

# Habitats Regulations Assessment

for

St Edmundsbury Borough Council  
Haverhill Vision 2031  
Document

September 2014

## Quality control

Habitats Regulations Assessment  
Screening

for

St Edmundsbury Borough Council  
Haverhill Vision 2031 Document

Checked by Project Manager:	Approved by:
Signature: 	Signature: 
Name: Nicholas Sibbett	Name: Jo Parmenter
Title: Principal Ecologist	Title: Associate Director
Date: September 2014	Date: September 2014

The Landscape Partnership Ltd is a practice of Chartered Landscape Architects, Chartered Town Planners and Chartered Environmentalists, registered with the Landscape Institute and a member of the Institute of Environmental Management & Assessment & the Arboricultural Association

### **The Landscape Partnership**

*Registered office*  
Greenwood House  
15a St Cuthberts Street  
Bedford  
MK40 3JB

Registered in England No. 2709001

# Contents

<b>1</b>	<b>Introduction.....</b>	<b>1</b>
1.1	The plan being assessed.....	1
1.2	Appropriate Assessment requirement.....	2
1.3	Appropriate Assessment process .....	3
1.4	European sites.....	3
<b>2</b>	<b>European sites potentially affected.....</b>	<b>5</b>
2.1	European sites within the Haverhill Vision 2031 area or St Edmundsbury Borough .....	5
2.2	European sites outside the Haverhill Vision 2031 area .....	8
2.3	Other relevant plans or projects affecting these sites .....	8
<b>3</b>	<b>Possible likely significant effects.....</b>	<b>9</b>
3.1	Introduction to possible likely significant effects .....	9
3.2	Consideration of likely significant effects .....	9
3.3	Conclusion of screening .....	10
3.4	In-combination effects of individual sites.....	10
3.5	In-combination effects of all development within St Edmundsbury .....	10
<b>4</b>	<b>Consultations.....</b>	<b>11</b>
4.1	Consultation comments received .....	11
4.2	Response to the consultations.....	11
<b>5</b>	<b>Summary.....</b>	<b>11</b>

## Appendix

1. Policies assessed
2. Screening of policies
3. Natural England letter of 26th April 2012
4. Suffolk Wildlife Trust letter of 30th April 2012
5. Natural England letter of 9<sup>th</sup> August 2013
6. Natural England letter of 21<sup>st</sup> May 2014

# 1 Introduction

## 1.1 The plan being assessed

- 1.1.1 The Haverhill Vision 2031 Local Plan Document sets out the strategy for the future growth of Haverhill including town centre brownfield sites and a strategic site on the north-eastern edge of the town. It combines plans for all service provision in the town into a single holistic vision, so that service-providers work together to achieve agreed aims and reduce wastage and duplication.
- 1.1.2 Haverhill Vision 2031 Local Plan Document has been compiled by St Edmundsbury Borough Council, working with many other partners, and it combines strategic service planning with land-use planning to ensure a joined-up approach shaping how the town will function. It forms part of the Council's Local Plan and will set out both the Council's vision for the future of Haverhill and the statutory planning policy for the town. The plan has been compiled after widespread consultation so that it reflects the views of local people
- 1.1.3 In planning terms, the Haverhill Vision 2031 Local Plan Document is an 'Area Action Plan' and forms part of the Borough's Local Plan. The version being assessed in this document is the adoption document and the policies being assessed are included in Appendix 1.
- 1.1.4 The Haverhill Vision 2031 Local Plan Document does not include rural parts of the Borough or the town of Bury St Edmunds. Separate 'Bury St Edmunds Vision 2031' and 'Rural Vision 2031' Local Plan Documents are being progressed separately.
- 1.1.5 The determination of likely significant effect under Regulation 102(1) of the Conservation of Habitats and Species Regulations 2010, of St Edmundsbury's Haverhill Vision 2031 Submission Document (area action plan DPD) was reported in June 2013<sup>1</sup>. It was concluded that the Haverhill 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.
- 1.1.6 On 28<sup>th</sup> February 2014 St Edmundsbury Borough Council submitted their 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.
- 1.1.7 The Inspector's report on his Examination of the Vision 2031 Local 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.

---

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

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

- 1.1.8 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 Bury St Edmunds Vision 2031 Local Plan Document. This includes all modifications and is the Adoption document. It is consistent with the Council's Core Strategy which was adopted in December 2010.

## 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 Haverhill 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 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 processes 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*.

## 1.4 European sites

1.4.1 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.

1.4.2 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.

1.4.3 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 Haverhill Vision 2031 area or St Edmundsbury Borough

2.1.1 Any European sites (including Ramsar sites) within the Haverhill Vision 2031 area or the remaining part of the Borough would be potentially affected. The Haverhill Vision 2031 area contains no European sites, but European sites elsewhere in the Borough 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). Nearest point approx 23km north of Haverhill.	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). Nearest point approx 28km north of Haverhill.	heathland, grassland, wet woodland, sand dunes, great crested newt
Waveney – Little Ouse valley Fens	parts of Market Weston, Hopton and Thelnetham parishes (also in South Norfolk District). Nearest point approx 46km north-east of Haverhill.	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 Haverhill Vision 2031 Local Plan Document are tabulated below.

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



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> <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>
Breckland SPA	<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> </ul>

European site name	Conservation Objectives
	<ul style="list-style-type: none"> <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 oedicanus</i>; Stone-curlew (Breeding)                      A224 <i>Caprimulgus europaeus</i>; European nightjar (Breeding)                      A246 <i>Lullula arborea</i>; Woodlark (Breeding)</p>
Waveney-Little Ouse Valley Fens 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> <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>

## 2.2 European sites outside the Haverhill Vision 2031 area

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

European site name	Location	Brief reasons for designation
Redgrave and South Lopham Fens SAC	50km north-east of Haverhill (Mid Suffolk District)	wetland habitat
Rex Graham Reserve SAC	29km north of Haverhill (Forest Heath District)	orchid-rich grassland
Norfolk Valley Fens SAC	nearest component site is 52km north of Haverhill (components in Breckland District and others)	wetland habitat
Devil's Dyke SAC	16km north-west of Haverhill (East Cambridgeshire District)	orchid-rich grassland
Fenland SAC	nearest component site is 22km north of Haverhill (East Cambridgeshire District)	wetland habitat
Chippenham Fen Ramsar site	22km north of Haverhill (East Cambridgeshire)	wetland habitat
Wicken Fen Ramsar site	26km north-west of Haverhill (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 Haverhill 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 Haverhill Vision 2031 Local Plan Document, 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 Regulation 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 Rural Vision 2031

2.3.3 These plans are considered as part of this determination of likely significant effect of the Haverhill Vision 2031 Local Plan Document. 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.

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

### 3 Possible likely significant effects

#### 3.1 Introduction to possible likely significant effects

3.1.1 Possible likely significant effects arising from development resulting from the Haverhill Vision 2031 Local Plan Document need to be considered to determine their effect on any European site. The matters 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 Haverhill Vision 2031 Local Plan Document depending upon their size, characteristics and location.

#### 3.2 Consideration of likely significant effects

3.2.1 There is no allocation or policy resulting in land-take from a European site so this matter would have no likely significant effect upon any European site.

3.2.2 There is no development within 1500m of part of Breckland SPA (supporting stone-curlew) or 400m of Breckland SPA (supporting woodlark and nightjar); Haverhill is around 23km from the nearest point of Breckland SPA. This matter would have no likely significant effect upon any European site.

3.2.3 In July 2010, a study was made of visitors to Breckland SPA, in particular studying visitors to car parks within Thetford Forest (a component of the SPA)<sup>5</sup>. Key points found from the study were that

- Most people drove to the car parks studied. Half the visitors drove under 10km, and those people tended to visit at least once a week. People who lived over 10km distant visited infrequently, with less than 1 visit per 1000 households per day. The study sites were generally further from Haverhill than that distance from which 75% of visitors came, indicating that most visitors came from much nearer the study area. One exception was High Lodge Forest Centre, which drew people in from a very wide area.
- Most people visited small 'honeypot' areas. Visitor levels were lower than to many other similar European sites elsewhere in southern England and there was no evidence of harm being caused to European sites
- In the study, 677 people were interviewed and none of them came from Haverhill.

3.2.4 The results of the study predict that very few additional visitors to the Breckland SPA would arise from increased housing numbers in Haverhill, due to its distance and the current unmeasurable levels of use; Haverhill residents presumably visit other countryside locations without needing to travel over 20 – 40 miles by road to reach any of the various point in the Breckland study area. Development in Haverhill would have no likely significant effect on Breckland SPA, nor Breckland SAC which has a large degree of overlap with the SPA. Other European sites are even further away and would similarly receive no likely significant effect from recreation.

---

<sup>5</sup> Fearnley, H., Liley, D. and Cruickshanks, K. (2010). *Visitor survey results from Breckland SPA*. Footprint Ecology

- 3.2.5 Development of sites may 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>6</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 a separate assessment of the impacts of that pollution.
- 3.2.6 A Water Cycle study forms part of St Edmundsbury's evidence base for their Local Plan<sup>7</sup>. This 2008 Study 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, 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.
- 3.2.7 Haverhill is in the catchment of the River Stour, which flows east and away from any of the European sites mentioned in Section 2. Any surface water drainage or sewage flow cannot reach those sites and consequently there will be no significant effect. Essex and Suffolk Water's (2010) *Water Resources Management Plan 2010 – 2035* was accompanied by a Strategic Environmental Assessment which confirmed that the downstream European site (Stour and Orwell Estuaries SPA) will not be harmed by implementation of the plan.
- 3.2.8 The list of policies assessed in in Appendix 1 and screening of individual policies is given in Appendix 2.

### **3.3 Conclusion of screening**

- 3.3.1 It is concluded that each individual site allocation or policy within the St Edmundsbury Borough Council Haverhill 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.

### **3.4 In-combination effects of individual sites**

- 3.4.1 The scale of the allocations, and their location in relation to European sites, means that no in-combination effects of individual allocations occur.

### **3.5 In-combination effects of all development within St Edmundsbury**

- 3.5.1 St Edmundsbury's Core Strategy underwent Appropriate Assessment, and was found to be sound following an Examination in Public. The Haverhill Vision 2031 Local Plan Document adds further detail, but does not increase the amount of development planned for the Haverhill area. The cumulative affect of all development has already been assessed and does not require further assessment.

---

<sup>6</sup> Highways Agency DMRB Volume11, Section3, Part 1, *Air Quality* (revised May 2007, Ref HA 207/07).

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

## **4 Consultations**

### **4.1 Consultation comments received**

- 4.1.1 St Edmundsbury Borough Council consulted publicly on the Haverhill Vision 2031 preferred options document in March and April 2012. One respondent commented on the Appropriate Assessment screening of that document.
- 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 was satisfied with the conclusion of the HRA that the Haverhill Vision 2031 is unlikely to have a significant effect on European sites. This letter is reproduced in Appendix 3.
- 4.1.3 Suffolk Wildlife Trust, in its letter of 30<sup>th</sup> April 2012 regarding nature conservation issues, made no comment about the Appropriate Assessment screening. This letter is given in Appendix 4.
- 4.1.4 Consultation on the Haverhill 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 substantive comments were received on consultation on the Main Modifications in spring 2014. Natural England commented on 21<sup>st</sup> May 2014 (Appendix 6) on modifications but made no comment on the Habitats Regulations Assessment of the modification.

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

- 4.2.1 There were no recommendations by any consultees which required addressing within the Appropriate Assessment screening.

## **5 Summary**

- 5.1.1 It is concluded that each individual site allocation or policy within the St Edmundsbury Borough Council Haverhill 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.
- 5.1.2 The scale of the allocations, and their location in relation to European sites, means that no in-combination effects of individual allocations or policies occur.
- 5.1.3 It is concluded that the Haverhill Vision 2031 Local Plan Document would have no likely significant effect on any European site.

# ***Appendix 1***

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

### Policy HV1

#### 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 HV2: HOUSING DEVELOPMENT WITHIN HAVERHILL

Within the housing settlement boundary for Haverhill (defined on the Policies Map) planning permission for new residential development, residential conversion schemes, residential redevelopment and replacement of existing dwellings with a new dwelling will be ~~permitted~~ granted where it is not contrary to other planning policies.



**POLICY HV3: STRATEGIC SITE – NORTH-WEST HAVERHILL**

42 Ha of land at north-west Haverhill is identified on the Policies Map to meet the provisions of Policy CS12 of the Core Strategy.

**POLICY HV4: STRATEGIC SITE – NORTH-EAST HAVERHILL**

138ha of land at north-east Haverhill as identified on the Policies map is allocated for development in accordance with the provisions of Policy CS12 of the Core Strategy.

A buffer is identified 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)  
Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.

If planning application(s) to develop all or part of the site come forward in advance of the provision of the North-West Relief Road, permission will not be granted unless it is demonstrated that the transport impacts can be satisfactorily mitigated without the Relief Road.

**POLICY HV5: HOUSING ON GREENFIELD SITES**

~~Two~~ Three smaller sites have been identified which, in the opinion of the borough council, can be delivered during the Plan period. These are put forward as allocations and identified on the Policies Map. The development of each site will be expected to accord with a design brief.

		Indicative Capacity	Site Area (Ha)
a)	Land south of Chapelwent Road	85	2.8
b)	Land on the corner of Millfields Way and Kestrel Road	12*	0.4
c)	<u>Former Castle Hill Middle School field, Chivers Road</u>	<u>25</u>	<u>0.75</u>

\* 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 11 affordable dwellings on Millfields Way was approved in May 2012.

**POLICY HV6: HOUSING ON BROWNFIELD SITES**

The following urban sites are allocated for residential development.

		Indicative capacity	Site area (Ha)
a)	Former gasworks, Withersfield Road	10	0.3
b)	Hamlet Croft	100*	2.5
c)	Westfield Primary School	30	1.2
d)	<del>Former Castle Hill Middle School field, Chivers Road</del>	<del>25</del>	<del>0.75</del>

\* 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 91 dwellings on Land at Hamlet Croft was approved in August 2012

**POLICY HV7: MIXED USE DEVELOPMENT OF BROWNFIELD LAND**

The following urban sites are allocated for mixed use development which may include residential development and commercial uses (including retail) and car parking. Numbers will be informed by more detailed development briefs for the sites at the appropriate time.

		Site Area (Ha)
a)	Wisdom Factory, Duddery Hill	1.5ha
b)	Chantry Mill, High Street	1.2ha
c)	Rear of Argos/Post Office	0.4ha
d)	Cleale's/Town Hall Car Park	1.3ha
e)	Brook Service Road/Car Park	0.8ha

## **Policy HV8: New and Existing Local Centres and Community Facilities**

**Sites for existing local centres are allocated at:**

- a) Hales Barn, Haverhill;**
- b) Former Chalkstone Middle School, Millfields Way;**
- c) Strasbourg Square;**
- d) Leiston Road;**
- e) Blair Parade; and**
- f) Hanchet End**

**Sites for new local centres are allocated at:**

- g) North-East Haverhill strategic growth area**
- h) North-West Haverhill strategic growth area**

**New local centres should be well served by public transport and cycle path access and within reasonable walking distance of all parts of the development.**

**The local planning authority will seek to maintain a mix of uses which could include:**

- i) Leisure and Recreation;**
- ii) Health and Community facilities;**
- iii) Small scale retail development, where it can be demonstrated to meet local need (generally not exceeding 150 sq. metres in net floor area unless a larger area is required to meet a demonstrated local shortfall); and**
- iv) Education.**

**These sites will be safeguarded from other forms of development.**

**In addition to the sites identified above, favourable consideration will be given to the provision of local centre facilities in the vicinity of Chivers Road/Chimswell Way.**

**POLICY HV9: GENERAL EMPLOYMENT AREAS – HAVERHILL**

The following areas are designated as general employment areas.

		Use Class
a)	Bumpstead Road	(B1, B2, B8)
b)	Falconer Road	(B1, B2, B8)
c)	Haverhill Industrial Estate	(B1, B2, B8)
d)	Homefield Road	(B1, B8)
e)	Stour Valley Road	(B1, B2, B8)
f)	<del>Haverhill Research Park</del>	<del>(B1)</del>

Proposals for industrial and business development within the use classes identified for each of the General Employment Areas in the table above ~~general employment areas~~ will be permitted providing that space requirements, parking, access, travel and general environmental considerations can be met.

Note: References to Classes B1, B2 and B8 are as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended).

**POLICY HV10: STRATEGIC EMPLOYMENT SITE - HANCHET END, HAVERHILL**

12 hectares of land at Hanchet End, Haverhill are allocated as a strategic employment site for class B1 use of the Town & Country Planning (Use Classes) Order 1987 (as amended).

Development at the Haverhill Research Park will comprise the following:

- light industrial, research and office use;
- units for new and small firms involved in high technology and related activities; or
- low density development with extensive landscaping.

The amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by a masterplan for the site (a masterplan was adopted in 2011 for a limited period of 3 years)

**POLICY HV11: ~~HAVERHILL RETAIL PARK AND EHRINGSHAUSEN WAY RETAIL PARK~~ Out of Centre Retail Proposals**

~~Sites are identified on the policies map bounded by Park Road, the A1307 Cambridge Road and Baines Coney known as the Haverhill Retail Park and fronting Ehringshausen Way east of Stour Valley Road known as Ehringshausen Way Retail Park.~~

~~In addition to the policies elsewhere in this plan, proposals~~ Proposals for all retail floorspace outside defined centres on these sites will only be permitted where they comply with ~~judged against~~ the following criteria:

- ~~a) the need for the proposal;~~
- ~~b) a) that a sequential approach has been adopted in selecting the site demonstrating that all potential there are no suitable, viable and available sites have been evaluated, in defined centre or edge-of-centre locations;~~
- ~~e) b) proposals for additional floorspace in excess of 1,000 square metres gross will be required to demonstrate that the impact of the proposal will not have a significant adverse impact on the vitality and viability of Haverhill town centre Primary Shopping Area and local centres, including taking into account the cumulative impact of recently completed developments and unimplemented planning permissions, taking into account the results of a shopping impact study retail impact assessment and/or where appropriate an environmental assessment; and~~
- ~~d) c) that the site is accessible by a choice of means of transport.~~

~~Proposals for additional floorspace in excess of 1,000 square metres gross will be required to submit an impact assessment with planning applications. This threshold is set in accordance with the recommendations of the Retail Appraisal and paragraph 26 of the NPPF.~~

Retail sites are identified on the policies map bounded by Park Road, the A1307 Cambridge Road and Baines Coney (known as the Haverhill Retail Park) and fronting Ehringshausen Way east of Stour Valley Road (known as Ehringshausen Way Retail Park). Proposals for additional floorspace on these sites will be judged against criteria (a) and (b) of this policy.

**POLICY HV12: HAVERHILL ~~NORTHERN~~ NORTH-WEST RELIEF ROAD**

~~The Haverhill Northern Relief Road will be completed between Withersfield Road (A1307) and Wratting Road (A143). Developers will~~

~~be required to enter into a legal agreement to implement this proposal or make an appropriate financial contribution towards its completion:~~

The Haverhill North-West Relief Road will be provided between Wrattling Road (A143) and Withersfield Road (A1307) as part of the North-West Haverhill strategic development (Policy HV3). The delivery and timing of the Relief Road will be controlled through a legal agreement attached to any planning permission for that development. Planning permission for the delivery of the North-West Haverhill strategic development in advance of the completion of the Relief Road will not be granted unless it is demonstrated that the transport impacts can be satisfactorily mitigated.

### ~~Policy HV13: District Heating~~

~~It is required that new development in a decentralised energy opportunity area (which, should they be identified, will be defined in a forthcoming Supplementary Planning Document on decentralised energy generation) should, unless it can be demonstrated to the satisfaction of the Local Planning Authority that it would be unfeasible or unviable, contribute to the establishment of a strategic decentralised energy network(s) in suitable locations according to the following protocol:~~

- ~~1. Developments should connect up to any available decentralised energy network.~~
- ~~2. Where a network does not (yet) exist, developments should consider installing a network to serve the site. The network should connect to or be compatible with connection to an area-wide network at a future date.~~
- ~~3. The following general principles also apply to all development.~~
- ~~4. Development of all sizes should seek to make use of available heat, biomass and waste heat.~~

~~New development should be designed to maximise the opportunities to accommodate a decentralised energy solution, considering density, mix of use, layout and phasing.~~

### ~~POLICY HV14 HV13: COMMUNITY INFRASTRUCTURE LEVY AND ALLOWABLE SOLUTIONS~~

Money raised through the CIL and Allowable Solutions may be required to contribute towards energy efficiency and carbon dioxide reduction projects identified by the Council in future. It may also contribute towards the development of the strategic district heating networks. Further details will be set out in the forthcoming CIL Charging Protocol and a future Allowable Solutions SPD.

**POLICY ~~HV15~~HV14: 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 in Masterplans and Development Briefs.

**POLICY ~~HV16~~HV15: SAFEGUARDING EDUCATIONAL ESTABLISHMENTS**

Except where permitted for enabling development in Policy ~~HV16~~HV17, 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 ~~HV17~~HV16: CASTLE MANOR ACADEMY**

Within the site shown on the Policies Map at Eastern Avenue and Park Road, (known as Castle Manor Academy), land is allocated for the expansion and redevelopment of educational premises. An element of residential development may be appropriate on the site of the existing buildings to facilitate the delivery of educational facilities.

The amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by a masterplan for the site. Applications for planning permission will only be ~~considered~~

determined once the masterplan has been adopted by the local planning authority.

As part of any new school development, it is expected that the education authority or providing body will prepare and implement a travel plan to reduce dependency on access to the new facilities by car.

#### **POLICY ~~HV18~~HV17: FURTHER EDUCATION FACILITY**

A site has been identified at Hollands Road/Duddery Hill for post 16 educational provision, ~~a sixth form/further education centre~~.

As part of any new development, it is expected that the education authority or providing body will prepare and implement a travel plan to reduce dependency on access to the facility by the private motor car.

In the event that an education facility is not forthcoming on the site, consideration will be given to alternative employment uses.

#### **Policy ~~HV19~~HV18: Green Infrastructure in Haverhill**

In and around the town of Haverhill 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) Enhance woodland planting to the A1017 bypass;
- c) Conserve and enhance the Meldham Washlands greenspace;
- d) Provide new community parkland/country park on the strategic growth area to the north east of the town, the areas for which will be determined at the concept and masterplan stage;
- e) Connect multifunctional green infrastructure routes/corridors in the town to existing and future green spaces; ~~and~~
- f) Make urban river corridor improvements to the Stour Brook Valley Green Corridor; and
- g) 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 ~~HV20~~ HV19: HAVERHILL TOWN CENTRE MASTERPLAN**

Haverhill town centre, as identified on the Policies Map is a suitable location for regeneration and new development. The amount of land available for development, including appropriate adjoining sites that will support the regeneration objectives, the location and distribution of uses, access arrangements, design and landscaping will be informed by a masterplan and subsequent individual site development briefs, which will be adopted as guidance.

Applications for planning permission for sites, other than already identified in the Plan for development, and which would have a strategic impact on the development of the masterplan will only be considered once the masterplan has been adopted as planning guidance by the local planning authority following public consultation.

## ***Appendix 2***

## Appendix 2. Screening of policies.

Policy	Screening required	Result of Screening	Recommendations required to be implemented, to provide no likely significant effect upon European site
Policy HV1 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT	<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>	n/a
POLICY HV2: HOUSING DEVELOPMENT WITHIN HAVERHILL	Yes	No	n/a
POLICY HV3: STRATEGIC SITE – NORTH-WEST HAVERHILL	Yes	No	n/a
POLICY HV4: STRATEGIC SITE – NORTH-EAST HAVERHILL	Yes	No	n/a
POLICY HV5: HOUSING ON GREENFIELD SITES	Yes	No	n/a
POLICY HV6: HOUSING ON BROWNFIELD SITES	Yes	No	n/a
POLICY HV7: MIXED USE DEVELOPMENT OF BROWNFIELD LAND	Yes	No	n/a
POLICY HV8: NEW AND EXISTING LOCAL CENTRES AND COMMUNITY FACILITIES	No	-	n/a
POLICY HV9: GENERAL EMPLOYMENT AREAS - HAVERHILL	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 HV10: STRATEGIC EMPLOYMENT SITE – HANCHET END, HAVERHILL	No	-	n/a
POLICY HV1: OUT OF CENTRE RETAIL PROPOSALS	No	-	n/a
POLICY HV12: HAVERHILL NORTH- WEST RELIEF ROAD	No	-	n/a
POLICY HV13: COMMUNITY INFRASTRUCTURE LEVY AND ALLOWABLE SOLUTIONS	No	-	n/a
POLICY HV14: ALLOTMENTS	No	-	n/a
POLICY HV15: SAFEGUARDING EDUCATIONAL ESTABLISHMENTS	No	-	n/a
POLICY HV16 – CASTLE MANOR ACADEMY	No	-	n/a
POLICY HV17: FURTHER EDUCATION FACILITY	No	-	n/a
POLICY HV18: GREEN INFRASTRUCTURE IN HAVERHILL	No	-	n/a
POLICY HV19: HAVERHILL TOWN CENTRE MASTERPLAN	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**

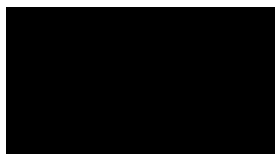
We are generally satisfied with the methodology and assessment presented in the report and believe this is in line with the requirements of the Conservation (of Habitats and Species) Regulations 2010..

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

T: 0300 060 1239  
F: 0300 060 2115

**[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

Suffolk Wildlife Trust,  
Brooke House, Ashbocking,  
Ipswich, IP6 9JY  
Tel: 01473 890089

[www.suffolkwildlifetrust.org](http://www.suffolkwildlifetrust.org)

[info@suffolkwildlifetrust.org](mailto:info@suffolkwildlifetrust.org)

Suffolk Wildlife Trust is a  
registered charity  
no. 262777

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.

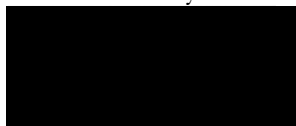
Hopton RV16 (a) – We note that the Rural Vision 2031 Habitats Regulations Assessment (HRA) has recommended additional wording for policy RV16 (a) in order to seek to minimise any adverse effects on the Waveney-Little Ouse Valley Fens Special Area of Conservation (SAC) which could occur from increased 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.

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

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

## **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  
St Edmundsbury Borough Council  
Bury St Edmunds

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**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