

**Land West of Eriswell Road****Habitat Regulations Assessment – screening**

Residential development of up to 140 dwellings with associated open space provision, landscaping and infrastructure works. (Major Development, Departure from the Development Plan and Development Affecting a Public Right of Way)

**European sites and location in relation to the development site:**

Breckland Special protection Area (SPA) The nearest component sites are 3.6km to the east (Breckland Forest SSSI), 3.5km to the north-east (Breckland Farmland SSSI), 2.1km to the south-east (Lakenheath Warren SSSI), and 1.9km to the south-east (Breckland Farmland SSSI)

Breckland Special Area of Conservation (SAC) The nearest component sites are 425m to the east (RAF Lakenheath SSSI) and 2.1km 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

S1166. *Triturus cristatus*; Great crested newt

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 not within the 400m buffer for woodlark and nightjar or the 1500m Stone Curlew buffer zone.

The site is located within the revised buffer surrounding around those parts outside of the SPA which have supported 5 or more nesting attempts by the Stone Curlew. Recent stone curlew data (2011-2015 inclusive) were used to review the constraint zones relating to supporting habitat outside the SPA. However in advising on direct impacts of this planning application upon the SPA, Natural England paid full regard to the relevant nesting records which also informed the revised nesting buffers. Accordingly, the updated buffers (which

have now caught up with the source nesting records) do not affect Natural England's advice nor the Councils HRA screening. In addition the development is screened from the SPA by existing development and is separated from the SPA and associated stone curlew habitat by the B1112 Eriswell Road. No significant direct effects are likely

The site is located outside of Breckland SAC and beyond the 200m buffer; RAF Lakenheath SSSI is within the fenced airbase with no access for the public and consequently 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 impacts on the SPA associated with increased residential properties within the vicinity has been considered. The indicative plan for the site provides opportunities for dog walkers within the site to reduce the need for dogs to be exercised on more sensitive sites. In addition this site is immediately adjacent to the playing fields which would also be available for informal recreational use. There are a number of footpaths in the area available to for public access. The increase in population resulting from this development is relatively small and no additional significant effects are likely from residents walking or driving into the SPA as a result of the proposed development alone.

**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 are:

- 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.

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. Assessment of this application alone concluded that significant effects are unlikely. The potential for in-combination effects to occur is most likely with other adjacent developments in the north and to the east of Lakenheath. In addition there is concern that residents from all of the sites drive to the forest and heathland elements of Breckland SPA for recreation and in particular to exercise their dogs in the absence of accessible local green space.

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 is being developed alongside the current local plan Single Issue Review and Site Allocations Local Plan.

In 2010 a visitor survey of Breckland SPA was commissioned by Forest Heath District and St. Edmundsbury Borough Councils to explore the consequences of development on Annex 1 bird species associated with Breckland SPA. An important finding of the study was that 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. The Annex I heathland bird interest features are not yet indicating that they are negatively affected by recreational disturbance. However there are still some gaps in our understanding of the Thetford Forest populations of Annex 1 birds, their current status and potential changes that may be occurring. It is not currently understood whether distribution is affected by recreation, for example.

The recreation study went on to advise that provision of alternative greenspaces could be provided to potentially divert some of the recreational pressure away from the SPA. These would need to be at least equally, if not more attractive than the European sites. Such an approach could link into any green infrastructure initiatives as part of the local plan. Important factors to consider in the design of such spaces are the distance to travel to the site, the facilities at the site, and experience and feel of the site. The visitor survey identified that people are travelling up to 10km to use the SPA as their local greenspace. The provision of an attractive alternative in closer proximity to a new development would increase its likelihood of use.

Natural England has advised that it is necessary to consider cumulative recreational effects to the qualifying species of Breckland Special Protection Area (SPA) up to a distance of 7.5km. This is the distance within which it has been established that the majority of recreational effects can be captured. The distance is relevant to the woodland and heathland areas of the SPA rather than the farmland areas as visitors were likely to travel some distance to forest/heathland areas, but would only use farmland (for walking dogs etc.) near to home.

In response and to support the FHDC Site Allocation Local Plan, the Council has undertaken a natural greenspace study which, based on the existing accessible

natural greenspace available in each settlement, recommends an approach to mitigation for each settlement identifying some of the opportunities available to achieve this. The study found that in Lakenheath there is an absence of natural greenspace between 2-20ha in size, except in the vicinity of Maidscross Hill. It concluded that additional provision of natural open space is required as part of any developments in particular provision of new natural green space to divert pressure away from the SPA and existing Maidscross Hill SSSI. For Lakenheath the measures identified were; additional provision of natural open space as part of any developments in particular provision of new natural green space to divert pressure away from the SPA, and existing Maidscross Hill SSSI and new access routes which could potentially focus on the Cut-Off Channel.

This site is located 3.6km from the closest forest component of the SPA and 41.9km from the closest heathland component of Breckland SPA, and has the potential to contribute to in-combination recreational effects. The proposals must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in Visitors to Breckland SPA. The council is currently working with other authorities including Suffolk County Council to secure public access along the Cut-off Channel including a bridge for recreational purposes and as part of the strategic mitigation for the settlement. This development could make a proportionate contribute to access projects through either a condition or a section 106 contribution.

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 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.

#### Conclusion

The proposals alone would not result in likely significant effects on Breckland SPA.

In-combination likely significant effects on Breckland SPA can be avoided if the applicant makes a proportionate contribute to influence recreation in the area and to avoid a damaging increase in Visitors to Breckland SPA through either a condition or a section 106 contribution.