



North Norfolk District Council

# **Habitat Regulations Assessment Screening Report for Consultation**

Ryburgh Neighbourhood Plan - Submission Version

**January 2020** (Final)

**North Norfolk District Council  
Planning Policy Team**

**01263 516318**

**[planningpolicy@north-norfolk.gov.uk](mailto:planningpolicy@north-norfolk.gov.uk)**

**Planning Policy**

**North Norfolk District Council**

**Holt Road, Cromer, NR27 9EN**

**[www.north-norfolk.gov.uk/ryburghnp](http://www.north-norfolk.gov.uk/ryburghnp)**

All documents can be made available in  
Braille, audio, large print or in other languages.  
Please contact 01263 516318 to discuss your requirements



# Contents

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
<b>2</b>	<b>Ryburgh Neighbourhood Plan .....</b>	<b>4</b>
<b>3</b>	<b>European sites.....</b>	<b>7</b>
	<b>River Wensum Special Area of Conservation .....</b>	<b>9</b>
<b>4</b>	<b>Context / In Combination Effects .....</b>	<b>10</b>
	<b>Recreational Impacts.....</b>	<b>11</b>
<b>5</b>	<b>Screening Assessment: Test of Likely Significant Effect .....</b>	<b>15</b>
	<b>Assessment Matrix .....</b>	<b>15</b>
<b>6</b>	<b>In-Combination Effects .....</b>	<b>19</b>
<b>7</b>	<b>Overall Conclusion - Screening Outcome .....</b>	<b>20</b>
	<b>Next Stages .....</b>	<b>20</b>

# 1 Introduction

- 1.1 This report represents a screening of the need for a Habitats Regulations Assessment (HRA) under Directive 92/43/EEC, also known as the Habitats Directive<sup>1</sup> for the emerging submission version of the Ryburgh Neighbourhood Plan (January 2019). Article 6 (3) of the EU Habitats Directive<sup>2</sup> and Regulation 63 of the Conservation of Habitats and Species Regulations 2017<sup>3</sup> (as amended) requires that an Appropriate Assessment is carried out on any plan or project likely to have a significant effect on a European site.
- 1.2 European designated sites, also referred to as Natura 2000 sites are defined in regulation 8 of the Conservation of Habitats and Species Regulation 2017, and consist of Special Areas of Conservation, SAC, Sites of Community Importance and Special Protection Areas, SPA. These are also reflected in the National Planning Policy Framework, NPPF, which also refers to Ramsar sites, which are listed in accordance with the international Ramsar Convention. The NPPF requires decision makers to apply the same protection and process to Ramsar sites as that set out in legislation for European sites<sup>4</sup>.
- 1.3 The Regulations require Habitats Regulations Assessment (HRA) screening to be undertaken by the competent authority i.e. any public body or individual holding public office with a statutory remit and function. In the case of Planning North Norfolk District Council is the competent authority under the EU 'Habitats' Directive 92/43/EEC. The *Habitats Directive* is transposed into UK legislation by the Conservation of Habitats and Species Regulations 2017 (referred to as the *Habitats Regulations*). Under Article 6(3) of the Habitats Directive the Council must consider if the project i.e. the development proposal (Neighbourhood Plan), is likely to have a significant effect on the conservation objectives of the Natura 2000 site or adversely affect the integrity of the Natura 2000 site alone or in combination with other plans or projects. This process is generally referred to as a Habitats Regulations Assessment (HRA).
- 1.4 It is a requirement of European law that a plan or project is subject to an iterative assessment to determine whether it will significantly affect the ecological integrity of any European site, in terms of impacting on the site's conservation objectives. HRA is the a two-stage process to consider whether a proposed development plan or programme is likely to have significant effects on a European site designated for its nature conservation interest. Firstly, plans or programmes must be screened to determine if they are likely to have a significant effect (and are not plans connected to

---

<sup>1</sup> Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eurlex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>

<sup>2</sup> [http://ec.europa.eu/environment/nature/natura2000/management/guidance\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm)

<sup>3</sup> <http://www.legislation.gov.uk/ukSI/2017/1012/contents/made>

<sup>4</sup> NPPF, 2019 Para 176

the management of the European site(s) in question). If it cannot be demonstrated during at the screening stage that the plan or programme will not have significant effects of the European site(s), an 'Appropriate Assessment' (AA) must then be undertaken, which is a much more detailed study of the effects of the plan or programme. The two parts together form a full HRA. Where it is deemed that adverse effects cannot be ruled out, a plan or project must not proceed, unless exception tests are met.

- 1.5 In determining whether a proposed development plan or programme is likely to have significant effects, the local authority must incorporate the 'precautionary principle' into its decision. This means that if there is uncertainty as to whether the plan or programme would cause significant effects on a European site, the full AA would be required. If an appropriate assessment is required, then this will engage the need for a strategic environmental assessment.
- 1.6 The Neighbourhood Planning (General) Regulations 2012<sup>5</sup>, state that submitted neighbourhood plans need to be accompanied by a statement explaining how the proposed neighbourhood 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 is one of the matters that will be tested as part of the independent examination of the Plan. In doing so the competent authority must issue a screening determination which can be relied upon as part of submission documents and subsequent examination.
- 1.7 Neighbourhood planning bodies are advised through national guidance to consider the environmental implications of its proposals in the production of a neighbourhood plan. Screening though can only be undertaken when sufficient information is available to enable the competent authority to determine whether the emerging Plan requires further detailed assessments in relation to the Habitats Regulations 2017. Undertaken too early a further screening exercise is likely to be necessary at subsequent stages when the direction and content of the plan is known. Undertaken during the later stages in the production of the neighbourhood plan however may have implications for delay as sufficient time needs to be factored into the production of a neighbourhood plan for any procedural steps required under the legislation. Plans should be kept under review and screened again should the content and particularly the scope change. A screening determination issued by the council is required at submission.
- 1.8 **The purpose** of this report is to provide sufficient information in order to consult the required statutory bodies, Environment Agency, Historic England and Natural England

---

<sup>5</sup> [http://www.legislation.gov.uk/ukxi/2012/637/pdfs/ukxi\\_20120637\\_en.pdf](http://www.legislation.gov.uk/ukxi/2012/637/pdfs/ukxi_20120637_en.pdf)

and other relevant local interest groups such as water companies and local wildlife trusts, prior to the Local Planning Authority issuing the required screening determination and the finalisation of the submission version of the draft Ryburgh neighbourhood plan. The screening is carried out on the emerging submission version of the Plan December 2019 which incorporates policy changes following the earlier pre submission consultation and is intended to inform the final version of the submitted draft plan prior to examination.

1.9 The HRA process is not defined in legislation but is used to address Articles 6(3) and 6(4) of the Habitats Directive, as transposed by Regulation 63 of the Habitats Regulations. In completing this HRA reference has been made to the information contained in the EC guidance document Managing Natura 2000 sites: The provision of Article 6 of the 'Habitats' Directive 92/43/EEC (European Communities, 2000), the Habitats Regulations Assessment Handbook by DTA Publications as well as relevant case law, the process is iterative

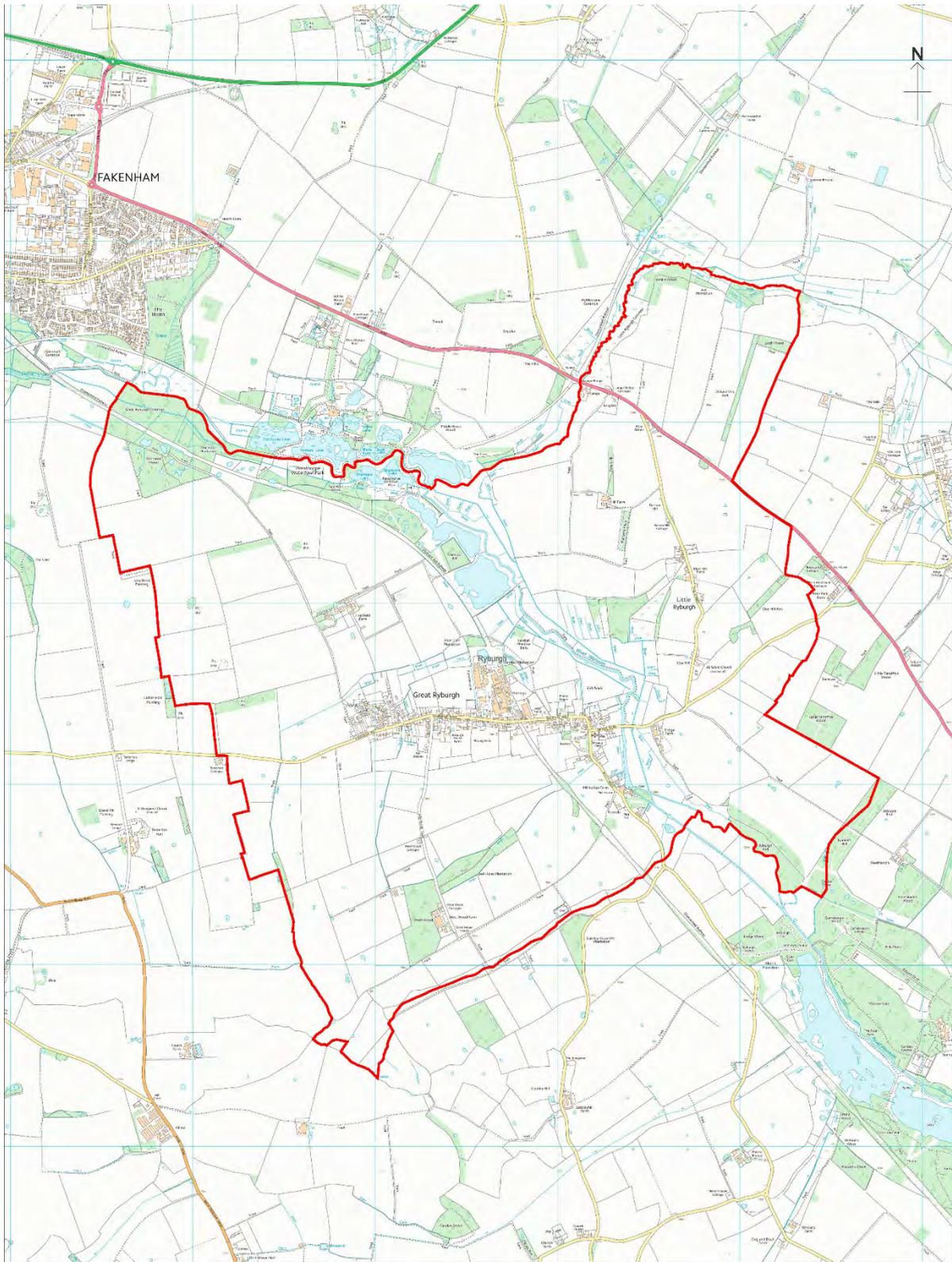
1.10 Article 6(3) of the EU Habitats Directive states that:

*Any plan or project not directly connected with, or necessary to, the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.*

1.11 Details of the designated sites need to be assessed to see if there is the potential for the implementation of the neighbourhood plan to have an impact on the sites.

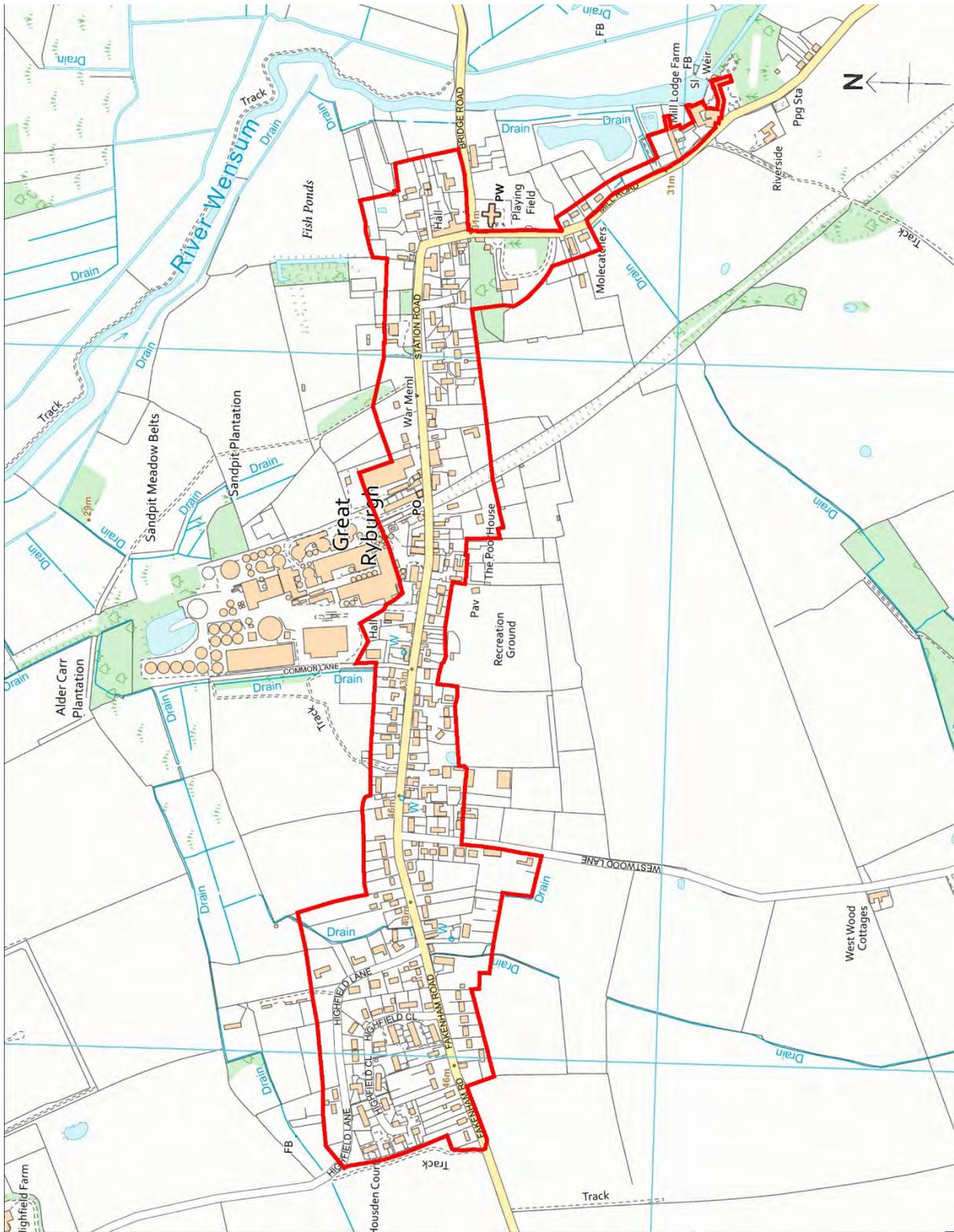
## 2 Ryburgh Neighbourhood Plan

- 2.1 The purpose of the Ryburgh neighbourhood plan is to provide for sustainable development of Ryburgh parish that will benefit the community whilst conserving and promoting the particular landscape and ecology that characterises the Neighbourhood Area. To do this, it seeks to provide a local policy content that addresses traffic safety and the provision of footpath/cycleway access, provides for a small level of sustainable growth through infill development and ensures that the local landscape character and ecology environmental are considered and promoted through development. It does this through a set of place shaping aims.
- 2.2 The Plans aims as set out in the emerging plan (December 2019) are:
- Traffic Safety – to ensure the current position does not get worse;
  - Footpaths, cycle ways and access to the countryside - To enhance provision and access to the countryside and safeguard existing land for public access.
  - New Housing - the encouragement and management of sustainable housing growth through the use of infill sites in Great Ryburgh.
  - Protection of the landscape – to ensure proposals are sympathetic to the distinctive character of the landscape.
  - The Protection of the Environment to ensure the conservation and protection of valued habitat.
- 2.3 The designated Ryburgh Neighbourhood Plan Area is shown in **Figure 1** on the following page.



 <p><b>North Norfolk District Council</b></p>	<p><b>Ryburgh Neighbourhood Area</b></p> <p>— Ryburgh Neighbourhood Area</p>		<p>1:20,000      CB</p>	<p>© Crown Copyright and database right 2018          Ordnance Survey 100018623</p> <p>Aerial Photos ©Getmapping plc</p>
			<p>16/05/2019</p> <p>North Norfolk District Council          Council Offices, Holt Road,          Cromer, Norfolk, NR27 9EN          Tel: 01263 513811          Fax: 01263 515042  <a href="http://www.northnorfolk.org">www.northnorfolk.org</a></p>	

Figure 1 - Ryburgh Neighbourhood Area



**Settlement Boundary**  
within Ryburgh Neighbourhood Area

— Settlement Boundary

North Norfolk District Council  
Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN  
Tel: 01263 513811 Fax: 01263 515042

1:10,000

CB

03/12/2019

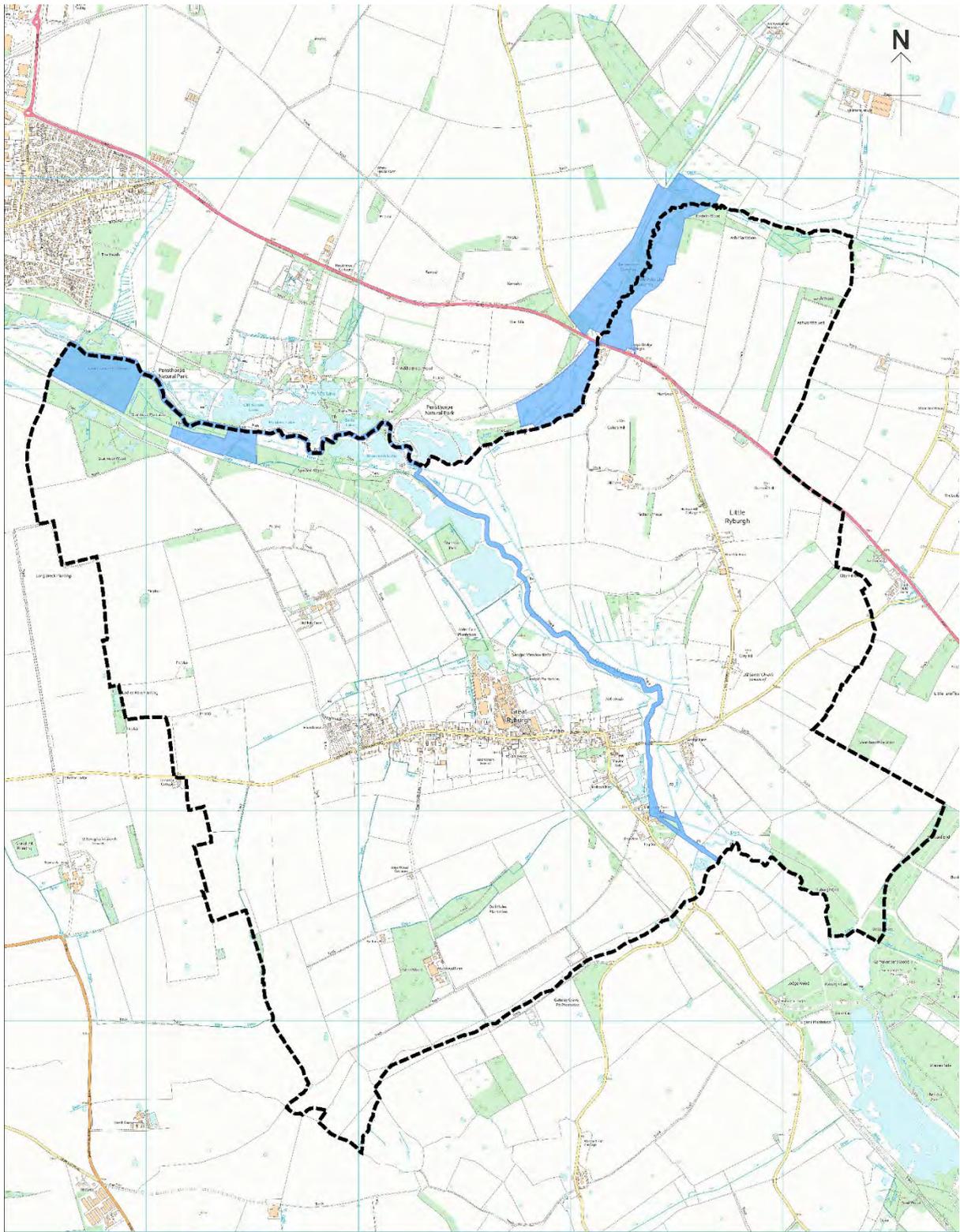
© Crown Copyright  
and database right  
2019  
Ordnance Survey  
100018623

Aerial Photos  
©Getmapping plc

Figure 2 - Settlement Boundary Map

### 3 European sites

- 3.1 In assessing the implications of any plan or project, in this case the neighbourhood plan, for European sites in close proximity, it is essential to fully understand the sites in question, their interest features, current condition, sensitivities and any other ongoing matters that are influencing each of the sites. This section seeks to answer the following questions:
- a. What are the Natura 2000 site/s affected by the development and why has it been designated?
  - b. Are there any nationally designated sites (SSSI) or Ramsar sites that may be affected by the development?
  - c. What are the qualifying features of the Natura 2000 Site/s and/or the special interest features of any associated SSSI/Ramsar;
  - d. What are the Conservation Objectives for the Natura 2000 Site/s
- 3.2 The Ryburgh Neighbourhood Plan Area (RNA) contains the following designated European sites and nature conservation sites:
- The River Wensum Special Area of Conservation
  - Component SSSI: The Wensum Special Site of Scientific Interest
- 3.3 The District contains a number of European sites however none other than the River Wensum SAC are within 10Km of Ryburgh Village where the growth proposed in the neighbourhood plan is to be facilitated. Map 3, on the following page, depicts European sites and SSSIs with a 10km radius:



**European Sites**  
in relation to Ryburgh Neighbourhood Area

-  Ryburgh Neighbourhood Area
-  River Wensum Special Area of Conservation (SAC) & River Wensum Site of Special Scientific Interest (SSSI)

North Norfolk District Council  
Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN  
Tel: 01263 513811 Fax: 01263 515042

NOT TO SCALE

CB

23/01/2020

© Crown Copyright  
and database right  
2020  
Ordnance Survey  
100018623

Aerial Photos  
©Getmapping plc

Figure 8 - European Sites

## River Wensum Special Area of Conservation

- 3.4 The River Wensum is a naturally enriched, calcareous lowland river. The upper reaches are fed by springs that rise from the chalk and by run-off from calcareous soils rich in plant nutrients. This gives rise to beds of submerged and emergent vegetation characteristic of a chalk stream. Lower down, the chalk is overlain with boulder clay and river gravels, resulting in aquatic plant communities more typical of a slow-flowing river on mixed substrate. Much of the adjacent land is managed for hay crops and by grazing, and the resulting mosaic of meadow and marsh habitats, provides niches for a wide variety of specialised plants and animals
- 3.5 The River Wensum is a water course of plain to montane levels with floating vegetation often dominated by water-crowfoot, (qualifying habitat). The river supports a rich and abundant invertebrate fauna, diverse mollusc fauna and a diverse fish community, including native freshwater crayfish, (White-clawed (or Atlantic stream) crayfish, Desmoulin's whorl snail, bullhead and brook lamprey which act as the qualifying species. The River Wensum has been selected as a whole river SSSI as one of a national series of rivers of special interest as an example of an enriched, calcareous lowland river. With a total of over 100 species of plants, a rich invertebrate fauna and a relatively natural corridor, it is probably the best whole river of its type in nature conservation terms, although short stretches of other similar rivers may show a slightly greater diversity of species.
- 3.6 The features of special interest of the River Wensum SSSI are currently regraded as being in an 'unfavourable condition' (River Wensum Restoration Strategy, 2009).
- 3.7 The Conservation Objectives are, subject to natural change, to ensure that the integrity of the site is maintained or restored as appropriate, and to ensure that the site contributes to achieving the favorable 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.

## 4 Context / In Combination Effects

- 4.1 Existing Plans and proposals must be considered when assessing new plans or programmes for likely significant effects as they may create “in combination” effects.
- 4.2 The emerging North Norfolk Local Plan covers the administrative area of the District Council, with the exception of the areas that are within the designated Broad’s Area. The Broads Authority is the local planning authority for the designated Broads area. The emerging North Norfolk Local Plan consists of the Local Plan Part 1, May 2019, which will cover strategic policy in relation to key topics such as retail, housing, job creation and tourism, and the main allocations to deliver the identified growth needs for the District. The Local Plan Part one has been subject to an HRA to inform its future preparation.
- 4.3 The Local Plan interim HRA, May 2019, acknowledges that policies in the emerging Local Plan have been developed with the need to protect European sites understood, and as such the policies contain strong wording and supporting text that enables a conclusion of no likely significant effects for most of the policies. The appropriate assessment whilst providing actions for the next phase of plan making concludes that there are measures in progress that are capable of providing the necessary certainty required to conclude no adverse effects at the next iteration of the HRA. Such measures include the progression of the strategic mitigation strategy for recreation pressure across the Norfolk European sites, specific policy measures in relation to allocations in the Local Plan but outside the Ryburgh Neighbourhood Plan Area including precautionary check for any watercourse connections between allocations in the local Plan and European sites within 2.5km – no allocations exist in Ryburgh Neighbourhood Plan Area.
- 4.4 The assessment also identifies that the water quality of the River Wensum SAC is of key concern for the site but identifies that threats to the integrity are primarily related to agricultural practices<sup>6</sup>.
- 4.5 The HRA for the adopted Core Strategy was undertaken in 2007 and concluded that the policies did not result in any likely significant effects but highlighted the need for further assessment of site allocations in the separate Site Allocations Plan. The HRA for the site Allocations Plan was prepared in 2010. It assessed the potential impacts from each of the 98 sites across 24 settlements, finding that there were potential risks to European sites arising from both recreation pressure and potential deterioration of water quality - no allocations exist in Ryburgh Neighbourhood Plan Area in the adopted development plan, the Ryburgh neighbourhood Plan or the emerging Local Plan.

---

<sup>6</sup> HRA North Norfolk First Draft Plan Part 1 , 2019, para 5.25

## Recreational Impacts

- 4.6 Different types of European 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. Recreational pressure is likely to be generated by an increase in residents associated with the new housing but less so for employment development. Most types of European sites can be affected by trampling, which in turn causes soil compaction and erosion and the reduction on vegetation cover. Dog walkers can contribute to pressures on sites through nutrient enrichment via fouling. Nutrient poor habitats such as chalk grassland, heathland are particularly sensitive to the fertilising effects of dog faeces through inputs of phosphates and potassium. Most impacts occur close to paths. Disturbance of birds can adversely affect the condition and survival as the effects result in the birds spending unnecessary energy and detract from the bird's ability to feed. In addition, displacement can cause issues around increased pressure of other sites and in the case of ground nesting birds may increase the risk of leaving a nest along with eggs exposed to predators. In relation to public access conflict can arise between people and habitats in terms of compromising effective site management. Dogs rather than people are often the cause of worrying grazing animals.
- 4.7 In summary recreational use of a European site has the potential to:
- Cause damage to soils and vegetation through trampling and erosion;
  - Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl.
  - Cause eutrophication as a result of dog fouling;
  - Cause littering, giving rise to potential animal mortality, nutrient enrichment and small-scale pollution;
  - Exacerbate existing management difficulties, for example by grazing being restricted
- 4.8 As part of the evidence base for Local Plan documents, using the available growth scenarios at the time the Council in collaboration with the Norfolk Strategic Framework and through the Norfolk Biodiversity Partnership commissioned a series of visitor surveys to be undertaken by Footprint Ecology Limited at European protected sites across Norfolk in 2015 and 2016. This culminated in a report detailing the trends and patterns of visitors at various protected sites, including an assessment of how far people travelled to visit a particular site (or group of sites) and how often.
- 4.9 This report provides a comprehensive analysis of current and projected visitor patterns to European protected sites across Norfolk. The report is novel in that it combines data from multiple local authorities<sup>7</sup> to predict changes in recreation use as a result of new

---

<sup>7</sup> North Norfolk, Broadland, Norwich City, South Norfolk, Great Yarmouth, Breckland and Kings Lynn and West Norfolk District and Borough councils.

housing planned across Norfolk. The work was carried out during 2015 and 2016 at 35 agreed sites including Norfolk Valley Fens and the North Norfolk Coast.

4.10 Through analysis of visitor surveys it provides a strategic overview to aid the understanding of the relationship between population growth (including new housing growth and tourist growth) and the potential for impacts on internationally designated wildlife sites throughout Norfolk. The Study provides updated evidence to inform the preparation of Local Plans.

It is principally concerned with:

- establishing the number and behaviour of visitors at the designated sites;
- predicting increases in access by Norfolk residents;
- drawing analysis around routes on sites, and distance travelled and frequency of use.

4.11 All of which will help to make the links between new housing development and recreation use and provide evidence to inform Local Plan preparation including the development of appropriate monitoring and mitigation measures for these designated sites.

4.12 Key findings relating to housing growth associated with planned allocations showed

- 14% increase in access by Norfolk residents to the sites surveyed (in the absence of any mitigation).
- Across the region the projected impacts varied:
  - In North Norfolk the estimated increase in access was 9% (without mitigation).
  - The most marked increase was in the Brecks, where an increase of around 30% was predicted. For the Broads the figure is 14%; 11% for the East Coast; 15% for Roydon & Dersingham; 28% for the Valley Fens and 6% for the Wash.

(note these figures relate to the surveyed access points only and to visits by Norfolk residents).

4.13 With a median dog walk length of around 3km, it is considered that a housing allocation within 1km of a European site access point (i.e. freely available for public entry / use) is likely to result in an increased visitor use of that European site, especially for regular dog walking, by people walking to the European site. Housing allocations greater than 1km distant are less likely to generate increased visitor use from people walking to that site, and above 1.5km distance there is likely to be little or no increased visitor use by people walking to the entry point.

4.14 The report generally concludes that increased housing from allocations (as opposed to windfall) is unlikely to have a marked effect on access to European sites at distances beyond 10 km. The North Norfolk Coast is however the exception with it drawing from

inside and outside of Norfolk due to significant levels of tourism the links between housing growth and impacts are less clear.

- 4.15 Increased growth in the countryside is closely related to recreational pressure from increases in human population and access to sites, domestic animals, and light pollution (potentially on minor impacts on birds/bat behaviour). The potential urbanisation impacts of larger scale growth are most likely to occur when a European site is within 1 km of a settlement and walking / access is facilitated. The potential effects are also likely to be related to scale and site size for example a site of 100 dwellings is likely to generate a greater number of walking visitors than an allocation of 10dwellings<sup>8</sup>.
- 4.16 In relation to providing effective and satisfactory mitigation of these effects it is generally considered there are three stands
- A tariff based approach taken from residential, and other relevant accommodation that can be used for a variety of strategic mitigation measures designed to manage and or increase resilience to greater visitor numbers.
  - The provision of suitable alternative natural green space, SANGs, at a scale large enough to meet a range of needs
  - Identification and implementation of a wider programme of green infrastructure improvements in association with development, so that residents of existing and proposed housing have an alternative to European sites for regular recreational activities such as dog walking.

#### **Recreation Avoidance Mitigation Strategy, RAMS**

- 4.17 The Norfolk Authorities are progressing a Norfolk-wide study, the Green infrastructure & Recreational Impact Avoidance and Mitigation Strategy. This strategy, which is being developed under the guidance of Natural England is expected to set out a proposed approach to a tariff contribution from new development in the emerging Local Plan. This study may also provide useful evidence/guidance for a future SANGs strategy. The Council has also produced a green infrastructure background paper<sup>9</sup> to inform site allocations in the emerging Local Plan.

#### **Water Quality / Increased pressure on water resources**

- 4.18 The east of England has been identified by the Environmental Agency as a region of considerable pressure of water resources and has been identified as an area of serious water stress, for the purposes of Regulation 4 of the Water Industry (Prescribed Condition) Regulation 1999 (as amended).
- 4.19 Pressure on water resources resulting in reduction of water levels or flow in streams, rivers and waterbodies would be a likely consequence of increased water demand

---

<sup>8</sup> HRA Assessment GNDP Regulation 18 consultation December 2019

<sup>9</sup> Background Paper No 5, First Draft Plan May 2019

requiring greater water abstraction from ground water or surface water. Surface water abstraction could have a direct impact upon water levels and stream flow, ground water abstraction would potentially lead to reduced flows in any watercourses which derive a significant proportion of their water from spring flow. Wetland European sites may be impacted by becoming too dry to support the special interest feature. Water supply to North Norfolk is from the North Norfolk Coast Cromer Ridge chalk aquifer, outside the neighbourhood plan area.

- 4.20 Anglian Water in its 2019 Water Resources Management Plan have identified the relevant Resource Zones to North Norfolk and outlines how Anglian Water will maintain a sustainable balance between water supplies and demand over the next 25yrs. The assessment and plan takes into consideration planned and predicted growth as well as climate change. All resource zones are forecast to be in deficit to 2045 prior to measures in the Plan being implemented. Anglian Water, through the Plan are committed to manage water resources by managing demand, from existing and proposed customers, i.e. supplying less water per customer and by transferring water from other areas, with no increase in abstraction from existing bore holes and no new abstractions. The Norfolk Planning Authorises through the Strategic Framework, in conjunction with Natural England, Environment Agency and Anglian Water, recognises that Plans should contribute to long-term water resilience and are committed to introducing the optional higher water efficiency standards across all authorities in the County in line with Government's Building Regulations requirement of 110 litres water use per person per day. The Interim HRA that informed the emerging Local Plan identifies such a policy as an environmentally positive policy.
- 4.21 Specifically to the Ryburgh neighbourhood Plan water quality is a key concern for the site, and threats are primarily related to agricultural practices.

## 5 Screening Assessment: Test of Likely Significant Effect

- 5.1 The Ryburgh neighbourhood plan is not seeking any site allocations.
- 5.2 Covering the parished area of Ryburgh, the emerging Ryburgh neighbourhood plan focusses, amongst other things, on shaping development, and protecting, maintaining and enhancing the environment and amenity value. In particular, policies 4,5,6,7,8 and 9 ensure that landscape and the protection and enhancement of the environment ensuring that development minimises its impacts on the open countryside and environmental features through effective consideration both local and national /international habitat designations.
- 5.3 Policies that seek to positively address the environmental aspects of sustainable development- specifically those that address protection and enhancement of habitats and the ecological network and light pollution are likely to have a positive effect on the wider environment. The small scale of growth sought within the settlement of Great Ryburgh is such that the effects are likely to be localised but not significant.

### Assessment Matrix

- 5.4 The following key is used to assess the likely effects of the proposed policy on a sites qualifying features in table 1.

-  No likely significant effect (NLSE) on the site's qualifying features
-  Likely significant effect (LSE) on the site's qualifying features (with or without mitigation)
-  Uncertain likely significant effect

**Table 1: Assessment Matrix**

Neighbourhood Plan policy	Policy feature	Potential impacts/effects of the development on the European site and why?	
		Likely Effect Wensum Special Area of Conservation	Recommendations and opportunities
Policy 1 Traffic Safety	Encourages improvements in traffic safety designed to ensure that future HGV movements on the highway do not negatively impact highway safety	NLSE	Although primarily concerned with highway safety traffic HGV's can have an effect on air quality. The main airborne pollutants of concern in the context of their potential to give rise to adverse impacts upon European sites are oxides of nitrogen (NOx), ammonia (NH3) and sulphur dioxide (SO2). Air quality however is not identified as an attribute or target area for improvement in relation to the Es.
Policy 2 Safeguard Land for Public Access	Supports the provision of green infrastructure and enhanced public access	NLSE	The policy is concerned with a specific former railway, an environmentally positive policy and impacts are unlikely.
Policy 3 Infill Housing in Great Ryburgh	Ensures that development minimises impacts on open countryside by directing small infill growth to within the identified settlement boundary.	NLSE	The policy is qualitative and does not promote a quantum of development or specific locations within the settlement boundary. The limited scale of housing development envisaged through the policy would be unlikely to give rise to increased levels of NOx arising from increased vehicle movements. Aquatic interest is not affected by bankside recreation and public access to the river is in any case very limited. Threats are primarily related to agricultural practices. Any new housing of any

			type will need to be the subject of the emerging strategic mitigation Strategy being brought forward through the strategic policies of the Local Plan, which will form part of the overall development plan along with the Ryburgh Neighbourhood Plan. The small scale of growth sought within the settlement of Great Ryburgh is such that the effects are likely to be localised but not significant. As a precautionary measure wording should be added around proposals providing adequate information to support a project level HRA and potential mitigation as reviewed in the in combination effects section para 6.3
Policy 4 Landscape Character	Ensures that the local landscape character is considered in development proposals.	NLSE	An environmentally positive policy that can protect and enhance the natural environment
Policy 5 Protection and Enhancement of Local Habitats, Landscape and Amenity	Ensures that proposals demonstrate and align with local distinctiveness in relation to settlement character.	NLSE	An environmentally positive policy that can protect and enhance the natural environment
Policy 6 Dark Night Skies	Seeks to reduce night sky light pollution	NLSE	An environmentally positive policy that can protect and enhance the natural environment and amenity
Policy 7 Protection & enhancement	In combination with policy 8, seeks to ensure development proposals consider the ecological features and the potential effects on these in the development process with	NLSE	A policy that strengthens the protective nature of the Plan protecting and enhancing the natural environment.

of Local Habitats (1)	the primary aim of conserve and enhance both local and nation /international designations.		
Policy 8 Protection & Enhancement of Local Habitats (2)	In combination with policy 8, seeks to ensure development proposals consider the ecological features and the potential effects on these in the development process with the primary aim of conserve and enhance both local and nation /international designations.	NLSE	A policy that strengthens the protective nature of the Plan protecting and enhancing the natural environment. Designated sites, local assets, local, national and European designations all included in line with national policy and good practice
Policy 9 Ecological Network	Expresses support for the enhancement of ecological network in relation to development proposals	NLSE	Positive worded policy.
Policy 10 Open Land	Seeks to set a positive framework for around how proposals in identified important open land areas would/would not be supported	NLSE	Identified open land area includes the river Wensum SAC and as such restricts development in the riparian zone which acts as a healthy and functional habitat zone within the river corridor for the Whorl snail.
Policy11 Archaeology	Set criteria around further consultation with regard Historic records		Sets a requirement covering archaeological matters over and above existing Core Strategy policy EN8 requirements in relation to the determination of proposals. Does not adversely affect the integrity of the European site

## 6 In-Combination Effects

- 6.1 Existing Plans and proposals must be considered when assessing new plans or programmes for likely significant effects as they may create in combination effects.
- 6.2 The Ryburgh Neighbourhood Plan proposes no site allocations and only very limited growth through a tight settlement boundary and infill policy. Small scale growth is limited to locations within the settlement boundary with no more than 5 dwellings. It is however, possible that development proposals could come forward within the 1km of the European site. Other policies seek the safeguarding of access to public paths and promote a strong consideration around the potential impacts and harm on local and European sites. The emerging Local Plan and existing Core Strategy do not identify any site allocations for development in the parish. The aquatic interest of the River Wensum is however not affected by bankside recreation and public access to the river is in any case very limited, the Plan is unlikely to see any significant clusters of growth or increase in population and overall visitor numbers.
- 6.3 The Ryburgh neighbourhood plan is a lower order plan than the adopted Core Strategy and the emerging Local Plan which focuses on strategic issues such as housing growth and distribution. Whilst the neighbourhood plan seeks a small level of infill growth it is considered to be in general conformity with the Core strategy and emerging Local Plan. Core Strategy policies SS4 and EN9 require the consideration of conservation and enhancement of SSSI's and provide a policy base for decision making around proposals that would cause a direct and or indirect adverse effect to designated sites. The policy does not specifically reference European sites and as such in line with the precautionary approach wording should be added to RNP policy 3 around proposals providing adequate information to support project level HRA and potential mitigation.
- 6.4 It is therefore considered that the mitigation measures described above in relation to the emerging Local Plan and additional wording would be sufficient that the assessment is able to ascertain no in combination adverse effect upon the integrity of any European site in relation to this plan.

## **7 Overall Conclusion - Screening Outcome**

7.1 It is concluded that there are no adverse effects upon the integrity of any European site. This decision is subject to review following consultation with the statutory bodies.

### **Next Stages**

7.2 The outcome of this Screening Report is subject to review by the required statutory bodies, Environment Agency, Historic England and Natural England and North Norfolk District Council. The Screening Report and subsequent screening opinion may also need to be reviewed if significant changes are made to the emerging draft neighbourhood plan as a result of this review or any other evidence that informs a significant change to the Plan prior to Submission Stage, (Regulation 16). A Screening Determination report on whether the Ryburgh neighbourhood Plan does or does not require a habitat regulations assessment will be issued following receipt of advice from the statutory consultation bodies on this report.