham is outside the Zone of Influence of the Deben Estuary SPA and Deben Estuary Ramsar site within 13km	N/A
Water quantity and quality	There is an impact pathway for development at Debenham to impact on the Deben Estuary SPA and Deben Estuary Ramsar site	Requires project level HRA for development
Changes in pollution levels	There is an impact pathway for development at Debenham to impact on the Deben Estuary SPA and Deben Estuary Ramsar site	Requires project level HRA for development

## 4.4 Results from HRA Screening of Draft Neighbourhood Plan Policies

Each of the policies in the Debenham draft Neighbourhood Plan were screened to identify whether they would have any impact on a European Site.

This assessment can be found in the following table.

**Table 7: Assessment of potential impacts**

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
Policy DEB 1 - Appropriate Housing	<p>a) All new housing development should take account of, and respect, the special landscape and built character of the village.</p> <p>b) The scale and nature of all schemes must ensure an appropriate level of services, facilities, and infrastructure are available or provided to serve the proposed development.</p> <p>c) The community at the moment strongly prefers smaller development schemes up to 15 units. Larger schemes must demonstrate that they will generate wider community benefits to the village over and above that are required in b) above.</p> <p>d) All development proposals for sites adjoining the settlement boundary must avoid hard edges with the existing boundaries, and with the countryside by creating landscape buffers.</p> <p>e) Such developments must incorporate good pedestrian and cycle routes from within the development, and off site of the development. In particular, developers must ensure adequate links exist or can be provided into the village centre and local schools.</p> <p>f) Within the built up area, the replacement of existing dwellings and sub division of existing residential plots and gardens to create new dwellings will be permitted if the proposal:</p> <ul style="list-style-type: none"> <li>• incorporates good quality design which maintains or enhances the character, appearance and setting of existing buildings and street scene;</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<ul style="list-style-type: none"> <li>• does not have an unacceptable impact on the amenities of neighbouring occupiers, or impact significantly on the landscape setting or the conservation area.</li> </ul> <p>g) New dwellings must be no more than 2 storeys, with accommodation only permitted in roof space when it is in keeping with the surrounding properties and area.</p>		
Policy DEB2 – Allocation of site north of Ipswich Road for development	<p>a) 4 HA of agricultural land north of Ipswich Rd is allocated for development. The site is shown as site SS0031 on the plan in paragraph 4.6. It has the potential to deliver 60-140 new homes. The actual number of homes to be built must be subject to a detailed site assessment based on the policies in this Plan, and in the MSDC emerging Local Plan. Development of the site must provide vehicular, cycle and pedestrian access through the site to its boundary with the site south of Low Road which is the subject of DEB 3 Policy 3.</p> <p><u>Principal Reason for policy:</u></p> <p>To meet the aims set out above.</p> <p><u>Evidence Supporting Policies:</u></p> <p>Independent experts, AECOM, assessed all of the Debenham sites that came forward under Mid Suffolk's call for sites exercise, and concluded this was the site most suitable for development. Development of the site avoids traffic bottle-necks e.g. Gracechurch St leading to High St. It could perform well in terms of landscape and visual impact; and surface and foul water would discharge downstream of the river. Hence of all the sites, this site would have the lowest probability of adding to the risk of flooding in the village.</p>	Category B	<p><b>Recommendations – Requires project level HRA</b></p> <p><u>“Any residential development subsequently coming forward will need to be subject to a project level HRA and secure sufficient mitigation measures, to avoid a Likely Significant Effect”</u></p>
Policy DEB 3 –	<p>a) 1 HA of agricultural land south of Low Road is allocated for development. The site is shown as site SS0902 on the plan in paragraph 4.6. It has the potential to deliver 15-35 new homes. The actual number of homes to be built must be subject to a detailed site assessment based on the policies in this Plan and in the Mid Suffolk emerging Joint</p>	Category B	<p><b>Recommendations – Requires project level HRA</b></p> <p><u>“Any residential development subsequently coming forward will need to be subject to</u></p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>Local Plan. Development of the site must be subject to no vehicular access onto Low Road, with vehicular access provided onto Ipswich Road, via the development of the site specified in DEB Policy 2. Development of the site must link pedestrian and cycle access from the site specified in Deb Policy 2 through to pedestrian and cycle access onto Low Road.</p> <p><u>Principal Reasons for Policies:</u></p> <p>To meet the aims set out above.</p> <p><u>Evidence Supporting Policies:</u></p> <p>Independent experts, AECOM, assessed this site as suitable for development with medium constraints. The site is well connected and development would be acceptable in terms of landscape and visual impact. Development should be on the basis of vehicular access onto Ipswich Road with no vehicular access onto Low Road, thus avoiding traffic bottlenecks in the village.</p>		<p><u>a project level HRA and secure sufficient mitigation measures, to avoid a Likely Significant Effect”</u></p>
Policy DEB 4 – Allocation of site east of Aspoll Road opposite Primary School	<p>a) 2.5 HA of agricultural land east of Aspoll Road is allocated for development subject to the successful development of the sites allocated in policies DEB 2 &amp; 3, the actual scale of those developments and the scale of windfall sites that come forward. If developed this site has the potential to deliver 37-87 new homes. The actual number of homes to be built must be subject to a detailed site assessment based on the policies of this NP and MSDC emerging Local Plan.</p> <p><u>Principal Reason for Policies:</u></p> <p>To meet the aims set out above.</p> <p><u>Evidence Supporting Policies:</u></p> <p>Policies 2 &amp; 3 have the potential to deliver 75-175 homes. The addition of this site increases the range to 102-262 and so provides flexibility for accommodating any changing housing requirements during the Plan period 2016-2036. The reasoning is that development of this site should only come forward if there is residual housing need following the development of the sites</p>	Category B	<p><b>Recommendations – Requires project level HRA</b></p> <p><u>“Any residential development subsequently coming forward will need to be subject to a project level HRA and secure sufficient mitigation measures, to avoid a Likely Significant Effect”</u></p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	allocated in policies DEB 2 & 3. The assessment of housing need to take into account the actual numbers of homes provided by sites specified in DEB 2 & 3, the number of homes provided or allocated on windfall sites. In addition the assessment to take into account that Debenham is a relatively isolated rural village with high levels of out commuting for work and is distant from the employment growth areas allocated in Mid Suffolk emerging Local Plan. Hence any further development will add to the already high levels of out commuting.		
Policy DEB 5 – Consultation with Parish Council	<p>Landowners and/or Applicants for major developments (over 15 dwellings) are required to actively engage with the Parish Council and the community, and to produce a development brief as part of the design process prior to the submission of any application The development brief must consist of:</p> <p>a) a master-plan and statement of design principles which demonstrate that the development respects the characteristic height, scale, and bulk of existing dwellings, and enhances the special rural nature of the village and conforms to the policies in this Neighbourhood Plan;</p> <p>b) a traffic appraisal that demonstrates how the proposed development would accommodate vehicles, cyclists and pedestrians safely and efficiently, in order that surrounding highways, cycle-ways and footpaths can be accessed and used safely; and</p> <p>c) an accommodation appraisal that demonstrates how the proposals responds to the community's needs with respect to provision of housing for the elderly, first time buyers, and those needing affordable housing.</p>	No, Category A	No specific recommendations
Policy DEB 6 – Sustainability	a) All proposals for new development, including the re-use or conversion of existing buildings should, where viable, follow the broad principles of a sustainable level of design and construction and optimise energy efficiency through the use of design, layout,	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>orientation, materials, insulation and construction techniques;</p> <p>b) The use of appropriate materials, and construction designs, that reflect the locally used features and developments should be accommodated where possible. (Examples of this can be seen in the built character assessment photos in this plan).</p>		
Policy DEB 7 – Housing Mix	a) Housing development must contribute to the existing and future needs of the village. A mix in size and type of housing will be required taking into account the needs of young people looking for 2 – 3 bedroom properties as well as the needs of an ageing population looking to downsize into smaller homes that match their needs.	No, Category A	No specific recommendations
Policy DEB8 – Residential Car Parking	<p>a) Development proposals that generate an increased need for parking must provide adequate and suitable off-street parking in order to minimise obstruction of the local road network in the interests of the safety of all road users, including pedestrians and cyclists. For residential development, a minimum of two parking spaces will be required for units with 1 - 3 bedrooms, and a minimum of three parking spaces will be required for units with 4 or more bedrooms; unless it can be satisfactorily demonstrated that an alternative provision would be appropriate on a specific site. Parking spaces can take the form of garaging and carport facilities, but must be available for parking use.</p> <p>b) Proposals that would reduce the existing level of off-street parking provision will be resisted unless it can be satisfactorily demonstrated that the amount of overall provision is adequate.</p> <p>c) New developments should resist 'front garden space' being used to accommodate car parking spaces. Car parking spaces should be in addition to space for front gardens.</p>	No, Category A	No specific recommendations
Policy DEB9 – Debenham	a) A minimum of 10% of housing on sites of 9 dwellings or more must meet the current	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
Area of Special Landscape Quality	<p>Lifetime Homes standards, (or the future equivalent). On sites of less than 9 new dwellings, at least one home must meet these standards.</p> <p><u>Principal reasons for policies:</u></p> <p>Ensuring appropriate integration with existing stock; current local housing need is met; sustainability; and new development doesn't add to existing car parking problems.</p> <p><u>Evidence supporting policies:</u></p> <p>Existing special and unique character of Debenham, see MSDC CAA 2009. Housing need as defined by housing needs survey.</p> <p>Existing on street car parking and traffic flow problems. Sustainability of new build.</p>		
Policy DEB10 – Traffic flows and non residential car parking	<p>a) Development should identify the realistic level of traffic it is likely to generate. It must assess the potential impact of this traffic on pedestrians, cyclists, road safety, parking and congestion within the parish and include measures to mitigate any impacts. Development that would give rise to unacceptable highway dangers will not be permitted.</p> <p>b) When proposals for development are considered opportunities to provide public car parking near the primary school, high school, and leisure centre will be taken, and the delivery will be secured through the planning process.</p>	No, Category A	No specific recommendations
Policy DEB11 – Non motorised networks	<p>a) Existing footpaths and bridleways provide a high level of amenity value and will be protected. New developments should take every opportunity to enhance existing networks and provide new networks where appropriate.</p> <p><u>Principal reasons for policies:</u></p> <p>Ensuring new housing stock provides opportunities to reduce existing traffic problems; and encouraging alternative use of cars, and developing healthier life style choices.</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<u>Evidence supporting policies:</u> 'Pinch point' traffic problems, and traffic flows. Lack of adequate existing car parking provision. Existing non motorised networks.		
Policy DEB12 – Supporting Financial Sustainability	<p>a) Development proposals for tourism and tourism related activities and facilities will be supported provided that:</p> <ol style="list-style-type: none"> <li>1. the siting, scale and design of any new buildings or conversions of existing buildings and associated works has regard to the local character and the historic and natural assets of the surrounding area;</li> <li>2. the design and materials are in keeping with the local style and reinforce local distinctiveness and a strong sense of place; and</li> <li>3. there will be no significant adverse impact from any traffic generated by the proposed development.</li> </ol> <p><u>Principal reason for policy:</u>            To support the development of a sustainable local economy; and develop tourism initiatives.</p> <p><u>Evidence supporting policy:</u>            Business requirement for increased local spending. Need for local employment opportunities.            Successful track record of village events.            Closure of 3 of the 5 public houses, and antique shops in the last 10 years. Closure of high profile local businesses in village.</p>	No, Category A	No specific recommendations
Policy DEB13 – Employment	<p>a) Any non-employment use proposed on sites and premises used and/or design indicated on the Proposals Map for employment purposes, and that is expected to have an adverse effect on employment generation, will only be permitted where the local planning authority is satisfied that the proposal can demonstrate that it complies with other policies in this and other adopted local plans, and one or more of the following criteria has been met (as appropriate to the site/premises and location):</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>b) there is sufficient supply of alternative and suitable employment land available to meet local employment job growth requirements;</p> <p>c) evidence can be provided that genuine attempts have been made to sell/let the site in its current use, and that no suitable and viable alternative employment uses can be found or are likely to be found in the foreseeable future;</p> <p>d) the existing use has created over-riding environmental problems (eg noise, odours or traffic) and permitting an alternative use would be a substantial environmental benefit that would outweigh the loss of an employment site;</p> <p>e) an alternative use or mix of uses would assist in the urban regeneration and offer greater benefits to the community in meeting local business and employment needs;</p> <p>f) it is for an employment related support facility such as employment training/education, workplace crèche or industrial café;</p> <p>g) an alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment site.</p> <p><u>Principal reason for policy:</u></p> <p>To support economic growth and job opportunities.</p> <p><u>Evidence supporting policy:</u></p> <p>Need to protect existing local employment uses. Support for existing businesses.</p> <p>Provision of job opportunities and choice.</p> <p>Provision of local services.</p> <p>Avoidance of stagnation of redundant, disused or bad neighbour uses.</p>		
Policy DEB14 – Broadband	<p>Debenham's location as a relatively isolated rural village means, that in comparison to those other Core villages adjacent Ipswich or located near to the A14 growth corridor, local employment opportunities are limited. This is reflected in the high level of out commuting, for employment purposes, from the village. Due to the lack of local employment</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>opportunities this level of out commuting is likely to increase as housing numbers grow. This Plan provides an opportunity to promote the provision of efficient fast broadband which would benefit local businesses, helping to retain those businesses, and providing the means for those householders that wish to work from home.</p> <p>a) The provision of high speed broadband is seen as essential to all development proposals (dwellings and business) in the village. All new dwellings and business shall incorporate a suitable infrastructure to enable high speed broadband.</p> <p><u>Principal reason for policy:</u></p> <p>As for policy 13.</p> <p><u>Evidence supporting policy:</u></p> <p>As for policy 13.</p>		
Policy DEB15 – Debenham's Retail Core	<p>a) Change of use of ground floor shops or services to residential within the core retail area will only be considered favourably if the business has been marketed diligently at a fair market price and continuously for at least one year.</p> <p>b) Proposals within the retail core area that diversify and enhance the range of shops and services will be supported provided that proposals are of an appropriate size in keeping with the existing character of the retail core area; will not lead to severe traffic congestion; adequate parking and servicing arrangements are available; proposals will not generate unacceptable noises, fumes, odours or other disturbance to neighbouring properties.</p> <p><u>Principal reasons for policy:</u></p> <p>To provide services to local residents and visitors. To promote a viable and lively, healthy core area.</p> <p><u>Evidence supporting policy:</u></p> <p>Provision of local services and facilities to serve the local community and visitors.</p> <p>To avoid stagnation and empty shop units.</p>	No, Category A	No specific recommendations

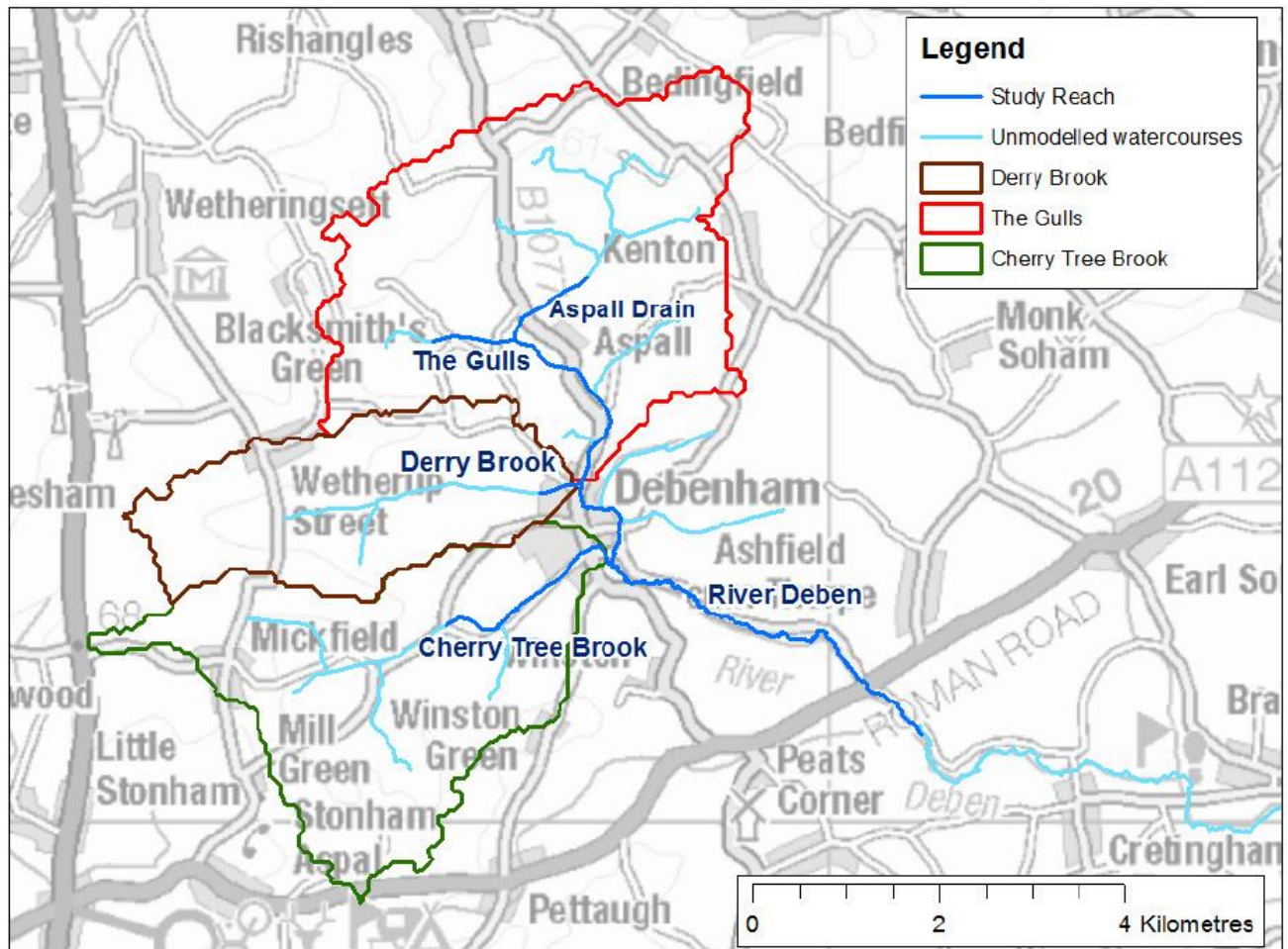
Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	Loss of shops and retail outlets in recent years.		
Policy DEB16 – Landscaping	<p>a) The design and layout of new development on or close to the edge of the village should take account of, respect, and seek to preserve the character of adjacent countryside, green spaces, and landscape setting by providing appropriate landscaping, open areas and tree planting to act to help, to assimilate the proposal into its context; and</p> <p>b) developers should provide landscaping between the boundaries of new and existing developments, together with buffer planting.</p>	No, Category A	No specific recommendations
Policy DEB17 – Green Spaces	<p>a) The Neighbourhood Plan designates the following locations as 'Local Green Spaces', as shown in the Local Green Spaces section:</p> <p>The Recreation Ground; Churchyard of St Mary's Church The Cemetery; Market Green; Cross Green; Debenham Allotments; Hoggs Kiss; Hoppit Wood and Lake; Millennium Woodland; Wells Way Play Area; Raedwald Play Area; Lower Gardeners Road Play Area; Upper Gardeners Road Play Area; Lock Close Green; and Andrews Close Green;</p> <p>b) Proposals for any development on the Local Green Spaces will be resisted other than in very special circumstances, for example, where it is essential to meet specific and necessary utility infrastructure needs and no alternative feasible site is available.</p>	No, Category A	No specific recommendations
Policy DEB18 – Public open Spaces	<p>a) Public open spaces are important to the health and well-being of the community and must continue to be available for use by all local residents. New developments of 5 or more dwellings should provide or contribute to open space suitable for informal recreation, in accordance with the 'Fields in Trust' guidelines and 'Mid Suffolk District Council's Green Infrastructure Assessment'.</p>	No, Category A	No specific recommendations
Policy DEB19 – Gardens	<p>Development proposals adjacent to other areas where the characteristic of large front gardens exists, will be expected to continue with this characteristic. Gardens (especially front gardens) are an important feature of the</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>current landscape, and overall make a significant contribution to the well-being of the inhabitants. All new residential units will be expected to have direct access to an area of private amenity space. The form of amenity space will be dependent on the form of housing and could include a private garden, balcony, glazed winter garden or ground-level patio with defensible space from any shared amenity areas. In providing appropriate amenity space, development should:</p> <p>a) consider the location and context of the development, including the character of the surrounding area;</p> <p>b) take into account the orientation of the amenity space in relation to the sun at different times of year;</p> <p>c) address issues of overlooking and enclosure, which may otherwise impact detrimentally on the proposed dwelling and any neighbouring dwellings; and</p> <p>d) design the amenity space to be of a shape, size and location to allow effective and practical use of and level access to the space by residents.</p>		
Policy DEB20 – Public Realm	<p>a) In Debenham village, all development will be expected to conserve or enhance buildings and public spaces and be of high quality design to promote a strong sense of place and an accessible and inclusive village. Particular attention should be paid to shop fronts and advertisements, quality of materials used, enhancement of spaces through trees and landscaping and street furniture.</p>	No, Category A	No specific recommendations
Policy DEB21 – Conservation	<p>To ensure the conservation and enhancement of Debenham's historic environment, proposals should:</p> <p>a) preserve or enhance the significance of the heritage assets of the village, their setting and the wider streetscape, including views into, within and out of the conservation area; b) retain buildings and spaces, the loss of which would cause harm to the character or appearance of the conservation area;</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>b) contribute to the local distinctiveness, built form and scale of heritage assets through the use of appropriate design, materials and workman- ship;</p> <p>c) be of an appropriate scale, form, height, massing, alignment and de- tailed design which respects the area's character, appearance and its setting:</p> <p>d) demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits, alongside assessment of the potential impact of the development on the heritage asset and its context; and</p> <p>e) provide clear justification for any works that would lead to harm or substantial harm to a heritage asset, yet be of wider public benefit, through detailed analysis of the asset and the proposal.</p>		
Policy DEB22 – Views	<p>a) New development should be designed to have a positive and distinctive character by designing the development to respond to site features such as views into or out of the area, trees landscapes, and existing buildings. Views highly valued by the community are shown on pages 24 and 25. Development which affects these highly valued views as shown on map 5, must ensure that key features of the view can continue to be enjoyed including distant buildings, areas of landscape and the boundaries be- tween the village edge and the countryside.</p>	No, Category A	No specific recommendations
Policy DEB23 – Nature Conservation	<p>a) New developments should retain features of high nature conservation or landscape value, including mature trees, species-rich hedgerows, ponds and existing areas of woodland. Improvement of the connectivity between wildlife areas and green spaces will be encouraged to enhance the green infrastructure of the Parish.</p> <p><u>Principal reasons for policies:</u></p> <p>Integration of new housing stock with existing green and open space, and proximity to countryside; and the promotion of personal</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
	<p>space and the subsequent opportunities for healthier lifestyles. Retention of valued landscape features including views, and wildlife habitats. The protection of important and valued open green spaces and the enhancement of the green infrastructure.</p> <p>Policy 16 emphasizes the need for boundary woodlands and landscape planting that 'contains' and screens the new development sites, especially on valley slopes.</p> <p><u>Evidence supporting policies:</u></p> <p>Existing green and open spaces, and large front gardens typifying the village scene.</p> <p>Existing landscaping provision. Landscape character assessment.</p>		
Policy DEB24 – Financial Contribution	<p>a) New developments must have regard to the operation of the Community Infrastructure Levy (CIL), in MSDC, whereby contributions will be made to infrastructure improvements and enhancements, a list of facilities seeking such contributions is included in the Community Action Section.</p> <p>b) Financial contributions paid directly to the local community as a result of the Community Infrastructure Levy, will be held by the Parish Council and used to deliver the infrastructure improvements and enhancements and other priorities set out in the Community Action section of the Neighbour- hood Plan.</p> <p><u>Principal reasons for policy:</u></p> <p>Maximise the funding opportunities from any new development, to secure the required infrastructure, and contribute to the community action priorities listed in this plan.</p> <p><u>Evidence supporting policy:</u></p> <p>Significant community needs and desires list, of facilities and services. Infrastructure requirements.</p> <p>MSDC's policy on Community Infrastructure Levy.</p>	No, Category A	No specific recommendations

Each of the site allocations identified for residential development in the Debenham Neighbourhood Plan Draft Pre-Submission Document have the potential for impacts on the Deben Estuary SPA with changes in water quality as a result of development via tributaries and upper reaches of the River Deben. (See below map, as included within the Draft Neighbourhood Plan at page 38 - Environment Agency, 2014).



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#### 4.4.3 Recommendations

There are therefore specific recommendations to deliver for the site allocation policies in this draft Neighbourhood Plan as they have all been assigned to Category B. There will therefore be a need for any development subsequently coming forward to be subject to a project level HRA and secure sufficient mitigation measures, to avoid a Likely Significant Effect on the Deben Estuary SPA or Deben Estuary Ramsar site.

**Project level HRA must ensure that only options that can demonstrate no adverse effects on the SPA/Ramsar site can be given approval. Consequently, the policy may need to be amended to include “Applications for development of the allocated sites will need to be subject to HRA screening. Any development which would result in significant adverse effects which could not be appropriately mitigated will not be permitted.”**

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

## 4.5 Other Plans and Projects – In-combination Effects

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

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

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

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

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

## References

- Atkins (2011) Habitats Regulations Assessment for Babergh District Council Core Strategy
- Habitats Regulations Assessment (Appropriate Assessment) for Mid Suffolk District Council Core Strategy(2007)
- Atkins (2010) St. Edmundsbury Borough Council Core Strategy HRA screening
- Babergh District Council (2014) Local Plan Core Strategy and Policies
- Debenham Neighbourhood Plan 2016-2036 Draft Pre-Submission Document (December 2017)
- Natural England Conservation objectives for European Sites: East of England Website
- The Landscape Partnership (2011) Suffolk Coastal District Council Habitats Regulations Assessment for Core Strategy and Development Management Policies Document

## 5. Conclusions

### 5.1 Strategic Environmental Assessment (SEA)

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The Neighbourhood Plan has been prepared for town and country planning purposes and sets a framework for future development consent. The policies of the Neighbourhood Plan can be considered to determine the use of small areas at local level commensurate with their status in determining local planning applications. However it is considered that the Plan should not have a significant effect on the environment although as it allocates land for development, any proposal subsequently coming forward will require a project level HRA. This will ensure that no environmental considerations within the Neighbourhood Plan area that are likely to be significantly harmed as a result of the Plan are approved.

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

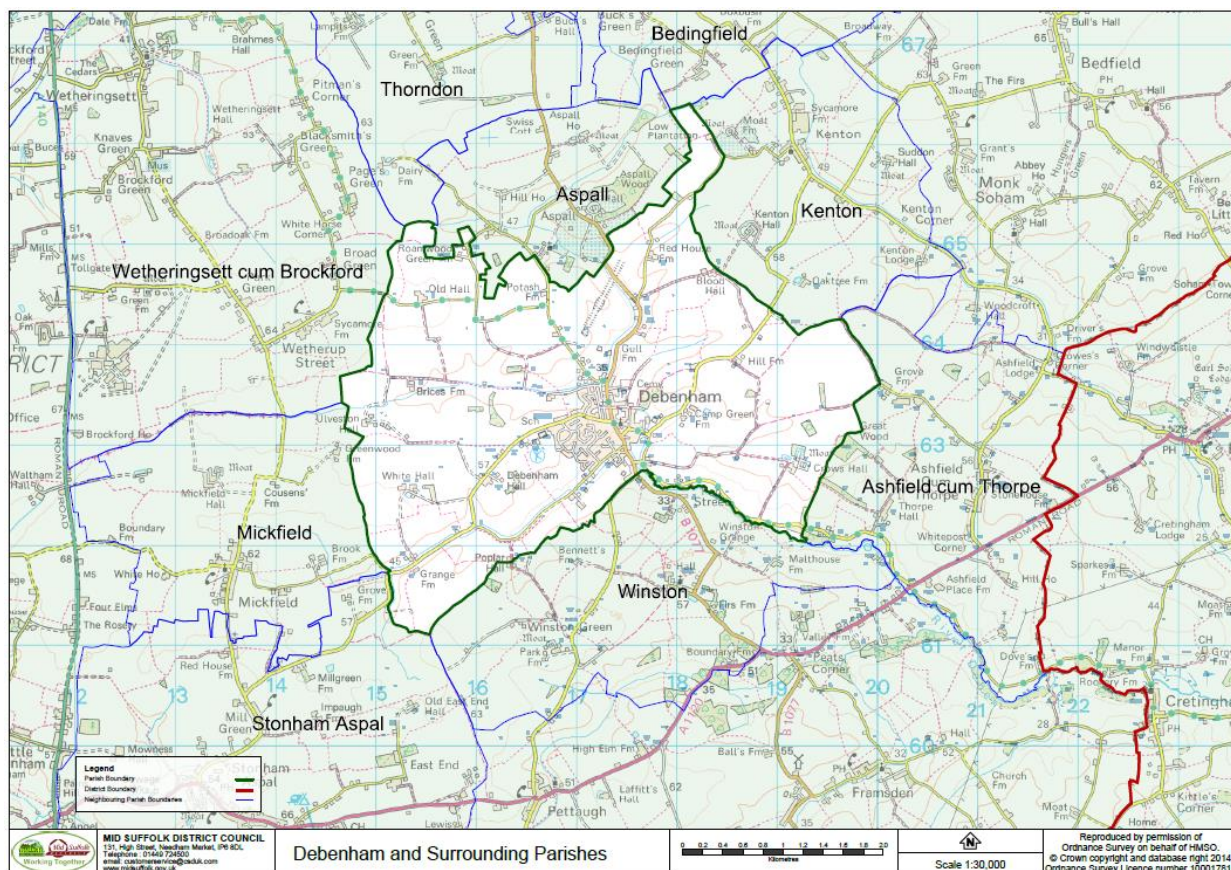
### 5.2 Habitats Regulations Assessment (HRA)

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Subject to Natural England's review, this HRA screening report indicates that the Debenham draft Neighbourhood Plan is predicted to have likely significant effects on a European site. The requirement for the Plan to undertake further assessment under the Habitats Regulations 2017 is therefore **screened in** and project level HRA must ensure that only options that can demonstrate no adverse effects on the SPA/SAC/Ramsar site can be given approval. Consequently, the policy needs to be amended to include "*Applications for development of the allocated sites will need to be subject to an HRA screening. Any development which would result in significant adverse effects which could not be appropriately mitigated will not be permitted.*"

## Appendix 1

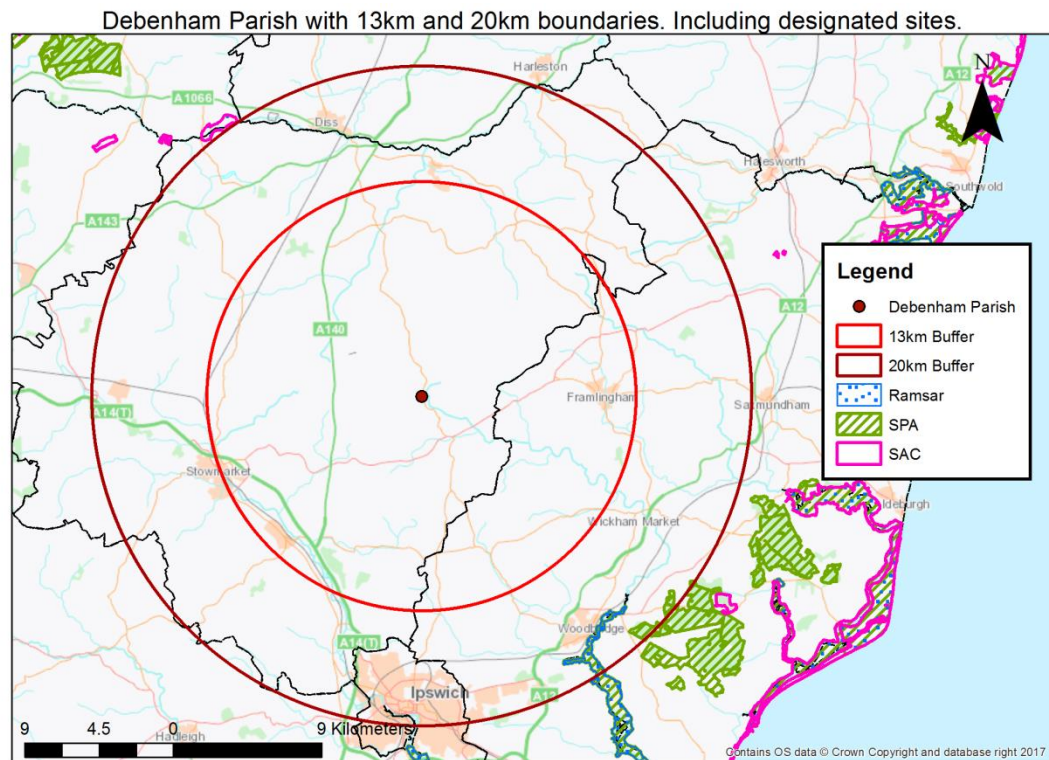
### The Neighbourhood Plan area for Debenham (Mid Suffolk DC 2017)



Source: Mid Suffolk District Council, 2017

## Appendix 2

### Debenham Parish and Locations of the European (Natura 2000) sites within 13km and 20 km



Source: Place Services, 2017



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**January 2018**



**Essex County Council**