



Elmsett Neighbourhood Plan 2017 - 2036

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

Screening Report – December 2018





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1. Introduction

1.1 The Purpose of This Report

This Screening Report is an assessment of whether or not the contents of the Elmsett Neighbourhood Plan 2017-2036 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 or 'Habitats Sites') as a result of the implementation of a plan/project.

1.2 The Elmsett Neighbourhood Plan 2017-2036

The Neighbourhood Plan will set out planning policies for Elmsett and within the confines of the Elmsett 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 Babergh District Council.

Section 6 of the Neighbourhood Plan states that the Plan's Vision is:

'In 2036 Elmsett will be a thriving village and will have balanced the provision of housing growth with the need to maintain existing village services and minimising the impact of growth on both the local environment and infrastructure.'

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

Objectives	
Housing Objectives	
1	Housing growth is appropriate in scale to the role of the village.
2	New homes are designed to meet the long terms needs of local residents.
3	New development is of a high-quality design, eco-friendly and of a scale that reinforces local character.
Historic and Natural Environment Objectives	
4	Conserve and enhance the heritage assets of the parish.
5	Protect and improve the features which contribute to historic character.
6	Maintain the village's rural setting.
7	Protect the important green spaces, woodland and countryside.



Objectives

8	Protect important views and links to the wider countryside.
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Infrastructure and Facilities

9	Improve and sustain high quality local facilities for existing and future residents.
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10	Encourage opportunities for home working and local employment.
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1.3 The Babergh Local Plan 2011-2031 Core Strategy & Policies (2014)

The adopted Babergh Core Strategy (2014) contains current strategic planning policy for the District and thus Elmsett. The Core Strategy was originally adopted in 2014 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 'Habitats Regulations Assessment Screening' in accordance with the Habitats Directive and Regulations.

The Core Strategy categorised the settlement of Elmsett as a 'Hinterland Village' within the Hadleigh Functional Cluster. It establishes that towns should be the main focus for development in the District, and that Core Villages are the main focus for development outside of the towns. Policy CS1 Settlement Hierarchy of the Core Strategy states that,

'Most new development (including employment, housing, and retail, etc.) in Babergh will be directed sequentially to the towns / urban areas, and to the Core Villages and Hinterland Villages identified below. In all cases the scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail/service centres, the capacity of existing physical and social infrastructure to meet forecast demands and the provision of new / enhanced infrastructure, as well as having regard to environmental constraints and the views of local communities as expressed in parish / community / neighbourhood plans....Hinterland Villages will accommodate some development to help meet the needs within them.'

Outside of the main towns, Policy CS3: Strategy for Growth and Development outlines that 1,050 dwellings are identified to be delivered in Core and Hinterland Villages as appropriate.

1.4 The Emerging Babergh Local Plan

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

The Regulation 18 stage Local Plan identifies Elmsett as a Core Village. A number of strategic options were explored relevant to Core Villages. 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 Elmsett. The map shows six potential development sites, with five adjacent to the settlement boundary of the village. The Plan seeks to modestly extend the settlement boundary to the east to include a completed development in this area.

Since then, a further five sites have been submitted for consideration as potential allocations within the emerging Local Plan (through the Regulation 18 consultation) in the Neighbourhood Plan area. A total of 11 sites have therefore been identified for potential development purposes within the Elmsett Neighbourhood Plan area.

Of 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 Elmsett Neighbourhood Plan regarding the principle of development. Indeed, the Neighbourhood Development Plan is being prepared at a comparably advanced stage to that of the Local Plan and its evidence base.



2. Legislative Background

2.1 Strategic Environmental Assessment (SEA)

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

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

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

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

The Elmsett 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 Elmsett Neighbourhood Plan.

2.2 Habitats Regulations Assessment (HRA)

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

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

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

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

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

The recent Court judgement (CJEU Holohan C- 46117/18) now imposes more detailed requirements on the competent authority at Appropriate Assessment stage although this is not part of this report.



3. SEA Screening

3.1 When is SEA Required?

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

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

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

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

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

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

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

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

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 Plan likely to require assessment under the Habitats Directive?	Yes to either criteria	Go to question 8	The policies of the Neighbourhood Plan can be considered to determine the use of small areas at a local level commensurate with their status in determining local planning applications.
		No to both criteria	Go to question 7	

Q	Criteria	Response	Outcome	Commentary
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 in Section 3.3 of this Screening Report.
		No	DOES NOT REQUIRE SEA	

The following sub-sections look 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 Development 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 Elmsett Neighbourhood Plan (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 Plan area once adopted. There are several policies that respond to housing allocations within the Plan area:</p> <ul style="list-style-type: none"> • Policy EMST3 – Land at Hadleigh Road (41 dwellings) • Policy EMST4 – Land south of Whatfield Road (7 dwellings) <p>Land at Hadleigh Road has outline planning permission, and Land south of Whatfield Road has full planning permission.</p> <p>The principle of the eventual development that is identified as coming forward within the Neighbourhood Plan period is already established; and any significant effects on the environment directly resulting from these proposals has been sufficiently identified at the planning application stage as part their determination in compliance with LPA and national policy requirements.</p> <p>In the case of Land south of Whatfield Road this is through conditions associated with the permission; regarding archaeology, surface water drainage, landscaping, materials and screenwalls / fences. In regard to Land at Hadleigh Road, the outline permission is granted subject to conditions regarding archaeology, landscaping, roads and footpaths, construction management, ecology, biodiversity, a habitat management plan, lighting design and landscaping, and reserved matters related to appearance and scale. The extent of these conditions in relation to the identified environmental baseline of the Plan area is appropriate and ensures no on-site likely significant effects.</p> <p>The LPA has secured funding for visitor management measures in relation to Habitats Regulations requirements for both the above allocations to avoid impacts on Habitats Sites, in combination with other plans and projects.</p> <p>For this reason it has been determined that the degree to which the Plan sets a framework for projects would not warrant the full application of the SEA Directive in the form of a SEA Environmental Report as the environmental effects of the Plan's allocations have already been considered in detail at the planning application stage.</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 policies of the Neighbourhood Plan do influence the emerging Babergh and Mid Suffolk Local Plan in so far as there is an intention for it to be 'made' prior to the adoption of the Local Plan, which is currently at the Regulation 18 stage.</p> <p>The Plan is in general conformity to Policy CS11 of the adopted Babergh Core Strategy. The Neighbourhood Plan, in allocating two sites for housing beyond the existing settlement boundary, will however need to justify that they respond to a proven local need in order to conform to Policy CS2 of the adopted Core Strategy regarding development in the 'countryside' (as defined as areas outside settlement boundaries). The Neighbourhood Plan goes some way in justifying such a need; however it is considered that this (and the quantum of housing need identified within the Neighbourhood Plan) is a matter to be discussed and examined outside of this Report i.e. the level of growth in the Plan area would not necessarily lead to a significant environmental effect.</p> <p>The emerging Babergh and Mid-Suffolk Local Plan recognises 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 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. Relevant to environmental considerations, the Neighbourhood Plan is compatible and does not conflict with adopted Babergh Core Strategy policies which have been subject to a thorough process of plan preparation and accompanying Sustainability Appraisal.</p> <p>The following policies exist within the Neighbourhood Plan relevant to environmental protection:</p> <ul style="list-style-type: none"> • Policy EMST8 – Area of Local Landscape Sensitivity • Policy EMST10 – Protection of Important Views • Policy EMST11 – Elmsett Special Character Area • Policy EMST12 – Heritage Assets. <p>The policies contained within the Plan are broadly considered to be sufficient to ensure that effects on the environment are minimised.</p>
<p>Environmental problems relevant to the plan.</p>	<p>The Neighbourhood Plan reflects a small area. The policy content of the adopted Babergh Core Strategy will additionally apply to any proposals within the Neighbourhood Plan area. These policies have</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>been subject to Sustainability Appraisal And Habitats Regulations Assessment Screening within the context of the Core Strategy. The potential environmental problems relevant to the Neighbourhood Plan area include:</p> <ul style="list-style-type: none"> • There are currently 18 Listed Buildings within the Plan area, including the Grade I listed Church of St Peter to the north of the settlement boundary near Church Farm. • Additionally, a Scheduled Monument lies within the Plan area and adjacent to the settlement boundary at its northern edge. This is a moated site at The Old Rectory, 150m north east of Malting Farm. • Regarding water quality, western / south-western parts of the Plan area are designated as a medium priority area for surface water pesticide issues. Small pockets of land to the south of the settlement boundary are also identified as high priority areas in this regard. The majority of the Plan area is also within a high priority area for sediment issues and phosphate issues. • Within the Plan Area lies a SSSI (Elmsett Park Wood) in its eastern part with associated Impact Risk Zones (IRZs). Any residential development of 50 units or more or any rural residential development of 50 or more houses outside existing settlements/urban areas require consultation with Natural England in the majority of eastern and central parts of the Plan area. • There are three County Wildlife Sites within the Plan area. As well as a number of Tree Preservation Orders (TPOs). • The Plan area contains Ancient Woodland at Elmsett Park Wood and Corn Hatches Grove. • The Plan area contains a significant number of scattered priority habitats, many of which are relatively large in size. These include woodland, deciduous woodland, broadleaved woodland, conifer woodland, traditional orchard, good quality semi-improved grassland, young trees woodland, lowland meadows, floodplain grazing marsh and an area of 'no main habitat but additional habitats present.' • The Neighbourhood Plan area is within a Groundwater Source Protection Zone – Total Catchment (Zone 3). • Areas of Flood Risk Zone 3 and 2 exist west-east to the north of the settlement boundary associated with a river tributary. • The majority of the Plan area is within Grade 3 agricultural land (good to moderate). This is not however the "best and most versatile agricultural land" within the wider District. • Parts of the Plan area are / were within a 'Special Landscape



Criteria for determining the likely significance of effects (Annex II SEA Directive)		Likelihood and summary of significant effects
Sustainability Theme	<p>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).</p>	<p>Character’.</p> <p>The content of the Neighbourhood Plan is not in conflict with those relevant planning documents within the wider district and county area related to waste management or water protection, although the Plan area is within a Minerals Consultation Area and a Waste Water Treatment Safeguarding Area.</p>
	<p>The probability, duration, frequency and reversibility of the effects on the following factors:</p>	<p>The following impacts have been identified within this Screening Assessment:</p>
	<ul style="list-style-type: none"> - Biodiversity 	<p>There are wildlife designations (a SSSI and three County Wildlife Sites) within the Plan area. The Plan area contains a large number of scattered and grouped priority habitats however none of these will be lost through the Plan’s two allocations at Hadleigh Road and Whatfield Road. The Plan area is within the Impact Risk Zones of the SSSIs; however there are no identified incompatibilities with any of the Neighbourhood Plan housing allocations due to their scale and the consultation parameters (with Natural England) within these IRZs.</p> <p>The HRA Screening element of this Report determines that European Sites lie within 13km of Elmsett parish. The Plan area is within the 13km Zone Of Influence (ZOI) of the Stour & Orwell Estuaries SPA & Ramsar and as such the Plan, in allocating land for residential development purposes, has the potential for Likely Significant Effects, in combination with other plans and projects.</p> <p>The Plan’s allocations however both have planning permission. Contributions towards HRA mitigation relevant to the effects from recreational disturbance on the Stour & Orwell Estuaries SPA & Ramsar have been secured through planning permissions for both sites allocated (within Policies EMST3 and EMST4) to avoid an adverse effect on site integrity from recreational disturbance, in-combination with other plans and projects. This ensures that the Neighbourhood Plan avoids a likely significant effect from these allocations.</p>
	<ul style="list-style-type: none"> - Population - Human health 	<p>The Neighbourhood Plan allocates sites for residential development. There is therefore expected to be some positive impacts from the Plan.</p> <p>The Plan allocates land for development purposes however there are no identified implications regarding human health. The Plan seeks to enhance and safeguard all open space, sport and recreation facilities within the Plan area in Policy EMT16. This will have positive implications for the purposes of health and well-being.</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>It can be considered that no significant effects will occur upon Human health in the Neighbourhood Plan area. Any potential impacts regarding contamination of any future proposals are best addressed at the 'project level', through the development management process and in adherence to relevant policies at the LPA level.</p>
- Fauna	<p>The impacts of the Neighbourhood Plan on fauna are not considered significant. It is possible that developments that could be forthcoming within the Plan area could have negative impacts on protected species; however these cannot be identified as strategically significant to warrant Strategic Environmental Assessment. Such issues are more appropriate to be considered on a case-by-case application basis at the development management stage in consideration of the Neighbourhood Plan policies and relevant policies contained within Babergh's adopted Core Strategy and emerging Local Plan (commensurate to the level of weight those policies would have at the time of application).</p>
- Flora	<p>Although Priority Habitats exist in close proximity to the Elmsett development boundary, none of the Plan's allocations would lead to the loss of any such habitats. Additionally, Policy EMT3 – Land at Hadleigh Road seeks enhanced tree and hedgerow planting and new wildlife habitat areas as policy criteria to be addressed through any full planning application. Babergh Local Plan / Core Strategy policies also apply within the Plan area to further protect such assets. There will therefore be no likely effects on Flora that can be significant to warrant the application of the SEA Directive.</p>
- Soil	<p>The Neighbourhood Plan area is predominantly within Grade 3 Agricultural Land ('good to moderate') which does not represent the best and most versatile agricultural land within the wider District. No significant effects on soil can be expected as a result of the Plan content.</p>
- Water	<p>Western / south-western parts of the Plan area are designated as a medium priority area for surface water pesticide issues. Small pockets of land to the south of the settlement boundary are also identified as high priority areas in this regard. Further, the majority of the Plan area is within a high priority area for sediment issues and phosphate issues.</p> <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 does allocate land for residential development purposes; however such land uses are not considered</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>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). No likely significant effects are identified regarding water quality.</p>
- Air	<p>No AQMAs or other identified air quality issues exist within or in close proximity to the Neighbourhood Plan area. 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 and this is true of all land in and around the settlement boundary area. Areas of land identified within Flood Risk Zones 2 or 3 exist within the Plan area and are associated with a river tributary to the north of the built up area and removed from the settlement boundary. Neither of the Plan’s housing allocations is within any such flood risk area and as such, no significant effects have been identified.</p>
- Material assets	<p>The site is within a Minerals Consultation Area, indicating that potential mineral deposits are present. Despite this, the content of the Neighbourhood Plan is not considered to have any significant impacts on material assets due to the extent / size of the Neighbourhood Plan area. Such issues are more appropriate to be considered on a case-by-case basis at the development management stage and in accordance with relevant development management policies contained within Babergh’s adopted Core Strategy and adopted Minerals & Waste Local Plan policies at the County level.</p>
- Cultural heritage	<p>A total of 18 Listed Buildings exist within the Neighbourhood Plan area as well as a Scheduled Monument. The Plan allocates a site for development residential purposes at ‘Land south of Whatfield Road’ for 7 dwellings (Policy EMT4) which surrounds the Grade II listed ‘The Chequers’ and is in relatively close proximity to the Grade II listed ‘Elm Farmhouse’ although a road lies between this latter asset and the allocated development area.</p> <p>Policy EMT11 – Elmsett Special Character Area and Policy EMT12 – Heritage Assets ensure the conservation and enhancement of heritage assets and the requirement for a heritage statement to accompany any planning applications where relevant.</p> <p>Irrespective of the adequacy of the Plan’s policies in regard to the protection and enhancement of the historic environment, further policy can be found in relevant policies at the LPA level. 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.</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>- Landscape</p>	<p>Both of the Plan’s allocations have outline planning permission, suggesting that the principle of development is in principle acceptable at the locations identified and at the scales proposed. There is considered to be no 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 Environmental Report.</p> <p>The Suffolk Landscape Character Assessment (2015) includes the parish of Elmsett within the Ancient Plateau Claylands landscape type. This character type includes the following key characteristics:</p> <ul style="list-style-type: none"> • Scattered ancient woodland is a feature of the landscape • Irregular field patterns • A flat or gently rolling arable pattern of loosely clustered villages and associated farmsteads <p>Objectives related to this Landscape Character Area, include:</p> <ul style="list-style-type: none"> • To maintain and enhance the landscape areas and settlement pattern, ensuring the sense of separation between settlements is maintained where appropriate. • To reinforce and enhance the existing field boundaries • To safeguard the plantation and ancient woodland areas • Safeguard the parkland area <p>These objectives are largely reiterated within relevant policies of the Plan.</p> <p>The Plan designates an ‘Area of Local Landscape Sensitivity’ within Policy EMT8 which protects and enhances the landscape qualities of this area. In way of context, the Policy’s justification within the Plan is reiterated here: <i>‘Land to the east and south-east of the village has, since the mid-1980’s, been designated in the development plan as a Special Landscape Area (SLA). It comprises an area with tributaries to the River Gipping. Given the uncertainty about the prospect of the SLA being retained in the Joint Local Plan and the importance of this high-quality landscape in the Neighbourhood Plan area, a new local designation, the Area of Local Landscape Sensitivity (ALLS), is made in the Plan. The designated area reflects the boundary of the original SLA but has been refined to follow field boundaries rather than, as in the original SLA designation follow undefined boundaries. The ALLS designation does not, in itself, stop development taking place. But it does ensure that any development within the area should be designed to be in harmony with the special characteristics of the area.’</i></p> <p>To this extent, the Plan ensures that potential landscape implications of proposals are suitably considered and significant effects minimised.</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The cumulative nature of the effects.</p>	<p>The Plan allocates two sites for development purposes and the cumulative effects on the environment have not been formally considered at this point. Despite this the SEA element of this Report does not identify any additional likely significant effects on the environment. The likelihood for cumulative effects is therefore ruled out.</p>
<p>The trans boundary nature of the effects.</p>	<p>The SEA Screening of the Plan above indicates that there are no significant effects on the environment. The findings of the HRA Screening element of this Report do not consider that there are any likely significant in-combination effects on the environment. Therefore transboundary effects are not predicted.</p>
<p>The risks to human health or the environment (e.g. due to accidents).</p>	<p>There is limited risk to human health or the environment as a result of the Neighbourhood Plan. This is in consideration of the above screening requirements related to sustainability themes. The Neighbourhood Plan is primarily focused on ensuring appropriate residential development through any forthcoming non plan-led schemes that may come forward within the Plan period, whilst retaining the character of Elmsett. This land use is unlikely to give rise to any accidents that can be considered to have a significant risk to human health or the environment.</p>
<p>The magnitude spatial extent of the effects (geographical area and size of the population likely to be affected).</p>	<p>The spatial extent of development resulting from the Neighbourhood Plan through allocated sites for residential development and as an overall quantum is not considered large. The magnitude of effects can be considered small in both the local and wider District context.</p>
<p>The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> - special natural characteristics or cultural heritage - exceeded environmental quality standards - intensive land use 	<p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has not been assessed as having a potential significant effect on environmental quality standard.</p>
<p>The effects on areas or landscapes which have a recognised national, community or international protection status.</p>	<p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has been assessed as not having any significant effects on areas or landscapes which have a recognised national, community or international protection status.</p>



4. HRA Screening

4.1 Habitat Regulations Assessment of Development Plans

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

Under the provisions of the EU Habitats Directive and translated into English law by the Habitats Regulations (The Conservation of Habitats and Species Regulations 2017), a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any European Site (now called Habitats Sites in the NPPF (2018), 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 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.

This HRA Screening Report has been undertaken in order to support the Elmsett Neighbourhood Plan which is being produced by Elmsett 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 Habitats (European) sites within 20km of Elmsett.
- Summarise the reasons for designation and Conservation Objectives for each site to be considered in this assessment.
- Screen the Elmsett Neighbourhood 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.



4.2 Habitats (European) Sites

The EU wide network of nature protection areas is the centrepiece of EU nature and biodiversity policy. 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 EU 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 Stour and Orwell Estuaries 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.

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 Habitats Sites to be considered

There are two Habitats Sites which lie within 20 km of Elmsett parish.

Table 3: Habitats Sites within 13km of the development

SPA	SAC	Ramsar
Stour and Orwell Estuaries	N/A	Stour and Orwell Estuaries

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

There are two Habitats Sites which lie within 13km of Elmsett parish, which is the Impact Risk Zone for the Stour and Orwell Estuaries Habitats Sites listed above.

These are therefore the Habitats sites to be considered to be within scope for this assessment.

4.3 Method and Approach

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

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

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

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



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

4.3.1 Stage 1: HRA Screening

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

Table 5: Screening categorisation

Category A : No negative effect
Policies or projects that will not be likely to have any negative effect on a Habitats site.
Category B : No Likely Significant Effect
Policies or projects that could have an effect but would not be likely to have a <i>significant</i> negative effect on a 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 their own or in combination with other plans and projects.

4.3.2 Potential impacts of Elmsett Neighbourhood Plan on Habitats 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 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.

In line with the HRA for Babergh 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 Elmsett 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	Elmsett is outside the boundaries of any Habitats sites	N/A
Impact on protected species outside the protected sites	Elmsett is within the Zone of Influence of the Stour & Orwell Estuaries SPA and Ramsar site	Both sites allocated within eth plan for residential development have planning permission and contributions have been secured for the delivery of HRA mitigation.
Recreational pressure and disturbance	Elmsett is outside the Zone of Influence of any Habitats sites	N/A
Water quantity and quality	Elmsett is outside the Zone of Influence of any Habitats sites	N/A
Changes in pollution levels	Elmsett is outside the Zone of Influence of any Habitats sites	N/A

4.4 Results from HRA Screening of Draft Neighbourhood Plan Policies

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

- Policy EMST 1: Elmsett Spatial Strategy
- Policy EMST 2: Housing Development
- Policy EMST 3: Land at Hadleigh Road
- Policy EMST 4: Land at Whatfield Road
- Policy EMST 5: Affordable Housing on Rural Exception Sites
- Policy EMST 6: Housing Space Standards
- Policy EMST 7: Housing Mix
- Policy EMST 8: Area of Local Landscape Sensitivity
- Policy EMST 9: Local Green Spaces
- Policy EMST 10: Protection of Important Views
- Policy EMST 11: Elmsett Special Character Area
- Policy EMST 12: Heritage Assets
- Policy EMST 13: Development Design Considerations
- Policy EMST 14: Communications Technology
- Policy EMST 15: Employment Sites
- Policy EMST 16: Community Facilities and Services
- Policy EMST 17: Open Space, Sport and Recreation Facilities

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

Table 7: Assessment of potential impacts

Policy Number	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
Policy EMST1: Elmsett Spatial Strategy	No, Category A	No specific recommendations
Policy EMST2: Housing Development	No, Category A	No specific recommendations
Policy EMST3: Land at Hadleigh Road	No, Category A	No specific recommendations as a HRA mitigation contribution has already been secured for



Policy Number	Will Policy have Likely Significant Effects on the European Sites?	Recommendations
		development of this site to avoid adverse effects on site integrity from recreational disturbance in-combination with other plans and projects.
Policy EMST4: Land at Whatfield Road	No, Category A	No specific recommendations as HRA mitigation contribution has already been secured for development of this site to avoid adverse effects on site integrity from recreational disturbance in-combination with other plans and projects
Policy EMST 5: Affordable Housing on Rural Exception Sites	No, Category A	No specific recommendations
Policy EMST6: Housing Space Standards	No, Category A	No specific recommendations
Policy EMST7: Housing Mix	No, Category A	No specific recommendations
Policy EMST8: Area of Local Landscape Sensitivity	No, Category A	No specific recommendations
Policy EMST9: Local Green Spaces	No, Category A	No specific recommendations
Policy EMST10: Protection of Important Views	No, Category A	No specific recommendations
Policy EMST11: Elmsett Special Character Area	No, Category A	No specific recommendations
Policy EMST12: Heritage Assets	No, Category A	No specific recommendations
Policy EMST13: Development Design Considerations	No, Category A	No specific recommendations
Policy EMST14: Communications Technology	No, Category A	No specific recommendations
Policy EMST15: Employment Sites	No, Category A	No specific recommendations
Policy EMST16: Community Facilities and Services	No, Category A	No specific recommendations
Policy EMST17: Open Space, Sport and Recreation Facilities	No, Category A	No specific recommendations



4.4.3 Recommendations

Both of the site allocation policies in this draft Neighbourhood Plan have HRA mitigation measures in place to avoid an adverse effect on site integrity of the Stour & Orwell Estuaries SPA and Ramsar site from recreational disturbance, in-combination from other plans and projects. This allows all of the policies have been assigned to Category A.

As such there is a no requirement for further assessment from the Neighbourhood Plan alone.

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 Elmsett 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.



Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
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 principle potential 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.	It is considered that in combination likely significant effects are not predicted.
Suffolk Coastal District Council	Suffolk Coastal Core Strategy and Development Management Policies Document HRA (2011)	N/A	It is considered that in combination likely significant effects are not predicted.

Although the Parish of Elmsett lies within the Impact Risk Zone for the Stour and Orwell Estuaries SPA and Ramsar site and that land is allocated for residential development, this HRA screening concludes that it is possible to rule out likely significant effects as both sites have planning permission and HRA mitigation has been secured.

References

- Atkins (2011) Habitats Regulations Assessment for Babergh District Council Core Strategy
- Habitats Regulations Assessment (Appropriate Assessment) for Babergh & 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
- Elmsett Neighbourhood Plan 2018-2036 Pre-Submission Version Draft 6 (May 2018)
- Natural England Conservation objectives for European Sites: East of England Website
- The Landscape Partnership (2011) Suffolk Coastal District Council Habitats Regulations Assessment for Core Strategy and Development Management Policies Document



5. Conclusions

5.1 Strategic Environmental Assessment (SEA)

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

Planning Practice Guidance on SEA of Neighbourhood Plans indicates that a strategic environmental assessment may be required, for example, where a neighbourhood plan allocates sites for development; the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; or the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a Sustainability Appraisal of the Local Plan.

The principle of the eventual development that is identified as coming forward within the Neighbourhood Plan period is already established at the District level; and the Plan's two site allocations both have planning permission. Therefore, any significant effects on the environment directly resulting from these proposals have already sufficiently been identified at the planning application stage as part of their determination in compliance with LPA and national policy requirements.

The HRA Screening element of this Report determines that European Sites lie within 13km of Elmsett parish. The Plan area is within the 13km Zone Of Influence (ZOI) of the Stour & Orwell Estuaries SPA & Ramsar and as such the Plan, in allocating land for development purposes has the potential for Likely Significant Effects in-combination with other plans and programmes that result in a cumulative increase in growth within the ZOI.

Despite this, mitigation relevant to potential effects on the Stour & Orwell Estuaries SPA & Ramsar in-combination with other plans and projects has been secured alongside the applications to which the Plan's allocations relate.

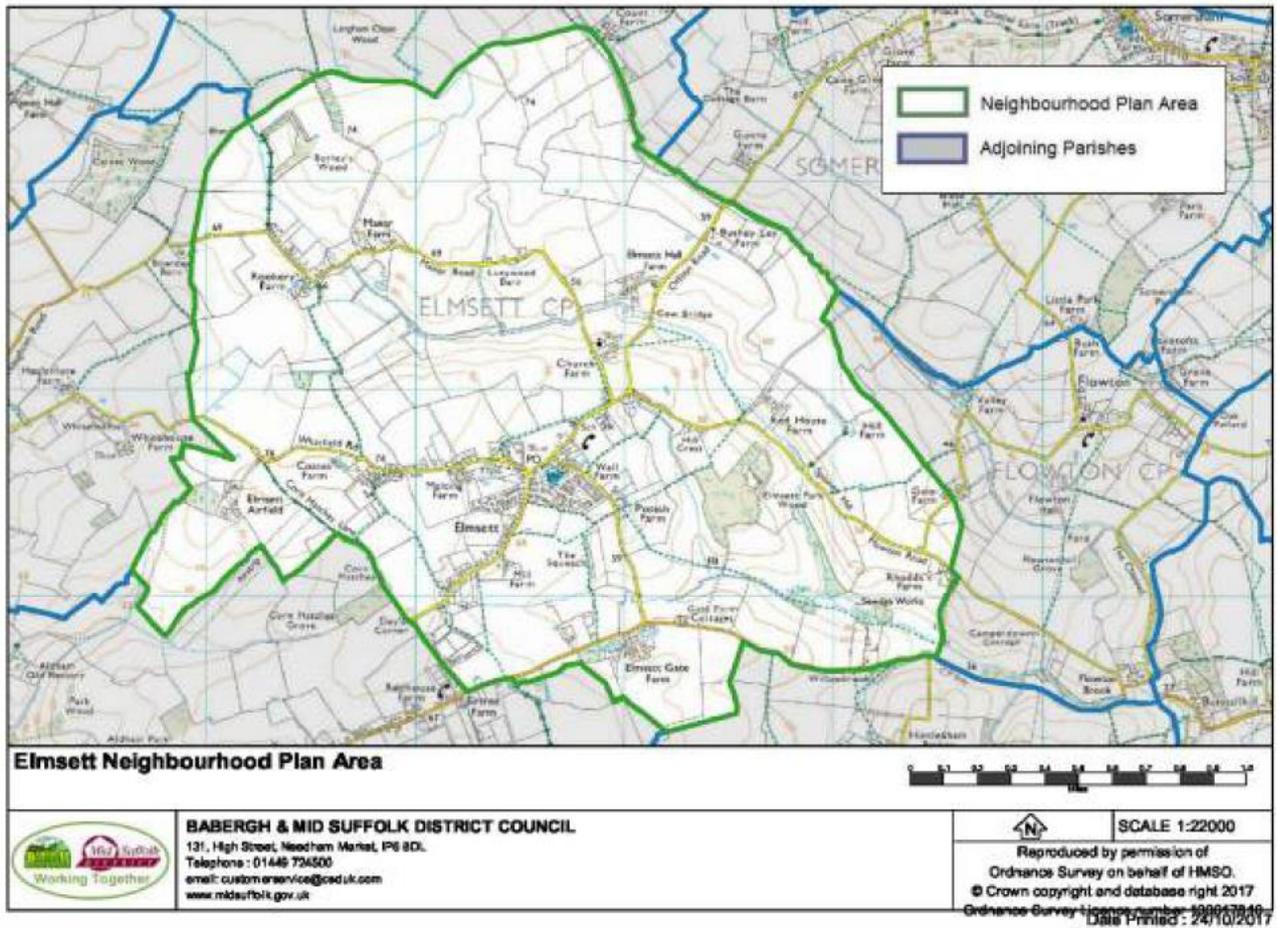
As such, the content of the Elmsett Neighbourhood Plan has therefore been **screened out** for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.

5.2 Habitats Regulations Assessment (HRA)

Subject to Natural England's review, this HRA screening report indicates that the Elmsett Neighbourhood Plan is not predicted to have a likely significant effect on a Habitats Site, either alone or in combination with other plans and projects. The requirement for the Plan to make revisions or undertake further assessment under the Habitats Regulations 2017 (when the Neighbourhood Planning Regulations have been amended to allow this) is therefore **screened out**.

Appendix 1

Elmsett Neighbourhood Plan Designated Area

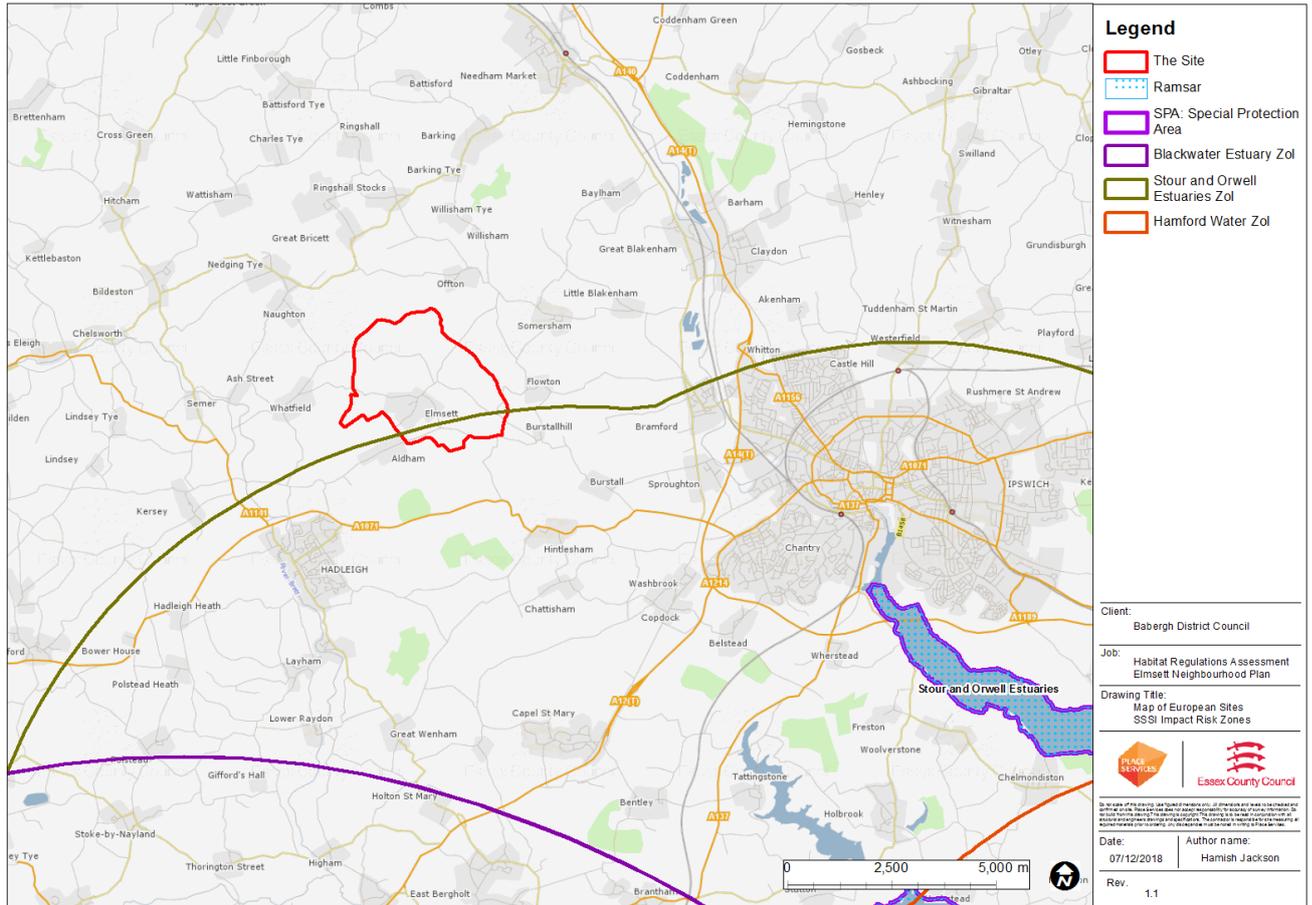


Source: Babergh District Council, 2017



Appendix 2

Locations of the Habitats sites within 20km of Elmsett parish



Source: Place Services, 2018



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December 2018



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