Wickhambrook Neighbourhood Plan

Habitat Regulations Assessment

Wickhambrook Parish Council

January 2025

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Quality information

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1. Introduction

Background to the project

1.1 AECOM was appointed by Locality to assist in undertaking a Habitats Regulations Assessment (HRA) of the Pre-Submission Draft Neighbourhood Plan (September 2023) for Wickhambrook Parish (hereafter referred to as the 'Neighbourhood Plan' or the 'Plan'). The objectives of the assessment are to:

- Identify any aspects of the Neighbourhood Plan that would cause a likely significant effect on any Habitat Sites, which include Special Areas of Conservation (SACs), candidate SACs (cSACs), Special Protection Areas (SPAs) and potential SPAs (pSPAs) and as a matter of Government policy, Ramsar sites, both in isolation and in combination with other plans and projects;
- Determine whether appropriate assessment would be required; and
- Undertake an analysis to inform the appropriate assessment, with a view to whether any aspects of the plan would have an adverse effect on the integrity of any Habitat sites.

Legislation

1.2 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment continues as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019[1]. The ultimate aim of the Directive is to "*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*" (Habitats Directive, Article 2(2)).

1.3 The Habitats Directive applies the precautionary principle to Habitat sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse impacts on Habitat sites may still be permitted if there are no reasonable alternatives to them and there are Imperative Reasons of Overriding Public Interest. (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

1.4 In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question:

[1] These don't replace the 2017 Regulations but are just another set of amendments.

Box 1. The legislative basis for Appropriate Assessment

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

"*A competent authority, before deciding to … give any consent for a plan or project which is likely to have a significant effect on a European site … shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives… The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site*".

1.5 Over the years the phrase 'Habitats Regulations Assessment' has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an 'appropriate assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

1.6 In spring 2018 the 'Sweetman' European Court of Justice ruling[2] clarified that 'mitigation' (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a Habitats Site that would otherwise arise) should **not** be taken into account when forming a view on Likely Significant Effects. Mitigation should instead only be considered at the Appropriate Assessment stage. Appropriate assessment is not a technical term: it simply means 'an assessment that is appropriate' for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case by case basis by the competent authority. As this report consists of a test of likely significant effect, mitigation measures are therefore not taken into consideration at this stage.

Report structure

1.7 Section 2 of this report summarises the methodology for the assessment. Section 3 details background information on the Habitat Sites discussed in this report. Section 4 identifies the possible pathway by which adverse effects on protected Habitat sites could arise. Section 5 discusses the results from the test of likely significant effects and Section 5 covers the Appropriate Assessment. The full initial policy screening table is present in Appendix B.

2. Methodology

Introduction

2.1 This section sets out our approach and methodology for undertaking the HRA. Habitats Regulations Assessment itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument.

A proportionate assessment

2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of adverse effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.

2.3 However, the draft CLG guidance[3] makes it clear that when implementing HRA of land-use plans, the AA should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:

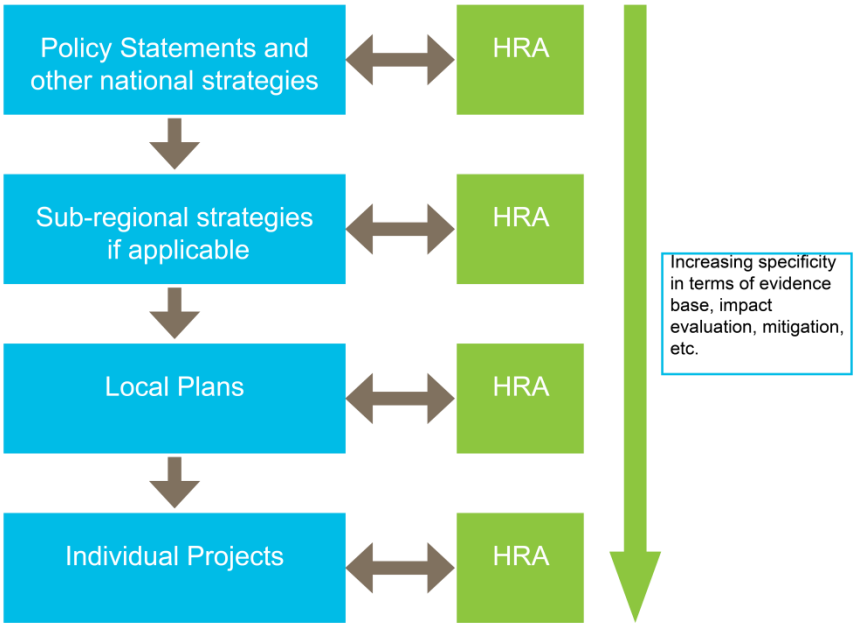
[2] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)
[3] CLG (2006) Planning for the Protection of European Sites, Consultation Paper

2.4 '*The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.*'

2.5 In other words, there is a tacit acceptance that appropriate assessment can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers (**Box 2**).

2.6 For a Development Plan the level of detail concerning the developments that will be delivered is usually insufficient to make a highly detailed assessment of significance of effects. For example, precise and full determination of the impacts and significant effects of a new settlement will require extensive details concerning the design of the town, including layout of greenspace and type of development to be delivered in particular locations, yet these data will not be decided until subsequent stages.

2.7 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt; it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon a Habitat site unless it can be clearly established otherwise.



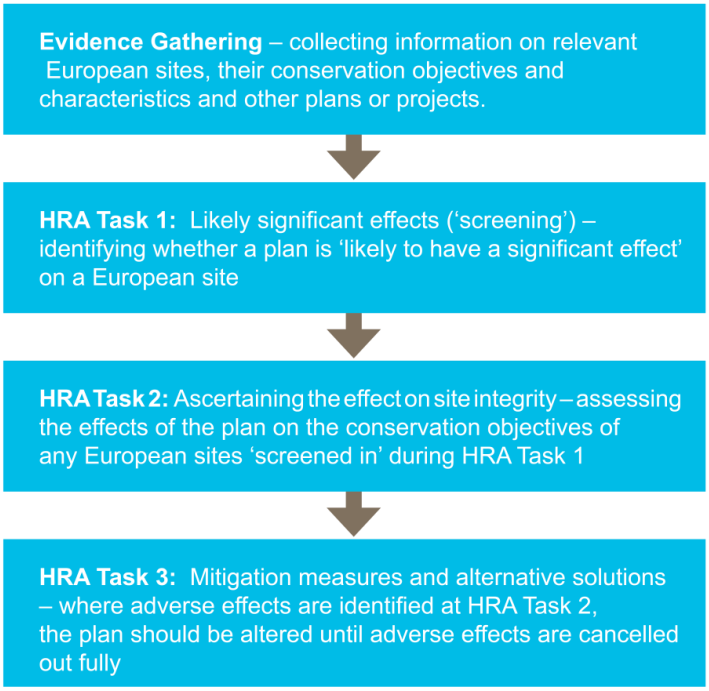
Box 2. Tiering in HRA of Land Use Plans

The process of HRA

2.8 The HRA has been carried out in the continuing absence of formal Government guidance. CLG released a consultation paper on AA of Plans in 2006[4]. As yet, no further formal guidance has emerged.

2.9 Box 3 below outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendation and any relevant changes to the plan until no significant adverse effects remain.

[4] Ibid



Box 3. Four-Stage Approach to Habitats Regulations Assessment

2.10 In practice, this broad outline requires some amendment in order to feed into a developing land use plan such as a Neighbourhood Plan. The following process has been adopted for carrying out the HRA.

Physical scope

2.11 The physical scope of the assessment i.e. the range of Habitat sites to be considered will be based upon a combination of tracing impact pathways and using distances derived from various studies.

2.12 The Habitat sites discussed in this HRA are as follows:

- Breckland SPA - ~7.1km north of the parish
- Breckland SAC - ~13.1km north of the parish
- Fenland SAC - ~13.8km northeast of the parish
- Chippenham Fens Ramsar - ~13.8km northeast of the parish
- Devil's Dyke SAC - ~12.5km east of the parish

The 'in-combination' scope – other plans and projects

2.13 It is a requirement of the Regulations that the impact and effects of any plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the Habitat sites(s) in question.

2.14 In practice, 'in-combination assessment' is of greatest importance when the Neighbourhood Plan would otherwise be screened out because the individual contribution is inconsequential. It is neither practical nor necessary to assess the 'in-combination' effects of the Neighbourhood Plan in the context of all other plans and projects within the region.

Stage One: Likely Significant Effect test (screening)

2.15 The first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a high level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

'Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitat sites?'

2.16 The objective is to 'screen out' those plans and projects (or site allocations/policies) that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon Habitat sites, usually because there is no mechanism or pathway for an adverse interaction with Habitat sites. This stage is undertaken in Section 4 of this report.

2.17 In evaluating significance, AECOM have relied on our professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the Habitat sites considered within this assessment.

Stage Two: Appropriate Assessment

2.18 Habitat Site(s) which have been 'screened in' during the previous Task will have a detailed assessment undertaken on the effect of the policies on the Habitat Site(s) site integrity. Avoidance and mitigation measures to avoid adverse significant effects will be incorporated where necessary.

2.19 As established by case law, 'appropriate assessment' is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse effects on the integrity of any Habitat sites that have not been dismissed at Likely Significant Effects. Since it is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage, but to a greater level of detail on a smaller number of policies and sites, this time with a view to determining if there would be adverse effects on integrity. For the air quality pathway the appropriate assessment is where detailed traffic and air quality modelling is reported.

2.20 One of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment takes any policies or allocations that could not be dismissed following the high-level Likely Significant Effects analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the Habitat site(s)).

2.21 The analysis first subjects each policy or site allocation to screening based upon potential pathways of impact. That is documented in Table 6-1 of Appendix B. The results of that screening are summarised in Section 4. Policies that cannot be screened out are then taken forward to appropriate assessment in Section 5. Therefore, it should be noted that Appendix B does not present a summary of the whole assessment process.

3. Relevant Habitat Sites

Breckland SAC

Conservation Objectives

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

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; and,

- The distribution of qualifying species within the site

Qualifying Features

Annex I habitats that are a primary reason for selection of this site:

- Inland dunes with open *Corynephorus* and *Agrostis* grasslands
- Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition* – type vegetation
- European dry heaths
- Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (*Important orchid sites)

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*)

Annex II species present as a qualifying feature, but not a primary reason for site selection

- Great crested newt *Triturus cristatus*

Environmental Vulnerabilities Relevant to the Plan

The threats and pressures likely to affect the SPA are listed below:

- Lack of ground disturbance
- Under grazing
- Forestry and woodland management
- Water pollution
- Changes in species distributions
- Stone curlew monitoring and intervention
- Planning permission: general
- Monitoring
- Air pollution: risk of atmospheric nitrogen deposition
- Public access / disturbance
- Climate change
- Inappropriate scrub control
- Inappropriate management practices
- Habitat fragmentation
- Inappropriate weed control
- Inappropriate pest control
- Inappropriate cutting / mowing

Breckland SPA

Introduction

The Breckland SPA is characterised by an extensive area of grass heath (and some heather heath), large arable fields, and the largest coniferous forest in lowland England. Together, these support over 2000 priority species, many of which are confined to the area, or have their core UK distribution there. The SPA holds internationally important populations of Stone Curlew, Nightjar and Woodlark. Stone Curlew establishes nests on open ground provided by arable cultivation in the spring, while Woodlark and Nightjar breed in recently felled areas and open heath areas within the conifer plantations.

Conservation Objectives

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

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, and,
- The distribution of the qualifying features within the site.

Qualifying Features

This site qualifies under Article 4.1 qualification 979/409/EEC) as during the breeding season the area regularly supports:

- Stone curlew *Burhinus oedicnemus* (western Europe -breeding) – 60.1% of the GB breeding population 5-year peak mean (1994 – 1998)
- European nightjar *Caprimulgus europaeus* – 12.2% of the GB breeding population count as at 1998
- Woodlark *Lullula arborea* – 28.7% if the GB breeding population count as at 1997.

Environmental Vulnerabilities Relevant to the Plan

The threats and pressures likely to affect the SPA are listed below:

- Lack of ground disturbance
- Forestry and Woodland Management
- Water Pollution
- Changes in Species Distribution
- Stone Curlew Monitoring and Intervention
- Planning Permission: General
- Monitoring
- Air Pollution: Risk of Atmospheric Nitrogen Deposition
- Public Access / Disturbance
- Climate Change
- Inappropriate Scrub Control
- Inappropriate Management Practices
- Habitat Fragmentation
- Inappropriate Weed Control
- Inappropriate pest control
- Inappropriate cutting / mowing

Fenland SAC

Introduction

The Fenland SAC is comprised of three fenland Sites of Special Scientific Interest: Woodwalton Fen, Wicken Fen and Chippenham Fen. Each site generally consists of standing water bodies, ditch systems, bogs, marshes and broad-leaved woodland carr. The primary qualifying Fenland SAC features are the extensive examples of the tall herb-rich East Anglian type of M24 *Molinia caerulea - Cirsium dissectum* fen-meadow and the calcium-rich fen dominated by great fen-sedge *Cladium mariscus* and species of the *Caricion davallianae*. Other qualifying features, although not the primary reason of the site's SAC selection, are the presence of Annex II species; great crested newt *Triturus cristatus* and spined loach *Cobitis taenia*.

Conservation Objectives

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

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; and,
- The distribution of qualifying species within the site.

Qualifying Features

Annex I habitats that are a primary reason for selection of this site:

- Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)
- Calcareous fens with Cladium mariscus and species of the Caricion davallianae

Annex II species present as a qualifying feature, but not a primary reason for site selection

- Spined loach *Cobitis taenia*
- Great crested newt *Triturus cristatus*

Environmental Vulnerabilities

- Water pollution
- Hydrological Changes
- Air pollution: impact of atmospheric nitrogen deposition

Chippenham Fens Ramsar (Part of Fenland SAC)

Introduction

The site is of international importance for its wide range of wetland habitats and associated flora, birds and insects. Areas of tall and often rich fen, fen grassland and basic flush have developed over shallow peat soils. The site also contains calcareous grassland, neutral grassland, woodland, mixed scrub and open water.

Conservation Objectives

Based on its designation as a part of the Fenland SAC the conservation objectives are as follows;

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

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; and,
- The distribution of qualifying species within the site.

Qualifying Features

With regards to the site's qualification as a Ramsar it is designated under the following criterion:

Criterion 1
A spring-fed calcareous basin mire with a long history of management, which is partly reflected in the diversity of present-day vegetation

Criterion 2
The invertebrate fauna is very rich, partly due to its transitional position between Fenland and Breckland. The species list is very long, including many rare and scarce invertebrates, characteristic of ancient fenland sites in Britain.

Criterion 3
The site supports diverse vegetation types, rare and scarce plants. The site is a strong hold of Cambridge milk parsley *Selinum carvifolia*.

Environmental Vulnerabilities

The Ramsar site is part of the Fenlands SAC which has the following vulnerabilities:

- Water pollution
- Hydrological Changes
- Air pollution: impact of atmospheric nitrogen deposition

Devil's Dyke SAC

Introduction

Devil's Dyke holds one of the best and most extensive areas of species-rich chalk grassland in Cambridgeshire. The grassland is of a type characteristic to chalklands of south, central and eastern England and represents a habitat type now very restricted in distribution and extent throughout its British range. The Dyke is an ancient linear earthwork comprising a deep ditch and high bank, originally colonised by plants from adjacent calcareous grassland. For this reason, the Dyke is important as one of the few remaining areas still supporting these relict chalkland vegetation communities, once traditionally maintained by sheep grazing.

Conservation Objectives

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

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
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

Qualifying Features

Annex I habitats that are a primary reason for selection of this site:

- Semi-natural dry grassland and scrubland facies on calcareous substrates (Festuco-Brometalia) (*Important orchid sites)

Environmental Vulnerabilities [REF 69]

- Inappropriate scrub control
- Air: pollution: risk of atmospheric nitrogen deposition

4. Pathways of Impact

Recreational Pressure and Disturbance

Introduction

4.1 Recreational use of a Habitat site has the potential to:

- Prevent appropriate management or exacerbate existing management difficulties;
- Cause damage through erosion and fragmentation;
- Cause eutrophication as a result of dog fouling; and,
- Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl.

4.2 Different types of Habitat sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

4.3 It should be emphasised that recreational use is not inevitably a problem. Many Habitat sites also contain nature reserves managed for conservation and public appreciation of nature. At these sites, access is encouraged, and resources are available to ensure that recreational use is managed appropriately.

Mechanical/Abrasive Damage and Nutrient Enrichment

4.4 Most types of terrestrial Habitat site can be affected by soil compaction and erosion, which can arise as a result of visits by walkers, cyclists, horse-riders and users of off-road vehicles. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and move more erratically. Motorcycle scrambling and off-road vehicle use can cause serious erosion, as well as disturbance to sensitive species.

Disturbance

4.5 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding[5]. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds[6].

4.6 Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, nest abandonment, avoidance of certain areas etc.) and physiological changes (e.g. an increase in heart

[5] Riddington, R. *et al*. 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

[6] Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death.[7]

4.7 Breckland SPA is vulnerable to recreational pressure and/or disturbance that could result from the Plan either alone or 'in-combination' with other plans and projects.

4.8 Chippenham Fen Ramsar was leased to the National Trust in 1946 and was then transferred to Natural England. The lease on the site includes a legal covenant that access away from the public right of way through the reserve, is restricted to visitors and students undertaking research projects on the site. The majority of the reserve is only accessible by permit and therefore pressure on the site from public access is very low and unlikely to increase with regards to increased residential growth in the parish. This is in line with the conclusions of the West Suffolk Local Plan. There is no other component of Fenland SAC within 20km of the parish and therefore recreational pressure at the SAC is also unlikely to increase with regards to increased residential growth in the parish.

4.9 Lastly, Devils Dyke SAC is one of the best surviving examples of Anglo-Saxon earthworks in Britain. The interest features of the SAC are chalk grassland. A public right of way runs along the top of the embankment. Although, the Site Improvement Plan for the SAC only lists inappropriate scrub control and air pollution as vulnerabilities of the SAC, the emerging RAMS SPD suggests recreational pressure at Devil's Dyke SAC as causing a likely significant effect and has a core recreational pressure zone of 5.5 km. Given that at its closest point, the parish lies far outside this zone, it is considered that pressure on the site from public access is unlikely to increase with regards to increased residential growth in the parish.

Loss of Functionally Linked Land

4.10 While most Habitat sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not necessarily the case. A diverse array of qualifying species including birds and fish are not always confined to the boundary of designated sites.

4.11 Generally, the identification of an area as functionally linked habitat is not always a straightforward process. The importance of non-designated land parcels may not be apparent and thus might require the analysis of existing data sources (e.g. Bird Atlases or data from record centres) to be firmly established. In some instances, data may not be available at all, requiring further survey work.

4.12 Stone curlew breed on short acid grassland, but in the Breckland SPA nest primarily within arable (vegetable) fields. As well as nesting within the SPA, it is known that a significant proportion of the Breckland SPA population of stone curlew nest in arable land outside the SPA boundaries. The land outside of the SPA which supports the SPA population of stone curlew e.g. nesting/roosting can be defined as 'functionally linked land' in that its preservation is integral to the SPA achieving its conservation objectives even though it lies outside the SPA boundary and must be taken into consideration when assessing if an adverse impact will occur upon the SPA.

4.13 To take account of this population and the potential for disturbance of stone curlew nesting outside the SPA a 1,500m buffer was introduced in 2009-10 around any 1 km grid square with equal to or greater than five stone curlew nesting attempts since 1995 which were associated with the Breckland SPA population (e.g. within 3 km of the SPA boundary) was established in order to capture additional functionally linked land outside of the SPA. These buffers were reviewed in 2016 using nesting attempt data from between 2011 and 2015.

4.14 Loss and disturbance of functionally linked land through development or where development causes disturbance of a level which causes avoidance of land, will reduce the area of land outside the SPA which is available to stone curlew for breeding, not only via direct land take but also through increased competition in the areas remaining and then through greater urbanisation effects, e.g. the increased disturbance of adjacent suitable functionally linked land.

[7] Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

Increased Water Demand and Impacts on Water Quality

4.15 Increased amounts of housing or business development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on Habitat sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has been identified during an Environment Agency Review of Consents process and a joint Environment Agency and Natural England evidence review, as being a major factor in causing unfavourable condition of Habitat sites.

4.16 The quality of the water that feeds Habitat sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour. Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen;
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life; and
- Increased discharge of treated sewage effluent can result both in high levels of macroalgal growth, which can smother the mudflats of value to SPA birds and in greater scour (as a result of greater flow volumes).

4.17 At sewage treatment works, additional residential development increases the risk of effluent escape into aquatic environments in addition to consented discharges to the catchment. In many urban areas, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk.

4.18 An increase in amounts of housing or business development can also lead to an increased demand for water resources. Part of the way this increase in water supply is achieved can be through increased abstraction of water from rivers in the catchment. Water abstraction reduces the flow in rivers and streams, lowers groundwater levels and potentially depletes aquifers.

4.19 Breckland SPA, Chippenham Fen Ramsar and Fenland SAC are vulnerable to hydrological changes that could result from the Plan either alone or 'in-combination' with other plans and projects.

4.20 The interest features of Devils Dyke SAC are not listed as vulnerable to hydrological effects within the Site Improvement Plan as the site is not linked to watercourses and/or their interest features are not water quality dependent.

Atmospheric Pollution

4.21 The main pollutants of concern for Habitat sites are oxides of nitrogen (NOx), ammonia (NH_3) and sulphur dioxide (SO_2), and are summarised in Table 1. NH_3 can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges[8]. NOx can also be toxic at very high concentrations (far above the annual average Critical Level). However, NOx and NH_3 exert their main impacts on ecosystems via determining the total nitrogen (N) deposition to soils, potentially leading to deleterious knock-on effects. Increases in N deposition from the atmosphere is widely known to enhance

[8] http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.

soil fertility and leading to eutrophication. This often has adverse effects on community composition and the quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats[9] [10].

Table 1: Main sources and effects of air pollutants on habitats and species[11].

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO_2)	The main sources of SO_2 are electricity generation, and industrial and domestic fuel combustion. However, total SO_2 emissions in the UK have decreased substantially since the 1980's. Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO_2 have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO_2 emissions in the UK.	Wet and dry deposition of SO_2 acidifies soils and freshwater and may alter the composition of plant and animal communities. The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species. However, SO_2 background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.
Acid deposition	Leads to acidification of soils and freshwater via atmospheric deposition of SO_2, NOx, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, increased N emissions may cancel out any gains produced by reduced S levels.	Gaseous precursors (e.g. SO_2) can cause direct damage to sensitive vegetation, such as lichen, upon deposition. Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants. Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.
Ammonia (NH_3)	Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock. Ammonia reacts with acid pollutants such as the products of SO_2 and NO_X emissions to produce fine ammonium (NH_4+) - containing aerosol. Due to its significantly longer lifetime, NH_4+ may be transferred much longer distances (and can therefore be a significant trans-boundary issue). While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.	The negative effect of NH_4+ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation. Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen. As emissions mostly occur at ground level in the rural environment and NH_3 is rapidly deposited, some of the most acute problems of NH_3 deposition are for small relict nature reserves located in intensive agricultural landscapes.

[9] Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. **2006.** Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176
[10] Dijk, N. **2011.** Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: Evidence from a long-term field manipulation. *Global Change Biology* **17**: 3589-3607
[11] Information summarised from the Air Pollution Information System (http://www.apis.ac.uk/)

Pollutant	Source	Effects on habitats and species
Nitrogen oxides (NO_x)	Nitrogen oxides are mostly produced in combustion processes. Half of NO_X emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. Nitrogen oxides have been consistently falling for decades due to a combination of coal fired power station closures, abatement of other combustion point sources and improved vehicle emissions technology. They are expected to continue to fall over the plan period.	Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NOx for all vegetation types has been set to 30 ug/m3. Deposition of nitrogen compounds (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO_x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.
Nitrogen deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO_X) or reduced (e.g. NH_3) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The N pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O_3)	A secondary pollutant generated by photochemical reactions involving NOx, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O_3 above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O_3 concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.

4.22 SO_2 emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as shipping (particularly on a local scale)[12]. NH_3 emissions primarily originate from agricultural practices[13], with some chemical processes and some vehicles (notably petrol cars) also making notable contributions.

4.23 In contrast, NOx emissions are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion to its overall NOx footprint (92%) through its associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison[14]. Therefore, the emerging NP, which will increase the population of the Parish, can be reasonably expected to increase emissions of NOx and NH_3, and thus total N deposition through an increase in vehicular traffic.

[12] http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.
[13] Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. 1998. A new inventory for ammonia emissions from U.K. agriculture. *Atmospheric Environment* **32**: 309-313
[14] Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. http://www.airquality.co.uk/archive/index.php

4.24 According to the World Health Organisation, the critical NOx concentration (Critical Level) for the protection of vegetation is 30 μgm^{-3}; the threshold for sulphur dioxide is 20 μgm^{-3}. In addition, ecological studies have determined Critical Loads (CLs) [15] for atmospheric nitrogen deposition (that is, NOx combined with NH_3).

4.25 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is insignificant (Figure 1 and see reference [16]). Therefore, this is the distance that is used in this HRA to identify major commuter routes along Habitat Sites, which are likely to be significantly affected by development outlined in the NP.

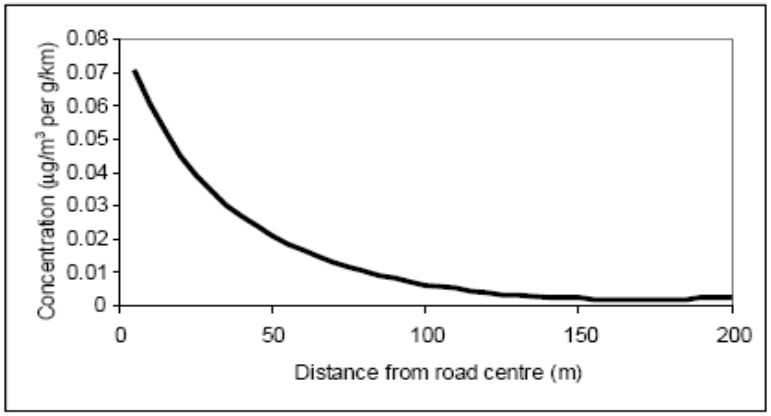


Figure 1: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT[17]).

4.26 The average UK car journey is approximately 10.6km [REF 39]. At a 10km distance between the development site and any road within 200m of a vulnerable Habitat site, the traffic generated from that development is likely to have dispersed across the network such that it is unlikely to contribute to a statistically significant difference in annual average daily traffic. A 10km buffer is therefore utilised within this report to identify sites which may have a potential likely significant impact. Being within this 10km buffer does not necessarily mean there will be a likely significant effect, just that they will be assessed within the report to ascertain if they will contribute to a likely significant effect in combination.

4.27 Devils Dyke SAC is within 200m of the A14 between Great Abingdon and Newmarket. The designated habitat of the site, calcareous grassland, is located approximately 138m from the road; however, there is a buffer of low-density deciduous woodland between the grassland and the road. Given that the entirety of Devil's Dyke SAC is located beyond the distance of an average car journey (10.6km), traffic generated from development within the parish is likely to have dispersed across the network such that it is unlikely to contribute to a statistically significant difference in annual average daily traffic. Therefore, this impact pathway can be excluded with regards to Devil's Dyke SAC.

4.28 Chippenham Fen Ramsar is not within 200m of any significant A road. This is the only component of Fenland SAC within 20km of the parish. An 80 m section of the Ramsar is located immediately adjacent to Palace Road a rural access road west of Chippenham village. However, the habitat within 200m of this road is semi-improved grassland and not a designated feature of the Ramsar/SAC. The next closest minor road is over 200m from the boundary of the site. As the SAC or designated habitats are well over 200m from any significant road and the habitat site is located over 10km from the parish, a conclusion of no likely significant effect is drawn for West Suffolk Local Plan.

[15] The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur
[16] http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013; accessed 12/05/2016
[17] http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf; accessed 13/07/2018

5. Test of Likely Significant Effects

Recreational Pressure

5.1 Increased residential population within Wickhambrook Parish is likely to result in increased recreational pressure on habitat sites. Breckland SPA is identified as vulnerable to public access and disturbance.

5.2 Survey work commissioned by the Suffolk and Norfolk Councils has identified that Breckland SAC, and those parts of Breckland SPA designated for nightjar and woodlark (i.e. excluding Breckland Farmland SSSI) has a core recreational catchment of 26.3km. This encompasses the entire parish. As such, development within the parish is likely to have an effect on recreational pressure from new dwellings.

5.3 Given there no is allocation for residential development beyond that allocated in the West Suffolk Local Plan, it is assumed that implications from this development regarding recreational pressure will be dealt with at a higher strategic level. Therefore, no likely significant effects will occur either alone or in combination with other plans or projects.

Loss of Functionally Linked Land

5.4 Breckland SPA is partially located within the West Suffolk District boundary. Stone curlew make use of land outside of the SPA boundary for foraging and breeding. As identified in Section 3 of this HRA there are a series of 1km grid squares identified outside the SPA which have had five or more breeding attempts by stone curlew between 2011 and 2015 according to RSPB surveys. The birds nesting in these areas are considered linked to the SPA population. Loss of locations outside the SPA where stone curlew have been recorded nesting, either through displacement of stone curlew through encroachment of housing, or direct loss of nesting habitat, could therefore adversely affect the population within the SPA through (for example) increased competition for resources and nesting sites within the SPA.

5.5 This Neighbourhood Plan has not made any specific housing allocations that have not been specifically made withing the West Suffolk Local Plan. The plan also encourages development to be within existing settlement boundaries, Policy WHB1 states that development should be focused within the existing housing boundary.

5.6 Based on available information, the impact pathway ‘functionally linked land’ can therefore be screened out; no likely significant effects will occur either alone or in combination with other plans or projects.

Hydrology

5.7 Increased residential development within the Parish could lead to the conversion of previously undeveloped land to hardstanding and therefore increased surface water runoff, which could reach nearby Habitat sites. West Suffolk District is drained by rivers including but not limited to; the River Lark, River Linnet, River Kennet, River Stour and New River. These rivers run the valley floors within the District and connect to the fenlands some of which are designated as Habitat sites. An increase in surface water run-off into these rivers upstream of the designation could potentially present likely significant effects to the water quality vulnerable habitats within the Habitat sites.

5.8 The interest features of the Breckland SPA are not listed as vulnerable to water pollution effects within their respective Site Improvement Plans as they are not linked to watercourses and/or their interest features are not water quality dependent.

5.9 Sections of the Breckland SAC are adjacent to the Little Ouse River. The habitat which is listed as vulnerable to surface water run-off is ‘naturally nutrient-rich lakes or lochs which are often dominated by pond weed’. The measure which corresponds to the pressure highlights the need to reduce nutrients through agri-environment/diffuse water pollution plans and through the river basin. Both lakes/lochs described to have vulnerability to water quality impacts are north east of Thetford, and therefore are located substantially outside of the parish. They will not be affected from run-off from development sites within the District boundaries; therefore, Breckland SAC will not be discussed further with regards to water quality (run-off).

5.10 Increased housing development within the parish will lead to increased sewage production. There is therefore a risk that an increase in the volume of treated sewage effluent from the wastewater treatment works that serve West Suffolk District could degrade water quality (i.e. through increased phosphorus discharge) of riverine Habitat sites when in the absence of environmental mitigation and adequate wastewater treatment work permits.

5.11 Increased residential development within the West Suffolk District will lead to increased water use within the area and potentially increase water abstraction. Increased water abstraction could degrade the habitat structures of Habitat sites susceptible to hydrological changes. The majority of extraction within the District is managed through the Cam Ely and Ouse Catchment Abstraction Management Plan (CAMS). In terms of future abstraction, much of the district is either classed as Restricted Water Available for Abstraction or Water Not Available for Licencing in terms of surface water and Water Not Available for Licencing in terms of ground water abstraction. However, there may be water available in the South Level area north and west of Mildenhall and Lakenheath at high flows subject to a Hands-Off Flow condition at AP17 (Denver Sluice). The Habitats Regulations Assessment undertaken for the Anglian Water Draft Water Resources Management Plan (WRMP) (December 2019) concluded that no Habitat sites have been identified with the potential to be affected in combination with the Anglian Water WRMP. Since the purpose of the WRMP is to set out how the water company intends to meet public water supply requirements up to 2045 it covers the period of the Neighbourhood Plan.

5.12 Given the above, and that there are no allocations that are not contained within the West Suffolk Local Plan, it can therefore be concluded that there are no likely significant effects that will not be addressed at a higher level.

Atmospheric Pollution

5.13 Increased residential development within the District is likely to increase the number of vehicles operating within the District. As a result, increased air pollution is expected from vehicle emissions relative to a situation without growth. Pollutants released form vehicles may be carried directly by wind currents and deposited to Habitat sites or pollutants may become soluble and taken up during evaporation and deposited to Habitat sites at precipitation. This generally occurs within 200m of significant roads, so the potential for development to contribute to traffic on roads within 200m of Habitat sites alone and in combination with neighbouring authorities is of relevance.

5.14 Natural England have identified that air quality is a current threat to Breckland SAC and SPA based on the fact that these sites currently exceed their critical loads for nitrogen deposition for at least one of their habitats, although it should be noted that road traffic will only be one contributory source to total nitrogen deposition on a site and the relative importance of local traffic will be related to the number of significant roads within 200m of each site. It should also be noted that while roads can elevate local nitrogen deposition up to 200m from the roadside, the degree to which they do so drops off sharply with distance, the greatest elevation being within a few tens of metres of the road.

5.15 Breckland SAC and SPA are within 200m of a number of major A roads and is bisected by several B roads. Habitats and species within the SAC and SPA that have been highlighted as potentially vulnerable include stone curlew (when nesting in grassland rather than arable land), woodlark (when nesting in heathland, but less so when nesting in rotational forestry), open grassland with grey-hair grass and common bent grass of inland dunes, European dry heaths, dry grassland and scrublands on chalk or limestone (important orchid sites). There are areas of European dry heathland and calcareous grassland within 200m of these major roads. Therefore, effects of District growth on traffic flows along the A14 are investigated further in the Appropriate Assessment as likely significant effects cannot be dismissed.

5.16 Given there are no allocations that are not contained within the West Suffolk Local Plan, it can therefore be concluded that there are no likely significant effects that will not be addressed at a higher level.

Screening of Neighbourhood Plan Policies

5.17 A screening assessment of the NP policies is undertaken in Appendix A. It was concluded that LSEs can be excluded in relation to all policies presented within the Wickhambrook Parish Neighbourhood Plan.

Appendix A Screening Table

Table 5-1. Policy Screening Table

Policy	Description	Likely Significant Effects
Policy WHB1 – Spatial Strategy	Policy outlines a spatial strategy for development within the parish, with new development focused within the Housing Settlement Boundary. Outside of the settlement boundary will be protected from inappropriate development, with support given to rural developments and affordable housing where required to meet local need. Proposals for new buildings outside the Housing Settlement Boundary must demonstrate that they will not have a significant detrimental impact.	No Likely Significant Effects This is a development management policy requiring new development to be appropriate to its location within the Parish. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB2 – Land West of Bunter's Road	Policy allocates a site of 4.2 hectares located west of Bunter's Road for the provision of up to 40 dwellings, up to 450m2 of commercial, business, service or community uses, community open space and structural landscaping. This development should follow the Concept Diagram and development principles found in the neighbourhood plan and other documents. Proposals should incorporate measures to safely manage traffic. Housing should be of an appropriate mix of size and type with an appropriate provision of affordable housing based on the local plan.	No Likely Significant Effects This is a policy detailing development of Land West of Bunter's Road. This allocation has already been made in the West Suffolk Local Plan and is included in the Neighbourhood Plan for completeness. This policy adds a few additional restrictions including adherence to the concept diagram and safely managing traffic. These provisions will not lead to any likely significant effects beyond those addressed in the Local Plan This policy does not allocate any sites or quantum of development beyond that allocated within the Local Plan and therefore has no likely significant effects.
Policy WHB3 – Housing Design	Policy states that proposals for new dwellings should comply with the latest Nationally Described Space Standards. Dwellings should also provide covered storage of all wheelie bins and cycles, in accordance with the adopted cycle parking standards as set out in the Suffolk Guidance for Parking document (2023) or any successor documents. New dwellings that are designed to be adaptable in order to meet the needs of the increasingly aging population, without restricting the needs of younger families, will be supported.	No Likely Significant Effects This is a design management policy requiring new dwellings to adhere to national standards and provide cycling storage. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB4 – Low Energy and Energy Efficient Housing Design	Policy states that development proposals should incorporate best practice in energy conservation. Development proposals should demonstrate how they: maximise the benefits of solar gain; incorporate best practice in energy conservation and are designed to achieve maximum achievable energy efficiency; avoid fossil fuel-based heating systems; and incorporate sustainable design and construction measures to improve energy and water efficiency measures.	No Likely Significant Effects This is a policy requiring new developments to adhere to best practice in energy conservation. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.

Policy	Description	Likely Significant Effects
Policy WHB5 – Employment Sites	This policy supports the retention and development of existing employment and business uses provided they do not cause undue negative impacts. Non-employment or business uses that are expected to have an adverse effect on employment generation must meet at least one of the listed criteria before it is permitted.	No Likely Significant Effects This is a policy supporting the retention of employment uses. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB6 – New Businesses and Employment	This policy supports proposals for new, small scale business development within the housing settlement boundaries where they would not have unacceptable impact on residential amenity. Outside of the housing settlement areas they should be located on land designated for business use or be related to small scale leisure or tourism activities or other forms of commercial/employment or agricultural development of an appropriate scale and nature. Where possible these developments should be sited in existing buildings or previously developed land and not adversely affect the local area.	No Likely Significant Effects This is a policy requiring new developments to adhere to best practice in energy conservation. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB8 – Protecting Wickhambrook's Landscape Character	Policy requires development proposals to respond positively to the landscape characteristics of the site and its vicinity. Development proposals should demonstrate how they regard, conserve and if possible, enhance the landscape character and setting of the parish.	No Likely Significant Effects This is a design management policy requiring new developments to respond to the local character. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB9 – Biodiversity and Habitats	Policy requires qualifying development to achieve a 10% biodiversity net gain. Proposals should protect trees, woodlands, hedgerows and other natural features and be sufficiently beneficial and provide mitigation if this cannot be done. In addition, the layout and design of the development proposal concerned should be landscape-led and appropriate in relation to its setting and context and have regard to its ongoing management. Where access is through a hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity. Proposals will be supported where they integrate improvements to biodiversity.	No Likely Significant Effects This is a positive policy requiring new developments to achieve biodiversity net gain and to protect trees, hedgerows and woodlands. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB10 – Local Green Spaces	Policy designates several Local Green Spaces. Development within these spaces must be consistent with national policy for green belts	No Likely Significant Effects This is a policy that limits development of certain sites by classifying them as Local Green Spaces. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB11 – Buildings and Structures of Local Significance	Policy requires development proposals to respect the integrity and appearance of the built heritage. Valued characteristics of the Parish must be protected. Proposals for any works that would lead to loss or substantial harm to non-designated heritage assets should provide an appropriate analysis of the asset and the public benefits of the proposal	No Likely Significant Effects This is a policy that requires new development to respect existing built heritage.

Policy	Description	Likely Significant Effects
		This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB12 – Development Design Considerations	Policy requires new development proposals to reflect the local characteristic to lead to a high quality safe and sustainable environment Proposals should satisfy the requirements of the Development Management Checklist. Proposals should also meet a range of criteria including respecting the local character, not harming historic, ecological or topographical features and using tree-lined streets wherever practical.	No Likely Significant Effects This is a policy that requires new development to reflect the local character and avoid harm to notable features. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB13 – Sustainable Construction Practices	Policy requires development to incorporate current best practice in energy conservation. Development proposals should demonstrate how they: maximise the benefits of solar gain; incorporate best practice in energy conservation and are designed to achieve maximum achievable energy efficiency; avoid fossil fuel-based heating systems; and incorporate sustainable design and construction measures to improve energy and water efficiency measures.	No Likely Significant Effects This is a policy that requires new development to follow best practice energy conservation measures. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB14 – Flooding and Sustainable Drainage	Policy states that proposals for development in areas at risk of flooding should be accompanied by a Flood Risk Assessment and Drainage Strategy demonstrating having met national safety requirements. Proposals must submit surface water drainage schemes appropriate to the size of development. Development must demonstrate an acceptably low level of flooding risk, should be safe for its lifetime and not increase flow rate compared to a greenfield site.	No Likely Significant Effects This is a policy that sets a requirement for new development to take appropriate flood risk measures, including appropriate drainage. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB15 – Dark Skies	Policies requires development to respond to the dark sky environment of the parish wherever practicable. This includes avoiding streetlighting and minimising impact of any external lighting on the environment	No Likely Significant Effects This is a policy that controls outdoor lighting to support dark skies. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB16 – Community Facilities	Policy sets criteria for the support of the provision and enhancement of community facilities including being accessible on foot, not having significant adverse impact on the environment and no appropriate existing building being feasibly useable for the purpose. Policy also sets criteria for the removal of existing community facilities including current use not being economically viable	No Likely Significant Effects This is a policy concerning the development or removal of community facilities. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.
Policy WHB17 – Open Space, Sport and Recreation Facilities	Policy supports the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities. Policy also requires that development which would result in the loss of this space must make equivalent or improved replacement or demonstrate that the space or facility is surplus to requirements. Policy states that developers may be required to provide open space including play areas sport/recreation areas and amenity areas. Supporting facilities must be well related, of high quality design and respectful of the local character.	No Likely Significant Effects This is a policy concerning the development or removal of open space, sport and recreation facilities. This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.

Policy	Description	Likely Significant Effects
	Proposals which give rise to intrusive floodlighting will not be supported.	
Policy WHB18 – Public Rights of Way	Policy supports measures to improve and extend the existing network of public rights of way where their value as biodiversity corridors is safeguarded and any public right of way extension is fit for purpose. Where practicable, development proposals should incorporate measures to enhance biodiversity within the improved or extended public right of way.	No Likely Significant Effects This is a policy supporting improvements and extension to public rights of way.This policy does not allocate any sites or quantum of development and therefore has no likely significant effects.

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