

North Norfolk District Council

### **Strategic Environmental Assessment Screening Report for Consultation**

Holt Neighbourhood Plan – Emerging DRAFT Submission Version (March 2022)

May 2022 Final version for consultation

North Norfolk District Council Planning Policy Team

01263 516318 planningpolicy@north-norfolk.gov.uk Planning Policy North Norfolk District Council Holt Road, Cromer, NR27 9EN www.north-norfolk.gov.uk/Holtnp

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### Contents

1	Introduction	1
2	Legislative Background	2
	Holt Neighbourhood Plan	
4	SEA Screening	6
5	Assessment of the Emerging Holt Neighbourhood Plan (March 2022)	9
6	Screening Outcome	16

### 1 Introduction

- 1.1 In some circumstances a Neighbourhood Plan could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended, including through EU Exit legislation) and so require Strategic Environmental Assessment.
- 1.2 This Screening Report is designed to determine whether or not the content of the emerging Holt Neighbourhood Plan March 2022 requires a full Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004 as amended through EU exit legislation. It is based on the screening opinion request and the information provided on the emerging content of the plan as of March 2022. To avoid any doubt, this does not affect the Council's obligation to provide further advice on later stages of the emerging Neighbourhood Plan/SEA process which may subsequently arise if there are changes to the plan's content that could have an adverse effect upon the environment.
- 1.3 Strategic Environmental Assessment is the process by which environmental considerations are required to be fully integrated into the preparation of plans and programmes prior to their final adoption. SEA is a tool used internationally to improve the environmental performance of plans so that they can better contribute to sustainable development.
- 1.4 Establishing whether a Neighbourhood Plan takes into account SEA is an important legal requirement. One of the basic conditions<sup>1</sup> that will be tested by the independent examiner is whether the making of the Plan is compatible with European Union Obligations. This includes the Strategic Environmental Assessment Directive. This directive is transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations (2004)<sup>2</sup>. A Neighbourhood Plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. Whether a Neighbourhood Plan requires a strategic environmental assessment, and the level of detail needed, will depend on what is proposed in the draft Neighbourhood Plan.
- 1.5 In meeting these obligations, the national PPG sets out that an initial screening stage is required to establish whether a Plan is likely to have significant environmental effects. As the "responsible body" this report sets out North Norfolk District Council's conclusions in respect the emerging policy areas of the Neighbourhood Plan.

<sup>&</sup>lt;sup>1</sup> <u>https://www.gov.uk/guidance/neighbourhood-planning--2</u>

<sup>&</sup>lt;sup>2</sup> <u>http://www.legislation.gov.uk/uksi/2004/1633/contents/made</u>

1.6 The screening report will seek the views of the statutory consultees<sup>3</sup> and their comments will inform the final screening determination.

### 2 Legislative Background

- 2.1 The basis for Strategic Environmental Assessment legislation is European Union Directive 2001/42/EC<sup>4</sup> which requires a Strategic Environmental Assessment to be undertaken for certain types of plans or programmes that could have a significant environmental effect. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, commonly referred to as the SEA Regulations<sup>5</sup>. The Government published 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005)<sup>6</sup>, which provides more detailed guidance on how an SEA should be carried out.
- 2.2 The SEA Regulations include a definition of 'plans and programmes' to which the regulations apply, and which programmes are required by legislative, regulatory or administrative provisions.
- 2.3 A Neighbourhood Plan is not required by legislative, regulatory or administrative provisions. It is an optional process under the provision of the Town and Country Planning Act 1990 (subsequently amended by the Localism Act 2011). However, once a Neighbourhood Plan is 'made' it becomes part of the statutory development plan for the area to which it applies. As such, it therefore forms part of a plan that is required by legislative provisions.
- 2.4 The Neighbourhood Plan therefore triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the 'responsible authority' being the authority by which or on whose behalf the plan is prepared. Before making a determination, the responsible authority shall:
  - a) Take into account the criteria specified Annex 2 of SEA Directive 2001/42/EC and Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004:
  - b) Consult the consultation bodies.
- 2.5 The consultation bodies are defined in section 4 of the SEA Regulations (as amended through EU Exit legislation. As the responsible authority, North Norfolk District Council will seek opinions from the statutory consultation bodies: Historic England; the Environment Agency; and Natural England on this screening report prior to updating and issuing its screening Determination.

<sup>&</sup>lt;sup>3</sup> Historic England, Natural England & Environment Agency

<sup>&</sup>lt;sup>4</sup> <u>http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042</u>

<sup>&</sup>lt;sup>5</sup> http://www.legislation.gov.uk/uksi/2004/1633/contents/made

<sup>&</sup>lt;sup>6</sup> <u>https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance</u>

- 2.6 In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9(1)), the Council must determine if a plan requires an environmental assessment. This process is commonly referred to as a "screening" assessment. Where the Council determines that a SEA is not required, then the Council must, under Regulation 9(3), prepare a statement setting out the reasons for this determination. Where it is determined that proposals in a Neighbourhood Plan are likely to have significant environmental effects, the Neighbourhood Plan may require a strategic environmental assessment. Draft Neighbourhood Plan proposals should then be assessed to identify, describe and evaluate the likely significant Environmental effects as prescribed in regulation 12 (2)& (3) of the above legislation.
- 2.7 In accordance with Regulation 9 of the SEA Regulations 2004, Holt Parish Council (the qualifying body) has requested North Norfolk District Council (NNDC), as the responsible authority, to consider whether an environmental assessment of the emerging Neighbourhood Plan is required due to significant environmental effects.
- 2.8 Whether a Neighbourhood Plan requires an SEA, and if so, the level of detail needed, will depend on what is proposed in the Neighbourhood Plan. The national PPG<sup>7</sup> suggests that an SEA may be required, 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; and
  - The Neighbourhood Plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.
- 2.9 It remains the responsibility of the Local planning authority to ensure that all the regulations appropriate to the nature and scope of a <u>Neighbourhood Plan</u> proposal submitted to it have been met in order for the proposal to progress. However it remains the qualifying body's responsibility to make every effort to ensure the resultant draft neighborhood plan that it submits to the local planning authority:
  - Meets each of the basic conditions;
  - Has been prepared in accordance with the correct process and all those required to be consulted have been;
  - Is accompanied by all the required documents<sup>8</sup>
- 2.10 The Council has an adopted Local Plan which includes a Core Strategy, 2008, Site Allocations, 2011. Adopted supplementary planning documents covering landscape

<sup>&</sup>lt;sup>7</sup> <u>https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal</u> para 013 Ref ID: 11-013-20140306

character, sensitivity to renewable energy and design are also published and provide further guidance. An updated single Local Plan was consulted on at Regulation 19 stage as the Proposed Submission Plan between January and March 2022 and is at an advance stage. Accompanying both adopted and emerging Plans are iterative Sustainability Appraisal Reports and Habitat Regulation Assessments. The Local Plan Sustainability Appraisals (SA) incorporates the requirements of the SEA Regulations, which implements the requirements of the SEA Directive on the assessment of the effects of certain plans and programmes on the environment and as such the strategies and policies were tested against the sustainability objectives (and accompanying questions) as published in the final SA Reports and demonstrates that the potential environmental effects have been given full consideration together with social and economic issues during the development of the Plans.

### 3 Holt Neighbourhood Plan

- 3.1 Holt Town Council is producing a Neighbourhood Plan for Holt, in order to set out the vision, objectives and policies for the development of the parish, within the context of the Local Plan and emerging updated Local Plan. This SEA screening assessment reviews the emerging Draft neighbourhood plan dated March 2022, following the previous regulation 14 pre submission consultation under taken in January / February 2018. The emerging Draft is significantly reworked to reflect feedback and further advice.
- 3.2 The Neighbourhood Plan includes a range of policies covering the Holt Neighbourhood Plan area as mapped in appendix 3. A number of policies relate to the full Neighbourhood Plan area whilst others are area/location specific. <u>The Neighbourhood Plan does not allocate specific sites for development.</u>
- 3.3 The policies in the Holt Neighbourhood Plan are listed in Table 2 below. An assessment of whether each policy is likely to have a significant effect on European protected sites is included in section 5 of this report

Holt 1	Design Guidance
Holt 2	Housing Mix & Tenure
Holt 3	Green Infrastructure
Holt 4	Employment Growth in Holt
Holt 5	Community Facilities
Holt 6	Connectivity in and around Holt
Holt 7	Open Spaces

Table 2: List of Neighbourhood Plan Policies March 2022.

### 4 SEA Screening

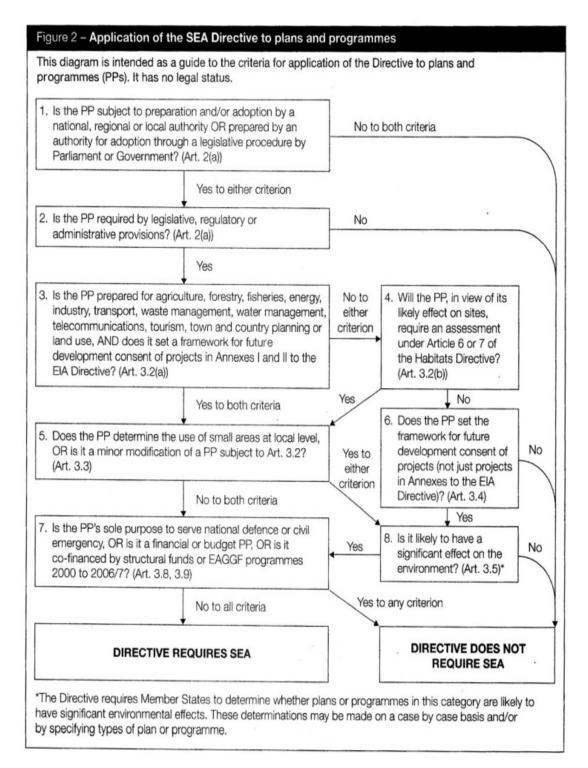
- 4.1 The process for determining whether or not an SEA is required is called screening. The SEA screening is a two stage interrelated process. The first part considers the Neighbourhood Plan against the SEA assessment flow chart set out in the national guidance "A Practical Guide to the Strategic Environmental Assessment Directive"<sup>9</sup>, (Paragraph 2.18, Figure 2, ODPM, 2005). The second part of the assessment is required in order to answer specific questions contained in the above Table 1, specifically question 8 and considers whether the Neighbourhood Plan is likely to have a significant effect on the environment, using criteria drawn from the EU SEA Directive and Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004<sup>10</sup>.
- 4.2 The regulations state that before making a determination the three statutory consultation bodies, The Environment Agency, Natural England and Historic England, must be consulted.
- 4.3 The process taken follows the application of the SEA Directive as set out in Figure 2 of 'A practical guide to the Strategic Environmental Assessment Directive' followed by application of the criteria determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC (Annex 11) and Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004:

<sup>&</sup>lt;sup>9</sup> <u>https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance</u>

<sup>&</sup>lt;sup>10</sup> <u>http://www.legislation.gov.uk/uksi/2004/1633/contents/made</u>

Figure 2: Application of the SEA Directive to plans and programmes

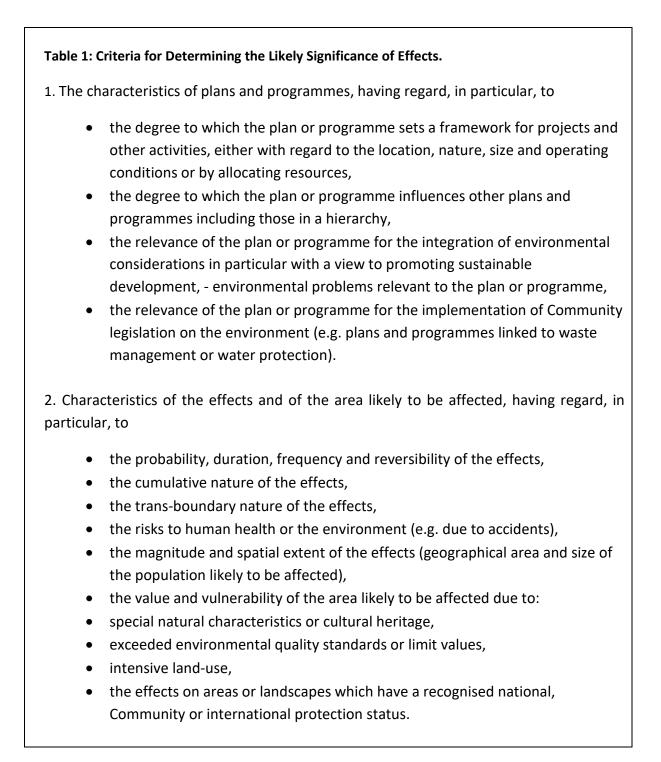
The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required



Source: A Practical Guide to the Strategic Environmental Assessment Directive (2005)

Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004 sets out the criteria for determining likely significant effects as follows:

Table 1: Criteria for determining the likely significance of effects



Source: Annex 11 of SEA Directive 2001/42/EC and Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004:

# 5 Assessment of the Emerging Holt Neighbourhood Plan (March 2022)

STAGE	Y/N	REASON
1. Is the Neighbourhood Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The preparation and adoption of the Neighbourhood Plan is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The NP is being prepared by the parish council (as the "relevant body") and will be "made" by North Norfolk District Council as the local authority subject an independent examination and community referendum. The preparation of NP's is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012, (as amended) and the Neighbourhood Planning (referendums) Regulations 2012 ( as amended).
<ul> <li>2. Is the Neighbourhood Plan required by legislative, regulatory or administrative provisions?</li> <li>(Art.2(a)</li> </ul>	Y	Whilst the Neighbourhood Plan is not a requirement of the legislative, regulatory or administrative process It is an optional process under the Town and Country Planning Act 1990 (amended by the Localism Act 2011). However, once a Neighbourhood Plan is "made" and becomes part of the statutory Development Plan for the area to which it applies and as such. These are directed by legislative processes and it is forms part of a plan that is required by legislative provisions
3. Is the Neighbourhood 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? (Art 3.2(a))	Y/N	A Neighbourhood Plan can include these policy areas and could provide, at a Neighbourhood Area level, the framework for development that would fall within Annex II of the EIA Directive. Developments that fall within Annex I are 'excluded' development for Neighbourhood Plans (as set out in the Localism Act 2011 and Section 61(k) of the Town and Country Planning Act 1990 (as subsequently amended). The Neighbourhood Plan is being prepared to set out a framework for town and country planning and "land use" at the local level within the parish of Holt which is within the wider North Norfolk Council area. Its role is to complement the higher order strategic Framework that already exists for land use planning across the District. The strategic framework for development is set by the adopted Core Strategy and the emerging Local Plan of North Norfolk District Council. Holt is selected as a growth settlement in the adopted Core Strategy and the emerging

5.1 Application of the SEA Directive to plans and programmes.

STAGE	Y/N	REASON
		Local Plan. The Local plan identifies a settlement boundary for Holt as well as the town center boundary and primary shopping area. The Local Plan also identifies suitable residential allocations and a number of open space designations and sets the strategic approach to development in the surrounding countryside as well as a number of other strategic policy areas covering environment, social and economic policy areas.
		The Neighbourhood Plan process requires alignment to be in general conformity with these, the assessment of which is part of the iterative process. The neighbourhood plan makes no material change to these strategic policies and is not considered to impact on other strategic designations. The adopted and emerging Local Plan has been subject to both sustainability appraisal (including strategic environmental assessment) and Appropriate Assessment under the Habitat Regulations
		The Neighbourhood Plan does not anticipate being the tool to manage development of the scale and nature envisaged by Annex I and Annex II of the EIA Directive.
4. Will the Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the habitats Directive?(Art.3.2(b))	N	A Neighbourhood Plan could potentially have impacts on sites covered by the Habitats Directive. The Neighbourhood Plan Area includes a site relating to the Norfolk Valley Fens SAC. A number of other SACs and SPA are within 20km and include the North Norfolk Coast SAC/SPA, The Wash & North Norfolk Coast, SAC, River Wensum, SAC, Overstrand Cliffs SAC and the Greater Wash SPA.
		The North Norfolk plan level HRA work undertaken for the adopted Site Allocations document, 2011 concluded that the site allocations set out within the plan would not cause an adverse effect on any of the European sites, with the commitment of North Norfolk District Council to progress key measures at a strategic level in relation to recreation.
		The North Norfolk plan level HRA work undertaken for the adopted Site Allocations document, 2011 concluded that the site allocations set out within the plan would not cause an adverse effect on any of the European sites, with the commitment of North Norfolk District Council to progress key measures at a strategic level in relation to recreation. The site have since been built out.

STAGE	Y/N	REASON
		An Interim Habitats Regulation Assessment was carried out as part of North Norfolk District Council emerging Local Plan Regulation 18 consultation in May 2019 and 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 emerging policies, concluding that there are measures in progress capable of necessary strategic measures to conclude NLSE. The final HRA / appropriate assessment December 2021 for the preferred sites for allocation in the emerging Local plan concluded Urban effects issues could be addressed at project level HRA stage through detailed design considerations and as this was in the policy requirements adverse impacts on the North Norfolk Valley Fens SCA could be ruled out when the sites came forward for development. Similarly any hydrological effects are considered to be able to be mitigated through sustainable drainage solutions at design stage and the HRA concluded the wording of the relevant site allocations policies ensures that this requirement is addressed. In terms of recreational impacts the HRA concludes that the strategic mitigation is embedded within the North Norfolk Local Plan through the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy, GIRAMS which provides the means to address the cumulative impacts from growth. The site allocations are required to provide appropriate contributions towards the mitigation action plan identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy, GIRAMS and the HRA concluded that the necessary wording is included in the site policies for Holt to enable the HRA to rule out adverse effects in combination in relation to recreational effects.
		A HRA screening report for the Holt Neighbourhood Plan, HNP ahead of consultation with the statutory bodies concludes on that that there are likely to be no adverse effects upon the integrity of any European sites from the policies contained in it. This will be reviewed on receipt of comment from the statutory bodies.
		The intention is that the Neighbourhood Plan will be in general conformity with the existing Local Plan, It does not allocate land for built development over and above the North Norfolk Local Plan which has been subject to Sustainability Appraisal including Strategic Environmental Assessment, SEA

STAGE	Y/N	REASON
		and Appropriate Assessment under the Habitats Regulations as detailed above
5 Does the Neighbourhood Plans determine the use of small areas at local level, Or is it a minor modification of a PP subject to Art 3.2? (Art3.3)	Y	A Neighbourhood Plan can determine the use of small areas at a local level. The Neighbourhood Plan for Holt focuses on qualitative and supportive policies. The Plan proposes no site allocations, sets no growth target and focuses on further minor local policy considerations.
<ul> <li>6. Does the Neighbourhood</li> <li>Plan set the framework for</li> <li>future development consent</li> <li>of Projects (not just projects in</li> <li>Annexes to the EIA Directive)?</li> <li>(Art 3.4)</li> </ul>	Y	Once "made" a Neighbourhood Plan is to be used by NNDC in helping determine future planning applications. Collectively the wider Development Plan forms the statutory framework and this NP will form part of that in relation to the defined neighbourhood plan area, NPA. The intention is that the Neighbourhood Plan will focus on shaping how development comes forward at a local level and be used together with the adopted higher order Plan form part of the Development Plan for the neighbourhood plan area.
8. Is it likely to have a significant effect on the environment	N	From the application of criteria for determining the likely significant effects below it is considered it is unlikely that there will be any significant effect.

## 5.2 SEA Screening Stage 2: SEA Directive Article 3(5) Annex II – Application of Criteria for determining the likely significance of effects of a Neighbourhood Plan

Criteria in Annex 11 of the SEA Directive	Response	Is there a significant effect?						
(1) Characteristics of the pla	(1) Characteristics of the plan 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 strategic framework for development is set by the adopted Development Plan and the emerging Local Plan of North Norfolk District Council. The Neighbourhood Plan does not seek to deliver any growth or locational requirements	No						
The degree to which the plan or programme influences other plans or	The Neighbourhood Plan will be adopted alongside the higher order Local Plan and form part of the District's Development Plan. The Neighbourhood Plan will expand	No						

programmes including	upon, providing supplementary information on a local	
those in a hierarchy;	scale.	
The relevance of the plan	Any Development that comes forward through the NP will	No
or programme for the	be subject to environmental considerations of the Core	
integration of	Strategy and the Local Plan when adopted. These policies	
environmental	have been subject to sustainability appraisal and HRA, and	
considerations in particular	are in place to ensure that sustainable development is	
with a view to promoting	achieved.	
sustainable development;		
Environmental problems	There are not considered to be any significant	No
relevant to the plan or	environmental problems which are specific to the area,	
programme;	above and beyond those considered and addressed in the	
	Local Plan. The Neighbourhood Plan includes policies	
	which provide seek positive consideration to	
	environmental protection.	
The relevance of the plan	The implementation of community legislation is unlikely to	No
or programme for the	be affected by the Neighbourhood Plan.	
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 Neighbourhood Plan does not bring forward growth and as such is unlikely to bring forward development of an extent that would result in a significant intensification of Local land Use	No
The cumulative nature of the effects;	It is considered unlikely that the degree of development facilitated through the Neighbourhood Plan when combined with the Core Strategy and the emerging Local Plan will introduce significant cumulative environmental effects. The Local Plan and emerging Local Plan has been subject to full SEA and Habitats Regulations and a Sustainability Appraisal. The Neighbourhood Plan impacts on the integrity of the European sites are considered to be limited as the neighbourhood plan does not seek to increase in population and overall visitor numbers, and remains largely qualitative.	No
The trans-boundary nature of the effects;	The Neighbourhood Plan policy areas outlined provide supplementary policy areas on a local scale. European	No

The risks to human health or the environment (e.g. due to accidents);	sites are broader than the NPA and as such there is the potential for impacts beyond the NPA. However, given the qualitative nature of the NP and the lack of scale and level of growth proposed it is considered that the trans- boundary effects would not be significant. The Neighbourhood Plan is unlikely to produce any significant effects in relation to this criteria	No
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Neighbourhood Plan covers the parish of Holt. The 2011 census recorded the usual resident population of as 3988. This is in comparison to the usual resident population of 101,499 of North Norfolk and an area of 96,333 hectares. The small spatial extent and the magnitude of the population affected are not considered significant for the purpose of the SEA.	No
The value and vulnerability of the area likely to be affected due to: i) Special natural characteristics or cultural heritage; ii)Exceeded environmental quality standards or limit values iii)Intensive land use	<ul> <li>i) The Plan Area contains a number of listed buildings and contains the Holt Conservation Area and is part of the wider Glaven Valley Conservation Area. The Neighbourhood Plan by virtue of the "basic conditions" will however be in general conformity to the existing Development Plan, and emerging Local Plan which contains detailed policies on the Historic Environment across the District to ensure that they are not vulnerable to significant impacts from development.</li> <li>ii) The Neighbourhood Plan is unlikely to result in exceedance of environmental quality standards, such as those relating to air, water, and soil quality.</li> <li>iii) The Neighbourhood Plan is unlikely to bring forward development of an extent that would result in a significant intensification of Local land Use.</li> </ul>	i) No ii) No iii) No
The effects on areas or landscapes which have a recognised national, Community or international protection status.	The Plan Area includes listings which reflect the cultural and heritage value of the area such as listed buildings and conservation area. Both the LP and the NP have policies that require the consideration of such assets.	No

#### **Habitat Regulations**

- 5.3 The Neighbourhood Area (NPA) contains Holt Lowes which is part of the Norfolk Valley Fens SAC and classed as a European site
- 5.4 A number of other European sites are within 20km and include the North Norfolk Coast SAC/SPA, The Wash & North Norfolk Coast, SAC, River Wensum, SAC, Overstrand Cliffs SAC and the Greater Wash SPA.
- 5.5 A HRA screening has been carried out on the emerging neighbourhood plan and has been used to inform this SEA screening. The screening is subject to consultation with the statutory bodies and the interim conclusion is that it is considered that the NP would have no likely adverse effects on the integrity of the European sites.

### 6 Screening Outcome

- 6.1 As a result of the assessment in section 5, it is considered that it is unlikely to be any significant environmental effects from the implementation of the proposals in the emerging Draft Neighbourhood Plan for Holt. As such it is considered under the Regulation9(1) of the Environmental Assessment of Plans and programmes Regulations 2004, that the emerging draft neighbourhood plan as of March 2022 does not require an SEA to be undertaken.
- 6.2 The outcome of this screening report will be subject to review by the statutory bodies, Natural England, Historic England and the Environment Agency as well as North Norfolk District Council. The screening report and subsequent screening opinion may also need to be reviewed if significant changes are made to the neighbourhood plan following this review. or any other evidence that informs a significant change to the Plan prior to Submission Stage, (Regulation 16)

### **Next Stages**

- 6.3 A Habitats Regulations Assessment screening has also been undertaken which has informed this SEA screening. It is concluded that there are no likely adverse effects upon the integrity of any European site. This decision is subject to review following consultation with the statutory bodies.
- 6.4 A Screening Determination report on whether the Holt neighbourhood plan does or does not require an SEA will be issued following receipt of advice from the statutory consultation bodies on this report and the HRA screening.

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