



# Woolpit Neighbourhood Plan 2016-2036 Pre-submission Draft

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

### Screening Report – April 2019





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# 1. Introduction

## 1.1 The Purpose of This Report

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This screening report is an assessment of whether or not the contents of the Woolpit Neighbourhood Plan Pre-submission draft requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/ EC and associated Environmental Assessment of Plans and Programmes Regulations. A SEA is required if the Neighbourhood Plan is deemed to have a likely significant effect on the environment.

This report will also screen to determine whether the Neighbourhood Plan requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) and (4) of the EU Habitats Directive and with Regulation 63 of the Conservation of Habitats and Species Regulations 2017. A HRA is required when it is deemed that likely adverse significant effects may occur on protected European Sites (Natura 2000 sites or 'Habitats Sites') as a result of the implementation of a plan/project.

## 1.2 The Woolpit Neighbourhood Plan Pre-submission draft

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The Neighbourhood Plan will set out planning policies for Woolpit and within the confines of the Woolpit Parish boundary. Once formally adopted, a Neighbourhood Plan carries the same legal weight as Local Development Plans adopted up by the Local Planning Authority (LPA), in this case Mid Suffolk District Council.

The Plan includes Vision Statement, which reads:

*'Woolpit in 2036 is...*

*...an integrated community where people of all ages and from diverse backgrounds and cultures benefit from a wide range of facilities and employment opportunities.*

*The historic character of the village has been preserved and can be enjoyed by everyone, through a diverse range of footpaths, cycle ways and roads.*

*Congestion in the village centre has been dealt with by careful management and taking opportunities from new development.*

*Modern facilities and infrastructure have been supported by steady growth of housing and businesses at a rate that could be integrated into the community, supporting the existing shops and services. The village centre is a vibrant place, not only because of its range of essential shopping facilities, but because of the many suitable locations for local clubs and societies.*

*This has maintained Woolpit as a key hub in the network of nearby communities.*

*Investing in the village has kept us up to date with amenities demanded by residents, ranging from technology like high speed internet connections to sporting facilities for all.*

*Careful design of new buildings has ensured that not only does their character and density complement the village, but they integrate new residents with old and*



*maintain a mixed community. It is a modern village with a traditional feel where people want to live and work.'*

The Plan also includes a number of specific objectives in which to deliver the Vision, covering social, economic and environmental themes. These are outlined in the following table:

The Plan's Objectives		
Social	SO1	To improve the parking especially near the school and health centre.
	SO2	To maintain easy access to the village centre and reduce traffic congestion and the shortage of parking.
	SO3	To enable the population to grow and become more balanced in terms of age profile.
	SO4	To embrace the development of new homes but at steady rate so integration can keep pace for the benefit of the whole village.
	SO5	To regulate housing development so that it responds to housing needs and provides a high quality built environment.
	SO6	To encourage investment in infrastructure and services in line with housing growth.
	SO7	To adopt a criteria based approach for evaluating proposed or potential sites for new housing.
Business and Economic	BO1	To maintain and encourage the expansion of our existing services, particularly the health centre and school.
	BO2	To ensure land is made available for businesses start-up or expansion outside the historic centre while creating easy access to the village centre.
	BO3	To encourage the maintenance of a responsive and competitive business community.
	BO4	To become a sustainable, cohesive and thriving community supporting a high standard of living for its residents.
Environmental	EO1	To maintain and enhance access to open countryside and ensure sustainable access to new housing developments by the creation of safe paths and cycle ways.
	EO2	To mitigate the impact of new development on climate change and encourage a low carbon economy.
	EO3	To maintain existing 'important' views.
	EO4	To keep as much of our agricultural land as possible for agriculture, while encouraging biodiversity.
	EO5	To maintain our green places and provide additional green spaces.
	EO6	To support new development which contributes positively to Woolpit's historic buildings, its rural village character and not becoming a town.

### 1.3 The Mid Suffolk Core Strategy (2012 Focused Review)

The adopted Mid Suffolk Core Strategy contains the current strategic planning policy for the District



and thus Woolpit. The Core Strategy 2008 and its Focused Review of 2012 and include a number of policies related to a strategy for growth in the District, the delivery of growth and the provision of infrastructure. A Sustainability Appraisal was carried out for the Core Strategy as well as 'Appropriate Assessment' in accordance with the Habitats Directive and Regulations.

The Core Strategy categorised the settlement of Woolpit as a Key Service Centre. It establishes that Key Service Centres should accommodate 750 homes in the District. The Core Strategy, at Section 3.53, states that:

*'Most new general market housing development, including a proportion of affordable housing will be in towns and Key Service Centres.'*

## 1.4 The Emerging Mid Suffolk Local Plan

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

The Regulation 18 stage Local Plan identifies Woolpit within the 'Core Villages' category of the settlement hierarchy. A number of strategic options were explored relevant to Core Villages. These were:

- County Town Focus – 20% district growth in Core Villages
- Market town / rural area balance – 20-25% district growth in Core Villages
- Transport corridor focus – 30% district growth in Core Villages
- New Settlement focus – 15% district growth in Core Villages

The emerging Local Plan states that,

*'The Councils have taken the approach that Urban Areas, Market Towns and Core Villages will have new growth identified and allocated in the new Local Plan through the allocation of new housing sites.'*

Within Appendix 3 of the Local Plan, there is included a map of Woolpit. The map shows 16 potential, submitted development sites that will be considered as allocations within the Local Plan.

Since then, a further nine sites / proposals have been submitted for consideration as potential allocations within the emerging Local Plan (through the Regulation 18 consultation) in the Neighbourhood Plan area. A total of 25 sites have therefore been submitted for consideration within the Woolpit Neighbourhood Plan area.

Of Neighbourhood Plans, the emerging Local Plan states that,

*'Neighbourhood plans can be brought forward at any time and can be developed before or at the same time as the local planning authority is producing its Local Plan. It is for the local planning authority to work closely with neighbourhood planning groups to minimise any conflicts between policies in the neighbourhood plan and the emerging Local Plan.'*

*There is an opportunity for local communities to bring forward sites for development*



*in neighbourhood plans in parallel with the developing local plan process and in accordance with the emerging level of growth agreed with the local planning authority and share evidence the evidence being prepared by the Local Planning Authority and vice versa.'*

The Local Plan at the current stage of process (at the time of writing) outlines high level options with initial preference for approaches included, however there is an absence of draft policy wording at this stage. With this in mind, the emerging Local Plan is unlikely to have any identifiable conflict with any of the content within the emerging Woolpit Neighbourhood Plan regarding the principle of development. The Neighbourhood Plan is being prepared at a comparably advanced stage to that of the Local Plan and its evidence base.

## 2. Legislative Background

### 2.1 Strategic Environmental Assessment (SEA)

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

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

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

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

The Woolpit Neighbourhood Plan may influence frameworks for future development, or become used ancillary to those plans and programmes that do set such a framework, and as such it has been determined that the principle of the Neighbourhood Plan should be screened for the necessary application of the SEA Directive.

The Report from the Commission to The Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions states, on the application and effectiveness of the Directive on Strategic Environmental Assessment (Directive 2001/42/EC), that

*'the following P&P, and modifications to them, are covered when prepared and/or adopted by an authority[2] and required pursuant to legislative, regulatory or administrative provisions:*

- P&P prepared for certain sectors and which set the framework for future development consent in respect of projects under the Environmental Impact Assessment-EIA-Directive.*
- P&P requiring an assessment under the Habitats Directive (92/43/EEC).*
- P&P setting the framework for development consent in respect of projects (not limited to those listed in the EIA Directive; see above) and determined by "screening"*





*as being likely to have significant environmental effects.'*

This report represents this screening process in regard to the content and influence of the Woolpit Neighbourhood Plan.

## 2.2 Habitats Regulations Assessment (HRA)

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

HRA is the screening assessment of the impacts of a land use proposal against the conservation objectives of European sites. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. European sites are also known as Natura 2000 sites and Habitats Sites (NPPF 2019).

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

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

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



## 3. SEA Screening

### 3.1 When is SEA Required?

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

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

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

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

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

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

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

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

Table 1: Exploring whether the Principle of the Plan would warrant SEA

Q	Criteria	Response	Outcome	Commentary
1	Is the Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through legislative procedure by Parliament or Government	Yes	Go to question 2	The Neighbourhood Plan has been prepared for adoption through legislative procedure.
2	Is the Plan required by legislative, regulatory or <u>administrative provision</u>  Typical characteristics of "administrative provisions" are that they are publicly available, prepared in a formal way, probably involving consultation with interested parties. The administrative provision must have sufficient formality such that it counts as a "provision" and it must also use language that plainly requires rather than just encourages a Plan to be prepared.	Yes	Go to question 3	The Neighbourhood Plan would be considered as falling within the category of an 'administrative provision'.
		No	DOES NOT REQUIRE SEA	
3	Is the Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Yes to both criteria	Go to question 5	The Neighbourhood Plan has been prepared for town and country planning and sets a framework for future development consent.
		No to either criteria	Go to question 4	
4	Will the Plan, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	Yes	Go to question 5	N/A
		No	Go to question 6	
5	Does the Plan determine the use of small areas at local level, OR is it a minor modification of a Plan likely to require assessment under the Habitats Directive?	Yes to either criteria	Go to question 8	The policies of the Neighbourhood Plan can be considered to determine the use of small areas at a local level commensurate with their status in determining local planning applications.
		No to both criteria	Go to question 7	

Q	Criteria	Response	Outcome	Commentary
6	Does the Plan set the framework for future development consent of projects (not just projects in the Annexes of the EIA Directive)?	Yes	Go to question 8	N/A
		No	DOES NOT REQUIRE SEA	
7	Is the Plans sole purpose to serve national defence or civil emergency, OR is it a financial or budget Plan, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7	Yes to any criteria	DOES NOT REQUIRE SEA	N/A
		No to all criteria	REQUIRES SEA	
8	Is it likely to have a significant effect on the environment?	Yes	REQUIRES SEA	Likely significant effects are explored in more detail elsewhere in this Screening Report.
		No	DOES NOT REQUIRE SEA	

The following section looks at the criteria for assessing the effects of the Neighbourhood Plan and the identified effects of the Neighbourhood Plan in line with the criteria. Crucially, it will determine whether there are any likely significant effects on the environment.



## 3.2 Criteria for Assessing the Effects of the Neighbourhood Plan

Criteria for determining the likely significant effects on the environment, referred to in Article 3(5) of Directive 2001/42/EC are set out below.

### Annex II of SEA Directive 2001/42/EC – Significant Effects

1. The characteristics of plans and programmes, having regard, in particular, to

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
- environmental problems relevant to the plan or programme,
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

- the probability, duration, frequency and reversibility of the effects,
- the cumulative nature of the effects,
- the transboundary nature of the effects,
- the risks to human health or the environment (e.g. due to accidents),
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
- the value and vulnerability of the area likely to be affected due to:
  - \* special natural characteristics or cultural heritage,
  - \* exceeded environmental quality standards or limit values,
  - \* intensive land-use,
  - \* the effects on areas or landscapes which have a recognised national, Community or international protection status.

### 3.3 Likely Significant Effects on the Environment resulting from the Neighbourhood Plan

The following assessment will consider the likelihood of the Woolpit Neighbourhood Plan Pre-submission draft (at the time of writing) to have significant effects on the environment.

**Table 2: Assessment of Likely Significant Effects on the Environment**

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>The Plan sets out relevant policies which will be used to determine proposals for development within the Neighbourhood Plan area once adopted. Policy WPT1 - Spatial Strategy includes a plan-period development quantum of 250 dwellings, and specifies that new development will be focused within defined Settlement Boundaries, through sites allocated in the Plan, or in the form of small scale windfall developments.</p> <p>The Plan allocates three sites for residential development purposes, the planning status of which are:</p> <ul style="list-style-type: none"> <li>• Policy WPT3 – Outline planning permission granted for 120 homes;</li> <li>• Policy WPT4 – Planning permission granted on appeal for 49 homes; and</li> <li>• Policy WPT5 – Pre-application stage proposed for 36 new homes. Without planning permission.</li> </ul> <p>The principle of development within the Neighbourhood Plan area is supported by the District Council through their categorisation of Woolpit as a Core Village within the settlement hierarchy of their emerging Local Plan. The Local Plan is not yet at a stage to identify a quantum of development for Woolpit or allocate sites for development within the Neighbourhood Plan area.</p> <p>The degree to which the Plan sets a framework for projects can be considered relatively high from a procedural viewpoint, in allocating land (as a resource) without planning permission (Policy WPT5) for development purposes.</p> <p>The allocation of a site for housing that does not have planning permission (Policy WPT5) would normally warrant the full application of the SEA Directive in the form of a SEA Environmental Report, in order to justify the allocation of site(s) in light of reasonable alternatives. Although site assessment work has been undertaken to influence the site selection process, the area of land making up site WPT5 has not specifically been included (although it is not dissimilar to Area of Search 8 in the site assessment report).</p> <p>The effects of developing the specific land area of Policy WPT5 are</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The degree to which the plan or programme influences other plans or programmes including those in a hierarchy.</p> <p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>explored in more detail elsewhere in this table.</p> <p>The Neighbourhood Plan provides policies for the Plan area, relevant to a local level only. The policies of the Neighbourhood Plan influence the emerging Babergh and Mid Suffolk Local Plan in so far as there is an intention for it to be ‘made’ prior to the adoption of the Local Plan, which is currently at the Regulation 18 stage.</p> <p>The Plan is however in general conformity to policies CS1, CS2 and CS3 of the Mid Suffolk adopted Core Strategy.</p> <p>The emerging Babergh and Mid-Suffolk Local Plan recognises that many of the settlements (within Babergh and Mid Suffolk) have already expanded beyond defined settlement boundaries and that these have been / are being reviewed through the plan-making process. Further, the Councils establish that Core Villages should receive growth as espoused in the emerging Local Plan. The stance of the Neighbourhood Plan in allocating land for development purposes to the tune of 205 dwellings (36 of which do not have planning permission) is therefore considered a moderately strong influence on the emerging Local Plan.</p> <p>Neighbourhood Plans are required to contribute to the achievement of sustainable development. The Neighbourhood Plan policies seek to ensure environmental considerations are taken into account. The Neighbourhood Plan is compatible and does not conflict with environmentally themed adopted Mid Suffolk Core Strategy policies which have been subject to a thorough process of plan preparation and accompanying Sustainability Appraisal.</p> <p>The following policy exists within the Neighbourhood Plan relevant to environmental protection:</p> <ul style="list-style-type: none"> <li>• Policy WPT14 – Areas of Special Landscape Quality; and</li> <li>• Policy WPT18 – Design</li> </ul> <p>The policies contained within the Plan in addition to those adopted and emerging within the District Council’s Core Strategy / Local Plan are considered to be sufficient to ensure that effects on the environment are minimised.</p>
<p>Environmental problems relevant to the plan.</p>	<p>The Neighbourhood Plan reflects a small area. The policy content of the adopted Mid Suffolk Core Strategy will additionally apply to any proposals within the Neighbourhood Plan area. These policies have been subject to Sustainability Appraisal And Habitats Regulations Assessment Screening within the context of the Core Strategy. The potential environmental problems relevant to the Neighbourhood development Plan area include:</p> <ul style="list-style-type: none"> <li>• A scheduled ancient monument known as Lady’s Well lies in woodland some 300m from the church. The site has</li> </ul>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).</p>	<p>protected trees including a 500 year old beech.</p> <ul style="list-style-type: none"> <li>• Several Romano-British and medieval sites with archaeological remains have been identified within the Plan area.</li> <li>• The historic core of Woolpit is a conservation area, and includes 40 listed buildings.</li> <li>• The Village includes some 61 listed buildings; including the Grade I listed Church of St Mary. The Plan area also includes the Grade II* listed The Lanes.</li> <li>• At the eastern edge of the parish there is the 80 hectares of the mediaeval Woolpit Wood.</li> <li>• The Plan area contains a banded area of flood risk zone 3 (and 2), emanating from the north west north of the A14 and extending southward to the west of the village settlement boundary.</li> <li>• The Plan area is within a number of SSSI Impact Risk Zones associated with the Norton Wood SSSI to the north, that may render some types of development unsuitable, pending consultation with Natural England as required.</li> <li>• The plan area contains multiple areas of priority habitat. These amount to Deciduous Woodland and Broadleaved Woodland.</li> <li>• The Woolpit plan area is primarily within Zone III (total catchment) of a Source Protection Zone which emanates from the east.</li> <li>• The existence of the A14 north of Woolpit has resultant noise quality issues that can be experienced in the village’s northern parts. Average noise levels of 55.0 - 59.9dB can be experienced in the north of the village in the day; however no such air quality issues are evident at night.</li> <li>• The Plan area contains a mix of Grade 2 (very good) and Grade 3 (good to moderate) agricultural land. Grade 2 agricultural land represents the “best and most versatile agricultural land” within the wider District.</li> <li>• The Plan area is within a Minerals Consultation Area.</li> </ul> <p>The content of the Neighbourhood Plan is not in conflict with those relevant planning documents within the wider district and county area related to waste management or water protection.</p>





Criteria for determining the likely significance of effects (Annex II SEA Directive)		Likelihood and summary of significant effects
Sustainability Theme	The probability, duration, frequency and reversibility of the effects on the following factors:	The following impacts have been identified within this Screening Assessment:
	- Biodiversity	<p>The Plan area contains a number of scattered priority habitats located around the settlement boundary. The Plan area is within the Impact Risk Zone of the Norton Wood SSSI; however there are no identified incompatibilities with any development relevant to Neighbourhood Planning in and around the settlement of Woolpit identified by Natural England.</p> <p>Of the Plan’s residential site allocations, none of them would lead to the loss of any priority habitats.</p> <p>The HRA Screening element of this Report determines that no Habitats Sites lie within 13km of Woolpit parish, which is the largest Zone of Influence for any Habitats Site in Suffolk and the distance recently confirmed by Natural England as the zone of influence to identify potential recreational impacts on coastal Habitats sites in Suffolk. Significant effects that would warrant the application of the SEA Directive can therefore be ruled out.</p>
	- Population	The Neighbourhood Plan allocates three sites for residential development and also a policy related to affordable housing on rural exception sites (Policy WPT7). There is therefore expected to be some positive impacts the general population resulting from the Plan.
	- Human health	<p>The Plan does not allocate any land for development purposes that could have any implications regarding human health. The Plan seeks to safeguard local green space and sports and recreational areas within the Plan area in Policy WPT12 and Policy WPT13. This helps to ensure that such spaces / areas are preserved for the purposes of health and well-being.</p> <p>It can be considered that no significant effects will occur upon human health in the Neighbourhood Plan area. Any potential impacts regarding contamination of any future proposals are best addressed at the ‘project level’, through the development management process and in adherence to relevant policies at the LPA level.</p>
	- Fauna	The impacts of the Neighbourhood Plan on fauna are not considered significant. It is possible that developments that could be forthcoming within the Plan area could have negative impacts on protected species; however these cannot be identified as strategically significant to warrant Strategic Environmental Assessment at the Plan level. Such issues are more appropriate to be considered on a case-by-case application basis at the development management stage in consideration of the Neighbourhood Plan policies and relevant policies contained within Mid Suffolk’s adopted Core



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>- Flora</p> <p>- Soil</p>	<p>Strategy and emerging Local Plan (commensurate to the level of weight those policies would have at the time of application).</p> <p>Although Priority Habitats exist in close proximity to the Woolpit development boundary, no specific policy exists that seeks their protection. Despite this, none of the Plan’s housing allocations are located within or adjacent to such habitats. Further, Policy WPT1 - Spatial Strategy seeks to protect the rurality of the Plan area by advocating development within the Settlement Boundary in the first instance. Further protection in regard to flora exists within relevant policies contained within Mid Suffolk’s adopted Core Strategy and emerging Local Plan (commensurate to the level of weight those policies would have at the time of application). There is not considered to be any likely effects on Flora that would be of a significance that would warrant the application of the SEA Directive.</p> <p>The Plan area contains Grade 2 (very good) agricultural land (ALC), which is defined as the “best and most versatile agricultural land” within the wider District. Of the Plan’s allocations, all would see the loss of greenfield land.</p> <p>The Plan’s sole allocation without planning permission is located within Grade 3 ALC (good to moderate) and is located adjacent to the existing built up area of the village. The Plan does not directly seek the protection of Grade 2 or 3 soils through any policy approach; however no significant effects on soil can be expected as a result of the Plan content.</p>
<p>- Water</p> <p>- Air</p> <p>- Climatic factors</p>	<p>Land within Zone III ‘total catchment’ makes up the majority of the Plan area and the entire settlement boundary of the village. Source Protection Zones (SPZs) respond to sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The Neighbourhood Plan allocates land for residential development purposes; however such uses are not considered to give rise to ground water pollutants (e.g. give rise to hazardous substances such as pesticides, oils, petrol and diesel, solvents, arsenic, mercury or chromium VI; or non-hazardous substances such as ammonia or nitrates).</p> <p>No AQMAs or other identified (significant) air quality issues exist within or in close proximity to the Neighbourhood Plan area. As such, no significant effects on air quality have been deemed likely.</p> <p>The majority of the Neighbourhood Plan area is not designated within flood risk zones, however a small area of flood risk zone 3 exists to the west and north of the Woolpit settlement boundary. The Plan’s allocations are all located to the east / south east of the settlement</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>- Material assets</p>	<p>boundary. As such, no significant effects have been identified.</p> <p>The Neighbourhood Plan area is within a Minerals Consultation Area and a proposed quarry (as allocated in the emerging Suffolk County Council Minerals and Waste Local Plan) is in relatively close proximity to the west in Wetherden.</p> <p>The Minerals Consultation Area indicates that potential mineral deposits are present in the Plan area. Despite this, the content of the Neighbourhood Plan is not considered to have any significant impacts on material assets due to the extent / size of the Neighbourhood Plan Area. Such issues are more appropriate to be considered on a case-by-case basis at the development management stage and in accordance with relevant development management policies contained within Mid Suffolk’s adopted Core Strategy and adopted Minerals &amp; Waste Local Plan policies at the County level.</p>
<p>- Cultural heritage</p>	<p>There are a large number of listed buildings in the Plan area, largely associated with a Conservation Area representing the core of the village of Woolpit.</p> <p>Of the Plan’s allocations, Policy WPT4 – New Homes at Land East of Green Road is in close proximity to Priory Cottage, a grade II listed building; however the site has planning permission (on appeal) and such effects will have been considered at that stage. The Plan’s sole allocation without planning permission (Policy WPT5 – New homes at land north of Woolpit Primary School) is not in close proximity to any listed buildings or heritage assets; however no identification of archaeological deposits has been undertaken to date. Effects in this regard are not considered significant however and can be considered a development management issue to explore at the planning application stage.</p> <p>No thematic policies exist within the Plan that are relevant to the protection or enhancement of the historic environment. Irrespective of this, further policy can be found in relevant policies at the LPA level. The Plan’s sole allocation without planning permission (Policy ALD4) is not in close proximity to any heritage assets and therefore, significant effects on cultural heritage / the historic environment can be ruled out.</p>
<p>- Landscape</p>	<p>The Joint Babergh and Mid-Suffolk District Council Landscape Guidance includes the parish of Woolpit as predominantly within the Rolling Valley Farmlands and Furze landscape area. This character type includes the following key characteristics and recommendations:</p> <ul style="list-style-type: none"> <li>• The landscape has good tree cover and a few fragmented woodlands and hedgerows of multiple species including oak, ash, field maple and hawthorn.</li> </ul>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The cumulative nature of the effects.</p>	<ul style="list-style-type: none"> <li>• The Gipping valley and the Woolpit Heath area are particular areas of change within this landscape character.</li> <li>• Villages tend to be more tightly clustered than is common for the north of Suffolk.</li> <li>• As a valley side landscape any new buildings are likely to have a significant impact on both the character and visual impact on this landscape.</li> <li>• The setting of Historic villages, buildings and monuments blend within this landscape and is sensitive to alterations and or new development which can have a significant negative impact in the existing visual quality.</li> <li>• In particular consideration needs to be taken with regards to the impact on the “skyline” and “roofscape” on the sides of the valleys.</li> </ul> <p>Objectives related to this Landscape Character Area, include:</p> <ul style="list-style-type: none"> <li>• To maintain and enhance the distinctive landscape and settlement pattern.</li> <li>• To safeguard the historic features.</li> <li>• To minimise visual intrusion on the very sensitive landscape include impact on the skyline.</li> <li>• To safeguard the heathland and open space areas</li> <li>• To safeguard and increase the woodland, tree and hedgerow cover.</li> </ul> <p>The site assessment report does not include an assessment of the site allocated within the Plan WPT5. Instead, that site is included as part of the wider Area of Search 8 within that report. The assessment of Area of Search 8 identifies no environmental or heritage designations on site, but that the site may have some landscape value that would have to be mitigated through effective policy. The emerging Local Plan’s Strategic Housing &amp; Employment Land Availability Assessment (SHELAA) has assessed all submitted site options within Woolpit, including the specific boundary of the site that has been allocated as WPT5 within the Local Plan (referenced as site SS0823 in the SHELAA). The assessment of the site within the SHELAA identifies that there would be no detrimental impact on local landscape as a result of the proposal. Further, it is additionally considered within this SA Screening Report that there would be no significant effects due to the size of the site and the fact that a larger nearby site has been granted planning permission (as allocated in Policy WPT3). The effects on landscape are therefore not considered significant.</p> <p>The Plan allocates land for development purposes and therefore cumulative effects have not been formally identified and assessed to date. Despite this, the Plan allocates only one site that does not have</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The trans boundary nature of the effects.</p>	<p>planning permission.</p> <p>The findings of the HRA Screening element of this Report do not indicate any trans boundary effects.</p>
<p>The risks to human health or the environment (e.g. due to accidents).</p>	<p>There is limited risk to human health or the environment as a result of the Neighbourhood Plan. This is in consideration of the above screening requirements related to sustainability themes. The Neighbourhood Plan is primarily focused on ensuring appropriate residential development through any forthcoming non plan-led schemes that may come forward within the Plan period, whilst retaining the character of Woolpit. This land use is unlikely to give rise to any accidents that can be considered to have a significant risk to human health or the environment.</p>
<p>The magnitude spatial extent of the effects (geographical area and size of the population likely to be affected).</p>	<p>The magnitude of effects can be considered small in the wider District and local context.</p>
<p>The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> <li>- special natural characteristics or cultural heritage</li> <li>- exceeded environmental quality standards</li> <li>- intensive land use</li> </ul>	<p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has not been screened as having potential significant effects on environmental quality standards that would warrant further assessment through SEA.</p>
<p>The effects on areas or landscapes which have a recognised national, community or international protection status.</p>	<p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has been assessed as not having any significant effects on areas or landscapes which have a recognised national, community or international protection status.</p>



## 4. HRA Screening

### 4.1 Habitat Regulations Assessment of Development Plans

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

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

The first stage of HRA is the screening assessment of the impacts of a land use proposal against the conservation objectives of Habitats sites. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would result in a likely significant effect on any Habitats (European) site. European sites are also known as Natura 2000 sites and Habitats Sites in the NPPF (2019).

This HRA Screening Report has been undertaken in order to support the Woolpit Neighbourhood Plan which is being produced by Woolpit Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012. The area covered by the Plan is shown in Appendix 1.

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

This section of this Report aims to:

- Identify the Habitats sites within 20km of Woolpit Neighbourhood Plan area.
- Summarise the reasons for designation and Conservation Objectives for each site to be considered in this assessment.
- Screen the Woolpit Neighbourhood Plan for its potential to impact upon a Habitats site.
- Assess the potential for in combination effects from other projects and plans in the area.
- Identify if there are any outstanding issues that need further investigation.

## 4.2 Recent Court Judgements and their consideration in this Report

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### 4.2.1 CJEU People Over Wind v Coillte Teoranta C-323/17

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

This HRA Screening Report does not therefore consider mitigation measures within the assessment of Likely Significant Effects resulting from the Woolpit Neighbourhood Plan.

### 4.2.2 CJEU Holohan C- 461/17

This recent Court judgement now imposes more detailed requirements on the competent authority at Appropriate Assessment stage:

1. [...] an 'Appropriate Assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.
2. [...] the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.
3. [...] where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'Appropriate Assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

Within this HRA Screening report, the assessment determines the requirement for whether an Appropriate Assessment is needed for the Woolpit Neighbourhood Plan.

## 4.3 Habitats (European) Sites

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Habitats Sites is the term used in the NPPF (2019) to describe any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations. European sites are the centrepiece of EU nature and biodiversity policy. It is an EU wide network of nature protection areas. The aim of the network is to assure the long-term survival of Europe's most valuable and threatened species and habitats.





The sites are designated under the European Union (EU) Birds Directive (Council Directive 79/409/EEC on the Conservation of Wild Birds) and the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora).

The Birds Directive requires the establishment of Special Protection Areas (SPAs) for birds. The Habitats Directive similarly requires Special Areas of Conservation (SACs) to be designated for other species, and for habitats. Wetlands of International Importance (Ramsar sites) are also part of the Natura 2000 network. This is because all SPAs and SACs are comprised of Sites of Special Scientific Interest (SSSIs) and all Ramsar sites in England are SSSIs. Together, SPAs, SACs and Ramsar Sites make up the Natura 2000 network in England.

### 4.3.1 Explanation of SPAs, SACs and Ramsar Sites

#### Special Protection Areas (SPAs)

SPAs are areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries. Example: The Stour & Orwell Estuaries are internationally important for wintering waterfowl. Legislation: EU Birds Directive.

#### Special Areas of Conservation (SACs)

SACs are areas designated to protect habitat types that are in danger of disappearance, have a small natural range, or are highly characteristic of the region; and to protect species that are endangered, vulnerable, rare, or endemic. Example: Waveney and Little Ouse Valley Fens for calcareous fens, *Molinia* meadows and Desmoulin's whorl snail. Legislation: EU Habitats Directive.

#### Wetlands of International Importance (Ramsar Sites)

Ramsar Sites are designated to protect the biological and physical features of wetlands, especially for waterfowl habitats. For example, Redgrave and South Lopham Fens is an extensive example of lowland base-rich valley, remarkable for its lack of fragmentation which supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. Ramsar sites often overlap with SACs and SPAs and UK planning policy determines that they should be accorded the same importance when developments are proposed. Legislation: Ramsar Convention (1971) – Wetlands of International Importance.

### 4.3.2 Habitats Sites to be considered

There are four Habitats sites which lie within 20 km of Woolpit parish.

**Table 3: Habitats Sites within 20km of the development**

SPA	SAC	Ramsar
Breckland	Waveney & Lt Ouse Valley Fens Breckland	Redgrave & South Lopham Fens

The Zones of Influence (ZOI) for the Habitats sites listed have been checked against the the Woolpit





parish boundary. A map showing 13km buffer on the Neighbourhood Plan area (as the largest distance in Suffolk for Habitats Sites i.e. Stour & Orwell Estuaries SPA & Ramsar site) has been provided within Appendix 2. However none of the individual ZOIs are triggered for this plan.

There are therefore no Habitats sites to be considered to be within scope for this assessment.

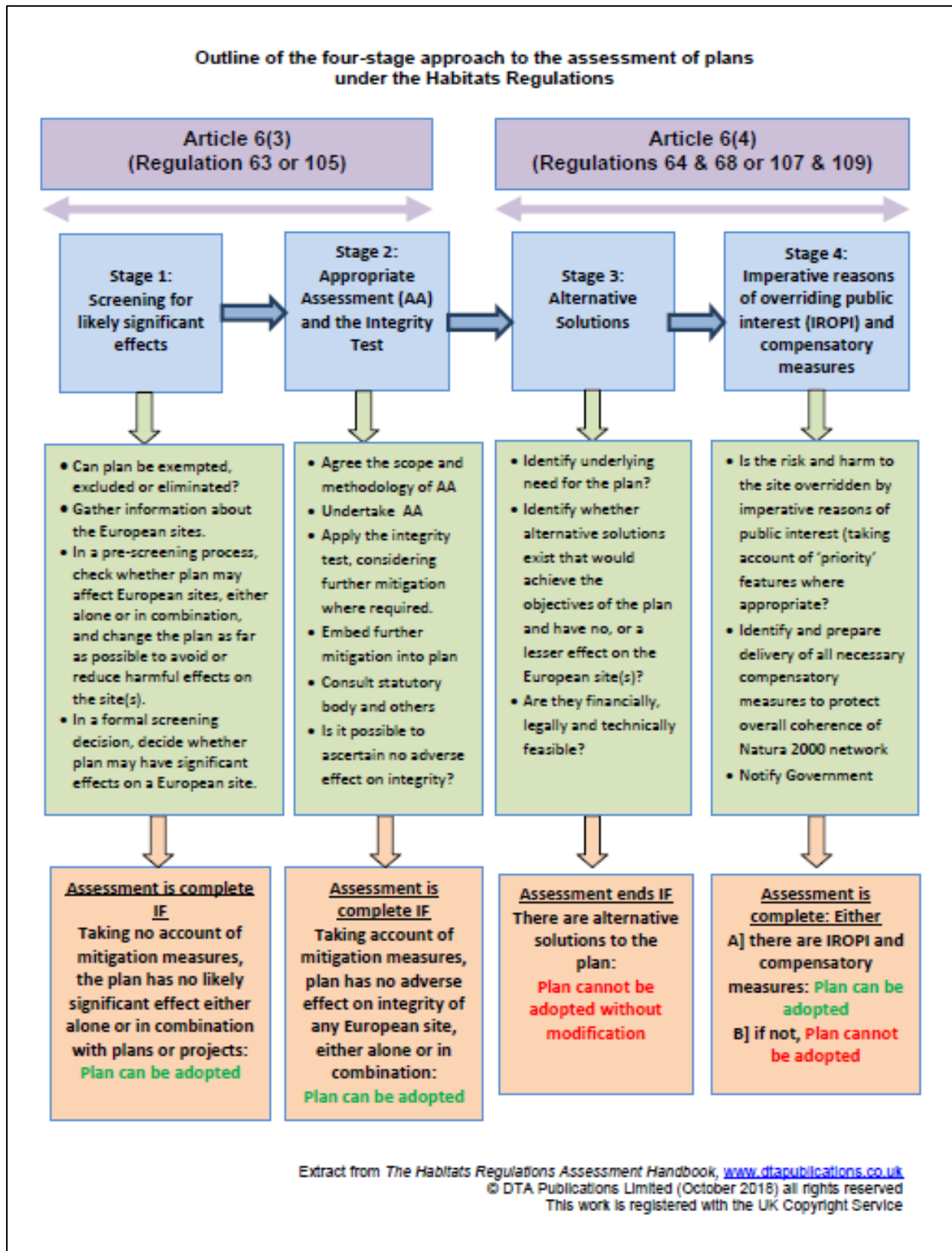
## 4.4 Method and Approach

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

This document relates only to Stages 1 and 2 of the HRA process as set out in Figure 1 below.

Figure 1: Outline of the Four Stage Approach to the Assessment of Plans under the Habitats Regulations (taken from the DTA handbook).





#### 4.4.1 Stage 1: HRA Screening

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

**Table 4: Screening categorisation**

##### **Category A : No negative effect**

Policies or projects that will not be likely to have any negative effect on a European site.

##### **Category B : No Likely Significant Effect**

Policies or projects that could have an effect but would not be likely to have a *significant* negative effect on a European site alone or in combination. This conclusion could only be reached if the effects, even in combination and taking the precautionary principle into account, are considered trivial.

##### **Category C : Likely Significant Effect**

Policies or projects which are predicted to have a likely significant effect on their own or in combination with other plans and projects.

#### 4.4.2 Potential impacts of Woolpit Neighbourhood Plan on Habitats sites

There are a wide range of impacts and these can be summarised as -

- Land take by developments;
- Impact on protected species found within but which travel outside the protected sites may be relevant where development could result in effects on qualifying interest species within the European site, for example through the loss of feeding grounds for an identified species.
- Increased disturbance, for example from recreational use resulting from new housing development and / or improved access due to transport infrastructure projects;
- Changes in water availability, or water quality as a result of development and increased demands for water treatment, and changes in groundwater regimes due to increased impermeable areas;
- Changes in atmospheric pollution levels due to increased traffic, waste management facilities etc. Pollution discharges from developments such as industrial developments, quarries and waste management facilities.

In line with the HRA for Mid Suffolk District Council Core Strategy, each policy will be assessed against the criteria in the table below.

Table 5: Assessment of potential impacts

Nature of potential impact	How the Woolpit Neighbourhood Plan (alone or in combination with other plans and project) could affect a Habitats site?	Why these effects are not considered significant?
Land take by development	Woolpit is outside the boundaries of any Habitats sites	N/A
Impact on protected species outside the protected sites	Woolpit is outside the boundaries of any Habitats sites	N/A
Recreational pressure and disturbance	Woolpit is outside the boundaries of any Habitats sites	N/A
Water quantity and quality	Woolpit is outside the boundaries of any Habitats sites	N/A
Changes in pollution levels	Woolpit is outside the boundaries of any Habitats sites	N/A

## 4.5 Results from HRA Screening of Draft Neighbourhood Plan Policies

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

- Policy WPT1 Spatial Strategy
- Policy WPT2 Location and scale of new housing developments
- Policy WPT3 New homes at land south of Old Stowmarket Road
- Policy WPT4 New homes at land east of Green Road
- Policy WPT5 New homes at land north of Woolpit Primary School
- Policy WPT6 Housing Type
- Policy WPT7 Affordable Housing on Rural Exception Sites
- Policy WPT8 Housing for the elderly
- Policy WPT9 Location of business sites
- Policy WPT10 Sustainability and support for the community
- Policy WPT11 Retail outlets and small businesses
- Policy WPT12 Local Green Space
- Policy WPT13 Sports and Recreational Areas (SRA)

- Policy WPT14 Areas of Special Landscape Quality
- Policy WPT15 Settlement gaps and key views
- Policy WPT16 Footpaths and cycleways
- Policy WPT17 Public charging points for electric vehicles
- Policy WPT18 Design
- Policy WPT19 Design and Character

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

**Table 6: Assessment of potential impacts**

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
Policy WPT1 Spatial Strategy	<p><b>Policy WPT1 Spatial Strategy</b></p> <p>The Neighbourhood Plan area will accommodate development commensurate with the village's designation in the Local Plan. In the period 2017 to 2036 at least 250 additional homes will be built and new development will be focused within the defined Settlement Boundaries, through sites allocated in this Plan as identified on the Policies Map, or in the form of small scale windfall developments.</p> <p>Unless specifically identified elsewhere in the Plan, development outside the Settlement Boundaries will only be allowed for that which is essential for the operation of agriculture, horticulture, forestry, outdoor recreation and other exceptional uses for which it can be satisfactorily demonstrated that it needs to be located there.</p>	No, Category A	No specific recommendations
Policy WPT2 Location and scale of new housing developments	<p><b>Policy WPT2 Location and scale of new housing developments</b></p> <p>Residential development proposals will be supported subject to conforming with Policy WPT1, and:</p> <ul style="list-style-type: none"> <li>• being within the capacity of the existing infrastructure and road layout of the village, or providing the necessary additional capacity;</li> <li>• not eliminating or encroaching on the gaps between the main village of Woolpit and one</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<p>or more of the outlying settlements;</p> <ul style="list-style-type: none"> <li>• being well related to the existing pattern of development;</li> <li>• preserving or enhancing the Conservation Area.</li> </ul> <p>All proposals should take into account any cumulative impact taken with other existing housing commitments in the village. They should also demonstrate that:</p> <ul style="list-style-type: none"> <li>• the scale and character of the proposal respects the landscape, landscape features, streetscape, heritage assets and important spaces and key views into and out of the village;</li> <li>• the proposal will make a positive contribution to the local character, shape and scale of the area;</li> <li>• the development (for example through its scale) will preserve or enhance the existing focal points provided by the village centre and its Conservation Area;</li> <li>• the proposed housing density is consistent with the village character and adjacent housing.</li> </ul> <p>Woolpit should remain a village, and to preserve its village character, larger schemes must be appropriately subdivided and landscaped in order to meet this objective.</p> <p>A landscape and visual impact appraisal will be required for all development proposals outside the existing settlement boundary unless they are located in an area of low landscape and visual sensitivity as shown in the Landscape Appraisal. In all areas outside the settlement, development proposals would have to demonstrate due regard to the particular sensitivities identified in the Landscape Appraisal and seek ways to mitigate effectively against potential harmful impacts, particularly in areas with higher sensitivity.</p>		
Policy WPT3 New homes at land south of	<b>Policy WPT3 New homes at land south of Old Stowmarket Road</b>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
Old Stowmarket Road	<p>Land south of Old Stowmarket Road, identified on the Policies Map, is allocated for up to 120 homes provided that the following are part of the development:</p> <ul style="list-style-type: none"> <li>• The housing density is no higher than 23 dwellings per hectare;</li> <li>• Mix of dwelling types and sizes across all tenures including bungalows;</li> <li>• The development will include 35% of affordable housing to address local housing needs;</li> <li>• Sufficient outdoor green space with high standard landscaping is included;</li> <li>• Each new dwelling will include adequate parking space at least to minimum standards, as contained within the Suffolk Guidance for Parking updated 2015.</li> </ul> <p>In order to improve connectivity of the site with the village centre, developers will be expected to enter into a planning obligation to provide the following off-site improvements:</p> <ul style="list-style-type: none"> <li>• Raised table pedestrian crossings on Heath Road at Woolpit Health Centre and at the junction of Old Stowmarket Road with Heath Road; and</li> <li>• New pedestrian linkages to enable residents to walk to all facilities in the village centre.</li> </ul>		
Policy WPT4 New homes at land east of Green Road	<p><b>Policy WPT4 New homes at land east of Green Road</b></p> <p>Land east of Green Road, identified on the Policies Map, is allocated for up to 49 homes provided that the following are part of the development:</p> <ul style="list-style-type: none"> <li>• The housing density is no higher than 23 dwellings per hectare;</li> <li>• Mix of dwelling types and sizes across all tenures including bungalows;</li> <li>• The development will include 35% of affordable housing to address local housing needs;</li> <li>• Sufficient children's play space with high standard landscaping is included;</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<ul style="list-style-type: none"> <li>Each new dwelling will include adequate parking space at least to minimum standards, as contained within the Suffolk Guidance for Parking updated 2015.</li> </ul> <p>In order to improve connectivity of the site with the village centre, developers will be expected to enter into a planning obligation to provide the following off-site improvements:</p> <ul style="list-style-type: none"> <li>New pedestrian linkages to enable residents to walk to all facilities in the village centre.</li> </ul>		
Policy WPT5 New homes at land north of Woolpit Primary School	<p><b>Policy WPT5 New homes at land north of Woolpit Primary School</b></p> <p>Land north of Woolpit Primary School, identified on the Policies Map, is allocated for up to 36 homes, provided that the following are part of the development:</p> <ul style="list-style-type: none"> <li>The housing density is no higher than 23 dwellings per hectare;</li> <li>Mix of dwelling types and sizes across all tenures including bungalows;</li> <li>The development will include 35% of affordable housing to address local housing needs;</li> <li>Sufficient outdoor green space with high standard landscaping is included;</li> <li>Each new dwelling will include adequate parking space at least to minimum standards, as contained within the Suffolk Guidance for Parking updated 2015.</li> </ul> <p>In order to improve connectivity of the site with the village centre, developers will be expected to enter into a planning obligation to provide the following off-site improvements:</p> <ul style="list-style-type: none"> <li>New pedestrian linkages to enable residents to walk to all facilities in the village centre.</li> </ul>	No, Category A	No specific recommendations
Policy WPT6 Housing Type	<p><b>Policy WPT6 Housing Type</b></p> <p>Proposals for housing developments of 10 or more homes will be supported if they specifically provide a mix of appropriate and diverse types of housing, which include two or more of these options:</p>	No, Category A	No specific recommendations



Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<ul style="list-style-type: none"> <li>• one and two bedroom homes;</li> <li>• family homes, with 3 or 4 bedrooms;</li> <li>• bungalows of 1 to 2 bedrooms.</li> </ul> <p>The majority of dwellings should comprise homes with 2 or 3 bedrooms. A proportion of the dwellings must be designed for lifetime occupation.</p> <p>At least 10% of the affordable housing in a development of 10 or more homes should comprise dwellings intended to provide an affordable route to home ownership, in order to meet the known local demand for such housing.</p>		
Policy WPT7 Affordable Housing on Rural Exception Sites	<p><b>Policy WPT7 Affordable Housing on Rural Exception Sites</b></p> <p>Proposals for the development of small scale affordable housing schemes on rural exception sites outside but adjacent to the settlement boundary, where housing would not normally be permitted by other policies, will be supported where there is a proven local need and provided that the housing:</p> <ul style="list-style-type: none"> <li>• always remains affordable;</li> <li>• is for people who are in housing need because they are unable to buy or rent properties in the village at open-market prices;</li> <li>• is offered, in the first instance, to people with a demonstrated local connection as identified in paragraph 4.4 of the Mid Suffolk Choice-based Lettings Scheme 2016. Where there is no need, a property should then be offered to those from neighbouring villages with a demonstrated need for affordable housing.</li> </ul> <p>These restrictions should be delivered through a legal agreement attached to the planning consent for the housing.</p>	No, Category A	No specific recommendations
Policy WPT8 Housing for the elderly	<p><b>Policy WPT8 Housing for the elderly</b></p> <p>Proposals will be welcomed for development which incorporates specific provision for the elderly, which may include:</p> <ul style="list-style-type: none"> <li>• Bungalows to accommodate older people as well as those with disabilities;</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<ul style="list-style-type: none"> <li>• Sheltered housing for those capable of living independently;</li> <li>• Care home provision for those no longer capable of independent living.</li> </ul>		
Policy WPT9 Location of business sites	<p><b>Policy WPT9 Location of business sites</b></p> <p>Proposals for redevelopment of brownfield sites for business / industrial use, and construction or redevelopment on existing employment sites will be supported, subject to meeting the following conditions:</p> <ul style="list-style-type: none"> <li>• being within the capacity of the existing infrastructure and road layout of the village, or providing the necessary additional capacity;</li> <li>• not eliminating or encroaching on the gaps between the main village of Woolpit and one or more of the outlying settlements;</li> <li>• good access to A14 avoiding the village centre;</li> <li>• mitigation of traffic / road impacts from the development;</li> <li>• improvement of pedestrian / cycling links with the built-up area of the village;</li> <li>• enough on-site parking to meet the needs of the proposed use;</li> <li>• avoidance of nuisance (from noise, fumes, smells, light pollution or other disturbance) to neighbouring properties;</li> <li>• any lighting plan that will keep pedestrians and other users safe without a detrimental effect on the environment;</li> <li>• mitigation of visual impacts on rural setting of the village consistent with the recommendations of the Landscape Appraisal;</li> <li>• no adverse impacts on a heritage asset or its setting, including the Conservation Area;</li> <li>• enhancement of the environment consistent with the recommendations of the Landscape Sensitivity Study.</li> </ul> <p>In any other case, proposals for new business / employment development will be supported where there is a demonstrable need in Woolpit</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<p>Parish or in Mid Suffolk District, and more particularly where there is a demonstrable benefit to the parish community and its infrastructure, in all cases subject to meeting the same conditions as listed above.</p>		
<p>Policy WPT10 Sustainability and support for the community</p>	<p><b>Policy WPT10 Sustainability and support for the community</b></p> <p>Proposals for the development of employment sites, i.e. 'business parks' will be supported where in addition to complying with other Policies it can be clearly demonstrated that there exists a long term, sustainable site management plan and a vision for growth in line with the gradual growth of housing, infrastructure and services in Woolpit.</p> <p>Proposals would be viewed more favourably from developers who are willing to, for example:</p> <ul style="list-style-type: none"> <li>• invest in expansion of existing community facilities;</li> <li>• contribute to community projects and services;</li> <li>• make improvements to the footpaths / cycleways between their location and the village centre, or improve the network of footpaths and cycleways in the vicinity of their location;</li> <li>• install low-carbon / carbon-neutral energy generation;</li> <li>• enhance biodiversity by enhancing and maintaining the local natural environment.</li> </ul>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy WPT11 Retail outlets and small businesses</p>	<p><b>Policy WPT11 Retail outlets and small businesses</b></p> <p>Within the Conservation Area, the development of a wider range of retail outlets will be supported, provided that: the character and architectural heritage is respected and development is sympathetic to and in keeping with the height, scale and appearance of neighbouring properties and the street scene.</p> <p>Outside the Conservation Area proposals for the development of small businesses including food shops will be supported but must be able</p>	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<p>to show that:</p> <ul style="list-style-type: none"> <li>• there is access for commercial vehicles without passing through the village centre;</li> <li>• there will be on-site servicing and delivery arrangements;</li> <li>• the development will not generate unacceptable nuisance (noise, fumes, smells, light pollution or other disturbance) to neighbouring properties</li> <li>• the Conservation Area, the setting of the historic core, the rural setting of the village and the key views will not be adversely impacted;</li> <li>• responsibility is accepted, for dealing with litter, refuse and packing materials which are generated by the activities of the business, and there is a management plan for dealing with this.</li> </ul>		
Policy WPT12 Local Green Space	<p><b>Policy WPT12 Local Green Space</b></p> <p>The green spaces listed below and identified on the Policies Map (Village Centre Inset Map), having been assessed in accordance with the criteria set out in paragraph 100 of the National Planning Policy Framework, and found to meet those criteria, are to be designated Local Green Space. New development on designated Local Green Space will only be permitted in very special circumstances.</p> <ul style="list-style-type: none"> <li>• St Mary's Churchyard</li> <li>• Lady's Well and enclosure</li> <li>• Meadows within the Conservation Area between Elmswell Road and the Old Rectory</li> <li>• Meadowlands meadow</li> <li>• Wooded ridge and grassed area adjacent to Wrights Way and Lower Broom Road</li> <li>• Grassed recreation space adjacent to Steeles Road</li> <li>• Baker's Piece</li> <li>• Former allotments site adjacent to Rags Lane</li> <li>• Millennium Garden</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<ul style="list-style-type: none"> <li>• Pump garden</li> <li>• Mitre Close green space</li> <li>• Briar Hill green space</li> <li>• Land within the Conservation Area north of Monks Close</li> <li>• Steeles Road garden</li> <li>• Allotments adjacent to Warren Lane</li> <li>• Graveyard behind The Room (White Elm Road)</li> </ul>		
Policy WPT13 Sports and Recreational Areas (SRA)	<p><b>Policy WPT13 Sports and Recreational Areas (SRA)</b></p> <p>The areas listed below, and identified on the Policies Map, make a vital contribution to the health and well-being of the community, and therefore development on any of these areas will not be permitted unless it can be shown that</p> <ul style="list-style-type: none"> <li>• they are no longer used for sport or recreation, or;</li> <li>• an equivalent or better replacement will be provided in a location which is at least as suitable and convenient; or</li> <li>• the development will enhance the sports / recreational facilities on the site to meet community needs, the benefits clearly outweighing any loss.</li> </ul> <p>Designated areas:</p> <ul style="list-style-type: none"> <li>• Sports Field</li> <li>• Village Hall Playing Field</li> <li>• Woolpit School playing field</li> </ul>	No, Category A	No specific recommendations
Policy WPT14 Areas of Special Landscape Quality	<p><b>Policy WPT14 Areas of Special Landscape Quality</b></p> <p>Development proposals in areas of special landscape quality, as identified by the Landscape Character Appraisal and the Landscape Appraisal, and shown on the Policies Map, will only be permitted where, over and above any proposed mitigation of impacts, they</p> <ul style="list-style-type: none"> <li>• protect and enhance the special qualities of</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<p>the area; and</p> <ul style="list-style-type: none"> <li>• are designed and sited so as to harmonise with the landscape setting.</li> </ul> <p>The benefits of development proposals must demonstrably outweigh any adverse impacts and provide for appropriate replacement on site of any features lost, together with an ongoing management and maintenance plan.</p> <p>The areas are marked on the Policies Map, and comprise:</p> <ul style="list-style-type: none"> <li>• Woodland in the east of the parish, east of the line Warren Lane—Wood Road—Borley Green, north and south of the A14</li> <li>• The valley of the Black Bourn river in the north-west corner of the parish</li> <li>• Bishop Karney Green</li> <li>• Westerly facing slopes south-west of Woolpit village, with views of Drinkstone Mills</li> <li>• The land separating Woolpit village from the settlements of Woolpit Green and The Heath</li> <li>• Glebe land north of Old Stowmarket Road</li> </ul>		
Policy WPT15 Settlement gaps and key views	<p><b>Policy WPT15 Settlement gaps and key views</b></p> <p>In order to preserve the Key Views (as identified on the Policies Map) and visual qualities of the landscape, prevent encroachment onto the gaps between the settlements to retain their separate and distinctive identities, developments will only be permitted within identified areas if:</p> <ul style="list-style-type: none"> <li>• they maintain the physical and/or visual separation of the settlements; and</li> <li>• they safeguard the integrity of the gaps between settlements, either individually or in combination with other existing or proposed development;</li> <li>• they retain the public visual amenity of the landscape setting; and</li> <li>• defined Key Views will be protected.</li> </ul>	No, Category A	No specific recommendations
Policy WPT16 Footpaths and	<b>Policy WPT16 Footpaths and cycleways</b>	No, Category A	No specific

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
cycleways	<p>In order to support the sustainability objectives of promoting walking and cycling and access to the countryside via the Public Rights of Way, larger new proposals (10 houses or more) will be required to provide linked or extended routes to existing footpaths and cycleways.</p> <p>Proposals to reroute existing public rights of way as part of a development will be supported if they result in an enhanced route being obtained that will benefit the community.</p>		recommendations
Policy WPT17 Public charging points for electric vehicles	<p><b>Policy WPT17 Public charging points for electric vehicles</b></p> <p>Where development proposals include car parking spaces for use by the general public, passive provision of electric vehicle charging infrastructure (i.e. underlying infrastructure meeting current best practice, which enables simple installation and activation of charging points at a later date) is required for 20% of all spaces. Parking spaces equipped with activated charging points for electric vehicles (EVCPs) must be provided at a ratio of at least 1 per 20 spaces, and not less than 1 per car park.</p>	No, Category A	No specific recommendations
Policy WPT18 Design	<p><b>Policy WPT18 Design</b></p> <p><i>Affordable homes</i></p> <p>Affordable homes are to be well integrated with and not segregated from open market homes on the same site.</p> <p><i>Space standards</i></p> <p>The gross internal floor space prescribed in the Nationally Described Space Standard shall apply to all dwellings whether or not that standard has been formally adopted by the Local Authority.</p> <p><i>Location</i></p> <p>The location and design of developments should be such as to achieve:</p> <ul style="list-style-type: none"> <li>• avoidance of nuisance (from noise, fumes, smells, light pollution or other disturbance) to neighbouring properties;</li> </ul>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<ul style="list-style-type: none"> <li>• mitigation of visual impacts on rural setting of the village consistent with the recommendations of the Landscape Appraisal;</li> <li>• no adverse impacts on the Conservation Area or its setting;</li> <li>• enhancement of the environment consistent with the recommendations of the Landscape Appraisal.</li> </ul> <p><i>Telecommunications</i></p> <p>All proposals are required to show that broadband provision and the associated infrastructure to meet the foreseeable needs of the site form part of the proposal.</p> <p><i>Green space and landscaping</i></p> <p>All developments must follow the Management and Development Guidelines in the Landscape Appraisal (reproduced in Appendix). For the site allocations in this Plan, and for other large proposals (10 or more houses), a landscape strategy shall be submitted, including:</p> <ul style="list-style-type: none"> <li>• a biodiversity assessment;</li> <li>• an appraisal of both near and distant views of the proposed development from principal public vantage points, showing existing landscaping and that proposed to be established after 10 years;</li> <li>• details of how areas to be retained as open space and/or woodland will be managed in the future.</li> </ul> <p><i>Renewable energy</i></p> <p>Renewable energy projects will be supported where they are located to avoid adverse impacts on the visual or environmental qualities of Local Green Spaces or other public recreational areas, areas of special environmental and landscape value (see Policies Policy WPT12, Policy WPT13 and Policy WPT14), or the historic core of the village.</p> <p><i>Roofscape</i></p> <p>Proposals to erect solar panels, satellite</p>		



Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<p>dishes, and aerals within the Conservation Area will be supported provided that they do not harm</p> <ul style="list-style-type: none"> <li>• the historic setting of Woolpit;</li> <li>• the character or appearance of the Conservation Area, including the setting of nearby listed buildings;</li> <li>• defined key views into or out of the village.</li> </ul>		
Policy WPT19 Design and Character	<p><b>Policy WPT19 Design and Character</b></p> <p>All development proposals including industrial units will be expected to preserve and enhance Woolpit's unique character:</p> <ul style="list-style-type: none"> <li>• Within the Conservation Area Woolpit's architectural heritage should be recognised and taken into account in the choice of materials, height, scale, spacing, layout, orientation and design.</li> <li>• Outside the Conservation Area development should contribute to the street scene so that choice of materials is sympathetic to the surrounding properties and height and scale is in keeping with the neighbouring buildings</li> <li>• All development should retain and where possible enhance green areas including trees and hedges, or restore local landscape structure through provision of alternative green spaces and appropriate planting.</li> <li>• When designing the layout of housing development schemes developers should ensure that the necessary infrastructure is in place to provide easy integration into the village and safe access to key services.</li> </ul> <p>Proposals should address climate change through sustainable design, adaptation and mitigation. Proposers of major developments (over 10 houses) should consult with the Parish Council and the community.</p>	No, Category A	No specific recommendations

#### 4.5.1 Recommendations

There are no recommendations for the site allocation policies in this draft Neighbourhood Plan as they have all been assigned to Category A. There will therefore be no need for any residential



development subsequently coming forward to be subject to a project level HRA. As such there is no requirement for this Plan to progress to Appropriate Assessment.

The in-combination effects from other plans and projects are considered in the following section.

## 4.6 Other Plans and Projects – In-combination Effects

There are no relevant Plan level HRAs that have been carried out by Babergh & Mid Suffolk DCs or other organisations and none have been found to have a likely significant effect on the Habitats sites being assessed.

In the context of this HRA, the relevant other plans to be considered are listed below in combination with Woolpit Neighbourhood Plan HRA.

**Table 7: Other plans or projects considered for in combination effects**

Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
Mid Suffolk District Council	Core Strategy Habitats Regulations Assessment (Appropriate Assessment) October 2007)	The HRA found no likely significant effects from the Plan on the Breckland SAC/SPA and Waveney and Little Ouse Valley Fens SAC.	It is considered that in combination likely significant effects are not predicted.
St Edmundsbury Borough Council	Core Strategy HRA screening (2010)	The HRA found no potential for in combination effects as no other current plans or projects that are likely to lead to significant effects on the Breckland SAC/SPA or the Waveney and Little Ouse Valley Fens SAC have been identified, or where impacts have been identified they have been adequately mitigated.	It is considered that in combination likely significant effects are not predicted.
Babergh District Council	Habitat Regulations Assessment of Core Strategy 2011	The Core Strategy aims to minimise impacts on the Orwell and Stour estuaries, a European-designated site which supports species that are susceptible to disturbance. The principal potential impact on the European sites as a result of	It is considered that in combination likely significant effects are not predicted.



Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
		development proposed under the Core Strategy relates to increased recreational pressure. The Strategy therefore sets out a series of measures to ensure that the policies will not have a significant effect on the European sites.	
Suffolk Coastal District Council	Suffolk Coastal Core Strategy and Development Management Policies Document HRA (2011)	N/A	It is considered that in combination likely significant effects are not predicted.

## References

- Woolpit Neighbourhood Plan Second Draft (January 2019)
- Atkins (2011) Habitats Regulations Assessment for Babergh District Council Core Strategy
- Habitats Regulations Assessment (Appropriate Assessment) for Mid Suffolk District Council Core Strategy(2007)
- Atkins (2010) St. Edmundsbury Borough Council Core Strategy HRA screening
- Babergh District Council (2014) Local Plan Core Strategy and Policies
- Natural England Conservation objectives for European Sites: East of England Website
- The Landscape Partnership (2011) Suffolk Coastal District Council Habitats Regulations Assessment for Core Strategy and Development Management Policies Document
- Tydlesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook, (Feb 2019) edition UK: DTA Publications Limited



## 5. Conclusions

### 5.1 Strategic Environmental Assessment (SEA)

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

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

The Plan allocates three sites for development in advance of the emerging Babergh & Mid Suffolk Local Plan however two of these have planning permission. The allocation of a site for housing that does not have planning permission (Policy WPT5) would normally warrant the full application of the SEA Directive in the form of a SEA Environmental Report, in order to justify the allocation of site(s) in light of reasonable alternatives, if significant environmental effects could not be ruled out. The District Council's Local Plan process identifies approximately 25 such alternative sites. The significance of any environmental effects associated with the future development of Policy WPT5 has been explored within this Screening Report.

Site assessment work has been undertaken to influence the site selection process, however this work omitted the specific area of land making up site WPT5, instead identifying 'Area of Search 8' as a larger expanse of land in the broad area. The assessment of Area of Search 8 identified no environmental or heritage designations on site, but added that development of the site may have some landscape value that would have to be mitigated through effective policy.

The District Council's SHELAA (for the emerging Local Plan) however does assess the specific proposal that is allocated within Policy WPT5 of the Neighbourhood Plan. This assessment does not identify any detrimental local landscape effects. Other negative effects have been identified within the SHELAA although the assessment of the site acknowledges that these would not be forthcoming should the development of the site to the north (Policy WPT3) come forward. The site allocated as Policy WPT3 now has planning permission.

In consideration of the findings of relevant environmental assessment work undertaken for the Plan's allocations, and the status of two of them with planning permission, the Woolpit Neighbourhood Plan can be **screened out** for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.



## 5.2 Habitats Regulations Assessment (HRA) / Appropriate Assessment (AA)

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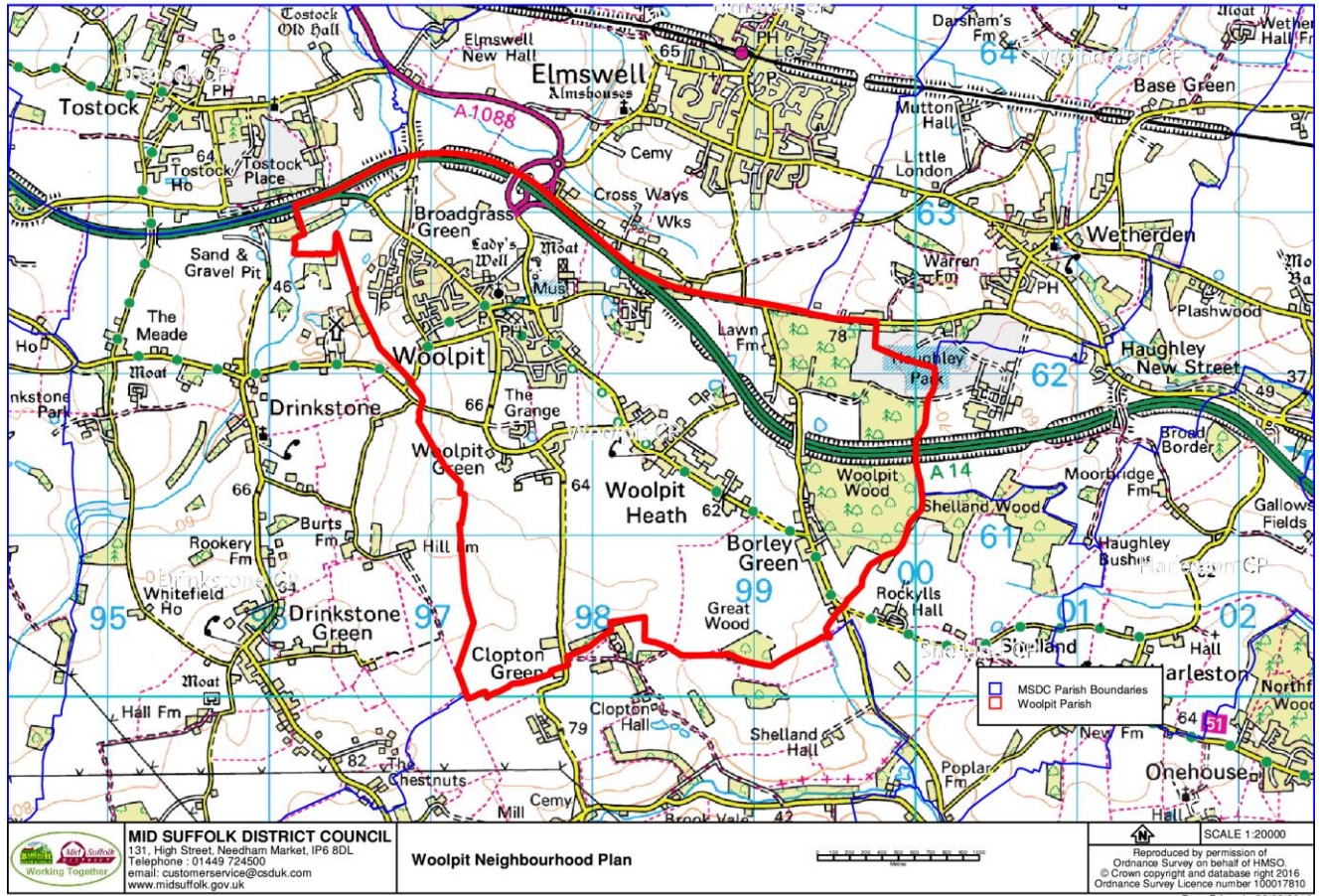
Subject to Natural England's review, this HRA report indicates that the Woolpit Neighbourhood Plan is predicted, without mitigation, to have any likely significant effect on a Habitats Site. The requirement for the Plan to undertake further assessment under the Habitats Regulations 2017 was therefore **screened out**.





# Appendix 1

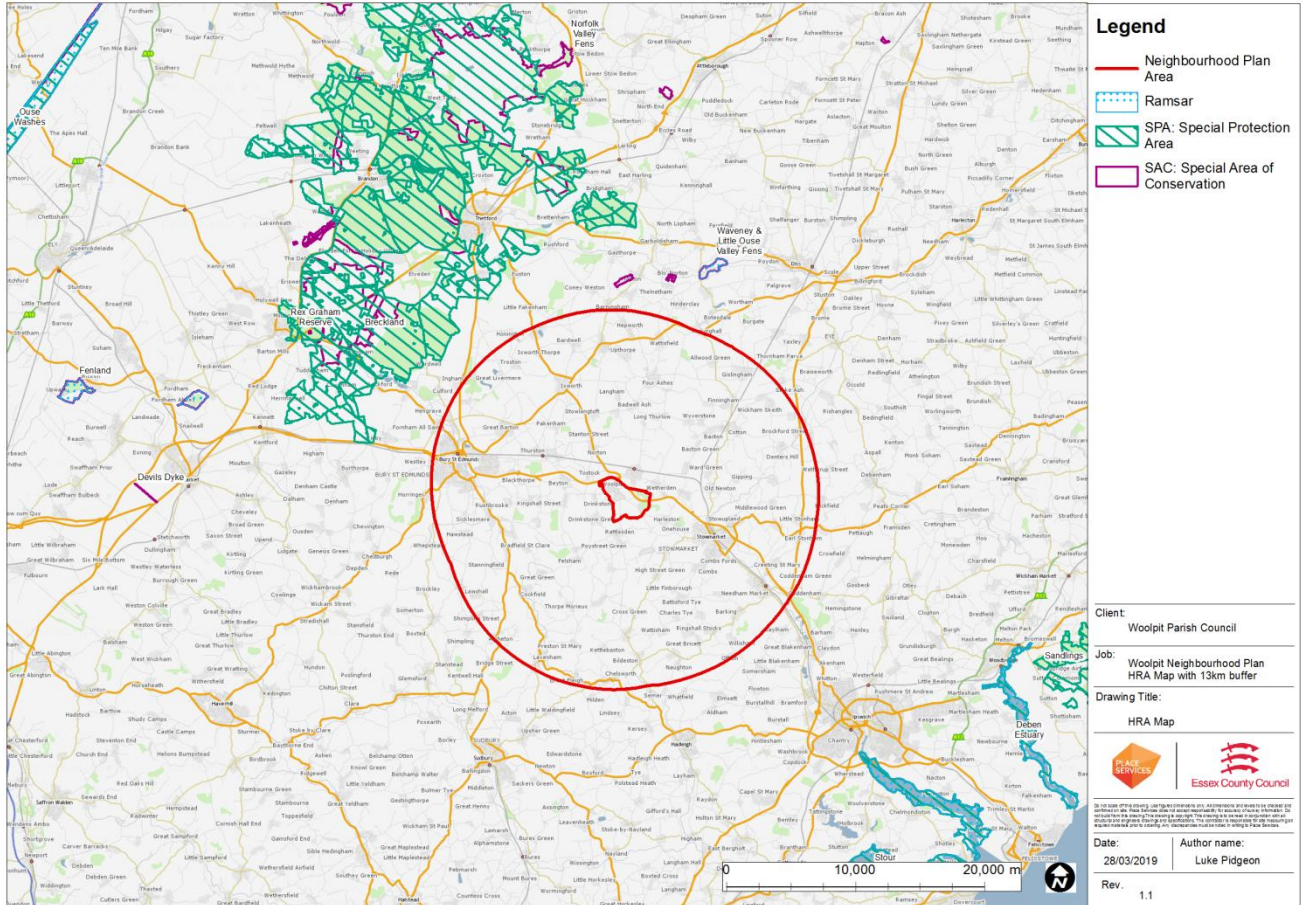
## Woolpit Neighbourhood Plan Area



Source: Mid Suffolk District Council, 2016

# Appendix 2

## Woolpit Parish and Locations of the Habitats Sites' Zones of Influence



Source: Place Services, 2019





## Place Services

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April 2019



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