

# Habitats Regulations Assessment Screening

for

St Edmundsbury Borough Council  
Rural Vision 2031  
Document

**September 2014**

## Quality control

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for

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Rural Vision 2031 Document

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# 1 Introduction

## 1.1 The plan being assessed

- 1.1.1 The Rural Vision 2031 document sets out the council's site allocations in the six key service centres and the 12 local service centres identified in the Core Strategy Document. It reviews the existing Housing Settlement boundaries for all villages and also proposes to designate the general employment areas and operational use areas outside Bury St Edmunds and Haverhill.
- 1.1.2 St Edmundsbury published its Preferred Options for its Rural Site Allocations Development Plan Document in April 2010. It was accompanied by a 'Habitat Regulations Assessment Stage 1 Screening' report by Atkins, dated February 2010. Subsequently, the St Edmundsbury Core Strategy was adopted in December 2010 following an Examination in Public. The Core Strategy adoption meant that the Council decided it was appropriate to review the Preferred Options Rural Site Allocations Local Plan Document. This Local Plan Document has been branded 'Rural Vision 2031'.
- 1.1.3 The Rural Vision 2031 document excludes the towns of Bury St Edmunds and Haverhill. Separate 'Bury St Edmunds Vision 2031' and 'Haverhill Vision 2031' Local Plan Documents are being progressed separately.
- 1.1.4 The determination of likely significant effect under Regulation 102(1) of the Conservation of Habitats and Species Regulations 2010, of St Edmundsbury's Rural Vision 2031 Submission Document was reported in June 2013<sup>1</sup>. It was concluded that the Rural Vision 2031 Submission Document would have no likely significant effect on any European site. The Submission Document was submitted to the Secretary of State on 24 October 2013 and the hearing sessions closed on Wednesday 12 February 2014.
- 1.1.5 On 28<sup>th</sup> February 2014 St Edmundsbury Borough Council submitted its proposed Main Modifications and Additional Modifications to the Inspector examining the Document. On 7<sup>th</sup> March 2014 the Inspector advised that four of the Additional Modifications should be Main Modifications, with reasons. The Inspector later advised on changes to the proposed main modifications and further main modifications that he considered would be needed to make the Vision 2031 documents legally-compliant and sound. These modifications were also subject to Habitats Regulations Assessment<sup>2</sup> which found that there was no likely significant effect upon any European site.
- 1.1.6 The Inspector's report on his Examination of the Vision 2031 Development Plan Documents, including all modifications, was received on 14<sup>th</sup> July 2014 (Planning Inspectorate, 14<sup>th</sup> July 2014, Report on the Examination into Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031). This report concluded that Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031 provide an appropriate basis for the allocation of sites for development in the Borough until 2031, and related matters, provided that a number of modifications were made. The modifications all concerned matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal [SA] of them. The modifications were subject to public consultation over a six-week period. In a few cases the Inspector amended the detailed wording in the light of the responses. It was recommended that the modifications be included in the Vision 2031 documents after considering all the representations made in response to consultation on them.
- 1.1.7 This Habitats Regulations Assessment is the determination of likely significant effect under Regulation 102(1) of the Conservation of Habitats and Species Regulations 2010, of St Edmundsbury's Rural Vision 2031 Local Plan Document. This includes all modifications and is the Adoption document.

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<sup>1</sup> The Landscape Partnership (June 2013) Habitats Regulations Assessment Screening for St Edmundsbury Borough Council Rural Vision 2031 Submission Document

<sup>2</sup> The Landscape Partnership (April 2014) Habitats Regulations Assessment for St Edmundsbury Borough Council Rural Vision 2031 Main modifications. April 2014

## 1.2 Appropriate Assessment requirement

- 1.2.1 The Appropriate Assessment process is required under the Conservation of Habitats and Species Regulations 2010. These regulations are often abbreviated to, simply, the 'Habitats Regulations'.
- 1.2.2 Regulation 102 states that
- (1) Where a land use plan—
    - (a) is likely to have a significant effect on a European site in Great Britain or a European offshore marine site (either alone or in combination with other plans or projects), and
    - (b) is not directly connected with or necessary to the management of the site,the plan-making authority for that plan shall, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.
  - (2) The plan-making authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.
  - (3) They shall also, if they consider it appropriate, take the opinion of the general public, and if they do so, they shall take such steps for that purpose as they consider appropriate.
  - (4) In the light of the conclusions of the assessment, and subject to regulation 103 (considerations of overriding public interest), the plan-making authority or, in the case of a regional spatial strategy, the Secretary of State shall give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).
  - (5) A plan-making authority shall provide such information as the Secretary of State or the Welsh Ministers may reasonably require for the purposes of the discharge of the obligations of the Secretary of State or the Welsh Ministers under this Part.
  - (6) This regulation does not apply in relation to a site which is—
    - (a) a European site by reason of regulation 10(1)(c); or
    - (b) a European offshore marine site by reason of regulation 15(c) of the 2007 Regulations(site protected in accordance with Article 5(4) of the Habitats Directive).
- 1.2.3 The plan-making authority, as defined under the Regulations, is St Edmundsbury Borough Council. This report is to determine, under Regulation 102(1), whether the Rural Vision 2031 Local Plan Document is likely to have a significant effect upon any European site. A significant effect could be positive or negative, permanent or temporary, apply to one or more European sites, and could arise from one or more policies or proposals within the Plan. The significant effect could be caused by the plan itself, or could be caused by a combination of the Plan with other plans or projects. Determination of likely significant effect does not require that an effect is identified in detail, but that an effect is likely to occur and hence further investigations are needed; it does not automatically mean that harm will definitely be caused.
- 1.2.4 If a likely significant effect is determined for all or part of the Plan, an Appropriate Assessment is then required before St Edmundsbury Borough Council may decide to adopt the Plan. The Appropriate Assessment process is set out below.

## 1.3 Appropriate Assessment process

1.3.1 The Appropriate Assessment process involves a number of steps, which are set out sequentially below.

### ***Likely significant effect***

1.3.2 The Council, in consultation with Natural England, should decide whether or not the plan is likely to have a significant effect on any European site. This is a 'coarse filter' and any effect, large or small, positive or negative, should be considered.

### ***Connected to management of the site***

1.3.3 The Council should decide whether the plan is connected to the nature conservation management of the European sites. Invariably, for a development plan, this is not the case.

### ***Screening***

1.3.4 The combination of decisions on likely significant effect and connections to management is often called 'screening'. If the plan is likely to have a significant effect, and is not connected to the management of the site, an Appropriate Assessment is required.

### ***Scoping***

1.3.5 The whole plan must be assessed, but a 'scoping' exercise helps decide which parts of the plan have potential to give rise to significant effects and therefore where assessment should be prioritised. Natural England is an important consultee in this process. The implementation of both screening and scoping process is described in Section 3 below.

### ***Consultations***

1.3.6 Natural England is a statutory consultee, and so should be consulted at the draft plan stage. The public may also be consulted if it is considered appropriate, for example if the appropriate assessment is likely to result in significant changes to the plan.

### ***Iterations and revision***

1.3.7 The process is iterative; the conclusions of the first assessment may result in changes to the plan, and so a revision of the assessment would be required. If the revised assessment suggests further plan changes, the iteration will continue.

1.3.8 Iterative revisions typically continue until it can be ascertained that the plan will not have an adverse affect on the integrity of any European site.

1.3.9 There are further provisions for rare cases where over-riding public interest may mean that a land-use plan may be put into effect, notwithstanding a negative assessment, where there are no alternatives to development, but these provisions are not expected to be routinely used.

### ***Guidance and good practice***

1.3.10 This Habitats Regulations Assessment has taken account of published guidance and good practice including: Department for Communities and Local Government, 2006, *Planning for the Protection of European Sites: Appropriate Assessment under The Conservation (Natural Habitats &c.) (Amendment) (England and Wales) Regulations 2006: Guidance for Regional Spatial Strategies and Local Development Documents*; Office of the Deputy Prime Minister (ODPM), Circular 06/2005, Department for Environment Food and Rural Affairs Circular 01/2005, *Biodiversity and Geological Conservation: Statutory obligations and their impact within the planning system*; and Royal Society for the Protection of Birds, 2007, *The Appropriate Assessment of Spatial Plans in England: A guide to why, when and how to do it*. European sites

1.3.11 European sites are those sites which are of nature conservation importance in a European context. They are often known as Natura 2000 sites across Europe, and are legally registered as Special Protection Areas (for bird sites) and Special Areas of Conservation (for species other than birds, and habitats). These are usually abbreviated as SPA and SAC respectively.

Wetlands of International Importance, designated under the Ramsar Convention, are usually abbreviated as Ramsar sites and are of global importance.

1.3.12 Although the Appropriate Assessment process only legally applies to European sites, Government Policy in the National Planning Policy Framework is to apply the same protection to Ramsar sites.

1.3.13 As the interest features of the Ramsar sites are usually very similar to the interest features of the SPA and / or SAC designations, both geographically and ecologically, the assessment below, for clarity does not always repeat Ramsar site names. The assessment does however consider Ramsar sites fully, and if an assessment for a Ramsar site was found to differ from that for the respective SPA / SAC, this would be clearly identified.



## 2 European sites potentially affected

### 2.1 European sites within the Rural Vision 2031 area

2.1.1 All European sites (including Ramsar sites) within the Rural Vision 2031 area are potentially affected. The Rural Vision area is the whole of St Edmundsbury Borough excluding the two towns of Bury St Edmunds and Haverhill. These European sites are listed below.

European site name	Location	Brief reasons for designation
Breckland SPA	north-west part of the Borough (also in Forest Heath District, Breckland District and Kings Lynn & West Norfolk Borough)	stone-curlew, woodlark and nightjar birds on arable land, heathland and forestry.
Breckland SAC	north-west part of the Borough(also in Forest Heath District, Breckland District)	heathland, grassland, wet woodland, sand dunes, great crested newt
Waveney – Little Ouse valley Fens	parts of Market Weston, Hopton and Theltenham parishes (also in South Norfolk District)	wetland habitat

2.1.2 In June 2012, Natural England published conservation objectives for European sites<sup>3</sup>. The conservation objectives for the sites potentially affected by the Rural Vision 2031 plan are tabulated below.

European site name	Conservation Objectives
Breckland SAC	<p>With regard to the natural habitats and/or species for which the site has been designated (“the Qualifying Features” listed below);</p> <p><b>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</b></p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species;</li> <li>• The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;</li> <li>• The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;</li> <li>• The populations of qualifying species;</li> <li>• The distribution of qualifying species within the site.</li> </ul>

<sup>3</sup> <http://www.naturalengland.org.uk/ourwork/conservation/designations/sac/eastofengland.aspx>

	<p><b>Qualifying Features:</b>                  H2330. Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands; Open grassland with grey-hair grass and common bent grass of inland dunes                  H3150. Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i>-type vegetation; Naturally nutrient-rich lakes or lochs which are often dominated by pondweed                  H4030. European dry heaths                  H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>); Dry grasslands and scrublands on chalk or limestone                  H91E0. Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>); Alder woodland on floodplains*                  S1166. <i>Triturus cristatus</i>; Great crested newt</p>
<p>Breckland SPA</p>	<p>With regard to the individual species and/or assemblage of species for which the site has been classified ("the Qualifying Features" listed below);</p> <p><b>Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.</b></p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> <li>▪ The extent and distribution of the habitats of the qualifying features;</li> <li>▪ The structure and function of the habitats of the qualifying features;</li> <li>▪ The supporting processes on which the habitats of the qualifying features rely;</li> <li>▪ The populations of the qualifying features;</li> <li>▪ The distribution of the qualifying features within the site.</li> </ul> <p><b>Qualifying Features:</b>                  A133 <i>Burhinus oedicephalus</i>; Stone-curlew (Breeding)                  A224 <i>Caprimulgus europaeus</i>; European nightjar (Breeding)                  A246 <i>Lullula arborea</i>; Woodlark (Breeding)</p>
<p>Waveney and Little Ouse Valley Fens SAC</p>	<p>With regard to the natural habitats and/or species for which the site has been designated ("the Qualifying Features" listed below);</p> <p><b>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</b></p> <p>Subject to natural change, to maintain or restore:</p>

	<ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species;</li> <li>• The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;</li> <li>• The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;</li> <li>• The populations of qualifying species;</li> <li>• The distribution of qualifying species within the site.</li> </ul> <p><b>Qualifying Features:</b></p> <p>H6410. <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>); Purple moor-grass meadows</p> <p>H7210. Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>; Calcium-rich fen dominated by great fen sedge (saw sedge)*</p> <p>S1016. <i>Vertigo moulinsiana</i>; Desmoulin's whorl snail</p>
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## 2.2 European sites outside the Site Allocations Development Plan area

2.2.1 European sites in neighbouring Districts are also potentially affected by development within the Rural Vision area. A 20km radius from the boundary of St Edmundsbury was chosen to identify European sites potentially affected by the Rural Vision 2031.

European site name	Location	Brief reasons for designation
Redgrave and South Lopham Fens SAC	1.8km east of the Borough (Mid Suffolk District)	wetland habitat
Rex Graham Reserve SAC	5km north of the Borough (Forest Heath District)	orchid-rich grassland
Norfolk Valley Fens SAC	nearest component site is 8km north of the Borough (components in Breckland District and others)	wetland habitat
Devil's Dyke SAC	9.6km north-west of Borough (East Cambridgeshire District)	orchid-rich grassland
Fenland SAC	nearest component site is 10.5km north-west of the Borough (East Cambridgeshire)	wetland habitat
Chippenham Fen Ramsar site	10.5km north-west of the Borough (East Cambridgeshire)	wetland habitat
Wicken Fen Ramsar site	17km north-west of the Borough (East Cambridgeshire)	wetland habitat

2.2.2 Other European sites, at greater distance, are considered to be at sufficient distance that no potential impact would occur from the Rural Vision 2031 Local Plan Document.

### **2.3 Other relevant plans or projects affecting these sites**

2.3.1 In addition to a potential effect from the Rural Vision 2031, the European sites might also be affected by a number of plans or projects, including other Local Plan documents of St Edmundsbury, the Local Plan documents of other neighbouring Local Authorities, existing developments and proposed developments, management carried out by land managers with the consent of Natural England and third party effects such as recreation, etc.

2.3.2 In the context of this Habitats Regulations Assessment, the most relevant other plans or projects to be considered are

- St Edmundsbury Borough Council's Bury St Edmunds Vision 2031
- St Edmundsbury Borough Council's Haverhill Vision 2031

2.3.3 These plans are considered as part of this determination of likely significant effect of the Rural Vision 2031. Plans or projects in neighbouring Districts / Boroughs / Counties have been assessed at the Core Strategy stage<sup>4</sup> and further assessment is not necessary.

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<sup>4</sup> Atkins (2010) St Edmundsbury Core Strategy Habitats Regulations Assessment: Screening

### 3 Assessment of effects

#### 3.1 Introduction to possible effects

3.1.1 Possible effects arising from development resulting from allocations and policies in the Rural Vision 2031 need to be considered to determine their effect on any European site. The issues to be considered are

- Land-take from any European site
- Development within 1500m of part of Breckland SPA (supporting stone-curlew) or 400m of Breckland SPA (supporting woodlark and nightjar), according to Core Strategy policy CS2
- Development which would result in harmful recreational pressure to a European site
- An increase in air pollution
- Increased water use requiring water companies to abstract water which would result in a wetland European site drying unacceptably
- Increased sewage and surface water drainage polluting a European site

3.1.2 These matters may be more or less relevant to different sites allocated for development within Rural Vision 2031 depending upon their size, characteristics and location. St Edmundsbury's Core Strategy contains Policy CS1 'St Edmundsbury Spatial Strategy' and Policy CS2 'Sustainable Development' which provide protection to Breckland SPA and other European, national and local sites designated for nature conservation. The Rural Vision 2031 Local Plan Document sits within the context of the over-arching Core Strategy.

3.1.3 Development of sites may potentially cause increased air pollution as a result of increased traffic in the area, such as on new roads. Air pollution associated with road traffic generally reduces to background levels within 200m of the road<sup>5</sup>. There is no allocation or policy resulting in development, including new roads, within 200m of a European site so air pollution would have no likely significant effect upon any European site. There are no allocations for employment sites which are anticipated to generate a significant source of pollution; any planning applications which might result in air pollution being emitted would need to be accompanied by an assessment of the impacts of that pollution.

3.1.4 Two Water Cycle studies, for the north<sup>6</sup> and south<sup>7</sup> of the Borough respectively, form part of St Edmundsbury's evidence base for their Local Plan. The studies highlighted that there should be sufficient water resources available to supply the study areas in the future provided that new developments meet water efficiency standards, and provided that Anglian Water Services and Essex & Suffolk Water can implement their Water Resource Management Plans. The Core Strategy highlights in Policy CS2 the maximising of water efficiency. Anglian Water's (2010) *Water Resource Management Plan* confirmed that it will be able to meet demand in an environmentally acceptable manner. Essex and Suffolk Water's (2010) *Water Resources Management Plan 2010 – 2035* confirms that it too will be able to meet demand in an environmentally acceptable manner. It is considered that increased water use would have no likely significant effect on any European site.

3.1.5 Of the above 6 issues, two (air pollution and water resources) may be screened out at this stage. The remaining four are assessed further below. .

#### 3.2 Land-take from a European site

3.2.1 There is no allocation or policy specifically resulting in land-take from a European site. However, Barnham Camp is protected under Policy RV5 'Protection of Special Uses' for military

<sup>5</sup> Highways Agency DMRB Volume11, Section3, Part 1, *Air Quality* (revised May 2007, Ref HA 207/07).

<sup>6</sup> Hyder Consulting (August 2009) *Forest Heath District Council and St Edmundsbury Borough Council SFRA and Water Cycle Study*

<sup>7</sup> Entec (November 2008) *Braintree District, Haverhill and Clare Water Cycle Study. Water Cycle Strategy*

use, with the boundary of the area protected following the existing fenceline boundary around the site. A small area of Thetford Heaths SSSI, a component of Breckland SPA and of Breckland Special Area of Conservation (SAC) exists within the fenceline and is therefore 'protected' for military uses. It is pragmatic and sensible to use the fenceline as a boundary for the 'protection of special uses', as it coincides with the boundaries of the Camp and is unambiguous.

3.2.2 This superficially suggests that the area of European site within Barnham Camp is protected for military development, but this is over-simplistic. The policy says that *Proposals for operational development at Barnham Camp and RAF Honington will need to take particular account of issues relating to the protection of Breckland Special Protection Area (SPA) and Breckland Special Area of Conservation (SAC). Evidence will need to be provided, alongside any proposals for development, that there will be no adverse impact on the SPA, SAC or its constituent features.* With no proposals currently known, and given that a large area of the Camp is free of the constraint of international designation, it is not likely that a proposal to take land from the European sites would be permitted and this policy for Barnham Camp is therefore unlikely to have a significant effect on the European sites.

3.2.3 It is concluded that the Rural Vision 2031 Local Plan Document allocations would not have an adverse affect upon the integrity of any European site with respect to land-take from a European site.

### **3.3 Development within 1500m of part of Breckland SPA (supporting stone-curlew) or 400m of Breckland SPA (supporting woodlark and nightjar)**

3.3.1 The Core Strategy includes the following avoidance and mitigation measures to ensure that the Core Strategy is not likely to have a significant effect on the interest features of the SPA;

- 1. The identification of a 1,500m buffer zone from the edge of those parts of the SPA that support or are capable of supporting stone curlews*
- 2. The identification of a 400m buffer zone from the edge of those parts of the SPA that support or are capable of supporting nightjar or woodlark.*

3.3.2 Policy CS2 of the Core Strategy says that

*Only development that will not adversely affect the integrity of the SPA will be permitted. In applying this policy a buffer zone has been defined that extends 1,500m from the edge of those parts of the SPA that support or are capable of supporting stone curlews, within which:-*

- a) Permission may be granted for the re-use of existing buildings and for development which will be completely masked from the SPA by existing development; alternatively*
- b) Permission may be granted for other development not mentioned in sub paragraph (a) provided it is demonstrated by an appropriate assessment that the development will not adversely affect the integrity of the SPA.*

*A further 1,500m buffer zone has been defined which extends around those areas (shown on the Proposals Map) outside of the SPA which have supported 5 or more nesting attempts by stone curlew since 1995 and as such act as supporting stone curlew habitat, within which permission may be granted in accordance with a) and b) above. Additionally within this zone, where it can be shown that proposals to mitigate the effects of development would avoid or overcome an adverse impact on the integrity of the SPA or qualifying features, planning permission may be granted provided the Local Planning Authority is satisfied that those proposals will be implemented. In these areas development may also be acceptable providing alternative land outside the SPA can be secured to mitigate any potential effects.*

*Development at Risby (which lies partly within the 1,500m stone-curlew buffer) will be possible if it is fully screened from the Breckland SPA by existing development. A project*

*level appropriate assessment should be undertaken to ensure no adverse affect upon the integrity of the SPA.*

*A 400m buffer zone has been defined around those parts of the SPA that support or are capable of supporting nightjar and woodlark. Any development proposal within this zone will need to clearly demonstrate that it will not adversely affect the integrity of the SPA.*

- 3.3.3 In the Inspector's report on the Examination into the St Edmundsbury Core Strategy Development Plan Document (available on the St Edmundsbury website), the Inspector said in relation to Policy CS2 that '*in the light of the avoidance and mitigation measures proposed, I am content that there would be no likely significant effects on the SPA and therefore that a full Habitats Regulations Assessment for the CS is not required*'. The Core Strategy, as examined by the Inspector, considered the totality of development proposed within the Core Strategy, and so the cumulative affect of all development does not require further assessment within this document. No further evidence has arisen which might suggest that a review of the Core Strategy's Habitats Regulations Assessment is required. Individual sites need to be assessed, so that any impact of each individual site is clear.
- 3.3.4 RAF Honington airfield is protected under Policy RV5 'Protection of Special Uses' for military use, with a small part of the airfield within the 1500m stone-curlew buffer. The policy goes on to state that *Proposals for operational development at Barnham Camp and RAF Honington will need to take particular account of issues relating to the protection of Breckland Special Protection Area (SPA)*. In practice this means that any proposals for development within that part of the airfield within the buffer would need to be considered under the Habitats Regulations. With no proposals currently identified, the existence of policy to protect the SPA, and a large area of the airfield free of this constraint, it is not likely that a damaging proposal would be applied for or permitted in the stone-curlew buffer and this policy for RAF Honington is unlikely to have a significant effect on any European site.
- 3.3.5 Barnham Camp is also protected under Policy RV5 'Protection of Special Uses' for military use, with the boundary of the area protected following the existing fenceline boundary around the site. A small area of Thetford Heaths SSSI, a component of Breckland SPA and of Breckland SAC exists within the fenceline and is therefore protected for military uses. Barnham Camp is already heavily used for military use, and the SPA/SAC is used for military training on foot and with vehicles. Policy text says that *Proposals for operational development at Barnham Camp and RAF Honington will need to take particular account of issues relating to the protection of Breckland Special Protection Area (SPA)*. Evidence would need to be provided, alongside any proposals for development, that there will be no adverse impact on the SPA or its constituent features. With no proposals currently known, policy to protect the SPA, and a large area of the Camp free of this constraint, it is not likely that a damaging proposal would be applied for or permitted in the stone-curlew buffer and this policy for Barnham Camp is unlikely to have a significant effect on the SPA.
- 3.3.6 Regardless of policy, Barnham Camp and RAF Honington are the responsibility of the Ministry of Defence and the armed services, which are defined as competent authorities under the Conservation of Habitats and Species Regulations 2010. Competent authorities, before deciding to undertake a plan or project, must make their own appropriate assessment of the implications for European sites and would not normally agree to the plan or project if it would adversely affect the integrity of the European site. This is an additional safeguard not applicable to private sector developers and gives further confidence that any development within these sites would need assessment and could not be implemented if any harm would be caused.
- 3.3.7 The nearest site to the Breckland SPA allocated for housing is at Risby, with the allocated site around 1200m from the nearest part of the SPA. The SPA is to the west of Risby, whereas the allocated site is to the east of the majority of the village. The development is 'masked' by the existing village and would, according to adopted policy, not be likely to have a significant effect. In the Core Strategy, a project-level Appropriate Assessment was proposed for development at Risby; but the Appropriate Assessment would not be required for the Vision 2031 Document allocated site due to 'masking'. As additional reassurance, Policy RV23 'Risby' has been

amended from the previous version to include "*The need for a project level appropriate assessment, to ensure no adverse affect on the integrity of the Breckland SPA, should be assessed at the planning application stage*", so that any unforeseen detailed issues would be considered at planning application stage.

3.3.8 The next closest site allocation is at Ingham, around 2.2km from the SPA and outside the buffer zone. No other policies, for example those regarding employment sites, would affect any European site due to their scale, characteristics and location.

3.3.9 It is therefore considered that no site allocation or policy would result in an impact on any European site resulting from a proximity of within 1500m of part of Breckland SPA (supporting stone-curlew) or 400m of Breckland SPA (supporting woodlark and nightjar).

### **3.4 Development which would result in harmful recreational pressure to a European site**

3.4.1 Three typologies of visits to European sites are helpful in understanding the way people use European sites, and therefore the impact which could arise.

3.4.2 The first typology is the use of European sites by tourists staying overnight in the area, for example on short breaks or longer holidays.

3.4.3 The second typology is the 'day trip' to European sites, often including visits to towns or other tourist facilities within the day. European sites might be visited for the enjoyment of nature or for recreation (e.g. visitors to West Stow Heath county park, part of Breckland SPA), or simply as a backdrop to walks within a beautiful landscape e.g. walking in Kings Forest (part of Breckland SPA). 'Day trips' can include people travelling from nearby and also substantial distances away.

3.4.4 The third typology is the use by people of European sites close to their homes for recreation or other activities. These visits tend to treat the European sites simply as convenient local greenspace, often regardless of its special interest. An example might be someone living near a SPA conifer plantation walking or driving a short distance to the European site to take a dog for a walk.

3.4.5 These typologies, using appropriate data, may be used to predict any change in visitors to European sites based on changes in numbers of people in each typology. The change in visitor numbers can be assessed to determine if that change would have an adverse affect upon the integrity of the European site

#### ***The use of European sites by tourists***

3.4.6 The Policy RV6 Ingham Park Farm site could potentially provide tourist accommodation, with some of the demand for tourists' countryside recreation being met by on-site public open space and recreational open space facilities. Just 9% of visitors in 2010 to Thetford Forest were holidaymakers, compared to local visitors (Fearnley, H., Liley, D. and Cruickshanks, K. 2010)<sup>8</sup> and tourist accommodation at Ingham is unlikely to add significantly to visitor impacts upon European sites. No details are currently available for any development there. There is no demonstrable threshold above which tourism development can clearly be identified as harmful although the type of accommodation typically planned within leisure facilities is unlikely to generate sufficient visitors to have a likely significant effect upon a European site. Any development proposal for tourist accommodation would through the normal planning application process be considered for likely effects upon European sites.

3.4.7 It is considered that the holiday use of Rural St Edmundsbury is not otherwise altered greatly by the Rural Vision 2031 Local Plan Document. It is considered that housing development will not increase or decrease incoming tourist use of European sites.

<sup>8</sup> Fearnley, H., Liley, D. and Cruickshanks, K. (2010). Visitor survey from results Breckland SPA. Footprint Ecology



***The use of European sites as convenient local greenspace or daytrips – Breckland SPA and SAC******Breckland SPA – Thetford Forest***

3.4.8 A study of visitors to, primarily, Thetford Forest (a component site within Breckland SPA) was carried out by Footprint Ecology in 2010 (Fearnley, H., Liley, D. and Cruickshanks, K. 2010)<sup>9</sup>. This showed that visitors overwhelmingly travelled by car to visit the Forest, mostly for walking with or without dogs, or for cycling. Around 56% of visitors visited weekly or more often, and so would be using the Forest as convenient local greenspace for their activities. The remaining proportion generally used the Forest for less frequent visiting, perhaps monthly or less and would be day-trippers. The closer people lived to the car park, the more frequently they visited, with a cut-off at around 9km distance beyond which a low proportion of people visited. Visitors came from a wide range of locations, with Bury St Edmunds and Brandon generating more than other towns/villages.

3.4.9 Most allocations within the Rural Vision 2031 Local Plan Document are small in relation to the overall housing present, and most are well over 9km from a car park giving access to Thetford Forest within Breckland SPA. Risby (5.5km), Barrow (8km), Ingham (4.9km) and Great Barton (9.5km) are the closest allocations measured on a straight line basis, from where residents of new housing might drive regularly to formal car parks in Thetford Forest. This is a very small proportionate increase in visitors, as the proportionate increase in the potential number of visitors is very small. The birds for which the SPA is designated within Thetford Forest are woodlark and nightjar. The Footprint Ecology report (Fearnley, H., Liley, D. and Cruickshanks, K. 2010) is clear that the amount of visitor pressure is sufficiently low to provide no evidence of impact upon those birds.

***Breckland SPA – heaths***

3.4.10 Other components of the Breckland SPA within around 9 – 10km in a straight line of the allocations in Risby, Barrow and Ingham, in addition to Thetford Forest, include the heaths at West Stow Heath SSSI, Cavenham – Icklingham Heaths, Deadman's Grave, and Berners' Heath. The straight-line distances to car parking locations in these SSSIs are given in the table below.

<b>Village</b>	<b>West Stow Heath</b>	<b>Cavenham Heath</b>	<b>Berner's Heath</b>	<b>Deadman's Grave</b>
<b>Barrow</b>	8.7km	9km	n/a – no car park available	n/a – no car park available
<b>Ingham</b>	6km	10.5km	n/a – no car park available	n/a – no car park available
<b>Risby</b>	5km	7.7km	n/a – no car park available	n/a – no car park available
<b>Great Barton</b>	9km	15km	n/a – no car park available	n/a – no car park available

3.4.11 The land within which SPA bird species nest at West Stow Heath is managed within West Stow Country Park to minimise visitor impact, and no other SPA species are present. Part of Cavenham – Icklingham Heaths which supports SPA bird species is open to the public during the nesting season but is managed within Cavenham Heath NNR to minimise visitor impact. The remainder of land within Cavenham – Icklingham Heaths which supports some or all SPA bird species, the vast majority of Deadman's Grave and all of Berner's Heath are not open to public access within the bird nesting period. There are no car parks which serve Deadman's Grave or Berner's Heath. It is considered that a small increase in visitors on these sites would not have an impact upon SPA bird species and therefore on the SPA.

<sup>9</sup> Fearnley, H., Liley, D. and Cruickshanks, K. (2010). Visitor survey from results Breckland SPA. Footprint Ecology

*Breckland SPA – arable land*

- 3.4.12 Recreation on arable land is very limited. There is a network of public rights of way through arable land in the SPA, but these are poorly served by car parking and thus receive very few users. The allocations are all at sufficient distance from arable areas of the SPA, that very few walkers from residents of the housing allocations would walk into the SPA and the change of numbers from present would be low.

*Breckland SAC*

- 3.4.13 Most allocations within the Rural Vision 2031 Local Plan Document are well over 9km from a car park giving access to component sites within Breckland SAC. Components of the Breckland Special Area of Conservation (SAC) around 9 – 10km in a straight line of the allocations in Risby, Barrow and Ingham, include the heaths and woodland at Cavenham – Icklingham Heaths, Deadman's Grave, and Berners' Heath. A very small proportionate increase in visitors is again predicted, as these allocations would result in a small increase in population. A car park at Cavenham – Icklingham Heaths gives access, managed by Natural England within Cavenham Heath NNR, to part of the SAC. Visitor use is low, and it is considered that SAC habitats at that site are not harmed by visitors. Access to other parts of Cavenham – Icklingham Heaths, and to Deadman's Grave, and Berners' Heath is not facilitated by car park provision and the land is generally not open to the public within the spring and summer.
- 3.4.14 It is therefore considered that an unacceptable increase in recreation pressure on Breckland SPA and Breckland SAC would not occur. The allocations in Rural Vision 2031 Local Plan Document would not have an adverse affect on the integrity of those European sites.

***Alternative provision of recreational facilities***

- 3.4.15 New Policy RV6 'Park Farm Ingham' allocates 86 hectares of land at Park Farm, Ingham for leisure, recreation and tourism as identified on the Policies Map. The site is over 1500m from Breckland SPA or any other European site. The amount of land available for the proposed uses, design and landscaping will be informed by a concept statement and masterplan for the site. The site would provide areas of public open space and recreational open space with public footpath and cycleway access within the site and to nearby villages.
- 3.4.16 It is unclear what would be provided in terms of built facilities, and how much land would be available for informal recreation such as dog walking. However, open space is likely to be used as an alternative convenient local greenspace by some residents of surrounding villages using footpath links, and by some residents of Bury St Edmunds subject to car parking availability, resulting in a decrease in visitor pressure to Thetford Forest and other parts of Breckland SPA.
- 3.4.17 Policy RV6 therefore gives additional reassurance that an unacceptable increase in recreation pressure on Breckland SPA and Breckland SAC would not occur, and the allocations in Rural Vision 2031 Local Plan Document would not have an adverse affect on the integrity of those or other European sites.

***Waveney – Little Ouse Valley Fens SAC***

- 3.4.18 The nearest allocation to Waveney – Little Ouse Valley Fens SAC is at Hopton, where community facilities/village hall, a sport pitch/playing field and an allocation of 25 dwellings are proposed. This site is around 400m from the Market Weston Fen component of the SAC. Although Market Weston Fen is open to visitors, access by car is limited by difficult road-side car parking. The village hall with car parking is already present although this could be improved. The allocation site is situated conveniently for footpath access to Market Weston Fen, and car parking associated with the village hall could be used as parking for fen access by visitors from outside Hopton village. A significant increase in visitors could be expected to the SAC as a result. An increase in visitors could result in increased and possibly unacceptable trampling of internationally important vegetation. Grazing management could also become

more difficult if visitors were to release dogs off-lead; there is little wardening to prevent this from occurring although visitors are requested to keep dogs on a short lead<sup>10</sup>.

3.4.19 At the earlier February 2012 Preferred Options Appropriate Assessment screening it could not be determined that the allocation is not likely to have a significant effect. However, possible mitigation measures could include provision for dog exercise in the vicinity of the village, and improving connections to the rights of way network so that there are alternative walking options. Upgraded SAC infrastructure, such as boardwalks or gates, might also be needed. It was recommended that this issue is raised in supporting text, and in Policy RV21 Hopton, so that developers can design a suitable scheme and avoid any harm to the SAC.

3.4.20 The Policy RV21 Hopton has been revised according to the recommendation in the February 2012 Appropriate Assessment Screening to include the text '*The development brief must include proposals for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Waveney-Little Ouse Valley Fens SAC*'.

3.4.21 This change allows the impact of the development to be assessed at planning application stage, with measures taken to design a scheme to remove impacts. It is considered realistic that such a scheme can be designed, due to the scale and location of the development. It is concluded that the allocations in Rural Vision 2031 Local Plan Document are not likely to have a significant effect on Waveney-Little Ouse Valley Fens SAC due to an increase in recreational pressure.

### 3.5 Increased sewage and surface water drainage polluting a European site

3.5.1 European sites tend to rely on low soil and water fertility, and with regular soil water levels, for continued maintenance of soil conditions suitable for the habitat. There is one allocation within the Rural Vision 2031 Local Plan Document where a development could have had an influence on water levels or fertility within a European site, from drainage from the development towards the nearby European site. This allocation is at Hopton (Policy RV21) where community facilities/village hall, a sport pitch/playing field and an allocation of 25 dwellings are proposed. It is theoretically possible that release of sewage via soakaways might result in nutrients flowing through groundwater and reaching Waveney – Little Ouse Valley Fens SAC, around 400m to the west and downslope.

3.5.2 Policy RV21 'Hopton' is clear that 'Foul drainage should be via the public sewerage network', thus removing the possibility of the release of sewage via soakaways. It is concluded that the allocations in Rural Vision 2031 Local Plan Document are not likely to have a significant effect on Waveney-Little Ouse Valley Fens SAC from an increase in recreational pressure.

3.5.3 All other European sites are sufficiently distant that no allocations are likely to have a significant effect in relation to this issue.

### 3.6 Conclusion of screening

3.6.1 It is concluded that each individual site allocation or policy within the St Edmundsbury Borough Council Rural Vision 2031 Local Plan Document is not likely to have a significant effect on any European site, and that no individual site appropriate assessment is necessary.

### 3.7 In-combination effects of individual sites

3.7.1 Each individual allocation was found to have no likely significant affect upon the integrity of any European site (this Section). The small scale of the allocations, and their dispersion across the Borough, means that no in-combination effects of individual allocations occur.

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<sup>10</sup> <http://www.suffolkwildlifetrust.org/reserves/market-weston-fen> website accessed on 12<sup>th</sup> August 2014.

### **3.8 In-combination effects of all development within the Rural Vision 2031 Local Plan Document**

- 3.8.1 St Edmundsbury's Core Strategy underwent Appropriate Assessment, and was found to be sound following an Examination in Public. The Rural Vision 2031 Local Plan Document adds further detail, but generally does not increase the amount of development planned for the Rural area. The cumulative affect of all development in the Core Strategy has already been assessed and does not require further assessment. Policy RV6 'Ingham' adds a new development of leisure and recreational facilities not described in the Core Strategy. This new development on balance is likely to reduce visitor pressure on European sites and does not add an in-combination negative effect upon any European site.

## **4 Consultations**

### **4.1 Consultation comments received**

- 4.1.1 St Edmundsbury Borough Council consulted publicly on the Rural Vision 2031 preferred options document in March and April 2012. Two respondents commented on the Appropriate Assessment screening.
- 4.1.2 Natural England, in its letter of 26<sup>th</sup> April 2012 said that it was generally satisfied with the methodology and assessment presented in the report and believed this is in line with the requirements of the Conservation (of Habitats and Species) Regulations 2010. Natural England also pointed out the Appropriate Assessment Screening recommendations for revisions to policy for RV4 (now RV5) 'Protection of Special Uses' and for policy RV16 (now RV21) Hopton. This letter is reproduced in Appendix 3.
- 4.1.3 Suffolk Wildlife Trust, in its letter of 30<sup>th</sup> April 2012, made similar comments to Natural England regarding the policies for RV4 (now RV5) 'Protection of Special Uses' and for policy RV16 (now RV21) Hopton. This letter is given in Appendix 4.
- 4.1.4 Consultation on the Rural Vision 2031 submission document took place between June and August 2013. Natural England, in its letter of 9 August 2013, stated that they were satisfied with the methodology and assessment presented in the report and believed it met the requirements of the Conservation (of Habitats and Species) Regulations 2010. This letter is given in Appendix 5.
- 4.1.5 No further substantial comments were received on consultation on the Main Modifications in spring 2014. Natural England commented on 21<sup>st</sup> May 2014 (Appendix 5) on modifications but made no comment on the Habitats Regulations Assessment of the modification.

### **4.2 Response to the consultations**

- 4.2.1 The Rural Vision 2031 Submission Document was amended to include the recommendations for the policies as requested by both consultees and as presented in the June 2013 Rural Vision 2031 Appropriate Assessment screening. There were no recommendations by any consultees which remain unaddressed at that time and no further recommendations or objections were made.

## 5 Summary

### 5.1 Summary of assessment

- 5.1.1 The Rural Vision 2031 document sets out the council's site allocations in the six key service centres and the 12 local service centres identified in the Core Strategy Document. It reviews the existing Housing Settlement boundaries for all villages and also proposes to designate the general employment areas and operational use areas outside Bury St Edmunds and Haverhill.
- 5.1.2 There is no allocation or policy resulting in development, including new roads, which would cause air pollution have a likely significant effect upon any European site. The Water Cycle study forming part of St Edmundsbury's evidence base highlighted that there should be sufficient water resources available to supply the study area in the future provided that new developments meet water efficiency standards.
- 5.1.3 There is no allocation or policy specifically resulting in land-take from a European site. However, Barnham Camp is protected under Policy RV5 'Protection of Special Uses' for military use, with the area protected including a small area of Breckland SPA and of Breckland SAC. It is not likely that a proposal to take land from the European sites would be permitted within the protected area and this policy for Barnham Camp is therefore unlikely to have a significant effect on the European sites.
- 5.1.4 St Edmundsbury's Core Strategy identifies a 1,500m buffer zone from the edge of those parts of the SPA that support or are capable of supporting stone curlews and a 400m buffer zone from the edge of those parts of the SPA that support or are capable of supporting nightjar or woodlark. RAF Honington airfield is protected under Policy RV5 'Protection of Special Uses' for military use, with a small part of the airfield within the 1500m stone-curlew buffer. The policy takes particular account of issues relating to the protection of Breckland Special Protection Area (SPA) and this policy for RAF Honington is unlikely to have a significant effect on any European site.
- 5.1.5 Barnham Camp is also protected for military use, with a small area of Breckland SPA and of Breckland SAC within the protected area and is therefore protected for military uses. Barnham Camp is already heavily used for military use, and the SPA/SAC is used for military training on foot and with vehicles. Policy text says that *Proposals for operational development at Barnham Camp and RAF Honington will need to take particular account of issues relating to the protection of Breckland Special Protection Area (SPA)*, and it is not likely that a damaging proposal would be applied for or permitted in the stone-curlew buffer and this policy for Barnham Camp is unlikely to have a significant effect on the SPA.
- 5.1.6 The nearest site to the Breckland SPA allocated for housing is at Risby, with the allocated site around 1200m from the nearest part of the SPA. The SPA is to the west of Risby, whereas the allocated site is to the east of the majority of the village. The development is 'masked' by the existing village and would, according to adopted policy, not be likely to have a significant effect. As additional reassurance, Policy RV23 'Risby' includes "*The need for a project level appropriate assessment, to ensure no adverse affect on the integrity of the Breckland SPA, should be assessed at the planning application stage*", so that any unforeseen detailed issues would be considered at planning application stage. The next closest site allocation is at Ingham, around 2.2km from the SPA and outside the buffer zone.
- 5.1.7 No other policies, for example those regarding employment sites, would affect any European site due to their scale, characteristics and location. It is therefore considered that no site allocation or policy would result in an impact on any European site resulting from a proximity of within 1500m of part of Breckland SPA (supporting stone-curlew) or 400m of Breckland SPA (supporting woodlark and nightjar).
- 5.1.8 Most allocations within the Rural Vision 2031 Local Plan Document are small in relation to the overall housing present, and most are well over 9km from a car park giving access to heathland or forestry land within Breckland SPA/SAC, so recreational pressure change would be low. Policy RV6 'Park Farm Ingham' allocates 86 hectares of land at Park Farm, Ingham for leisure,

recreation and tourism, including public open space which may divert visitors from European sites and thus reduce existing visitor pressure.

- 5.1.9 An allocation at Hopton (policy RV21) could potentially cause increased visitor pressure and water quality issues to Market Weston Fen, part of Waveney – Little Ouse Valley Fens SAC. These issues are addressed within the policy and have been discounted as having any significant effect.

## **5.2 Summary of Conclusions**

- 5.2.1 It is concluded that the Rural Vision 2031 Local Plan Document would have no likely significant effect on any European site, alone or in combination with any other plan or project.

# ***Appendix 1***



## Rural Vision 2031: Final tracked changes of policies (September 2014)

### **Policy RV1**

#### **Presumption in Favour of Sustainable Development**

When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise – taking into account whether:

- any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- specific policies in that Framework indicate that development should be restricted.

*Note: This policy has been published by the Planning Inspectorate and is required to be included in all Local Plans*

### **Policy RV2**

#### **Neighbourhood Plans and Neighbourhood Development Orders in the rural areas**

Proposals to bring forward and develop neighbourhood plans and/or neighbourhood development orders in the rural areas will be considered favourably if they meet the following requirements.

- Proposals for development meet at least the minimum level of growth and demonstrate how they conform with the strategic policies as set in the adopted Core Strategy

- The form, size, type and design of new development proposed meets the requirements set out in national and local planning policy.

### **Policy RV3 Housing Settlement Boundaries**

Housing settlement boundaries for the villages listed in Appendix 2 are defined on the separate Policies Map book (which accompanies this document).

Planning permission for new residential development, residential conversion schemes, residential redevelopment and replacement of an existing dwelling with a new dwelling will be permitted within housing settlement boundaries where it is not contrary to other policies in the plan.

### **Policy RV4 Rural Employment Areas**

The following areas are designated as rural employment areas

<b>Reference</b>	<b>Site</b>	<b>Use class</b>
<b>A</b>	<b>Barrow Business Park</b>	<b>(B1)</b>
<b>B</b>	<b>Chedburgh</b>	<b>(B1, B2, B8)</b>
<b>C</b>	<b>Clare Chilton Street Business Park</b>	<b>(B1)</b>
<b>D</b>	<b>Clare, Bridewell Industrial Estate</b>	<b>(B1, B8)</b>
<b>E</b>	<b>Gorse Industrial Estate (Barnham)</b>	<b>(B1, B2, B8)</b>
<b>F</b>	<b>Ingham</b>	<b>(B1, B8)</b>
<b>G</b>	<b>Ixworth, land off Bardwell Road</b>	<b>(B1)</b>
<b>H</b>	<b>Risby Business Park</b>	<b>(B1, B8)</b>
<b>I</b>	<b>Saxham</b>	<b>(B1, B2, B8)</b>
<b>J</b>	<b>Shepherd's Grove, Stanton/Hepworth</b>	<b>(B1, B2, B8)</b>

K	Wrattling	(B1, B2, B8)
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Within the rural employment areas, the following land is available for development.

	Developable site area (hectares)
(A) Barrow Business Park	1.0
(B) Chedburgh	1.1
(C) Clare Chilton Street	0.5
(G) Ixworth, land off Bardwell Road	1.6
(H) Risby Business Park	2.5
(J) Shepherd's Grove, Stanton/Hepworth	53.1
<b>Total area available:</b>	<b>59.8</b>

Proposals for B1, and B2 and B8 uses where appropriate, will be permitted within ~~general~~ **rural** employment areas providing that space requirements, parking, access, landscaping and general environmental considerations can be met.

Any development proposals for the rural employment area (A) Barrow Business Park will need to take into account the requirements for the future expansion of the primary school.

The following infrastructure is required to facilitate development:

- a) an access road to Shepherd's Grove Industrial Estate.

The route of the above road scheme is identified on the Policies Map and will be safeguarded.

**If, having regard to prevailing market conditions, it is demonstrated that the development of the available land at the Shepherd's Grove site for B1/B2/B8 uses together with the provision of the required access road could not be viably achieved, the inclusion of a proportion of residential and/or other higher-value development will be considered. Any higher-value development included for this purpose shall be no more than is necessary to achieve a viable B1/B2/B8 development together with the access road, and shall not include any main town centre uses as defined in the Glossary to the National Planning Policy**

**Framework, other than retail development to serve local needs. The amount, location and nature of any higher-value development will be specified in the masterplan for the site and will be subject to regular review, having regard to market conditions and development viability.**

A Masterplan will be required for Shepherd's Grove, Stanton/Hepworth.

**Applications for planning permission will only be determined once the masterplan has been adopted by the local planning authority.**

(Note: Rougham general employment area is considered under Policy BV14 of the Bury Vision 2031 document)

#### **Policy RV5 Protection of Special Uses**

Special circumstances apply for military and prison establishments and in the areas listed below, and as identified on the Policies Map, proposals for operational development will be considered favourably, taking into account existing constraints and statutory guidelines and in accordance with the Core Strategy and Development Management Development Plan Documents (DPD).

- a) Barnham Camp
- b) RAF Honington
- c) HMP Highpoint North and South

Proposals for operational development at Barnham Camp and RAF Honington will need to take particular account of issues relating to the protection of Breckland Special Protection Area (SPA) and Breckland Special Area of Conservation (SAC). Evidence will need to be provided, alongside any proposals for development, that there will be no adverse impact on the SPA, SAC or its constituent features.

#### **Policy RV6 Park Farm Ingham**

86 hectares of land is allocated at Park Farm, Ingham for leisure, recreation and tourism as identified on the Policies Map.

The amount of land available for the proposed uses, types and location of uses, access arrangements, design and landscaping will be informed by a concept statement and masterplan for the site. The site must provide:

- public footpath and cycleway access within the site and to the nearby villages of Fornham All Saints, Fornham St Genevieve,

**Ingham and Culford**

- public transport links; and
- areas of public open space and recreational open space.

A transport assessment and safety audit will need to be provided as part of any proposal for development on the site.

**Policy RV7: Allotments**

Proposals that will result in the loss of allotments will not be allowed unless:

- a) it can be demonstrated that there is no local demand for the allotment; or
- b) suitable alternative allotment provision ~~mitigation~~ can be identified and made available.

Any replacement provision should take account of the needs of the locality, accessibility and suitability.

Sites for the provision of additional allotments will be identified, where appropriate, in Masterplans and Development Briefs.

**Policy RV8: Safeguarding educational establishments**

Existing and proposed schools and educational establishments will be safeguarded for educational and community use. Development will be considered favourably where:

- i) a the development is for buildings and/or facilities ancillary to, or enhancing the educational or community use; or
- ii) b the facility which would be lost as a result of the proposed development would be replaced by an establishment of an equivalent or better quality, in a suitable location; or
- iii) c there is clear evidence through a quantified and documented assessment that now, and in the future, the site will no longer be needed for its current purpose and there is no community need for the site.

## **Policy RV9 Green Infrastructure in the rural areas**

**In the rural areas the integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced, which includes the creation of new habitats, through the implementation of the St Edmundsbury Green Infrastructure Strategy.**

**Opportunities to extend the coverage and connectivity of the strategic green infrastructure network should be undertaken in association with new development, where appropriate.**

**Green Infrastructure projects will:**

- a) Enhance the character of the Green Infrastructure Action Zones identified in the Green Infrastructure Strategy;**
- b) Conserve and enhance the wooded character of identified woodland enhancement corridors in the GI Strategy, with a view to linking areas of ancient woodland corridor;**
- c) Seek to use existing routes, tracks and links, wherever possible, to form continuous green corridors, as identified in the GI Strategy, facilitating equal access and maximising permeability to existing routes within the countryside; ~~and~~**
- d) improve and enhance, where practical, the wetland landscape character along the river corridors; and**
- e) promote access to, and appreciation of, local history and heritage assets within the landscape as part of a multi-functional approach.**

**The council will work with its partners to develop the green infrastructure network and implement proposed network improvements including those set out in the Green Infrastructure Strategy.**

**Planning permission for development that would harm the Green Infrastructure network will only be granted if it can incorporate measures that avoid the harm arising or sufficiently mitigate its effects.**

## Policy RV10 Barrow

Residential development is proposed in Barrow on the following greenfield sites;

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Land at The Green, Barrow	1.5	Short term	29*
b)	Land east of Barrow Hill	4.2	Medium term	<u>75 dwellings and 1 hectare of B1 business use</u>
c)	Land west of Barrow Hill	3.5	Medium term	75

Residential development on these sites will be permitted ~~in accordance with~~ having regard to the phasing periods shown.

Development on land at The Green (a) must accord with the requirements in the adopted site development brief.

On sites (b) and (c) the amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by development briefs for the sites.

Applications for planning permission will only be ~~considered~~ determined once the development brief has been agreed by the local planning authority.

Land east of Barrow Hill (b) and west of Barrow Hill (c) must provide enhanced footpath and cycleway access to the village centre and areas of public open space.

Developers of ~~the~~ land east of Barrow Hill (b) should investigate the opportunity for ~~facilitating~~ the provision of a new dental surgery and improved access/parking for the existing Barrow doctor's surgery

through consultation and liaison with NHS England. The location of the B1 business uses on the site will be determined through the production of the development brief.

Strategic landscaping and open space must be provided on all sites to address the individual site requirements and locations.

\*Allocations in this document are based on the planning situation at 1 April 2012. Sites where planning applications were approved after the April 2012 base dates are included as allocated sites, as to omit them would not show the complete planning picture. The approved Development Brief for the site was the most up to date document available at this time which included the figures shown in the table above. Planning permission for 40 dwellings on Land at The Green, Barrow was ~~approved~~ granted in December 2012 July 2013. Planning permission for 80 dwellings on Land west of Barrow Hill was granted in December 2013.

#### Policy RV11 Clare

Development is proposed in Clare on the following greenfield sites:

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Land east of The Granary	2.3	Short term	60*
b)	Land off Cavendish Road	2.2	Medium term	64

Residential development on these sites will be permitted ~~in accordance with~~ having regard to the phasing ~~dates~~ periods shown.

Development on land east of The Granary (a) must accord with the requirements in the adopted site Development Brief.

On site (b) the amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by a Development Brief for the site. Applications for planning permission will only be ~~considered~~ determined once the



Development Brief has been agreed by the local planning authority.

Land off Cavendish Road (b) must incorporate proposals for enhancing footpath and cycleway access to the town centre.

Strategic landscaping and open space must be provided on all sites to address the individual site requirements and locations.

\* Allocations in this document are based on the planning situation at 1 April 2012. Sites where planning applications were approved after the April 2012 base date are included as allocated sites, as to omit them would not show the complete planning picture. Planning permission for 60 dwellings on Land east of the Granary was approved in ~~January~~ November 2013.

### Policy RV12 Ixworth

Development is proposed in Ixworth on the following sites:

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Reeves Farm, Stow Road	0.5	Short term	20*
b)	Land off Crown Lane	2.5	Short term	90
c)	Land west of A143 and south of A1088	TBC	Medium term	80 (southern part of site) (residual land to north protected for educational use)

Residential development on these sites will be permitted ~~in accordance with~~ having regard to the phasing ~~dates~~ periods shown.

Development on land off Crown Lane (b) must accord with the requirements in the adopted site concept statement and masterplan.

The southern part of site (c) ~~An area of~~ (land to the west of the A143 and south of the A1088) is allocated for 80 dwellings, ~~with~~ The remaining land residual part of the site to the north is protected for future educational needs. ~~If at a later date it is determined this residual land is not required for educational uses then it can be brought forward for residential use in the medium term.~~

Residential use on the residual land to the north can come forward in the medium term subject to the consideration of educational requirements on this land. This should be determined through the concept statement and masterplan process, which should also identify. ~~If site (c) is brought forward for residential use the amount of land available for development, location of uses, access arrangements, and design and landscaping. will be informed by a concept statement and masterplan for the site.~~ The site must provide:

- contributions through CIL or S106 to the provision of a safe crossing from Crown Lane across the A143 Ixworth bypass, unless it is demonstrated not to be feasible;
- improvements to existing public transport links;
- enhanced footpath and cycleway access to the village centre; and
- areas of public open space and recreational open space.

Applications for planning permission on site (c) will only be ~~considered~~ determined once the concept statement and masterplan have been ~~agreed~~ adopted by the local planning authority.

Strategic landscaping and open space must be provided on all sites to address the individual site requirements and locations.

\*Allocations in this document are based on the planning situation at 1 April 2012. Sites where planning applications were approved after the April 2012 base date are included as allocated sites, as to omit them would not show the complete planning picture.  
Planning permission for ~~24~~ 16 dwellings at Reeves Farm, Stow

Road was approved in November 2012.

### Policy RV13 Kedington

Residential development is proposed in Kedington on the following site:

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Stourmead complex	2.2	Short term	65
b)	Land at Limes Cottage and adjoining land	1.8	Medium term	40

Residential development on these sites will be permitted ~~in accordance with~~ having regard to the phasing ~~dates~~ periods shown.

Development on land at the Stourmead complex (a) must accord with the requirements in the adopted site Development Brief.

Access to site (a) will be via Risbridge Drive with the viability of a secondary road access from Mill Road explored as part of any application for development on the site. The site must provide enhanced footpath and cycleway access directly onto Mill Road from the site, to the village centre and along Mill Road to the school.

On site (b) the amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by a Development Brief for the site. Applications for planning permission will only be ~~considered~~ determined once the Development Brief has been ~~agreed~~ adopted by the local planning authority.

The undeveloped area of countryside in the centre of the village will be protected for amenity and visual value.

Strategic landscaping and open space must be provided to address the individual site requirements and location.

**\*Allocations in this document are based on the planning situation at 1 April 2012. Sites where planning applications were approved after the April 2012 base dates are included as allocated sites, as to omit them would not show the complete planning picture. Planning permission for 63 dwellings (following demolition of 13 bungalows & resource centre) at the Stourmead Complex was approved in October 2013.**

**Policy RV14 Stanton**

Residential development is proposed in Stanton on the following site:

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Land at Upthorpe Road, Stanton	3.1	Short term	90*

Residential development on this site will ~~only~~ be permitted ~~after the date~~ having regard to the phasing period shown.

Development on Land at Upthorpe (a) must accord with the requirements in the adopted site Development Brief.

Improvements to public foot and cycleways across the A143 should be investigated and implemented to increase accessibility to the main village services and facilities for residents living to the north of the A143.

**\*Allocations in this document are based on the planning situation at 1 April 2012. Sites where planning applications were approved after the April 2012 base date are included as allocated sites, as to omit them would not show the complete planning picture. Planning permission for 101 dwellings at Upthorpe Road, Stanton was approved in May 2012.**

### Policy RV15 Barningham

Residential development is proposed in Barningham on the following greenfield site.

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Hopton Road	0.7	Short term	20

Residential development on this site will be permitted ~~in accordance with~~ having regard to the phasing date period shown.

The access arrangements for the site should be designed to allow for the potential of a dual access point to serve this site as well as any future provision of an affordable housing exception site on adjoining land.

Strategic landscaping and open space must be provided to tackle the individual site requirements and location.

\*Allocations in this document are based on the planning situation at 1 April 2012. Sites where planning applications were approved after the April 2012 base dates are included as allocated sites, as to omit them would not show the complete planning picture. Planning permission for 21 dwellings was approved in December 2013.

### Policy RV16 Cavendish

Residential development is proposed in Cavendish on the following greenfield site;

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Land at end of Nether	0.4	Short term	10

	Road			
--	------	--	--	--

Residential development on this site will be permitted ~~in accordance with~~ having regard to the phasing date-period shown.

Existing informal footpaths should be retained wherever possible.

Strategic landscaping and open space must be provided to address the individual site requirements and location.

### Policy RV17 Chedburgh

Residential development is proposed in Chedburgh on the following greenfield site.

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Queens Lane	0.7	Long term	10

Residential development on this site ~~should be~~ will be permitted in accordance with having regard to the phasing date-period shown.

Any applications for development on the site should demonstrate how surface water flooding issues will be mitigated.

Access to the development site will be from Queens Lane.

Strategic landscaping and open space must be provided to address the individual site requirements and locations.

#### Land at The Conifers, The Street, Chedburgh (underlined)

Any proposals to redevelop The Conifers site, located on The Street, Chedburgh, will be required to deliver a footpath link between the former fireworks factory site and The Street.

### Policy RV18 Great Barton

12.4 hectares of land is allocated for residential and community uses on the north eastern edge of Great Barton.

The total capacity of the site should be determined through a site Development Brief, with up to 40 dwellings permitted in the period to 2031.

The amount of land available for development, types and location of uses, access arrangements, design and landscaping will be informed by a Development Brief for the whole 12.4 ha site. The Development Brief should set out how the community uses on the site will be delivered. Applications for planning permission will only be ~~considered~~ determined once the development brief has been adopted ~~agreed~~ by the local planning authority.

Access to the site will be from Mill Road (B1106).

Development on the site must make provision for the potential expansion needs of Great Barton Primary School.

Development on the site will need to respect and respond appropriately to issues of congestion, air quality and noise management.

The development area must provide enhanced footpath and cycleway access to the village centre and areas of public open space.

Strategic landscaping and open space must be provided to address the sites requirements and location.

### Policy RV19 Great Thurlow

Residential development is proposed in Great Thurlow on the following site.

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Goldings Farm	0.25	Short term	5

Residential development on this site ~~should be~~ will be permitted in accordance with ~~having regard to the phasing date period~~ shown.

Improvements to public footpaths should be investigated and implemented to increase accessibility to the main village services and facilities.

Strategic landscaping and open space must be provided to address the individual site requirements and location

**Policy RV20 Great and Little Whelnetham**

Residential development is proposed in Great and Little Whelnetham on the following sites;

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Land at Erskine Lodge	2	Short term	Affordable and market homes with dwelling capacity and mix to be confirmed by the development brief
b)	Land off Tutelina Rise	0.4	Long term	10

Residential development on these sites will be permitted ~~in accordance with~~ having regard to the phasing ~~period~~ periods shown.

On site (a) the amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by a site Development Brief. Applications for planning permission will only be ~~considered~~ determined once the development brief has been adopted ~~agreed~~ by the local planning authority.

The mix of affordable and market housing will be detailed in the development brief and will include trigger points for delivery.



Primary access to site (b) should be provided from Hambrook Close.

Proposals for development on both sites should reflect the scale and form of surrounding development.

Strategic landscaping and open space must be provided to address the individual sites requirements and locations.

#### Policy RV21 Hopton

~~2.5~~ 3.25 hectares of land is allocated for residential, ~~and~~ community and/or village hall facilities and open space ~~uses on land to the south eastern edge of Hopton.~~

~~25 dwellings will be permitted on the site in the period to 2031.~~

~~Drainage should be via the mains sewer.~~

The indicative capacity of the site is 25 dwellings in the period to 2031. If the new community and/or village hall facilities were to be developed on the site of the existing village hall and playing field, a higher level of housing may be feasible, provided that appropriate contributions were secured towards the delivery of the new facilities. The final housing numbers will be informed through the production of a site development brief which will establish the amount of land available for development, location and types of uses on the site, access arrangements, and design and landscaping, will be informed by a concept statement and masterplan for the site. The concept statement and masterplan  
The development brief must include proposals for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Waveney-Little Ouse Valley Fens SAC.

The development area must provide footpath and cycleway access/links to the village centre.

Applications for planning permission on the site will only be determined ~~considered~~ once the development brief ~~concept statement and masterplan~~ has been agreed adopted by the local planning authority.

~~Development proposals on the site should incorporate community facilities /village hall and provide a sports pitch/playing field.~~

Proposals for development will need to address the potential need for the expansion of Hopton Primary School and ensure the continued provision of an early years education facility.

Strategic landscaping and open space must be provided to address the individual site requirements and location.

Foul drainage should be via the public sewerage network.

### Policy RV22 Ingham

Residential development is proposed in Ingham on the following greenfield site;

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Land at The Gables	0.8	Short term	22

Residential development on this site will be permitted ~~in accordance with~~ having regard to the phasing ~~date-period~~ shown.

Development on the site must take account of the need for safe access onto the A134.

Strategic landscaping and open space must be provided to address the individual site requirements and location.

### Policy RV23 Risby

Residential development is proposed in Risby on the following greenfield site:

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Adjacent to the Cricket Pitch	1.1	<del>Medium</del> <u>Short</u> term	20

Residential development on this site will be permitted ~~in accordance with~~ having regard to the phasing ~~date-period~~ shown.

Development on the site must provide enhanced footpath and cycleway access to the village centre (The Green), community centre and primary school.

Strategic landscaping and open space must be provided to address the individual site requirements and location.

The need for a project level appropriate assessment, to ensure no adverse affect on the integrity of the Breckland SPA, should be assessed at the planning application stage.

### Policy RV24 Rougham

Residential development is proposed in Rougham on the following greenfield site.

Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity
a)	Land at the south of Kingshall Street	0.75	Short term	12

Residential development on this site will be permitted ~~in accordance with~~ having regard to the phasing ~~date period~~ shown.

Proposals for development on the site must incorporate areas of informal and formal open space and footpath links to the village.

Strategic landscaping and open space must be provided to address the individual site requirements and location.

### Policy RV25 Wickhambrook

Residential development is proposed in Wickhambrook on the following greenfield site;

Ref	Location	Area	When development	Indicative
-----	----------	------	------------------	------------

		(ha)	could take place (short/medium/long term)	capacity
a)	Land at Nunnery Green and Cemetery Hill	1.8	Short term	22 (with doctor's surgery on site)

Residential development on this site will be permitted ~~in accordance with~~ having regard to the phasing date period shown.

If this site is brought forward for residential use the amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by a Development Brief for the site.

Applications for planning permission on this site will only be ~~considered~~ determined once the development brief has been ~~agreed~~ adopted by the local planning authority.

~~Development on land at Nunnery Green and Cemetery Hill should incorporate proposals for a new GP surgery and associated car parking, the location of which will be determined in the development brief. The impact of development on land at Nunnery Green and Cemetery Hill on healthcare capacity should be assessed and required mitigation measures determined through consultation and liaison with NHS England.~~

Proposals should incorporate the protection of the hedgerow which separates the eastern and western parts of the site and measures put in place to ensure the continued management of those parts of the site which contain notable plant species to maintain existing wildlife and biodiversity on the site.

The provision for a new footpath and improvements to existing footpaths along Cemetery Road should be made in any application for development on the site.

Strategic landscaping and open space must be provided to address the individual site requirements and location.

## ***Appendix 2***

## Appendix 2. Screening of policies.

<b>Policy</b>	<b>Screening required</b>	<b>Result of Screening</b>	<b>Recommendations required to be implemented, to provide no likely significant effect upon European site</b>
	<p><i>Yes – might have an effect upon European site.</i></p> <p><i>No – no possible influence on European site</i></p>	<p><i>Yes – is likely to have a significant effect upon a European site.</i></p> <p><i>No – is not likely to have a significant effect upon a European site</i></p>	
Policy RV1 Presumption in favour of Sustainable development	Yes	No – although there is a presumption in favour, the policy includes safeguard for European sites.	No
Policy RV2 Neighbourhood Plans and Neighbourhood Development Orders in the rural areas	No	-	n/a
Policy RV3 Housing Settlement Boundaries	No	-	n/a
Policy RV4 Rural Employment Areas	No	-	n/a
Policy RV5 Protection of Special Uses	Yes	No	No
Policy RV6 Park Farm Ingham	Yes	No – no likely significant effect. May have a positive effect by a reduction of visitor pressure on Breckland SPA/ SAC.	No
Policy RV7 Allotments	No	-	n/a
Policy RV8 Safeguarding educational establishments	No	-	n/a
Policy RV9 Green Infrastructure in the Rural Areas	No	-	n/a
Policy RV10 Barrow	Within threshold distance of Thetford Forest for frequent recreational visits.	No significant increase in population size leading to recreational impacts upon the SPA.	n/a
Policy RV11 Clare	No	-	n/a
Policy RV12 Ixworth	No	-	n/a
Policy RV13 Kedington	No	-	n/a

<b>Policy</b>	<b>Screening required</b>	<b>Result of Screening</b>	<b>Recommendations required to be implemented, to provide no likely significant effect upon European site</b>
	<i>Yes – might have an effect upon European site.</i> <i>No – no possible influence on European site</i>	<i>Yes – is likely to have a significant effect upon a European site.</i> <i>No – is not likely to have a significant effect upon a European site</i>	
Policy RV14 Stanton	No	-	n/a
Policy RV15 Barningham	No	-	n/a
Policy RV16 Cavendish	No	-	n/a
Policy RV17 Chedburgh	No	-	n/a
Policy RV18 Great Barton	Within threshold distance of Thetford Forest for frequent recreational visits.	No significant increase in population size leading to recreational impacts upon the SPA.	n/a
Policy RV19 Great Thurlow	No	-	n/a
Policy RV20 Great and Little Whelnetham	No	-	n/a
Policy RV21 Hopton	Yes	No	No
Policy RV22 Ingham	Within threshold distance of Thetford Forest for frequent recreational visits.	No significant increase in population size leading to recreational impacts upon the SPA.	No
Policy RV23 Risby	Yes – within 1500m buffer around SPA. Within threshold distance of Thetford Forest for frequent recreational visits.	No – masked by other development. No significant increase in population size leading to recreational impacts upon the SPA.	n/a
Policy RV24 Rougham	No	-	n/a
Policy RV25 Wickhambrook	No	-	n/a

## ***Appendix 3***



Date: 26<sup>th</sup> April 2012  
Our ref: 47223  
Your ref:



Ian Poole  
Planning Policy and Specialist Services Manager  
St Edmundsbury Borough Council  
Bury St Edmunds

Natural England  
Consultation Service  
Hornbeam House  
Electra Way  
Crewe Business Park  
CREWE  
CW1 6GJ

T: 0300 060 3900

## BY E-MAIL ONLY

Dear Mr Poole

### **St Edmundsbury Borough Council Local Development Framework – Publication of Preferred Options Bury St Edmunds Vision 2031**

Thank you for your letter dated 29<sup>th</sup> February 2012 consulting Natural England on the above LDF Preferred Options Publication. Our comments on this are as follows:

As you know, Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We are generally very supportive of this document and particularly welcome proposals to protect and enhance the natural and built environment and to increase the provision of green open space and access to the countryside. We note and welcome recognition of the importance of addressing the challenges of climate change and the need to mitigate and adapt to this through, for example, renewable energy and water efficiency measures.

The document needs to replace reference to the draft NPPF with reference to the NPPF; the newly adopted document includes key amendments, including greater protection and enhancement of the natural environment. Section 11 of the NPPF provides useful guidance for local authorities in preparing Local Plans which will contribute to the conservation and enhancement of the natural environment.

This document recognises the importance of the natural environment for people and wildlife, seeking to ensure that all new development will respect Breckland Special Protection Area (SPA), Special Area of Conservation (SAC) and Sites of Special Scientific Interest (SSSI). We would recommend that this wording is tightened to identify that '*....all new development will seek to protect and enhance Breckland Special Protection Area....*' in line with statutory and national policy requirements.

Natural England supports the Plan's objectives and aspirations, particularly in relation to the historic and natural environment, travel, landscape, health and well being and sustainability and climate change.

Natural England  
Foundry House  
3 Millsands  
Riverside Exchange  
Sheffield S3 8NH

[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

We welcome proposals to protect, maintain and enhance the natural environment, including designated sites and areas of local importance for wildlife. We particularly welcome proposals to promote the management, understanding of and connectivity between these areas and to engage the local community. The section on green infrastructure recognises the need to plan positively for green infrastructure as part of sustainable development and climate change mitigation and adaptation. We are pleased that GI, as part of development, will seek to be multi-functional and be based on the objectives and aspirations of the Green Infrastructure Strategy, including the need for high quality GI linkages. Reference should be made to the crucial role of well designed multi-functional accessible GI in diverting additional recreational pressure, through growth, away from more sensitive areas such as European sites and SSSIs.

### **Sustainability Appraisal**

The Sustainability Appraisal has not identified negative impacts on any national or European designated conservation sites although a number of site allocations are within close proximity to a number of these statutory sites. Whilst we welcome recognition that future development should protect, maintain and enhance the natural environment we believe Section 14 of the Plan should be strengthened to ensure development proposals seek to minimise impacts on biodiversity and provide net gains where possible. This can be achieved by ensuring planning permission is refused if significant harm to biodiversity cannot be avoided, mitigated or compensated for (Section 11 of the NPPF provides further detail).

### **Habitats Regulations Assessment**

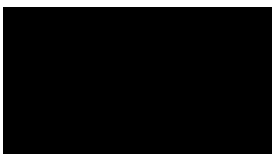
We are generally satisfied with the methodology and assessment presented in the report and believe this is in line with the requirements of the Conservation (of Habitats and Species) Regulations 2010..

The HRA considers the potential negative effects of increased recreational pressure, associated with increases in housing as a result of the Plan, on areas of Breckland SPA. Whilst we do not disagree with the conclusion that any increase in visitor numbers is unlikely to result in a significant effect we would suggest that consideration is also given to the mitigating effects of alternative strategic and local green infrastructure which the Plan is promoting through development. The provision of sufficient high quality accessible green space is a crucial factor in diverting additional recreational pressure away from more sensitive sites, including European sites and also SSSIs and other sensitive areas.

You should refer to our response to the Core Strategy for further comments on specific policies and sites.

For any correspondence or queries relating to this consultation only, please contact me using the details below. For all other correspondence, please contact the address above.

Yours sincerely



Janet Nuttall CEnv MIEEM  
Planning and Conservation Advisor  
Land Use Operations  
Cambridge

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**[janet.nuttall@naturalengland.org.uk](mailto:janet.nuttall@naturalengland.org.uk)**

## ***Appendix 4***

Ian Poole  
Planning Department  
St. Edmundsbury Borough Council  
West Suffolk House  
Western Way  
Bury St. Edmunds, IP33 3YU

30/04/2012

Dear Mr Poole,

**RE: St Edmundsbury Borough Council Local Development Framework – Publication of Preferred Options Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Areas Vision 2031**

Thank you for consulting us on the above documents, we have the following comments:

**Comments relating to all three Vision 2031 Preferred Options documents (Bury St Edmunds; Haverhill and Rural)**

The comments detailed in this response should be read in conjunction with those provided at the Historic and Natural Environment Vision focus group held on the 22<sup>nd</sup> March 2012.

All documents should be updated to reflect the passing of the Localism Act (2011) and the introduction of the National Planning Policy Framework (NPPF) (2012).

**Comments relating to the Map Books accompanying the Vision 2031 documents**

Neither the maps nor their respective keys identify any Local Nature Reserves (LNRs) which are present within the Borough. This is particularly relevant to Haverhill where the Railway Walks LNR passes through the centre of the town. All maps should be updated to include LNRs where relevant.

**Bury St Edmunds Vision 2031 Preferred Options Document**

Paragraph 1.50 – We support the reference to local biodiversity within this paragraph. However, we recommend that the paragraph is slightly revised because as currently worded it includes it appears to only support the protection and enhancement of biodiversity where this increases access into the countryside or provides the provision of green open space. We consider that it is important that this vision part of the document establishes that biodiversity should be protected and enhanced as a core part of Vision 2031.

Paragraph 3.1 (h) – We support the reference to the town having enhanced and new green infrastructure by 2031.

Policy BV6 (Strategic Site South East Bury St Edmunds) – This site is located adjacent to the River Lark. Any development should be suitably designed so as to ensure that there is no adverse effect on the river, this should include an appropriate natural green space buffer between any development and the river.

Policy BV11 (Ram Meadow) – We object to the allocation of this area for mixed use development and car parking for the following reason. The site forms an important part of the River Lark corridor through the town and development here is likely to result in the

reduction of this green corridor. We are particularly concerned about the proposed access road from Compiegne Way which run the full length of the site, destroying habitat and severing the connection between the main north-south running ditch and the River Lark. The site is known to support water vole (*Arvicola amphibius*) and fragmentation of this site is likely to adversely impact on this species. We recommend that the allocation of this site for development is not included as part of this document and that a more appropriate use is identified to secure the future of this area and to implement the management recommendations made in our 2010 survey report (Suffolk Wildlife Trust report, 2010).

Policy BV21 (Land West of Rougham Hill) – Whilst we recognise that the allocation of this, currently agricultural, site is primarily for recreational use we note that policy BV21 also includes provision for built facilities associated with this use. This site is adjacent to the River Lark and has the potential to form a valuable green space within the river corridor, therefore any built development should be carefully sited and designed so as to ensure that it has no adverse impact on the natural environment, including lighting and recreational pressure.

Paragraph 14.7 (h) – This action relates to the provision of a new country park to the north of the town. We recommend that more detail is included within the document relating to this proposal to help ensure that its implementation will be achieved.

Paragraphs 14.12 to 14.14 – We support the references to the importance of green infrastructure and the St Edmundsbury Green Infrastructure Strategy (2009) contained within these paragraphs. However, whilst as drafted the Vision 2031 includes reference to a number of green infrastructure projects, we query through what mechanisms these projects will be implemented? We consider that in order for this document to be sufficiently robust further detail relating to the implementation of the green infrastructure strategy should be included, as currently worded the document appears to be little more than a reiteration of the aspirations of the green infrastructure strategy.

Monitoring – The document does include any reference as to how the delivery of the proposals and the effectiveness of the policies will be monitored. We would recommend that a suitable chapter identifying the necessary monitoring requirements is included within the document.

### **Haverhill Vision 2031 Preferred Options Document**

Policy HV2 (Strategic Site North West Haverhill) – It should be ensured that the implementation of this policy accords with the measures identified within the adopted Masterplan to protect the Ann Suckling's Way County Wildlife Site (CWS).

Policy HV4 (a) (Land South of Chapelwent Road) – This site is adjacent to Haverhill Disused Railway Line CWS. The site should be subject to a reptile survey prior to any development being considered. The combination of rough grassland and hedgerows also make this site suitable for nesting and foraging birds.

Policy HV7 (b) (Chivers Road/Chimswell Way) – Any development at this site should retain the bramble present at the site.

Policy HV18 (Hollands Road/Duddery Hill) - The site should be subject to a reptile survey prior to any development being considered.

Paragraphs 14.9 to 14.12 – We support the references to the importance of green infrastructure and the St Edmundsbury Green Infrastructure Strategy (2009) contained within these paragraphs. However, whilst as drafted the Vision 2031 includes reference to a number of green infrastructure projects, we query through what mechanisms these projects will be

implemented? We consider that in order for this document to be sufficiently robust further detail relating to the implementation of the green infrastructure strategy should be included, as currently worded the document appears to be little more than a reiteration of the aspirations of the green infrastructure strategy.

Monitoring – The document does include any reference as to how the delivery of the proposals and the effectiveness of the policies will be monitored. We would recommend that a suitable chapter identifying the necessary monitoring requirements is included within the document.

### **Rural Vision 2031 Preferred Options Document**

Paragraph 3.11 (ii) – Update reference to Knettishall Heath, the site is now owned and managed by Suffolk Wildlife Trust and not Suffolk County Council.

Policy RV1 (Neighbourhood Plans) – This policy appears to largely repeat national planning policy and legislations (NPPF and the Localism Act). We query the inclusion of such a policy and recommend that it should be removed if it does not add further local clarification to the situation.

Policy RV4 (Protection of Special Uses) – This policy should include reference to the Breckland Special Area of Conservation (SAC) as part of this site, along with part of the Breckland Special Protection Area (SPA), is located within the perimeter of Barnham Camp. It is noted that this amendment was identified in the Rural Vision 2031 Habitats Regulations Assessment (HRA) and we therefore recommend that the policy and supporting text are amended in line with the recommendations of the HRA.

Section 18 (Historic and Natural Environment) including Policy RV5 (Green Infrastructure in the rural areas) - We support the references to the importance of green infrastructure and the St Edmundsbury Green Infrastructure Strategy (2009) contained within these section, particularly within policy RV5. However, whilst as drafted the document includes reference to a number of green infrastructure projects, we query through what mechanisms these projects will be implemented? We consider that in order for this document to be sufficiently robust further detail relating to the implementation of the green infrastructure strategy should be included, as currently worded the document appears to be little more than a reiteration of the aspirations of the green infrastructure strategy.

Barrow RV6 (a) – This site has the potential to support amphibians, bats and a range of bird species, we therefore recommend that appropriate ecological surveys are carried out at this site.

Barrow RV6 (b) – This site features a central hedge which links to Willsummer Wood, which is designated as a County Wildlife Site (CWS). Any development of this site should include a suitable buffer of this hedge to ensure that it is not adversely affected by development, the indicative housing numbers included within this document should take such a buffer in to account.

Clare RV7 (a) – We note that the reptile survey carried out in support of a planning application for this site (Ref: SE/12/0461) recorded an exceptional population of common lizard (*Zootoca vivipara*) on the site, this species is both a UK and Suffolk Biodiversity Action Plan species. The survey report identified that such a population is likely to be of county importance and we therefore query whether the allocation of this site for development is appropriate given its nature conservation value. Should this site remain as an allocation appropriate mitigation may require several years to implement and it is therefore questionable whether the site can be delivered in the short term?

Clare RV7 (b) – The margins of this site have the potential to support both reptiles and roosting bats, we therefore recommend that surveys for these groups of species are carried out at this site.

Ixworth RV8 (a) - This site has the potential to support roosting bats, we therefore recommend that detailed bat surveys are carried out at this site. It is also known that the site supports nesting swifts (*Apus apus*), any development here should make suitable alternative provision to replace any nest sites which may be lost.

Kedington RV9 (b) - We are currently awaiting the results of an ecological survey of this site. We therefore request that we be allowed to make further comments when we are in receipt of the survey information, this is likely to be by the end of May 2012.

Stanton RV10 (a) – It is understood that a development proposal for this site is currently the subject of a planning appeal. Although the existing proposal did not include the development of the rough grassland in the north of the site, should any development be proposed here in the future we recommend that reptile surveys are carried out.

Cavendish RV12 (a) – Protected species have been recorded on this site (please refer to Suffolk Wildlife Trust survey, 2010). Opportunities for retaining protected species on site should be explored.

Hopton RV16 (a) – We note that the Rural Vision 2031 Habitats Regulations Assessment (HRA) has recommended additional wording for policy RV16 (a) in order to seek to minimise any adverse effects on the Waveney-Little Ouse Valley Fens Special Area of Conservation (SAC) which could occur from increased recreational pressure and increased sewage and surface water resulting from the proposed development. These amendments do not appear in the Preferred Options document and we request that they are included within the final version of the document.

Risby RV18 (a) – The veteran oak tree in the south west corner of this site should be buffered from any development. It is also noted that this is located within one of the Breckland Special Protection Area (SPA) buffer zones identified in Policy CS2 of the St Edmundsbury Core Strategy Development Plan Document.

Wickhambrook RV20 (a) – We are currently awaiting the results of a further ecological survey of this site. We therefore request that we be allowed to make further comments when we are in receipt of the survey information, due to a botanical survey being required this is likely to be by the end of May 2012 (to allow the survey to be carried out during the optimum period).

Monitoring – The document does include any reference as to how the delivery of the proposals and the effectiveness of the policies will be monitored. We would recommend that a suitable chapter identifying the necessary monitoring requirements is included within the document.

Yours sincerely



James Meyer  
Conservation Planner



# ***Appendix 5***

Date: 9<sup>th</sup> August 2013  
Our ref: 94011  
Your ref:



Natural England  
Consultation Service  
Hornbeam House  
Electra Way  
Crewe Business Park  
CREWE  
CW1 6GJ

T: 0300 060 3900

Ian Poole  
Place Shaping Manager  
St Edmundsbury Borough Council  
Bury St Edmunds

## **BY E-MAIL ONLY**

Dear Mr Poole

### **Rural Vision 2031 Local Plan Submission Consultation**

Thank you for your letter dated 17<sup>th</sup> June 2013 consulting Natural England on the Rural Vision 2031 Local Plan Submission documents. Our comments below are in addition to those made in our response at the Preferred Options consultation stage, in our letter dated 26<sup>th</sup> April 2012.

As you know, Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We are generally supportive of this document and particularly welcome proposals to protect and enhance the natural and built environment and to increase the provision of green open space and access to the countryside. We note and welcome recognition of the importance of addressing the challenges of climate change and the need to mitigate and adapt to this through, for example, renewable energy and water efficiency measures. Natural England supports the Plan's objectives and aspirations, particularly in relation to the historic and natural environment, travel, landscape, health and well being and sustainability and climate change.

### **Policy RV5**

Natural England supports inclusion within Policy RV5 of the need for proposals for operational development at Barnham Camp and RAF Honington to take particular account of issues relating to the protection of Breckland Special Protection Area (SPA) and Breckland Special Area of Conservation (SAC); the policy requires development proposals to be accompanied by evidence that there will be no adverse impact on the SPA, SAC or its constituent features, which is welcomed.

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## **Policy RV9**

Section 18 Historic and Natural Environment includes aspirations to protect and enhance the natural environment, manage pressures on the countryside and promote and enhance access to the countryside which is welcomed. This section recognises the importance of the natural environment, including designated sites such as Breckland SPA, for people and biodiversity. We welcome the actions identified to ensure these aspirations are delivered.

We welcome recognition of the need to plan positively for green infrastructure as part of sustainable development and climate change mitigation and adaptation. We are pleased that GI, as part of development, will seek to be multi-functional and based on the objectives and aspirations of the Green Infrastructure Strategy, including the need for high quality GI linkages. Policy RV9 addresses Aspiration 32 to ensure new pressures on the countryside are managed and new development is responsive to local distinctiveness. This is a comprehensive policy which seeks to protect and enhance green infrastructure and green linkages across the Plan area, in line with the GI Strategy. It will also ensure that new green infrastructure linking to existing open spaces is integral to new development; and will improve access to the countryside, walking and cycling routes.

Policy RV9 states that planning permission for development that would harm the Green Infrastructure network will only be granted if it can incorporate measures to avoid harm or sufficiently mitigate its effects. We trust that this requirement relates to designated sites; specific reference would be welcomed, however, we note the reference to the requirements of Core Strategy Policy CS2 in the supporting text. We would expect all development to be subject to ecological assessment and to aspire to net biodiversity gain where possible, in accordance with NPPF requirements. A specific reference to this in the Vision would be welcomed.

## **Policy RV21 Hopton**

Natural England supports requirements within Policy RV21 for the concept statement and masterplan to include proposals for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Waveney-Little Ouse Valley Fens SAC. This will require the provision of sufficient high quality GI provision to help divert additional recreational pressure away from such sensitive sites.

We support amendments to Policy RV21 to include a requirement that '*drainage should be via the main sewer*', thus removing the possibility of the release of sewage via soakaways which could have an adverse effect on the SAC.

## **Policy RV23 Risby**

Given the location of proposed development within the Breckland SPA buffer we note and welcome the revision to Policy RV23 Risby, in accordance with our previous advice, to include a requirement for project level appropriate assessment to ensure no adverse affect on the integrity of the SPA.

## **Other comments on the Vision**

We welcome the preparation of Concept Statements and Master Plans for developments where these include objectives to protect and enhance biodiversity, green infrastructure and landscape and to incorporate SUDS wherever possible.

Natural England welcomes the inclusion of a monitoring and review framework to measure the success of the plan policies in delivering plan aspirations; we would recommend that this includes more explicit indicators relating to protection and enhancement of the natural environment.

## **Sustainability Appraisal**

We are satisfied that the Sustainability Appraisal (June 2013) addresses issues relating to the natural environment and that mitigation recommendations have been satisfactorily addressed in the Vision document, including potential impacts of development in Hopton and Risby on designated sites.

The Sustainability Appraisal also identifies potential negative impacts on locally important habitats and species. Whilst we welcome recognition that future development should protect, maintain and enhance the natural environment we believe Section 14 of the Plan could be strengthened to ensure development proposals seek to minimise impacts on biodiversity and provide net gains where possible.

## **Habitats Regulations Assessment**

We are generally satisfied with the methodology and assessment presented in the report and believe this meets the requirements of the Conservation (of Habitats and Species) Regulations 2010.

We welcome amendments to policies RV4, RV16 and RV21 in accordance with mitigation requirements identified through the HRA to ensure these policies do not have an adverse effect on the integrity of Breckland SPA, Breckland SAC and the Waveney-Little Ouse Valley Fens SAC. Natural England therefore agrees with the conclusion of the HRA Screening Report (June 2013) that the Rural Vision 2031 is unlikely to have a significant effect on European sites.

You should refer to our response to the Core Strategy for further comments on specific policies and sites.

I hope you will find these comments helpful. For any correspondence or queries relating to this consultation only, please contact me using the details below. For all other correspondence, please contact the address above.

Yours sincerely

Janet Nuttall  
Planning and Conservation Advisor  
Land Use Operations

T: 0300 060 1239

**[janet.nuttall@naturalengland.org.uk](mailto:janet.nuttall@naturalengland.org.uk)**

# ***Appendix 6***

Date: 21 May 2014  
Our ref: 118299  
Your ref: [Click here to enter text.](#)



Ian Poole  
Place Shaping Manager  
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**BY EMAIL ONLY**

Dear Mr Poole

**Vision 2031 Local Plan Examination - Main Modifications Consultation**

Thank you for consulting Natural England on the above in your letter of 14<sup>th</sup> April 2014. Our comments are provided below.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Bury Vision 2031 Main Modifications**

We generally welcome the proposed modifications including additional wording, within relevant policies, to identify that buffers are included on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS). Natural England welcomes the delivery of multi-functional informal open space as part of development; however, we would recommend that this should include reference to biodiversity. The additional wording could also be strengthened to better encourage its provision within development.

**Rural Vision 2031 Main Modifications**

We have no substantive comments to make on any of the proposed main modifications.

**Haverhill 2031 Main Modifications**

We generally welcome the proposed modifications including additional wording to Policy HV4 to identify that, in relation to land at north-east Haverhill, a buffer is included on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS). Natural England welcomes the delivery of multi-functional informal open space as part of development; however we would recommend that this should include reference to biodiversity. The additional wording could also be strengthened to better encourage its provision within development.

As requested we have not reiterated previous comments provided in our responses to the individual submission documents, in our letters dated 9<sup>th</sup> August 2013.



You will be aware that we have previously advised the Examination Programme Officer that Natural England is satisfied to rely on our written representations on the Vision documents and we do not intend to appear at the examination.

I hope these comments are helpful. For any queries relating to the specific advice in this letter only please contact Janet Nuttall on 0300 060 1239. For any new consultations, or to provide further information on this consultation please send your correspondence to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Janet Nuttall  
Sustainable Land Use and Regulation  
Area 08 Essex, Beds, Northants, Cambs and Herts

