

## Habitat Regulations Assessment – screening

The project being assessed:

Hybrid planning application - 1) Full application for the creation of a new vehicular access onto Station Road, and entrance to a new primary school, 2) Outline application for up to 375 dwellings (including 112 affordable homes), and the provision of land for a new primary school, land for ecological mitigation and open space and associated infrastructure (as amended).

European sites and location in relation to the development site:

Breckland Special Protection Area (SPA) The nearest component sites are 4.3km to the east (Breckland Forest SSSI), 1.8km to the north-east (Breckland Farmland SSSI), 3.7km to the south-east (Lakenheath Warren SSSI)

Breckland Special Area of Conservation (SAC) The nearest component sites are 2.2km to the south (RAF Lakenheath SSSI) and 3.7km to the south-east (Lakenheath Warren SSSI).

Qualifying features and conservation objectives:

Breckland Special Protected Area (SPA) qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting internationally important populations of Stone Curlew *Burhinus oedicanus*, Woodlark *Lullula arborea* and Nightjar *Caprimulgus europaeus*.

Breckland Special Area of Conservation (SAC) is designated for the habitats supported. Habitats qualifying for SAC designation in the two component sites include heathland and calcareous grassland only.

Qualifying Features:

H2330. Inland dunes with open *Corynephorus* and *Agrostis* grasslands; Open grassland with grey-hair grass and common bent grass of inland dunes

H4030. European dry heaths

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*); Dry grasslands and scrublands on chalk or limestone

Is the plan or project directly connected with or necessary to the management of the site for nature conservation?

No, the proposal is not necessary for the management of the European sites

Is the qualifying feature likely to be directly affected?

The development is located outside of the SPA and is outside of the 400m constraint zone for Woodlark and Nightjar and the 1500m Stone Curlew constraint zone. However the eastern edge of the site is located within the frequent nesters constraint zone which has been drawn to protect Stone Curlew breeding on farmland outside of the SPA but considered to be part of the Breckland population. The Forest Heath Core Strategy policy CS2 requires that proposals for development within these areas will require a project level HRA. As part of the HRA process available Stone Curlew nesting records have been assessed in the determination of likely significant effects along with Stone Curlew survey of the development site and surrounding farmland.

A buffer has been drawn on the eastern side of the site, shown on the submitted concept plan as an ecology zone, where no built development would take place. This has been taken into account in association with the specific locations of Stone Curlew nesting records within 1.5km of the new edge of the development.

The RSPB have expressed concern about the application because built development is proposed within the frequent nesters constraint zone. In general the element of the site that falls within the frequent nesters constraint zone is shown as the ecology zone and this would not include built development. Only a very small part of the constraint zone would be in the developable area and this is largely screened from the closest nest sites by the existing employment area.

No direct likely significant effect on the SPA have been identified

The site is located outside of Breckland SAC and outside the 200m constraint zone for RAF Lakenheath SSSI. This site is within the fenced airbase with no access for the public with no risk of impacts from fly tipping, trampling or other anti-social behaviour.

No direct likely significant effect on the SAC have been identified

#### Is the qualifying feature likely to be indirectly affected?

The potential for indirect recreational effects on the SPA associated with increased residential properties has been considered. The concept plan for the site shows an ecology buffer located to the north and east of the development site; there is potential for this land to be designed such that it provides suitable alternative natural green space which would divert the public from travelling to use the SPA as their local green space. The buffer would also support pedestrian access and link to other footpaths. This would provide opportunities for dog walking routes within the site; such routes are indicated on the concept plan; a walk around the periphery of this site and the adjacent Rabbithill Covert would be approximately 2km. In addition to the ecology buffer the development would also deliver public open space as required by the FHDC open space SPD. The acceptability of the scheme relies on the quality and connectivity of the proposed open space /green space, a proportion of which should be available when the first dwellings are occupied. Information on the layout and connectivity and delivery program of all the public open space to be delivered must form part of the remedial matters secured by condition.

The site is connected to the Public Rights of Way network by Sandy Drove; located to the south east of the site. This PRow connects to Poshpoors Fen and the farmland beyond. An obvious circular walk which would be attractive to dog walkers leads to Maidscross Hill SSSI and LNR and potentially returns via village roads; a distance of approximately 5km which is somewhat longer than would normally be regarded as a daily walk. There is currently no footpath link between the site and the village centre as the existing footpath on Station Road terminates close to Drift Road; however it is anticipated that a walking route to the village would be part of the proposals and could be secured by condition or legal agreement.

The concept plan shows a pedestrian link into the agricultural land to the north west of the site however there is currently no PRow in this area and connectivity

here cannot be relied on. An alternative walk of a similar length to the Sandy Drove route, but avoiding Maidscross Hill could be created if a footpath was secured along Station Road to the Cut Off Channel and then using the existing PRoW on Whitefen Track and via Sharpes Corner. This route would need to be secured by a legal agreement. An additional link to Lakenheath Fen would also be beneficial if it were achievable

If these measures are implemented it is considered that indirect likely significant effect on the SPA can be screened out

#### Are there any in-combination effects?

The in-combination effects of the project have been considered.

Planning applications registered with the local planning authority and being considered in Lakenheath at the current time including projects published for consultation but prior to application:

- a) Rabbit Hill Covert, (81 dwellings)
- b) Land West of Eriswell Road, Lakenheath(140 dwellings)
- c) Land off Briscow Way(67 dwellings)
- d) Land North of Broom Road (132 dwellings)
- e) Land adjacent to 34 Broom Road (120 dwellings)
- f) Land North of Station Road (375 dwellings and a school)
- g) Land at Little Eriswell (550 dwellings and a school)

The total number of dwellings currently being considered significantly exceeds the total which was tested in the FHDC Core Strategy Habitats Regulation Assessment which for Lakenheath was 670 homes. The concern is that whilst alone each of the applications may not have an impact; for this number of dwellings within the settlement, in-combination effects need consideration. The main issues are in-combination recreational effects on the SPA and the potential requirement for road improvements close to the SPA to deal with any increase in traffic movements.

Natural England's internal advice on in-combination effects states that it is only the effects of those plans and projects that are not themselves significant alone which are added into an in combination assessment. The assessment should only include those that genuinely result in a combined effect, which impairs the ability of an interest feature to meet its conservation objectives. In this regard the application for 550 dwellings at Little Eriswell which is accompanied by an EIA and HRA can be excluded from in-combination impact assessment.

The distance of this site from the SPA and SAC is such that it is unlikely that there would be a significant change to current use of paths within the SPA from residents walking out of their houses, however there is potential for use of footpaths outside of the SPA but within farmland potentially used by Stone Curlew; for the application site this has been assessed and measures identified therefore in-combination effects on this matter need no further consideration. The main concern is that residents from all of the sites drive to Breckland Forest SSSI/Breckland SPA and to Breckland SAC for recreation and in particular to exercise their dogs in the absence of accessible local green space. Natural England has recommended that the provision of additional natural green space

in the settlement which is well connected to the existing PRow network would divert residents from using the SPA in this way. The proposals will make a significant contribution to the availability of green space in the northern part of Lakenheath and there is potential, because of the size and location of this green space adjacent to the Cut Off Channel, and because there is potential for it to be well linked (by improvements to the footpath network) that these measures will contribute to an overall strategy to reduce recreational pressure on the SPA.

FHDC Core Strategy proposes a total of 6400 homes in the district for the period 2001-2021 and this was tested in the HRA which recommended measures to avoid in-combination effects with other plans including a mitigation and monitoring strategy. This strategy is being considered alongside the current local plan Single Issue Review and Site Allocations Local Plan. In the absence of this supporting information the proposals have been considered in-combination with other plans which include development plans for those authorities around Breckland SPA and SAC (St Edmundsbury, Kings Lynn and West Norfolk, Forest Heath and Breckland). In-combination impacts are largely concerned with Woodlark and Nightjar given that there is limited access to farmland where Stone Curlew breed and in other areas such as heathland and grassland sites, CRoW access restrictions will be in place and enforced. Thetford Forest is a large area, surrounded by relatively low levels of housing, and at present it seems apparent that recreational pressure may be adequately absorbed by the Forest. However taking a precautionary approach and in accordance with the requirements of Article 6(2) of the Habitats Directive to take a proactive approach to avoiding the deterioration of populations of species for which the SPA is classified, and the habitats upon which the bird interest features rely, before that deterioration is actually found to be occurring. There is currently no strategic monitoring strategy in place however, monitoring associated with this development would be appropriate. Monitoring the success of the site as a suitable alternative natural greenspace would inform future decision making in respect to strategic mitigation.

The concern in relation to in-combination traffic impacts is that road improvements will be required to roads and junctions close to or adjacent to the Breckland SPA or SAC. There are two junctions where the potential for effects has been identified as follows; B1112 / A1065 priority cross-roads, and Wangford Road / A1065 Brandon Road signalised junction. An overview of the cumulative traffic studies undertaken on behalf of the local highway authority to assess the impact of the various proposals has been published (7 June 2016). This confirms that the level of proposed development being considered in Lakenheath could be delivered without any effects on the Wangford Road / A1065 Brandon Road signalised junction. With regard to the B1112 / A1065 priority cross-roads, the study indicates that 663 dwellings (the total within the submitted planning applications that are being supported by the council) could also be accommodated and would not trigger improvements to the junction, however development amounting to 1465 dwellings would result in a severe traffic impact on this junction and hence mitigation would be required. The identified mitigation would be advanced warning signage and significant in-combination effects are not likely.

If these measures are implemented it is considered that in-combination likely significant effects on the SPA can be screened out.

**Conclusion:**

If the measures above are implemented alongside the proposed development it is considered that likely significant effect on any European site can be screened out. Further HRA will be required at the reserve matters and detailed planning application stage.

**Documents referred to:**

- Lakenheath North Habitats Regulations Assessment – Applied Ecology November 2015
- Land at Lakenheath North Extended Phase 1 Habitat Survey October 2014- Applied Ecology Ltd
- Land at Lakenheath North Extended Phase 2 Habitat Survey September 2015 - Applied Ecology Ltd
- NE comments and letters of 11/01/2016 , 4/06/15, 16/10/15, 27/01/15
- RSPB letters of 16/12/14 and 20/01/16
- Lakenheath North - Concept plan 0012/7.8.12/0001
- Visitor survey results from Breckland SPA – Footprint Ecology 2011
- SWT letter of 11/12/15
- Richard Buxton letter of 25 January 2016
- Landscape partnership letter of 22 January 2016
- Forest Heath District Core Strategy (adopted 2010 )
- Habitats Regulations Assessment of FHDC Core Strategy (March 2009)
- St Edmundsbury Borough Council Rural Vision 2031, St Edmundsbury Borough Council Rural Vision 2031
- Kings Lynn and West Norfolk Core Strategy (adopted 2011)
- Breckland Core Strategy (adopted 2009) and Site Specific policies and Proposals Document (adopted 2012)
- Lakenheath Cumulative Traffic Study – Study Overview AECOM 7 June 2016

JMF 5.07.16

Approved: