

Wickhambrook Neighbourhood Plan

Strategic Environmental Assessment and Habitats Regulations Assessment Screening Opinion

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1. Introduction

- 1.1. This screening report has been prepared to determine whether the content of the Wickhambrook Neighbourhood Plan 2023-2040 (pre-submission draft November 2023) requires a strategic environmental assessment in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2. This report also contains a habitats regulations assessment (HRA) screening to determine whether the plan would have a likely significant effect on a European site, either alone or in combination with other plans or projects as required by the Habitats Directive.
- 1.3. This screening has undergone consultation with the statutory consultees, Natural England, Historic England and the Environment Agency.
- 1.4. Wickhambrook is in the administrative area of West Suffolk Council and is defined in the existing development plan (Core Strategy 2010 former St Edmundsbury Borough Council area) as a local service centre these settlements tend to have fewer dwellings than key service centres and a smaller range of services but will have as a minimum a school and convenience shop or a community run shop and/or post office and village hall. These settlements are less accessible than the higher order settlements but can still meet some of the needs of other nearby smaller settlements. The Neighbourhood Plan is being prepared by Wickhambrook Neighbourhood Plan Working Group (a qualifying body as defined by the Localism Act 2011) on behalf of Wickhambrook Parish Council.
- 1.5. The plan underwent consultation at the pre-submission consultation stage (Regulation 14) and this screening is based on the information within the neighbourhood plan and accompanying documents that were on pre-submission consultation from 4th November to 22nd December 2023. The submission version of the Neighbourhood Plan will be screened if there are any relevant material changes made between the pre-submission and submission versions of the plan.
- 1.6. The information on the plan is in section two. The legislative background, set out in section three, outlines the regulations that require this screening exercise. Section four outlines the process; Section five provides a screening assessment of the significant environmental effects of the neighbourhood plan; section six is the habitats regulations assessment screening and section seven is the screening outcome.

2. Key information on the emerging neighbourhood plan

Vision, aims and objectives of neighbourhood plan.

2.1. The vision for Wickhambrook is set out on page 7 of the neighbourhood plan and is as follows:

In 2040 Wickhambrook will remain a village that has retained its distinct structure of a number of small settlements within a high-quality rural landscape, where limited sustainable growth has taken place that meets the needs of the Parish and where essential infrastructure, and services are retained and improved.

2.2. To deliver the vision, the neighbourhood plan has the following objectives in seven themes that have guided and influenced the preparation of its planning policies.

Development location	1. New development should minimise the loss of the best quality agricultural land and its impact on the natural and historic environment as well as being well related to the existing services and facilities in the village centre.
Housing	 New housing development will reflect Wickhambrook's status as a Local Service Centre within the "Settlement Hierarchy" of West Suffolk and provide a range of types, sizes, prices and tenures that meets the needs of all age groups and incomes. New housing should be located where it is safely accessible by foot to the village's services and facilities. Homes should incorporate measures to ensure they are accessible for all needs, incorporate energy saving features and make use of sustainable approaches to building.
Employment and local economy	5. A range of employment opportunities in the Parish will be retained and supported where there will not be a detrimental impact on the environment, services and infrastructure.
Natural environment	6. The rural character of the Parish will be protected and, where possible, enhanced.7. Natural habitats will be protected and enhanced.

Built environment and design	 8. Wickhambrook's built heritage assets will be protected. 9. High-quality and eco-friendly development will reinforce the local character of the village. 10. New development will not have a detrimental impact on the quality of life of existing residents.
Services and facilities	11. The level of services and facilities will be protected and improved.12. The range of existing community facilities and services will be improved.
Highways and travel	13. The capacity and safety of the road network to cope with new development will be ensured.14. The improvement of bus services to nearby towns will be encouraged.15. The Public Rights of Way network will be protected, maintained and improved.

Neighbourhood area

2.3. The Wickhambrook Neighbourhood Plan area was originally designated by the West Suffolk Council in October 2021, but was subsequently amended in April 2023 following parish boundary changes that came into force on 1 April of that year. This is the area that the neighbourhood plan covers. The plan area includes the whole of the parish of Wickhambrook defined by the new parish boundary and is shown on Map 1 on page 5 of the plan.

Approach to development

2.4. The neighbourhood plan for Wickhambrook recognises that in the coming years new housing will be required across West Suffolk and the plan area will accommodate development commensurate with the village's designation as a local service centre in the adopted local plan. New development will be focussed within the housing settlement boundary where proposals for housing development on infill plots or for small groups on redeveloped plots will be supported where they do not have a detrimental impact on residential amenity, the natural and historic environment, infrastructure and highways.

Policies

2.5. The neighbourhood plan includes 18 draft policies as set out in table 1. All the policies address the types of development that would be supported, and the mitigation or enhancement measures required to protect the character and environment of the parish.

Table 1: summary of policies in the Wickhambrook neighbourhood plan

Policy	Summary	
Policy WHB 1 Spatial strategy	The plan will support development appropriate to its designation in the local plan as a local service centre.	
	New development will be concentrated within the defined settlement boundary – infill or small housing groups on redeveloped plots will be supported where they do not cause detriment to amenity, environment, infrastructure, or highways.	
	Outside the settlement boundary protection of the countryside will be paramount and development will only be supported for certain uses and must be accompanied by evidence showing how it's impact will be mitigated.	
	 Agriculture/forestry/horticulture/equine Affordable housing where there is a proven 	
	 need Small scale sporting/recreational uses Replacement of existing dwelling on one-for-one basis 	
	 Key worker dwelling where there is demonstrable essential need 	
	Proposals must be accompanied by landscape or visual impact assessment or other evidence demonstrating how it can be accommodated in the countryside without detriment to the environment or diminishing gaps between settlements.	
Policy WHB 2 Land west of Bunter's Road	A 4.2-hectare site is allocated for up to 40 dwellings, up to 450 square metres of business use, community open space and structural landscaping.	
	The development must be in accordance with concept and site masterplans, incorporating road safety measures and incorporating a mixture of size and types of housing according to the assessed housing needs for the village and in accordance with the adopted local plan.	
	Social housing should be pepper-potted throughout the site and should be indistinguishable from open housing market. Delivery is preferred through a community land trust. Self-build proposals will be supported. All proposals must be accompanied by landscape and visual impact assessment and a heritage impact assessment.	

Policy	Summary	
Policy WHB 3 Housing design	New dwellings should achieve the latest nationally described space standards and provide:	
	 covered storage of wheelie bins and cycles suitable ducting to enable super-fast broadband electric vehicle charging and parking spaces as per the current adopted parking standards adaptable dwellings to meet changing needs of the population both young and old 	
Policy WHB 4 Low energy and energy efficient housing design	Proposals that incorporate current best practice in energy conservation will be supported where this is integral to the design of the building and should: • maximise passive solar gain through layout • aim for maximum achievable energy efficiency • avoid fossil fuel-based heating systems • incorporate sustainable solutions where possible in all aspects of the build	
Policy WHB 5 Employment sites	The retention and development of existing employment and business uses is supported subject to proposals not having a detrimental impact on landscape, heritage, residential amenity, traffic and important views and gaps.	
	 Proposals for other uses that may have an impact on employment generation will only be permitted if they meet at least one of the following criteria: Evidence of marketing and no viable end business user being found. The new use creating demonstrably less environmental problems than the existing use. The new use assists in regeneration and provides community benefits. It is for an employment related facility. The new use or uses bring sustainable benefits that outweigh the loss. 	
Policy WHB 6 New businesses and employment development	New business development is supported within the housing settlement boundary subject to acceptable impacts on residential amenity, heritage and highways.	
aevelopilient	Outside the housing settlement boundary proposals are supported where: • The land is designated for business use; or • It is small scale leisure, tourism, employment, commercial or agricultural related development of a scale appropriate in the countryside.	

Policy	Summary	
	Existing buildings and brownfield land should be used if possible. Support will not be given if development would cause detriment to interests of acknowledged importance.	
Policy WHB 7 Farm diversification	Diversification will be supported where redundant traditional farm buildings and other rural buildings are no longer viable or needed for farming.	
	Reuse for community or economic development is preferred.	
	Support will not be given if development would cause detriment to interests of acknowledged importance.	
Policy WHB 8 Protecting Wickhambrook's landscape character	Proposals must demonstrate how they have had regard to, conserve or enhance local landscape character.	
Policy WHB 9 Biodiversity and habitats	Developments should avoid loss or harm to natural features and habitats wherever possible, and if such loss or harm is unavoidable should demonstrate how the benefits of the development outweigh the harm and provide mitigation through measurable biodiversity net gain.	
	All proposals should deliver biodiversity net gain and will be supported where they can add improvements to biodiversity through habitat creation. Development design should be landscape led.	
	Hedgerows should be protected but where lost, replacement native hedges should be planted and maintained to retain the hedgerow continuity throughout the village.	
	Proposals are supported where biodiversity and habitats improvement are an integral part of the design concept.	
Policy WHB 10 Local green spaces	Twelve local green spaces are proposed in the plan and identified on the policies map. All development within local green spaces will be consistent with national policy for green belts.	
Policy WHB 11 Buildings and structures of	The policy seeks to protect buildings, structures and features of local interest.	

Policy	Summary		
local significance	Proposals that would lead to the loss or harm to a local heritage asset should be supported by an analysis of its significance and an explanation of the public benefits of the proposal.		
	49 buildings and structures are identified.		
Policy WHB 12 Development design considerations	All new development proposals should create a high quality, safe and sustainable environment which reflects the local character and circumstances of the site. Proposals will be supported where they: Recognise and reflect local characteristics Recognise and reflect local distinctiveness Maintain the village's features and sense of place Do not involve loss of any green spaces that contribute to character and amenity Do not damage any features of architectural, historical, landscape, amenity or environmental significance Do not cause any kind of nuisance to residents Include tree planting, especially of street trees Ensure highway safety and adequate parking provision Allow connectivity through spaces joining communities together and to services Street facing designs Do not create flooding or run-off		
	Provide adequate bin and cycle storage		
Policy WHB 13 Sustainable construction practices	All appropriate developments will be supported if they incorporate best practice in energy conservation where they are integral to the design of the building and minimise any detrimental impact. They should: • maximise passive solar gain through layout • aim for maximum achievable energy efficiency • avoid fossil fuel-based heating systems • incorporate sustainable design, construction and renewable energy measures • Make best use of recycling and grey water solutions that minimise runoff and wastage.		
Policy WHB 14 Flooding and sustainable drainage	All development in flood zones two and three must be accompanied by a flood risk assessment and satisfy the safety requirements in the Flood Risk National Planning Policy Guidance.		

Policy	olicy		
	All proposals must demonstrate how water will be managed to avoid surface water and fluvial flooding. As appropriate Sustainable Drainage Systems (SuDs) should be installed.		
Policy WHB 15 Dark skies	Dark skies are preferred whilst ensuring that new developments are safe and secure and meet highway safety needs. All exterior lighting should be energy efficient and minimise light pollution and glare. Lighting should have minimal impact on the environment and wildlife.		
Policy WHB 16 Community facilities	New or enhanced community facilities will be supported where: • they are within or close to the settlement boundary and are accessible by foot • contribute to quality and sustainability of community life • there are no other more appropriate or convertible buildings for the proposed use • there will not be significant adverse effects on environment, amenity, and character of the village • the benefits outweigh any loss of countryside. Loss of facilities (11 facilities are identified in the plan) will only be permitted if it can be demonstrated that: • the current use is no longer viable • there is no demand for the use or alternative uses • there is a suitable alternative facility locally that is accessible on foot or via sustainable transport.		
Policy WHB 17 Open space, sport and recreation facilities	New or enhanced amenity, sport or recreation open space or facilities is supported. Loss of facilities will not be allowed unless: They are surplus to requirements, or Equivalent or improved facilities are made available in a suitable location. New provision should comply with LPA standards. New development should be well designed.		
Policy WHB 18 Public rights of way	Additions and extensions to public rights of way will be supported where the biodiversity and wildlife		

Policy	Summary	
	corridor value is protected or enhanced, and the proposal is fit for purpose.	

3. Legislative background

- 3.1. The basis for strategic environmental assessment (SEA) legislation is European Union Directive 2001/42/EC4 which requires a strategic environmental assessment to be undertaken for certain types of plans or programmes that could have a significant environmental effect. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, commonly referred to as the SEA regulations.
- 3.2. To decide whether a draft neighbourhood plan might have significant environmental effects, it must be assessed (screened) at an early stage of the plan preparation according to the requirements set out in regulation nine of the Environmental Assessment of Plans and Programmes Regulations 2004. These include a requirement to consult the environmental assessment consultation bodies.
- 3.3. Where it is determined that the plan is unlikely to have significant environmental effects (and accordingly, does not require an environmental assessment) a statement of reasons for the determination should be prepared. A copy of the statement must be submitted with the neighbourhood plan proposal and made available to the independent examiner.
- 3.4. If likely significant environmental effects are identified, a strategic environmental assessment needs to be carried out and an environmental report must be prepared in accordance with paragraphs two and three of Regulation 12 of those regulations.
- 3.5. In accordance with Regulation 9 of the SEA Regulations 2004, Wickhambrook Parish Council (the qualifying body) has requested that West Suffolk District Council consider whether a strategic environmental assessment of the emerging neighbourhood plan is required due to significant environmental effects.
- 3.6. Sustainability appraisal is not legally required for neighbourhood plans, but it must be demonstrated how the neighbourhood plan contributes to the achievement of sustainable development in the area. It is the responsibility of the qualifying body to demonstrate how its neighbourhood plan will contribute to achieving sustainable development.
- 3.7. Strategic environmental assessment is a process for evaluating, at the earliest appropriate stage, the environmental effects of a plan before it is made. A habitats regulations assessment identifies whether a plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects. This assessment must determine whether

- significant effects on a European site can be ruled out based on objective information.
- 3.8. European sites are defined in Regulation 8 of the Conservation of Habitats and Species Regulation 2017 and include special areas of conservation and special protection areas, potential special protection areas, and potential special areas of conservation. The National Planning Policy Framework requires decision makers to apply the same protection and process to listed or proposed Ramsar sites. The sites collectively are referred to as habitats sites in this document.
- 3.9. If the conclusion of the habitats regulations assessment screening is that the plan is likely to have a significant effect on a European site then an appropriate assessment of the implications of the plan for the site, in view of the conservation objectives of the site, must be undertaken. If a plan is one which has been determined to require an appropriate assessment under the Habitats Directive, then it will normally also require a strategic environmental assessment.

4. Screening process

- 4.1. The environmental constraints of the area are set out in appendix one of this document.
- 4.2. The criteria from schedule one of the strategic environmental assessment regulations have been used in the consideration of environmental effects.

5. Screening assessment

5.1. A neighbourhood plan may have a significant effect on the environment depending on the proposals within it and a case-by-case assessment is required. The criteria for undertaking this assessment are drawn from Article 3(5) of Directive 2001/42/EC (Annex 11) and Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004 as set out in table two below:

Table two: consideration of likely significant effects, using the criteria from schedule one of the strategic environmental assessment regulations.

Significant effect criteria	Assessment	
The characteristics of the plan having regard to:		
The degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The Wickhambrook neighbourhood plan policies set out a framework for all development projects and other activities considering design, scale, operating conditions and protection of existing landscape and character. The majority of proposals that would be supported are relatively small in scale and as such would be unlikely to have any significant effect on the environment.	
	The plan also includes land for development (Policy WHB2 Land West of Bunter's Rd) that is in addition to land allocated in the existing adopted local plan. This land is outside the existing settlement boundary and is primarily for housing although a small area is proposed for commercial, business, service or local community uses. The site is located on an arable field bounded to the east by the B1063 Bunters Road, and Claydon's agricultural business site to the west.	
	The same site is also a proposed allocation (Policy AP53) in the Reg. 19 Submission draft West Suffolk Local Plan (Jan 2024).	
	The scale of the development is in keeping with the size of the village and will provide structural	

Significant effect criteria	Assessment	
The characteristics of the plan having regard to:		
	landscaping, green spaces and routes within it. Development proposals should be supported by a Landscape and Visual Impact, Ecological and Heritage Impact Assessment. As such it is unlikely that the development would cause significant detriment to the local environment. The potential for likely significant effects on European sites is considered below in the Habitats Regulations Screening.	
The degree to which the plan influences other plans and programmes including those in a hierarchy	The neighbourhood plan provides policies for the designated plan area, relevant to a local level only. The Wickhambrook Neighbourhood Plan must be in conformity with the strategic policies of the former St Edmundsbury area of West Suffolk and in addition has had regard to the emerging West Suffolk Local Plan. The site (WHB2) is also a proposed allocation (Policy AP53) in the Reg. 19 Submission draft West Suffolk Local Plan (Jan 2024). This local plan has	
	been through the SA and HRA process. The neighbourhood plan does not directly influence other plans but will	
	become a development plan document if made and read alongside other parts of the local plan.	
The relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development.	A neighbourhood plan is required to contribute to the achievement of sustainable development. The plan includes a strong emphasis on increasing biodiversity and protecting the existing natural environment and habitats. The neighbourhood plan seeks to safeguard areas of the parish that are considered historic assets and to promote community facilities, sustainable construction, including	

Significant effect criteria	Assessment		
The characteristics of the plan having regard to:	•		
	renewable energy and energy efficiency as well as consideration of sustainable drainage and safeguarding against flood risk. Policy WHB18 aims to protect, enhance and reinstate public rights of way in the parish, allowing greater opportunities for local leisure and recreation, and reaffirming possibilities to enhance green corridors and biodiversity.		
Environmental problems relevant to the plan.	The environmental impact of the proposals within the Wickhambrook Neighbourhood Plan area is likely to be minimal due to the location, size and scale of development that would come forward as a result of the policies. The proposed development will be restricted by existing roads, field boundaries and existing development which form a physical boundary between the settlement and the surrounding countryside. This will be reinforced by the proposed retention and enhancement of the existing trees and hedges around the site and provision of structural landscaping and buffers along the boundaries.		
	Any potential local environmental problems including those associated with loss of agricultural land are likely to be of a local scale and could be tackled through the implementation of the plan. The policy content of the previously adopted St Edmundsbury Local Plan and the emerging West Suffolk Local Plan will additionally apply to any proposals within the neighbourhood plan area. These policies have been or will be subject to sustainability appraisal and habitats regulations assessment screening.		
	The potential for likely significant effects on European sites is		

Significant effect criteria	Assessment	
The characteristics of the plan having regard to:		
	considered below in the Habitats Regulations Screening.	
The relevance of the plan or programme for the implementation of community legislation on the environment (for example plans and programmes linked to wastemanagement or water protection).	The neighbourhood plan is required to be in conformity with the strategic policies of the local plan. The existing and emerging local plans have had regard to European community legislation on the environment.	
	The potential for likely significant effects on European sites is considered below in the Habitats Regulations Screening.	
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
The probability, duration, frequency and reversibility of the effects	Development that could come forward through the plan would in general be of small enough scale that any effects are unlikely to be significant in terms of duration, frequency, and reversibility.	
	Development of the site allocated for approximately 40 dwellings will have minor local impacts during the construction phase, but the site is well contained and criteria for development in Policy WHB2, other policies in the neighbourhood plan and local plan addressing issues such as landscaping, biodiversity and habitats and providing pedestrian access to facilities will ensure the development integrates with the settlement and impacts of development are minimised.	
	The potential for likely significant effects on European sites is considered below in the Habitats Regulations Screening.	
The cumulative nature of the effects	Other plans and projects in the vicinity of the plan area have been reviewed. Policy themes in the plan	

Significant effect criteria	Assessment
The characteristics of the plan having regard to:	
	and policies in other existing and emerging local plan documents that would continue to be relevant protect local environmental assets. The potential for cumulative recreational effects on European sites outside the NP area is considered in the HRA screening below. Other than this the cumulative effects are unlikely to be significant. The neighbourhood plan policies seek to safeguard the plan area from inappropriate development, individually and in combination.
The transboundary nature of the effects	The plan will not lead to transboundary effects. The development site proposed within the plan is relatively central within the parish and as such any transboundary effects are likely to be minimal. Any proposals that arise as windfall development or incidentally are unlikely to lead to significant transboundary effects on interests of acknowledged importance.
	The potential for likely significant effects on European sites is considered below in the Habitats Regulations Screening.
The risks to human health or the environment (for example due to accidents)	The level of development in the plan is unlikely to lead to additional risks to human health or the environment.
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The potential development that could occur as a result of the plan is limited physically in its geographical area. The allocated site at Land West of Bunters Rd has an area of approximately 2.85 hectares. Any effects are likely to be local and are unlikely to be significant.
	The potential for likely significant effects on European sites is considered below in the Habitats Regulations Screening.

Significant effect criteria

Assessment

The characteristics of the plan having regard to:

The value and vulnerability of the area likely to be affected due to: -special natural characteristics or cultural heritage,

- -exceeded environmental quality
- -standards or limit values,
- -intensive land-use

The environmental sensitivities in the plan area and immediate vicinity are listed in appendix one. The plan proposes to include policies that protect heritage and archaeological assets and protect and enhance local environmental assets. There is a conservation area to the southeast of the parish extending from Wickham Street to the Parish church. Some 61 listed buildings. Gaines Cottage (grade II) fronts the site to the east of Bunters Road, Gaines Hall (Grade II) is some 200m to the west and Cutt Bush some 200m southeast along Bunters Rd. 6 buildings of local significance are identified along Bunters Rd. The allocation requires any application to be supported by a Landscape and visual impact assessment and heritage assessment.

Policy WHB12 in the plan expects proposals for residential development to reflect the local character and this is supported by separate design guidance and code for the parish. Other local plan policies would also continue to be relevant. The local environmental effects arising from the plan are unlikely to be significant.

The potential for likely significant effects on European sites is considered below in the Habitats Regulations Screening.

The effects on areas or landscapes which have a recognised national, community or international protection status.

Local, national and internationally designated nature conservation sites in the locality are listed in appendix one. There are no nationally recognised wildlife designations in the Parish, but the ancient woodlands at Easter Wood, near Baxter's Green, Spring Wood at Genesis Green and Garbs Grove, near Giffords Hall, are

Significant effect criteria	Assessment
The characteristics of the plan having regard to:	
naving regard to:	designated as County Wildlife Sites and Special Landscape Areas. Public rights of way link this area to the village and there may be an increase in footfall or dog walking in the area. A review of local landscape designations has looked at locally valued landscapes (West Suffolk Preferred Options Local Plan consultation 2022) and did not identified this area as locally valued. As such the designation to the north of the parish will not be taken forward. However, to the southeast of the parish an area along Church Road from Bury Rd to the Church is in the proposed Glem Valley locally valued landscape. Development here has the potential to significantly change the character of the landscape. The Habitats regulations assessment screening below in section 6 takes into account recreational impacts from new residential development on the Breckland SPA/SAC component

6. Habitats regulations assessment screening

- 6.1. There are no Natura 2000 (European Sites) sites within the Wickhambrook Neighbourhood Plan area. Sites outside of the neighbourhood plan area include Breckland Special Protection Area (SPA), Devils Dyke (SAC), Breckland Special Area of Conservation (SAC) and Fenland (SAC).
- 6.2. Recent habitats regulations assessment (HRA) work in West Suffolk (HRA West Suffolk Local Plan Regulation 19 December 2023) considers the following pathways of impact relevant:
 - Urbanisation (changes in species distribution)
 - Recreational pressure
 - Loss of functionally linked land
 - Hydrological changes and water pollution
 - Atmospheric Pollution (atmospheric nitrogen deposition)
- 6.3. The Wickhambrook Neighbourhood Plan allocates one site for development in Policy WHB2 Land West of Bunters Road. The site is some 11.2 km south of the Breckland SPA, 14 km southeast of Devils Dyke SAC, 16.3 km southeast of Fenland SAC and 16.7km south of Breckland SAC.
- 6.4. The area over which net new residential development can cause a recreational impact to a Habitat site i.e. the 'zone of influence' or core catchment can vary between sites. Survey work undertaken for the Suffolk and Norfolk Councils has identified that Breckland SPA/SAC (components designated for nightjar/woodlark) has a core recreational catchment (defined as the zone within which 75% of visitors derive) of 26.3 km. This is a significant increase from the previous recreational core catchment of 7.5km. That 7.5km figure was derived from visitor surveys undertaken in 2010 while the 26.3km figure is from more recent data, with surveys undertaken in 2015 and 2016. The recent surveys were more comprehensive and timed to coincide with the bird breeding season. The large catchment is probably a reflection of the dispersed population around the Brecks.
- 6.5. Survey work also identified that Devils Dyke SAC has a recreational catchment of 5.5km, while Wicken Fen Ramsar (Fenland SAC) has a recreational catchment of 10.3km. Therefore, any development within these zones of influence or core catchments could cause an impact in-combination with all other development within the relevant zones of influence and therefore, likely require mitigation for recreational pressure.
- 6.6. It is concluded that there is the potential for likely significant effects of recreation as site WHB2 Land West of Bunters Road is within 26.3km of woodlark/nightjar Breckland SPA habitat and Breckland SAC. It is therefore considered that a Habitats Regulations Assessment progressing to Appropriate Assessment is required for the Wickhambrook Neighbourhood Plan.

7. Consultation

- 7.1 Consultation with statutory consultees; Environment Agency, Natural England and Historic England was undertaken between 5th June and 3rd July 2024. Consultation responses were received from the Environment Agency, Natural England and Historic England.
- 7.2 Environment Agency commented: Based on a review of environmental constraints for which we are a statutory consultee, we find that there are some areas of fluvial flood risk and watercourses within the neighbourhood plan area. In particular, we note that the boundary does extend into areas of Flood Zones 2 and 3. On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. (See full response attached in appendix 4).
- 7.3 Natural England Commented: Natural England notes that the HRA does not rule out likely significant effects (LSE) to Breckland Special Protection Area (SPA) for recreational disturbance. Where LSE are identified, it will be necessary to undertake an appropriate assessment of the neighbourhood plan and, if needed, identify and secure appropriate mitigation measures to ensure the plan does not result in an adverse effect on the integrity of the habitats site... A screening exercise should be undertaken if there is any doubt about the possible effects of the plan on the habitats site(s)... Planning practice guidance also outlines that if an appropriate assessment is required for your neighbourhood plan this will also engage the need for a SEA. (See full response attached in appendix 4).
- 7.4 Historic England commented: For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the neighbourhood plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion... Given the likely significant effects (both positive and negative) upon the historic environment, Historic England concurs that a Strategic Environmental Assessment will be required. (See full response attached in appendix 4).

8. Screening outcome

- 8.1. This report contains the detail of the assessment of the need for the Wickhambrook Neighbourhood Plan to be subject to strategic environmental assessment as required by Strategic Environmental Assessment Directive (2001/42/EC) and appropriate assessment as required by the Habitats Directive (92/43/EEC). The assessment for both these requirements has been undertaken on the basis of the growth set out in the neighbourhood plan and summarised in section two of this report. Based on the environmental information, and the scope of the policies in the Wickhambrook Neighbourhood Plan, the outcome of the assessment is:
 - In respect to habitats regulations assessment, likely significant effects cannot be screened out and therefore Appropriate Assessment is required (section six).
 - In respect of strategic environmental assessment, the SEA Directive requires that if an eligible plan or programme requires an appropriate assessment under the Habitats Directive, then that plan or programme will also require an SEA.
- 8.2. This report has been informed by consultation with the statutory consultees, the Environment Agency, Natural England and Historic England. The submission version of the Neighbourhood Plan will require further screening if there are any relevant material changes made between the pre-submission and submission versions of the plan.

Appendix 1 – environmental constraints

Biodiversity

There are no internationally important sites within the plan area. The closest habitats sites to the plan boundary, including special areas of conservation (SAC), special protection area (SPA) and Ramsar sites are listed in the table below.

SAC	SPA	Ramsar
Devils Dyke (12.5 km) Breckland (13 km) Fenland (14 km)	Breckland (7.3 km)	Chippenham Fen (14 km)

There are no **nationally important sites** within the plan area.

There are many nationally important SSSI sites in the vicinity including:

- Hay Wood, Whepstead 3.9 km.
- Frithy and Chadacre Wood 6.9 8.25 km.
- Kentwell Wood 6.9 km.
- Cavendish Wood 2.8 4.2 km
- Trundley and Wadgell's Woods, Great Thurlow 3.3 4.5 km
- Carlton Wood 7.2 km
- Out and Plunder Woods 6km
- Ten Wood 6.3 km
- Devils Dyke 8.5 km
- Breckland Farmland 7.2 km
- Horringer Court Caves 8.3 km

Sites of Special Scientific Interest (SSSI) risk zones of Natural England give an indication of the types and scale of development that might have an effect on these SSSI. The criteria listed are in the following table.

Development category	Description	Comment
All planning applications	All planning applications outside or extending outside existing settlements or urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings and structures.	The allocated site is outside the settlement boundary and would lead to loss of arable farmland and potentially some landscape features.
Infrastructure	Airports, helipads and other aviation proposals.	There are no such proposals or policies proposed in the plan

Air pollution	Livestock and poultry units with floorspace more than 500 square metres (m²), slurry lagoons more than 750 m² and manure stores more than 3500	There are no such proposals or policies proposed in the plan
Combustion	General combustion processes more than 50 megawatts energy input. Including energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis or gasification, anaerobic digestion, sewage treatment works, other incineration or combustion.	There are no such proposals or policies proposed in the plan
Discharge	Any discharge of water or liquid waste of more than 20 cubic metres per day to ground (for example to seep away) or to surface water, such as a beck or stream (please note: This does not include discharges to mains sewer which are unlikely to pose a risk at this location).	There are no such proposals or policies proposed in the plan

County Wildlife Sites

There are three designated county wildlife sites (CWS) within the plan boundary: Spring Wood, Easter Wood and Garbs Grove which are all areas of ancient woodland.

Outside the plan area small sites such as Black Wood (ancient woodland) abuts the parish boundary and Redfield Grove (ancient woodland), Willis's Farm (species rich grassland and hedgerows) and Littly Wood (ancient woodland) are within 500m of the boundary.

The proposed allocation is several km from these sites by public rights of way and lanes, with a footpath only going through Spring Wood. A good network of public rights of way serve other destinations from the proposed allocation and the proposed site is therefore unlikely to have any impact on the CWS's.

Local Nature Reserves

There are no local nature reserves within five kilometres of the plan boundary.

Ancient woodland – See County wildlife sites above.

No proposed site allocations fall within the 500m protective buffer zones for these ancient woodlands.

Soil

The land within the plan area is primarily grade 2 agricultural land with a small swathe of grade 3 running north – south in the centre of the parish from Coltsfoot Green to Baxter's Green. The proposed development of Bunters Road is grade 2.

Water

A tributary of the River Glem runs roughly north – south down the centre of the parish from Genesis Green to Wickhambrook and then southeast to Wickham Street. There are associated flood zones two and three along the length of the river and functional flood plain although only some 120m wide at its widest point. The proposed allocation WHB 2 – Land West of Bunters Road is some 600m west of the flood zone.

There are many drainage channels, connecting waterways within the plan area that are indicated on the 30-year surface water flooding map. Land West of Bunters Road is not in these surface water flooding areas.

The north-western portion of the plan area is within source protection zone 2. – Zone 1 Inner protection zone. The bulk of the plan area including Land West of Bunters Road is in zone 3.

Air quality

There are no air quality management areas within the plan area.

Noise

The main sources of noise pollution in the plan area is likely to come from traffic noise from the A143 crossing through the parish.

Access and recreation

The plan area is well served by public rights of way within the plan area although opportunities exist for linkages and new routes. Policy WHB 18 seeks to extend and improve the existing network.

Cultural heritage, including architectural and archaeological heritage.

One scheduled ancient monument is present within the plan area – a 'Moated site west of Gifford's Hall' which lies southwest of Gifford's Lane in Clopton Green on the other side of the A143 from the main settlement of Wickhambrook.

There are fourteen further scheduled ancient monuments within five kilometres (km) of the plan area boundary:

- Motte and bailey at Denham Castle 4 km
- Moted site at Denham Hall 2.6 km
- Moted site at Depden Hall 0.5 km
- Two moated sites adjoining St Andrew's Church, with associated remains of medieval settlement at Pound Green 4.4 km

- Churchyard cross in St Andrew's churchyard, Pound Green 4.4 km
- Bowl barrow 135m south of Waterhall Cottage, Wickham Street 0.15 km
- Moated site 300m southwest of Sowley Green Farm 3.6km
- Moated site at Cowlinge Hall 1.8 km
- Moated site at Fairstead Farm 0.6 km
- Moated site at Seven Elms Green, 210m southwest of Erratts Farm 1.7 km
- Moated site in Beeton's Plantation 2.1 km
- Roman villa SE of Lidgate 0.75 km
- Lidgate Castle and C16 Fortified Manorial Complex 1.75 km

There are 60 listed buildings within the plan area, dispersed among the settlements in the parish. Most are listed Grade II.

Listed Grade I – Church of All Saints, Giffords Hall. Listed Grade II* - Badmondisfield Hall and Clopton Hall.

There is a conservation area to the south of the parish in Wickham Street.

The area is rich in archaeology, with some 50 known archaeological sites.

Landscape

The plan area is comprised of two different landscape character types (West Suffolk Landscape Character Assessment) – Gem and Wickhambrook Farmlands that covers most of the parish and a small area of Upper Glem Valley landscape type in the south of the parish which runs from Wickham Street to Shop Hill. These landscapes have the following characteristics:

Glem and Wickhambrook Farmlands:

- Flat to gently undulating plateau landscape that forms an interfluve between river catchments.
- Chalky clay glacial till covers the plateau giving fertile soils for arable farming with some areas of slower draining heavier clay.
- Dispersed settlement pattern of loosely clustered dwellings arranged around greens, isolated moated manor and church complexes and larger settlements where 20th century infill has occurred.
- Large scale field pattern, with intensive arable farmland defined by hedgerows and linear poplar shelterbelts.
- Large blocks of semi-natural ancient woodland, comprising oak and ash stands, create a wooded skyline.
- Network of narrow lanes with wide verges. Rich stock of medieval and Tudor timber-framed and brick buildings and moated sites.
- Vertical structures break the skyline including masts and water towers.
- Open expansive landscape with long views and wide skies.

<u>West Suffolk Landscape Character Assessment - Glem and Wickhambrook Farmlands (C2) (inconsult.uk)</u>

Upper Glem Valley:

- Clearly defined river valley of the Glem which flows west to east with gently sloping valley sides.
- Repetitive pattern of nucleated villages and hamlets along the valley and occasional farmsteads.
- Small to medium scale arable farmland defined by thick hedgerows with hedgerow trees.
- Woodland occurs as small copses on upper valley slopes and along the valley floor.
- Narrow valley floor pastures flank the watercourse.
- Network of winding enclosed narrow lanes with grass verges and high hedges.
- Distinctive vernacular of 'Suffolk pink' cottages and timber weatherboarding.
- Contrast between intimate and well treed character of the valley and the wider more open plateau farmland which surrounds.
- Deeply rural, intimate, enclosed, inward looking and tranquil.

<u>West Suffolk Landscape Character Assessment - Upper Glem Valley (A3) (inconsult.uk)</u>

A review of local landscape designations has looked at locally valued landscapes and identified the Glem Valley as an important landscape area in the local context. This report forms part of the evidence base for the emerging West Suffolk Local Plan Landscape Valuation report and annexes April 2022.pdf (inconsult.uk) and the designation is included in the submission consultation draft of the West Suffolk Local Plan.

Appendix 2 – Internationally designated sites

Wickhambrook is over five seven kilometres (km) from the nearest element of an Internationally designated site. The closest sites are Breckland Special Protection Area (7.3 km), Devils Dyke Special Area of Conservation (12.5 km) and Chippenham Fen Ramsar site (14 km).

Site	Conservation objectives of the international site
Breckland Special Protection Area	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:
	 The extent and distribution of the habitats of the qualifying features. The structure and function of the habitats of the qualifying features. The supporting processes on which the habitats of the qualifying features rely. The population of each of the qualifying features. The distribution of the qualifying features within the site.
	Qualifying features: A133 Burhinus oedicnemus; Stone curlew (breeding). A224 Caprimulgus europaeus; European nightjar (breeding). A246 Lullula arborea; Woodlark (breeding).
Breckland Special Area of Conservation	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the favourable conservation status of its qualifying features, by maintaining or restoring:
	 The extent and distribution of qualifying natural habitats and habitats of qualifying species. The structure and function (including typical species) of qualifying natural habitats. The structure and function of the habitats of qualifying species. The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely. The populations of qualifying species. The distribution of qualifying species within the site.
	 Qualifying Features: H2330. Inland dunes with open Corynephorus and Agrostis grasslands; Open grassland with grey-hair grass and common bent grass of inland dunes.

- H3150. Natural eutrophic lakes with Magnopotamion or Hydrocharition-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 (Festuco-Brometalia); Dry grasslands and scrublands on chalk or limestone.
- H91E0. Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae); Alder woodland on floodplains. (Important orchid site.)
- S1166. Triturus cristatus; Great crested newt.

Chippenham Fen Ramsar site

Ensure that the integrity of the site is maintained or restored as appropriate and ensure that the site contributes to achieving the favourable conservation status of its qualifying features, by maintaining or restoring:

- The extent and distribution of the habitats of qualifying species.
- The structure and function of the habitats of qualifying species. Maintenance of a reasonably high summer water table is vital to the fen's survival
- The supporting processes on which the habitats of qualifying species rely.
- · The populations of qualifying species and
- The distribution of qualifying species within the site

Qualifying Features

- The site is notable for its ecological diversity, from characteristic sedge fen to fen meadow, chalk grassland, Alnus/Salix carr and ancient woodland (Fraxinus, Quercus, Betula).
- More than 300 species of flowering plants have been recorded, including very rare, regionally rare or local species, as have several rare invertebrates (moths).
- A notable assemblage of breeding birds includes Gallinago gallinago, Scolopax rusticola, Luscinia megarhynchos, Acrocephalus spp., and Locustella naevia.

Appendix 3 – plan area



Appendix 4 – Responses from statutory consultees

Environment Agency:

Dear Sir/Madam

WICKHAMBROOK NEIGHBOURHOOD PLAN - STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATIONS ASSESSMENT SCREENING OPINION

Thank you for consulting us on the Strategic Environmental Assessment Screening Report for the Wickhambrook Neighbourhood Plan.

Flood Risk

Based on a review of environmental constraints for which we are a statutory consultee, we find that there are some areas of fluvial flood risk and watercourses within the neighbourhood plan area. In particular, we note that the boundary does extend into areas of Flood Zones 2 and 3.

On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. We note that a relevant policy covering flood risk (WHB 14 Flooding and sustainable drainage) has been included within the draft Plan. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. National Planning Policy Framework (NPPF) paragraph 161 sets this out.

The Lead Local Flood Authority's Surface Water Management Plan will indicate if there are any critical drainage areas from local sources of flood risk (e.g. surface water, groundwater and sewerage) which coincide with the neighbourhood plan area.

Water Resources

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with Anglian Water, in line with their Draft 2024 Water Resources Management Plan. The Local Planning Authority's Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including

rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the $110\ l/p/d$ requirement. We recommend all new non-residential development of $1000\ sqm$ gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk).

Additional Advice

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning

We trust this advice is useful.

Yours faithfully

Mr Alasdair Hain-Cole Planning Officer

Historic England:

Thank you for your email regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the neighbourhood plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The supporting information (screening report and draft neighbourhood plan) supplied with the consultation indicates that within the plan area there are designated historic environment assets. There is also likely to be other features of local historic, architectural or archaeological value, and consideration should also be given to the wider historic landscape.

The documentation provided indicates the Neighbourhood Plan proposes to allocate the site 'Land West of Bunters Road (PolicyWHB2)' for development. We note that this site has also been proposed in the draft West Suffolk Local Plan. We further note the Screening Outcome shown at 7.1: 'In respect of strategic environmental assessment, the SEA Directive requires that if an eligible plan or programme requires an appropriate assessment under the Habitats Directive, then that plan or programme will also require an SEA.'

Given the likely significant effects (both positive and negative) upon the historic environment, Historic England concurs that a Strategic Environmental Assessment will be required.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

We should like to stress that this opinion is based on the information provided by you with your correspondence below. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Please do contact me, either via email or the numbers below, if you have any queries.

Kind regards, Ross

Ross McGivern Historic Places Adviser

Natural England:

Wickhambrook Neighbourhood Plan - SEA & HRA Screening Consultation

Thank you for your consultation on the above dated 5 June 2024.

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Screening Request: Habitats Regulations Assessment (HRA)

Natural England notes that the HRA does not rule out likely significant effects (LSE) to Breckland Special Protection Area (SPA) for recreational disturbance. Where LSE are identified, it will be necessary to undertake an appropriate assessment of the neighbourhood plan and, if needed, identify and secure appropriate mitigation measures to ensure the plan does not result in an adverse effect on the integrity of the habitats site.

In accordance with Schedule 2 of The Neighbourhood Planning (General) Regulations 2012 (as amended), a neighbourhood plan cannot be made if it breaches the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (as amended).

A screening exercise should be undertaken if there is any doubt about the possible effects of the plan on the habitats site(s). This will be particularly important if a neighbourhood plan is to progress before a local plan and/or the neighbourhood plan proposes development which has not been assessed and/or included in the Habitats Regulations Assessment for the local plan. Where mitigation is necessary to ensure no effects then this will need to be properly assessed via an appropriate assessment. Natural England is a statutory consultee at the appropriate assessment stage of the Habitats Regulations Assessment process.

Screening Request: Strategic Environmental Assessment (SEA)

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004 (as amended). Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the planning practice guidance.

Planning practice guidance also outlines that if an appropriate assessment is required for your neighbourhood plan this will also engage the need for a SEA. One of the basic conditions that will be tested by the independent examiner is whether the neighbourhood plan is compatible with European obligations, including those under

the SEA Directive. Where a SEA is required it should be prepared in accordance with regulation 12 of the SEA Regulations.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact consultations@naturalengland.org.uk

Yours sincerely

Richard Hack Norfolk & Suffolk Team