



East Cambridgeshire
District Council

28 October 2021

Strategic Environmental Assessment Determination Statement: Draft Haddenham and Aldreth Neighbourhood Plan

This determination statement has been produced by East Cambridgeshire District Council (ECDC) as “responsible authority”, to meet the requirements of Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.

This Determination Statement forms a Submission Document for the purposes of neighbourhood planning, as required by The Neighbourhood Planning (General) Regulations 2012 (as amended) (reg. 15(e)(ii)).

A Screening Assessment was undertaken by ECDC during the preparation of the draft Haddenham and Aldreth Neighbourhood Plan. As part of this assessment, ECDC consulted the statutory consultation bodies. The SEA Screening Report follows this Determination Statement.

The Screening Report examines the strategic policy and environmental context relevant to Haddenham Neighbourhood Area, and presents the findings of the screening assessment. The report identifies that the draft Haddenham and Aldreth Neighbourhood Plan does not seek to increase the overall quantum of growth beyond that which has already been permitted through the planning system. Other policies generally accord with the adopted Local Plan, the potential environmental effects of which were duly assessed through the plan-making process.

The Screening Report was sent to consultation bodies for comment (06 September to 18 October 2021). Responses were received from Environment Agency, Historic England and Natural England.

Through its response to the draft Screening Report consultation, the Environment Agency confirm that it considers the HANP to be in line with the NPPF’s Sequential Approach, and indicate that based on the environmental constraints within the area, it has no detailed comments to make.

Historic England confirmed that, on the basis of the information supplied and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations, it concurs that Strategic Environmental Assessment is not required.

Natural England confirm that, in so far as its strategic environmental interests are concerned, there are unlikely to be significant environmental effects from the proposed HANP. In addition, Natural England agrees with the report’s conclusions that the HANP would not be likely to result in a significant effect on any European Site, either alone or in combination.

Based on the assessment undertaken in the SEA Screening Report and the responses received from statutory consultation bodies, ECDC considers that significant environmental effects are not likely to arise from implementation of the Haddenham and Aldreth Neighbourhood Plan. Strategic Environmental Assessment of the Haddenham and Aldreth Neighbourhood Plan is therefore not required.



East Cambridgeshire
District Council

Strategic Environmental Assessment & Habitats Regulations Assessment Screening Report

October 2021

On behalf of Haddenham Parish Council

Date of assessment:	28 October 2021
Date / version of neighbourhood development plan to which Screening Report applies:	Haddenham and Aldreth Neighbourhood Plan Pre-Submission Draft Plan – September 2021

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Overview

Neighbourhood Development Plan to which this Screening Report applies:

Haddenham and Aldreth Neighbourhood Plan

Version/ date of Neighbourhood Development Plan to which this Screening Report applies:

Haddenham and Aldreth Neighbourhood Plan Pre-Submission Draft Plan – September 2021

Neighbourhood area to which the Neighbourhood Development Plan applies:

Haddenham Neighbourhood Area

Qualifying Body within the neighbourhood area:

Haddenham Parish Council

Acronyms

DEFRA	Department for Environment, Food & Rural Affairs
ECJ	European Court of Justice
ECDC	East Cambridgeshire District Council
EIA	Environmental Impact Assessment
EU	European Union
ha	Hectares
HANP	Haddenham and Aldreth Neighbourhood Plan
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
NCA	National Character Area
NDP	Neighbourhood Development Plan
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NSN	National Sites Network
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

1. Introduction

- 1.1. The purpose of this report is to undertake a screening exercise against various criteria to determine whether the Haddenham and Aldreth Neighbourhood Plan (HANP) requires a full Strategic Environmental Assessment (SEA) and / or Habitats Regulations Assessment (HRA).
- 1.2. The findings of the screening report will inform preparation of the HANP, a *Neighbourhood Development Plan* (NDP), and support it in satisfying the basic conditions. It is expected that the Screening Report will be submitted for examination alongside the HANP as part of its accompanying evidence base.
- 1.3. This version of the Screening Report has been subject to consultation with statutory consultation bodies, and updated in response to comments received. This report therefore replaces the earlier *Draft Screening Report*.

Overview of requirements of the SEA Regulations in regard to Neighbourhood Plans

- 1.4. A NDP must meet the 'basic conditions' set out in 8(2) of Schedule 4B of the Town and Country Planning Act 1990. This includes demonstrating that the NDP does not breach, and is otherwise compatible with EU obligations (that are transposed into UK law) such as:
 - **Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment** (the Strategic Environmental Assessment Directive), transposed into UK law by The Environmental Assessment of Plans and Programmes Regulations 2004; and
 - **Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora**, which was initially transposed into UK law by The Conservation (Natural Habitats, &c.) Regulations 1994 with various amendments consolidated by The Conservation of Habitats and Species Regulations 2018.
- 1.5. In addition, basic condition 'g' requires:

*prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan)*¹.
- 1.6. Notably, this includes demonstrating that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the *Conservation of Habitats and Species Regulations 2017*, which set out the habitat regulation assessment process for land use plans, including consideration of the effect on habitats sites.
- 1.7. Following the United Kingdom's withdrawal from the European Union (*Brexit*), EU law no longer has supremacy over British laws. Whilst initially introduced by EU Directives, the processes for SEA and HRA have been transposed into UK law, namely through *The*

¹ https://www.gov.uk/guidance/neighbourhood-planning--2?mc_cid=e09f0934ad&mc_eid=c5e5a6ab4a#basic-conditions-for-neighbourhood-plan-to-referendum

Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) and the *Conservation of Habitats and Species Regulations 2017* (as amended).

- 1.8. In light of *Brexit*, to enable the continued operation of the HRA processes *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*² made a number of changes to the 2017 Regulations. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales, with all other processes or terms in the 2017 Regulations remaining unchanged and existing guidance remaining relevant. The obligations of competent authorities (in this case *ECDC*) for the protection of sites or species do not change.
- 1.9. *Special Areas of Conservation* (SACs) were originally designated under the Habitats Directive and target particular habitats (Annex I) and/or species (Annex II) identified as being of European importance. *Special Protection Areas* (SPAs) are classified under the European Council Directive “on the conservation of wild birds” (79/409/EEC; ‘Birds Directive’) for the protection of wild birds and their habitats.
- 1.10. SPAs and SACs in the UK no longer form part of the EU’s Natura 2000 ecological network. The 2019 Regulations have created a ‘national site network’ on land and at sea, including both the inshore and offshore marine areas in the UK, and includes existing SPAs and SACs. Ramsar sites are designated wetlands of international importance. Ramsar sites do not form part of the national site network. Many Ramsar sites overlap with SPAs and SACs, and are designated for the same or different species and habitats. All Ramsar sites remain protected in the same way as SPAs and SACs.
- 1.11. This Screening Report uses the term ‘*European Site*’ when referring collectively to SPAs, SACs, and Ramsar sites. The National Planning Policy Framework (NPPF) also expects candidate SACs, potential SPAs and Ramsar sites to be included within the assessment.
- 1.12. In general terms, a NDP may require full SEA following screening, where its policies and proposals are likely to result in significant effects on the environment, particularly where such effects have not already been considered and dealt with, such as through a Sustainability Appraisal (SA) (incorporating SEA) of a Local Plan.
- 1.13. In the context of neighbourhood planning, following screening, should a NDP be deemed likely to result in a significant impact occurring on a protected European Site as a result of the plan’s implementation, the HRA proceeds to Appropriate Assessment. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any European Site designated for its nature conservation importance.
- 1.14. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any European Site designated for its nature conservation importance. Special Areas of Conservation (SACs) were formerly designated under the Habitats Directive and target particular habitats (Annex I) and/or species (Annex II) identified as being of European importance. Special Protection Areas (SPAs) were formerly classified under the European Council Directive “on the conservation of wild birds” (79/409/EEC; ‘Birds Directive’) for the protection of wild birds and their habitats.

² <https://www.legislation.gov.uk/uksi/2019/579/contents/made>

Responsibilities

Local Planning Authority (ECDC)

- 1.15. As local planning authority, ECDC has a duty to ensure the SEA requirements have been met prior to the Neighbourhood Plan being made. ECDC is best placed to make a screening determination, given its access to environmental information and understanding of strategic-level planning issues relating to the Neighbourhood Area, East Cambridgeshire, and surrounding area.
- 1.16. ECDC was responsible for coordinating consultation on the Screening Report, updating the report to reflect comments received, and issuing the Determination Statement.

Qualifying Body (Haddenham Parish Council)

- 1.17. Haddenham Parish Council is the Qualifying Body for the Haddenham Neighbourhood Area (which is coterminous with the parish boundary). Only Haddenham Parish Council has the legal right to prepare a Neighbourhood Plan for the Haddenham Neighbourhood Area.

Statutory Bodies

- 1.18. For the purposes of SEA, the statutory bodies are executive non-departmental public bodies with responsibilities for managing the environment on government's behalf, including:
- Environment Agency
 - Historic England
 - Natural England
- 1.19. For the purpose of SEA for the HANP, the statutory bodies were requested to review and make representations during consultation on the draft version of the Screening Report. Responses received from the Statutory Bodies are discussed in Section 6 and set out in Appendix 1.

Report structure

- 1.20. Following this introductory section, Section 2 describes the strategic planning context against which the HANP is being prepared.
- 1.21. Section 3 provides key information about the HANP and Haddenham Neighbourhood Area, including its relationship to other plans and strategies and a summary of key environmental characteristics and constraints within, or in proximity of, the Neighbourhood Area.
- 1.22. Section 4 describes the SEA methodology. Section 5 provides assessment of the HANP against various SEA themes to identify the likelihood of significant effects on the environment, drawing on the environmental constraints identified in section 3.
- 1.23. Section 6 sets out the procedure through which the Statutory Bodies were consulted on the Screening Report, with responses from consultation bodies provided in Appendix 1. Section 7 provides a summary of the Screening Report's conclusions.

2. Strategic Planning Context

- 2.1. The basic conditions require a NDP to be in *general conformity* with the strategic policies contained in the Development Plan (the Local Plan) for the area.
- 2.2. Through its strategic policies, the Local Plan effectively defines the parameters within which a NDP may operate. Throughout their preparation, Local Plans are subject to SEA (generally incorporated through a SA) and HRA. Where a NDP is in general conformity with the strategic policies of the Local Plan, it is likely that many of the environmental effects of the plan will have already been considered through the Local Plan-making process.
- 2.3. National planning policy states that evidence should be proportionate, and should not repeat policy assessment already undertaken. It is therefore relevant to consider the strategic policy context for the purpose of avoiding duplication and to identify environmental effects not already considered and addressed through the Local Plan-making process.

East Cambridgeshire Local Plan 2015 & Single Issue Review

Current status

- 2.4. The current East Cambridgeshire Local Plan was adopted in 2015. The Local Plan defines strategic and locally specific policies for the district, and covers a plan period from 2011 to 2031. During its preparation, the Local Plan was subject to a full SA (incorporating SEA) and HRA.
- 2.5. Being greater than five years old, it is necessary (by law) to regularly review its content to determine how 'up to date' it is. The Council undertook, and published, a second formal Review in April 2020. That Review, in summary, concluded that the:

"...Local Plan 2015 does require to be revised, but only partially and only in respect of its strategic housing policies. Of those policies, Policy GROWTH1 needs to be revised, because it has an out of date housing requirement. Other strategic housing policies may also be updated during the course of updating GROWTH1, should that be necessary.

The rest of the Local Plan is considered to not, at the present time, be in need of updating, therefore a full update of the Local Plan is not considered necessary.

However, whilst only one policy has been identified in need of updating, this does not prevent the Council from commencing preparation of a new Local Plan, in whole or part, on matters as it sees fit."

- 2.6. In light of these conclusions, East Cambridgeshire District Council (ECDC) has commenced a Single Issue Review (SIR) of the adopted Local Plan.
- 2.7. At the time of writing this screening report, ECDC is at its first stage in the process of producing the Single Issue Review (SIR) of the Local Plan. This first stage (also sometimes known as a 'Regulation 18' consultation stage) of the Local Plan captures the issues which ECDC intends to address and includes proposals to tackle those issues.
- 2.8. The SIR's proposed changes include updating the Local Plan's housing requirement. The proposals do not seek to change the plan period, site allocations and broad locations for growth, or other policies in the plan.

- 2.9. The timetable for undertaking the SIR indicates that formal adoption will take place in October 2023. Therefore, at the time at which the HANP will likely reach the examination stage, the Local Plan 2015 will remain the adopted Local Plan and the SIR will continue to be in progress.

Local Plan Spatial Strategy for Haddenham

- 2.10. The adopted Local Plan directs the majority of growth to main settlements (such as Ely, Littleport and Soham), with a relatively modest amount of growth distributed across the rural area. Policy GROWTH 2 provides a locational strategy for the distribution of growth:

Policy GROWTH 2: Locational strategy

The majority of development will be focused on the market towns of Ely, Soham and Littleport. Ely is the most significant service and population centre in the district, and will be a key focus for housing, employment and retail growth.

More limited development will take place in villages which have a defined development envelope, thereby helping to support local services, shops and community needs.

Within the defined development envelopes housing, employment and other development to meet local needs will normally be permitted – provided there is no significant adverse effect on the character and appearance of the area and that all other material planning considerations are satisfied. Two key exceptions to this will apply in the case of proposals involving the loss of employment land or community facilities – which will be assessed against Policies EMP 1 and COM 3 respectively. Retail development should be focused where possible within the town centres of Ely, Soham and Littleport – or alternatively, if there are no suitable sites available, on edge of centre sites, then out of centre sites, in accordance with Policy COM 1 and other policies in Part 2 of this Local Plan.

Outside defined development envelopes, development will be strictly controlled, having regard to the need to protect the countryside and the setting of towns and villages. Development will be restricted to the main categories listed below, and may be permitted as an exception, providing there is no significant adverse impact on the character of the countryside and that other Local Plan policies are satisfied...

Excerpt from policy GROWTH 2, p25 East Cambridgeshire Local Plan

- 2.11. The Haddenham Neighbourhood Area is contiguous with Haddenham parish boundary. Haddenham parish includes the large village of Haddenham; Aldreth, a hamlet; and extensive open countryside principally in agricultural use. Haddenham parish is located within East Cambridgeshire's rural area. The Local Plan's locational strategy identifies 'settlements' as locations for growth, rather than parishes. Haddenham village, Aldreth, and the open countryside are addressed separately within the Local Plan, with differing policies to manage their growth.

Haddenham village

- 2.12. The Local Plan provides a description of Haddenham's characteristics, noting its relationship to its landscape setting, significant historic features and provision of services:

Haddenham is a large village on the west 'shore' of the Isle of Ely and is located 7 miles south-west of Ely. The village occupies a dramatic ridge, with views north and south to the

surrounding fenland.

The village contains a large number of Listed Buildings and has two Conservation Areas, one of which covers the Hill Row area. The A1123 and the A1421 roads run through the village, meeting at a crossroads in the centre of the village.

Haddenham has a reasonable level of services, including a post office, several shops, a library, a primary school, two public houses, 3 churches, a village hall, a sports and social club, a doctor's surgery, a pharmacy, an elderly day care centre and a number of public open spaces, including the recreation field (which has Queen Elizabeth II Field status). Haddenham is served by two regular bus services.

p195 East Cambridgeshire Local Plan

- 2.13. The Local Plan expects Haddenham village to grow over the plan period, with new housing being built on suitable 'infill' sites within the village's *Development Envelope*. In addition, the Local Plan includes two housing allocation sites at land off Rowan Close (15 dwellings - complete) and land at New Road (24 dwellings – currently with planning permission for part of site).
- 2.14. There are a number of businesses in Haddenham, both in the centre of the village and on the Haddenham Business Park. The Local Plan notes '*the District Council is keen to retain the stock of business land and premises in order to support local economic growth*'. The Local Plan proposes the allocation of additional 0.8 hectares of employment land in Haddenham in the form of an extension to Haddenham Business Park.
- 2.15. Haddenham offers a range of community facilities, including shops, Post Office, pubs, Library, Arkenstall Centre, Doctors Surgery and churches, contribute to the quality of people's lives. The Local Plan protects community facilities by resisting their loss to other uses.

Aldreth

- 2.16. The Local Plan provides the following description of Aldreth:

Aldreth is a hamlet located two miles south-west of the village of Haddenham. Aldreth is surrounded by fenland on all sides and the River Great Ouse runs close by. The hamlet is served by one road.

Aldreth has a limited range of facilities – there is no food shop and no church, although the church building is now the thriving Village Centre and there is a recreation field and play area. Aldreth has a daily bus service to Ely (Monday – Saturday).

p110 East Cambridgeshire Local Plan

- 2.17. The Local Plan expects Aldreth to grow at a slow rate, with new housing being built on suitable 'infill' sites within Aldreth's *Development Envelope*. No new housing allocation sites are proposed at Aldreth.
- 2.18. For the avoidance of doubt, neither Haddenham nor Aldreth are 'market towns' described as the focus for growth in policy GROWTH 2. The Local Plan defines a *Development Envelope* around Haddenham village and Aldreth within which 'infill' development will

generally be acceptable. Applying policy GROWTH 2, both Haddenham and Aldreth's 'place' in the locational strategy is as '*villages which have a defined development envelope*' in which '*more limited development*' will take place.

- 2.19. Aldreth offers a limited range of community facilities, including the Village Centre, recreation field and play area.

Open countryside

- 2.20. As indicated in policy GROWTH 2, development outside defined development envelopes (i.e. in the countryside) will be strictly controlled, having regard to the need to protect the countryside and the setting of towns and villages.

- 2.21. The majority of land within the Neighbourhood Area is outside the defined Development Envelopes which surround Haddenham village and Aldreth.

Withdrawn Local Plan

- 2.22. In February 2018, East Cambridgeshire District Council submitted for examination a new Local Plan along with a supporting evidence base. Examination of the Local Plan commenced in June 2018. In February 2019, East Cambridgeshire District Council withdrew the draft Local Plan, and therefore the plan has no formal status.

- 2.23. At the point of withdrawal, the draft Local Plan was at an advanced stage of its preparation and had been subject to a full Sustainability Appraisal incorporating SEA, and a full HRA. The withdrawn Local Plan proposed a similar growth strategy to the adopted Local Plan, focussing growth principally in the market towns, albeit with an increased role for large and medium villages in the rural area.

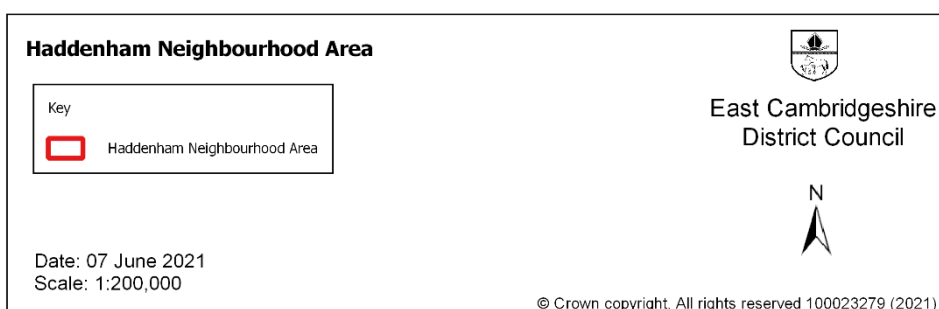
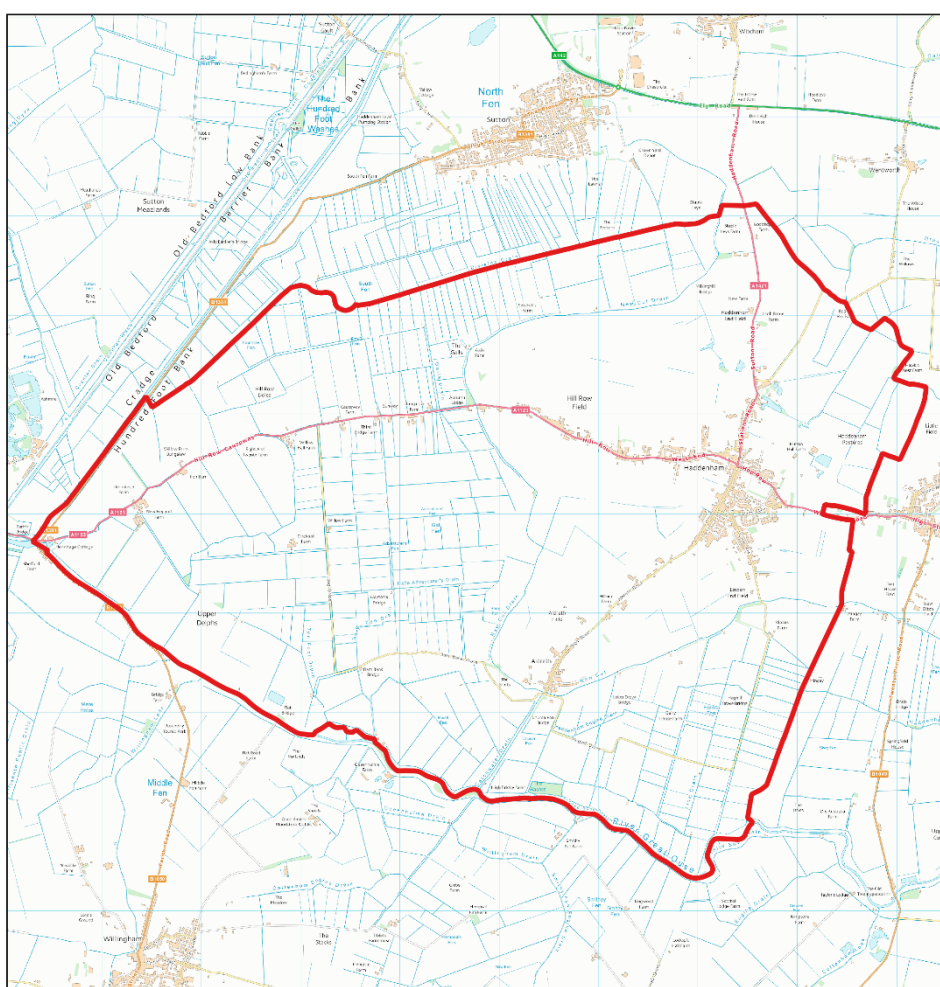
- 2.24. Following withdrawal of the Local Plan, East Cambridgeshire District Council has retained some key documents, including the HRA (dated June 2018) as it provides evidence and guidance on issues relating to European Sites which the Council believes remains relevant to applicants, decision-makers and to the preparation of Neighbourhood Plans.

3. Summary of Haddenham and Aldreth Neighbourhood Plan

Overview of the Neighbourhood Development Plan

- 3.1. The subject of this screening report is the Haddenham and Aldreth Neighbourhood Plan, Pre-submission Draft Plan September 2021. This version of the HANP was subject to Regulation 14 consultation in September and October 2021.
- 3.2. The HANP has been prepared by Haddenham Parish Council, the 'qualifying body' for the purposes of neighbourhood planning. The Haddenham Neighbourhood Area was formally designated by ECDC on 06 August 2019 and amended on 10 June 2021, and comprises the whole of the parish of Haddenham. The designated area is shown in **Map 1** below.

MAP 1: BOUNDARY OF THE DESIGNATED HADDENHAM NEIGHBOURHOOD AREA (ECDC)



3.3. The HANP sets out the following Vision for the Neighbourhood Area:

Haddenham Parish will remain an attractive and desirable place to live, maintaining its unique heritage assets and environmental assets within the fen landscape.

It will be a thriving and sustainable community, supported by appropriate infrastructure, encouraging a range of employment opportunities.

It will meet the housing needs of all ages with a community seeking to provide a good quality of life for all its residents.

3.4. The HANP identifies a set of 12 objectives to achieve the vision, many of which echo the three over-arching objectives for sustainable development: environmental, social and economic:

HOUSING

1 To ensure that the amount, size and tenure of new housing in the Parish meets locally identified needs

2 Enable opportunities for the provision of affordable housing that meets the needs of those with a connection with Haddenham Parish

EMPLOYMENT, SERVICES AND FACILITIES

3 To protect and improve the range of existing community facilities and services.

4 Maintain and improve employment opportunities that do not result in detrimental impacts on local infrastructure, the environment and residents' amenity

5 Improve opportunities for home working

NATURAL ENVIRONMENT

6 Protect and enhance the rural setting of the Parish and minimise the impact of development on the natural environment

7 Maximise opportunities to improve natural habitats and biodiversity

HISTORIC ENVIRONMENT

8 Recognise and protect the importance of historic assets and their settings

DEVELOPMENT DESIGN

9 Ensure that new development is designed in a way that reflects local character

10 Minimise the impact of new development on infrastructure, services and existing residents

HIGHWAYS AND TRAVEL

11 Support and encourage safe and sustainable transport, including walking, cycling and public transport

12 Minimise the impact of vehicles on the historic character of the area

3.5. To deliver the Vision and Objectives, the HANP proposes 15 policies in total, which are summarised in Table 1. Note that the table provides a *summary* of the policies intent, not the actual policy wording.

TABLE 1: SUMMARY OF DRAFT HADDENHAM AND ALDRETH NEIGHBOURHOOD PLAN POLICIES

Policy	Summary
Policy HAD1 – Spatial Strategy	<p>The policy updates the Development Envelope around Haddenham village (including Hill Row) and Aldreth reflecting recent planning consents and completed developments.</p> <p>Sustainable development proposals within the Envelope are supported subject to being of an appropriate scale and not having an unacceptable impact on residential amenity, historic and natural environment, provision of services and facilities, and the highway network.</p> <p>The policy strictly limits development outside the Envelopes (i.e. in the countryside) to exceptional uses, as allowed by the Local Plan or national policy.</p>
Policy HAD2 - Housing	<p>The policy provides for at least 161 additional dwellings to be developed in the Neighbourhood Plan area between 2019 and 2031 through the implementation of extant planning permissions and development of small “windfall” sites and infill plots within Development Envelopes.</p> <p>No new site allocations are identified.</p>
Policy HAD3 – Housing Mix	<p>The policy requires housing developments to contribute to meeting existing and future identified housing needs. In particular, proposals that deliver homes with three bedrooms are supported.</p>
Policy HAD4 – Haddenham Business Park Extension	<p>The business park extension site is currently allocated for employment development by the Local Plan 2015. The policy identifies the uses which are appropriate on the site (B2, B8 and E(g)), and sets design principles for future employment development of the site.</p>
Policy HAD5 – Protecting Existing Services and Facilities	<p>The policy resists the loss of existing services and community facilities, including retail premises, public houses, community halls, education and other public services, and sets out the exceptional circumstances for the loss of such facilities.</p>
Policy HAD6 - Sport and Recreation Facilities	<p>The policy supports proposals for the provision, enhancement and/ or expansion of sport or recreation open space or facilities, and resists the loss of existing sport and recreation facilities.</p>
Policy HAD7 – Conserving and Enhancing Internationally Designated Sites	<p>The policy provides the highest level of protection to international sites designated for their nature conservation importance.</p> <p>Proposals likely to have an adverse impact on the integrity of such sites will not be permitted other than in exceptional circumstances. The policy requires certain developments to undertake a Habitats Regulations Assessment, and sets requirements for avoidance and mitigation measures.</p>
Policy HAD8 – Protection of Important Views	<p>The policy protects important views from public vantage points within the built-up area or into or out of the surrounding countryside, indicated on the Policies Map.</p>

	The policy seeks to ensure that development proposals will not harm key landscape and built development features of those views, as identified by the accompanying Design Code document. Development proposals outside the Development Envelopes are required to undertake a Landscape and Visual Impact Appraisal or other appropriate and proportionate evidence.
Policy HAD9 – Settlement Gaps	To conserve the Neighbourhood Area's landscape, heritage and rural character, the policy requires development proposals to demonstrate that important 'settlement gaps' will not be eroded. The settlement gaps are located between Haddenham village, Aldreth and other neighbouring settlements, and seek to prevent the coalescence of settlements.
Policy HAD10 – Dark Skies	The policy gives preference to dark skies over lighting to minimise impacts on the environment, light pollution and wildlife, while ensuring that new developments are secure in terms of occupier and vehicle safety.
Policy HAD11 – Local Green Spaces	The policy designates 18 green areas as 'Local Green Spaces', for protection in accordance with national policy for Green Belts.
Policy HAD12 – Buildings and Features of Local Interest	<p>The policy seeks to protect and retain buildings of local interest identified in the East Cambridgeshire Register of Buildings of Local Interest.</p> <p>The policy requires proposals likely to lead to the loss of or harm to buildings of local significance to be supported by assessment of the significance of the asset and wider public benefits of the scheme.</p>
Policy HAD13 – Design considerations	The policy sets out design principles which all development proposals are expected to meet, requires development proposals to satisfy a Development Design Checklist (provided in the Neighbourhood Plan), and take account of the Haddenham Design Code and National Model Design Code.
Policy HAD14 – Sustainable Building	The policy favours proposals which incorporate current best practice in energy conservation. The policy encourages proposals to be designed to maximise solar gain.
Policy HAD15 – Flooding and Sustainable Drainage	<p>The policy requires development proposals to demonstrate how on-site drainage and water resources will be managed so as not to cause or exacerbate surface water and fluvial flooding elsewhere.</p> <p>Proposals are required to include above-ground open Sustainable Drainage Systems (SuDS), favouring those which provided wetland or water features to enhance biodiversity, amenity or recreation, and rainwater and stormwater harvesting and recycling.</p>

Summary of Haddenham Neighbourhood Area Characteristics

3.6. In order to determine the likely significant effects of the HANP on the environment, it is important to consider the characteristics of the area likely to be affected. A range of sources of information have been used to gather this information, including DEFRA Magic Maps³, the Environment Agency Flood Risk Map for Planning⁴, Nomis⁵, Cambridgeshire Insight parish profile⁶, and the East Cambridgeshire Local Plan 2015 and accompanying documents.

Geography

3.7. Haddenham parish covers a total area of 3,654 ha. It is located at the west of East Cambridgeshire district, approximately 6km south-west of the City of Ely.

Population & households

3.8. The Census 2011 indicates there 3,344 residents in the parish at 2011. Estimates from the Office for National Statistics indicate that the parish population in mid-2019 was 3,396; equating to an estimated population density of 0.93 persons per ha.

3.9. The Census 2011 shows there were 1,389 households in Haddenham parish at 2011. Of which 79.1% were owned outright or owned with a mortgage or loan. At the time of the 2011 census, Haddenham parish has an average household size of 2.41 people per household. This is greater than the East Cambridgeshire average of 2.34 people per household.

3.10. The mean age of the population living in Haddenham parish at the time of the Census 2011 was 41.6 years. This is higher than the national average of 39.3 years and the average for East Cambridgeshire of 40.2 years. There were 576 residents aged 65 and over (17.2%) living within the Haddenham area at the time of the Census 2011.

3.11. In terms of the health of the population living within Haddenham parish, at the time of the 2011 Census, 46.2% described their health as 'very good' and 37.4% as 'good'.

3.12. 9.6% of all households in Haddenham at the time of the 2011 Census had no cars or vans in the household. This is lower than the figure for East Cambridgeshire (13.0%), and significantly lower than the figure for England (25.8%).

Internationally Designated Sites

3.13. The Ouse Washes SPA / Ramsar intersects the Haddenham Neighbourhood Area at its western boundary. The following *European Sites* (Special Protection Areas & Special Areas of Conservation⁷, Ramsar), designated for their nature conservation interest, lie within 30km of Haddenham Neighbourhood Area (see **Map 2** for their location):

- Breckland SPA and SAC
- Ouse Washes SPA, SAC and Ramsar
- Nene Washes SPA, SAC and Ramsar
- Devil's Dyke SAC
- Eversden and Wimpole Woods SAC
- Fenland SAC (Chippenham Fen Ramsar)
- Fenland SAC (Woodwalton Fen Ramsar)

³ <https://magic.defra.gov.uk/>

⁴ <https://flood-map-for-planning.service.gov.uk/>

⁵ www.nomisweb.co.uk

⁶ <https://cambridgeshireinsight.org.uk/parish-profile/?geographyId=7f94ea12b8914d3cb0c0c29bc9ad1767&featureId=E04001632>

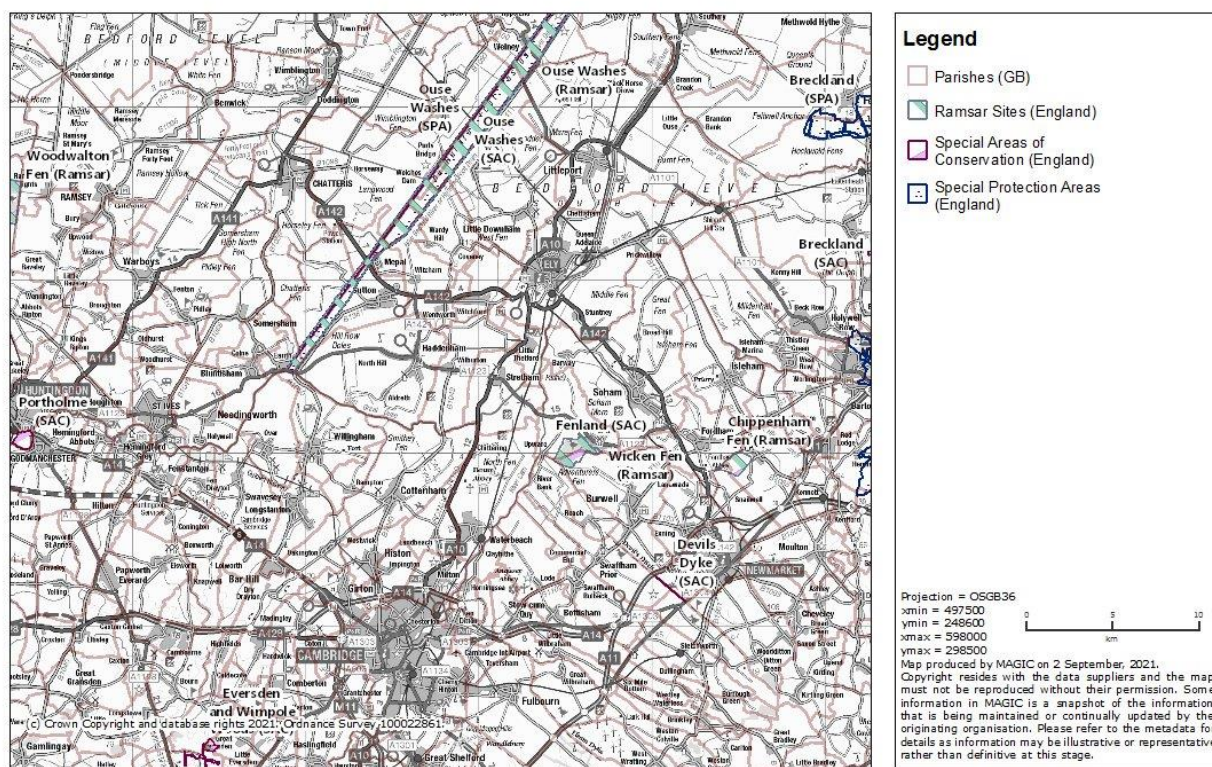
⁷ SPAs and SACs now form part of the 'National Sites Network'.

- Fenland SAC (Wicken Fen Ramsar)
- Orton Pit SAC
- Portholme SAC
- Rex Graham Reserve SAC

3.14. There are no Proposed Ramsar sites, Possible Special Areas of Conservation, or Potential Special Protection Areas in proximity of the Haddenham Neighbourhood Area.

MAP 2: INTERNATIONALLY DESIGNATED SITES IN PROXIMITY OF HADDENHAM

MAGiC SPAs, SACs, Ramsar in prox. of Haddenham NA

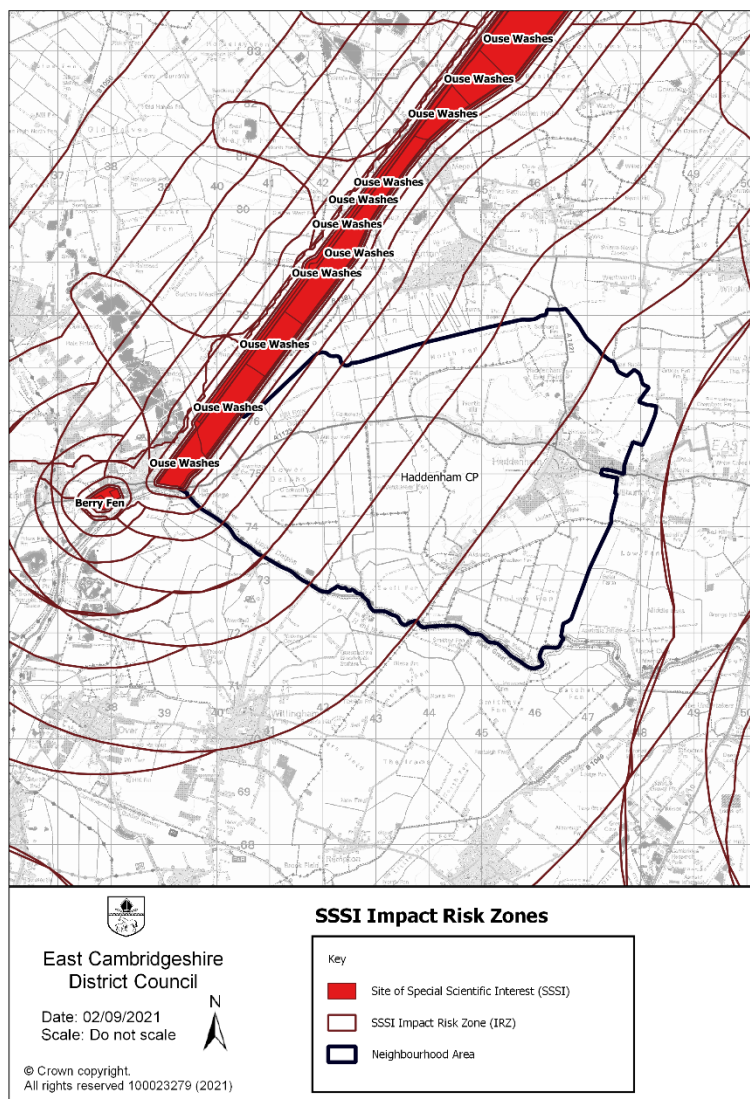


Sites of Special Scientific Interest & Impact Risk Zones

3.15. The Ouse Washes Site of Special Scientific Interest (SSSI) intersects the Haddenham Neighbourhood Area at the western boundary.

3.16. There SSSI Impact Risk Zones (IRZs) relating to the Ouse Washes SSSI, as defined by Natural England, extends across the Haddenham Neighbourhood Area (see **Map 3**). IRZs define zones around SSSIs and reflect the particular sensitivities of the features for which it has been designated and indicate the types of development proposal which could potentially have adverse impacts.

MAP 3: SSSIs & IRZs IN HADDENHAM NEIGHBOURHOOD AREA



Locally Designated Sites

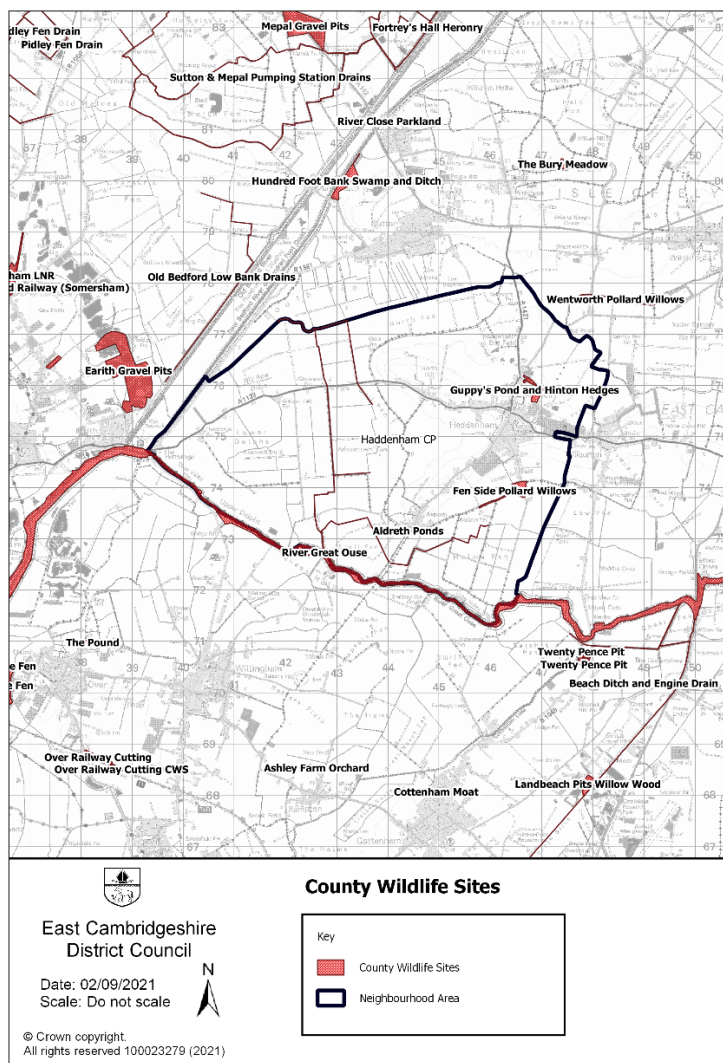
3.17. There are no Local Nature Reserves within the HANP area. A number of County Wildlife Sites (CWS) are located in / intersect the Haddenham Neighbourhood Area (see **Map 4**). These are:

- Aldreth Ponds
- Fen Side Pollard Willows
- Guppy's Pond and Hinton Hedges
- Haddenham Engine / Adventurers' Head Drainage System
- River Great Ouse

3.18. CWS are defined areas, identified and selected locally for their nature conservation value based on important, distinctive and threatened habitats and species within a national, regional and importantly a local context. CWS are areas of land important for their wildlife and can be found on public and private land. They vary in shape, size and may encompass a variety of different habitat types. The habitats and species present are often because of past management and many sites provide a refuge for rare or threatened plants and animals.

3.19. These sites play a vital role in the conservation of the UK's natural heritage by providing essential wildlife refuges, stepping-stones, corridors and buffers linking and protecting other site networks and open spaces found in towns and the wider countryside.

MAP 4: COUNTY WILDLIFE SITES IN HADDENHAM



National Character Areas

3.20. The HANP area lies within The Fens National Character Areas (NCAs). The key characteristics of this NCA include:

The Fens NCA⁸

- Expansive, flat, open, low-lying wetland landscape influenced by the Wash estuary, and offering extensive vistas to level horizons and huge skies throughout, provides a sense of rural remoteness and tranquillity.
- Jurassic clays are overlain by rich, fertile calcareous and silty soils over the coastal and central fens and by dark, friable fen peat further inland. The soils are important for agriculture, which is hugely significant for the rural economy in the Fens. There are over 4,000 farms in the Fens; enough wheat is grown here annually to produce a quarter of a million loaves of bread and one million tons of potatoes are grown here. In addition to traditional vegetables, exotics such as pak choi are now cultivated. Some 40 per cent of England's bulbs and flowers are also produced in the Fens.

⁸ [46 The Fens 240215.pdf](#)

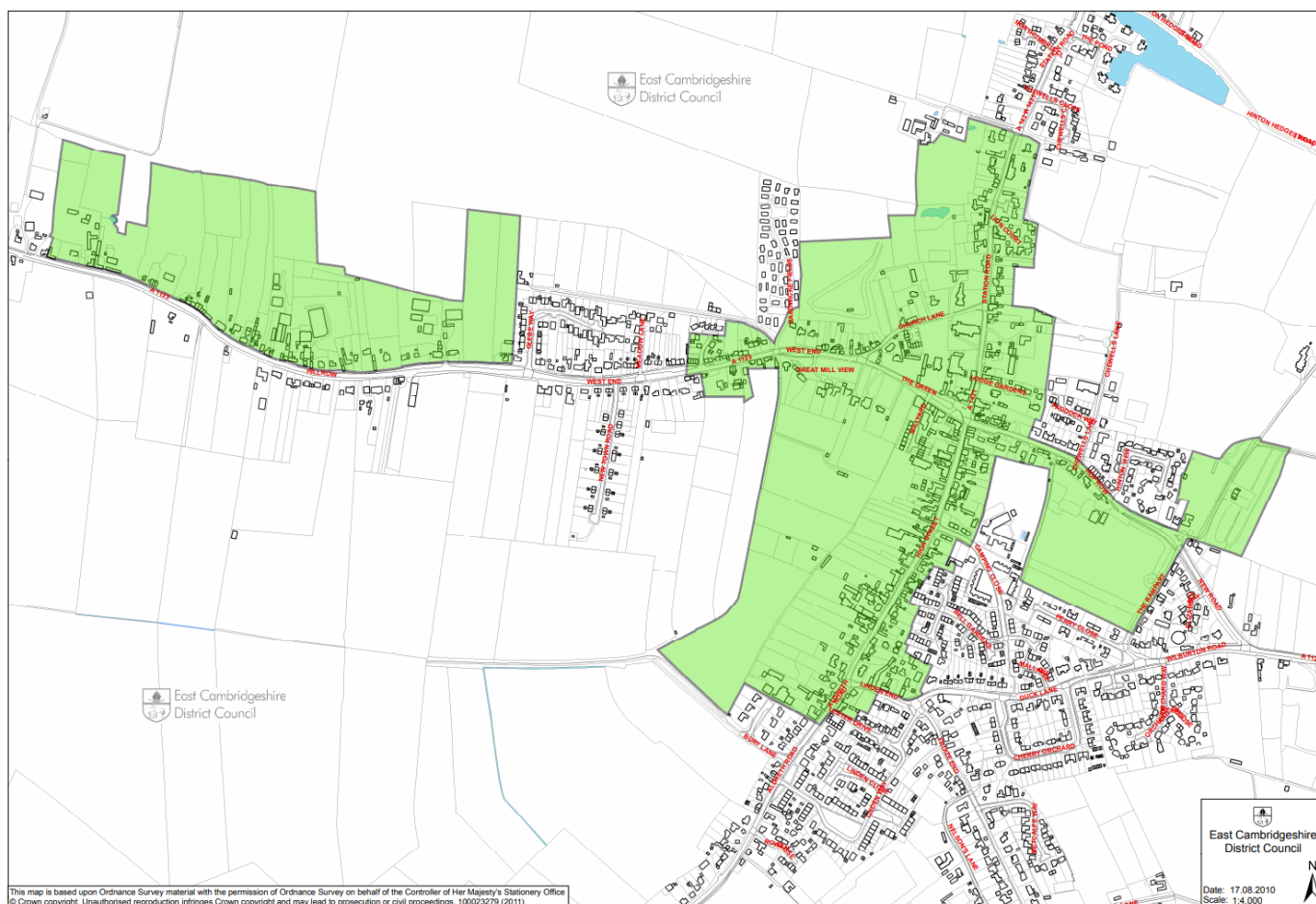
- The Wash is the largest estuarine system in Britain, supporting internationally important intertidal and coastal habitats influenced by constant processes of accretion and deposition, forming salt marsh and mudflats and providing habitats for wildfowl, wading birds and other wildlife, including grey seals and approximately 90 per cent of the UK's common seals. It also provides important natural sea defences and plays a key role in climate change regulation. Flood storage areas on the Nene, Cam, Lark and Ouse washes also provide significant biodiversity interest. True fen mainly occurs at remnant conservation sites, such as Baston or Wicken Fen.
- Overall, woodland cover is sparse, notably a few small woodland blocks, occasional avenues alongside roads, isolated field trees and shelterbelts of poplar, willow and occasionally leylandii hedges around farmsteads, and numerous orchards around Wisbech. Various alders, notably grey alder, are also used in shelterbelts and roadside avenues.
- The predominant land use is arable – wheat, root crops, bulbs, vegetables and market gardening made possible by actively draining reclaimed land areas. Associated horticultural glasshouses are a significant feature. Beef cattle graze narrow enclosures along the banks of rivers and dykes and on parts of the salt marsh and sea banks.
- Open fields, bounded by a network of drains and the distinctive hierarchy of rivers (some embanked), have a strong influence on the geometric/rectilinear landscape pattern. The structures create local enclosure and a slightly raised landform, which is mirrored in the road network that largely follows the edges of the system of large fields. The drains and ditches are also an important ecological network important for invertebrates, fish including spined loach, and macrophytes.
- The area is very rich in geodiversity and archaeology, with sediments containing evidence for past environmental and climate changes and with high potential for well-preserved waterlogged site remains at the fen edge, within some of the infilled palaeo-rivers and beneath the peat.
- Large, built structures exhibit a strong vertical visual influence, such as the 83 m-high octagonal tower of 'Boston Stump' (St Botolph's Church), Ely Cathedral on the highest part of the Isle of Ely dominating its surrounding fen, wind farms and other modern large-scale industrial and agricultural buildings, while drainage and flood storage structures and embanked rail and road routes interrupt the horizontal fen plain.
- Settlements and isolated farmsteads are mostly located on the modestly elevated 'geological islands' and the low, sinuous roddon banks (infilled ancient watercourses within fens). Elsewhere, villages tend to be dispersed ribbon settlements along the main arterial routes through the settled fens, and scattered farms remain as relics of earlier agricultural settlements. Domestic architecture mostly dates from after 1750 and comprises a mix of late Georgian-style brick houses and 20th century bungalows.

Historic environment

Conservation Area

3.21. Much of the built area of Haddenham village is designated as a Conservation Area, as illustrated on **Map 5**.

MAP 5: HADDENHAM CONSERVATION AREA



Listed Buildings

3.22. There are 16 listed buildings within the Haddenham Neighbourhood Area⁹ and their location is shown on **Map 6**. They are concentrated within the village centre. The listed buildings within the Neighbourhood Area:

- 36 and 38, Station Road Grade (II)
- Porch House Grade (II)
- Haddenham War Memorial Grade (II)
- The Limes Grade (II)
- Barn, About 5 Yards South of Number 10 Grade (II)
- Haddenham Mill Grade (II)
- Union Yard Grade (II)
- The Beristead Grade (II)
- 57, High Street Grade (II)
- 68, Hill Row Grade (II)
- Three Kings Inn Grade (II)
- 5, Aldreth Road Grade (II)
- Mill House Grade (II)
- The Limes Grade (II)

⁹ <https://historicengland.org.uk/listing/>

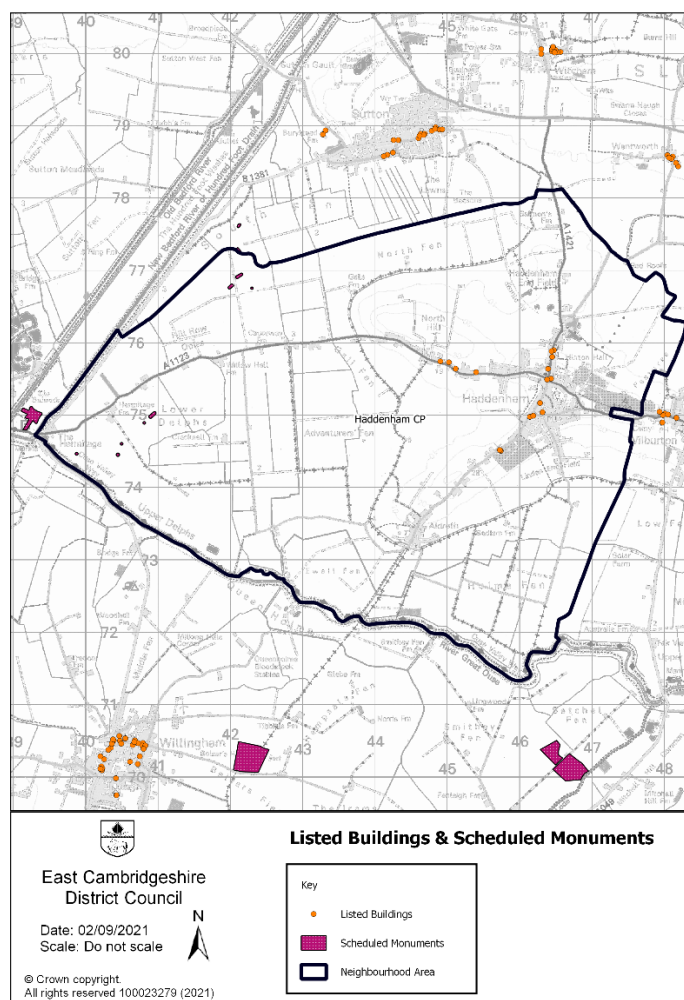
- Barn, About 20 Yards West of Number 1 Grade (II)
- Church of Holy Trinity Grade (I)

Scheduled Monuments

3.23. There are six Scheduled Monuments within the Haddenham Neighbourhood Area, as indicated on **Map 6**:

- Bowl barrow 450m east of Shelford Farm
- Long barrow at Foulmire Fen, 140m north west of the junction of Back and Small Fen Drove
- Oval barrow and round barrow at Small Fen, 250m north of the junction of Back and Small Fen Drove
- Round barrow at Small Fen, 220m east of the junction of Back and Small Fen Drove
- Three bowl barrows 450m and 570m east of New England, part of the Haddenham round barrow cemetery
- Two bowl barrows 370m and 505m south of New England, part of the Haddenham round barrow cemetery

MAP 6: LISTED BUILDINGS & SCHEDULED MONUMENTS IN HADDENHAM



3.24. The *Long barrow at Foulmire Fen, 140m north west of the junction of Back and Small Fen Drove* Scheduled Monument is identified as *Heritage at Risk*¹⁰.

¹⁰ <https://historicengland.org.uk/listing/the-list/>

3.25. There are no Registered Parks and Gardens in the Haddenham Neighbourhood Area.

Environmental Designations

Air

3.26. There are no Air Quality Management Areas within the Haddenham Area.

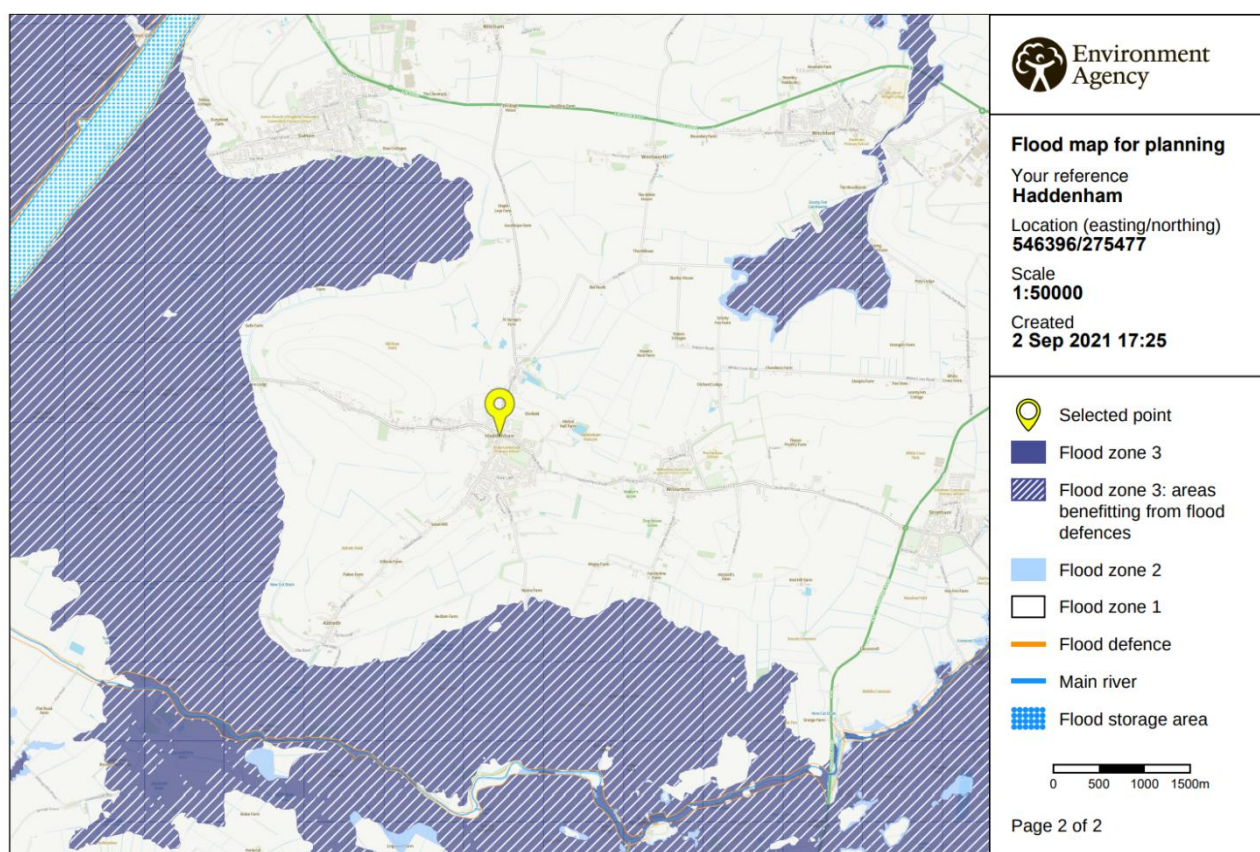
Water environment & flood risk

3.27. In terms of the water environment, the Haddenham Neighbourhood Area falls within the Environment Agency's Cam and Ely Ouse Management Catchment.

3.28. The Old West River runs along the southern boundary of Haddenham parish and is monitored by the Environment Agency for its chemical and ecological status. The Old West River's overall status is currently classified as moderate (base date 2019)¹¹.

3.29. According to the Environment Agency's Flood Risk Maps (see **Map 7**), there are areas of fluvial flood risk (i.e. flood risk zones 2 and 3) within and adjoining the Haddenham Neighbourhood Area. These areas are largely located to the south and west of the boundary in proximity of the river. The majority of the Neighbourhood Area is, including the built areas of Haddenham village and Aldreth are located in Flood Zone 1.

MAP 7: FLUVIAL FLOOD RISK (ENVIRONMENT AGENCY FLOOD MAP FOR PLANNING)



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Source Protection Zones & Groundwater Protection Zones

3.30. Source Protection Zones are defined around large and public potable groundwater abstraction sites, including wells, boreholes and springs. The Haddenham Neighbourhood Area does not fall within a Source Protection Zone.

¹¹ <https://environment.data.gov.uk/catchment-planning/WaterBody/GB205033043375>

3.31. Groundwater Source Protection Zones are areas of groundwater where there is particular sensitivity to pollution risks due to the closeness of a drinking water source and groundwater flows. The Haddenham Neighbourhood Area does not fall within a Groundwater Protection Zone.

Soil

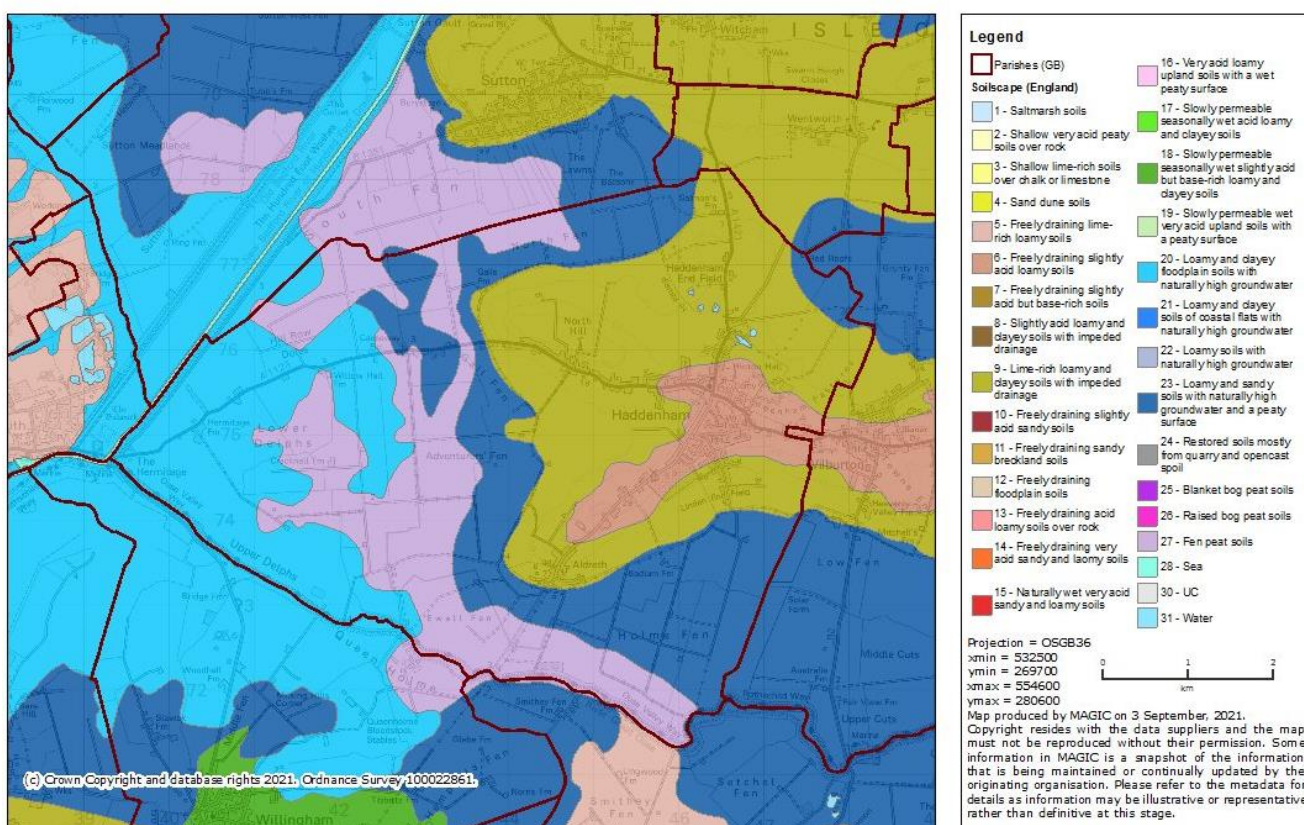
Soil Types

3.32. The Soilscape (England) dataset is based on the National Soil Map of England and Wales (NATMAPvector)¹².

MAP 8: SOIL TYPES IN HADDENHAM NEIGHBOURHOOD AREA

MAGIC

Soil Types



3.33. The Haddenham Neighbourhood Area includes the following soil types:

- Loamy and clayey floodplain soils with naturally high groundwater
- Fen peat soils
- Loamy and sandy soils with naturally high groundwater and a peaty surface
- Lime-rich loamy and clayey soils with impeded drainage
- Freely draining slightly acid loamy soils

3.34. The location of different soil types reflects the topography of the Neighbourhood Area, with deposits of *lime-rich loamy and clayey soils with impeded drainage* and *freely draining slightly acid loamy soils* located on elevated ground (on the 'fen isle'), with *loamy and clayey*

¹² <https://magic.defra.gov.uk/MagicMap.aspx>

floodplain soils with naturally high groundwater, fen peat soils, and loamy and sandy soils with naturally high groundwater and a peaty surface located on low-lying fen land.

Agricultural Land Classification

3.35. The national Agricultural Land Classification (ALC) dataset¹³ indicates the quality of agricultural land in the Neighbourhood Area. The best and most versatile land is defined as Grades 1, 2 and 3a. The ALC data does not distinguish between grades 3a and 3b (instead simply referring to Grade 3). More detailed assessment would be required to identify subgrades 3a and 3b.

3.36. Table 2 shows the percent of the Neighbourhood Area by ALC grade.

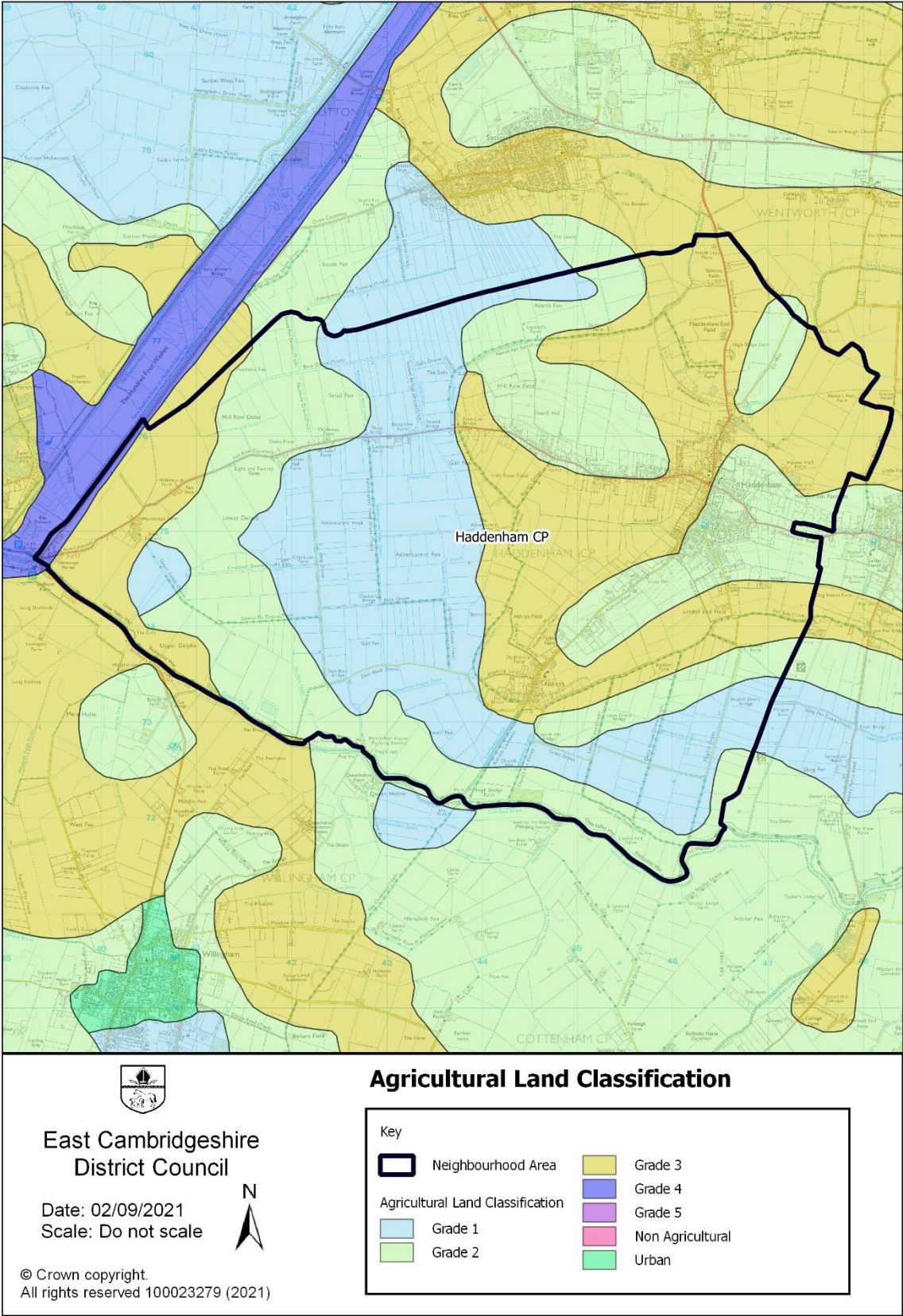
TABLE 2: AGRICULTURAL LAND CLASSIFICATION - HADDENHAM NEIGHBOURHOOD AREA

ALC Grade	Percent of Neighbourhood Area (%)
Grade 1	28.1
Grade 2	36.8
Grade 3	34.6
Grade 4	0.5

3.37. As illustrated in the table, the majority of land in the Neighbourhood Area is 'best and most versatile land'. Map 9 shows the location of ALC grades. As illustrated on the map, land in Grades 1 & 2 is mainly located in the open countryside, outside of the built areas of Haddenham village and Aldreth.

¹³ <https://data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc>

MAP 9: AGRICULTURAL LAND CLASSIFICATION IN HADDENHAM NEIGHBOURHOOD AREA



4. Screening Methodology: Criteria for Assessing the Effects of Neighbourhood Plans

Strategic Environmental Assessment (SEA)

- 4.1. The Localism Act 2011 (Schedule 9) introduced neighbourhood planning into the Town and Country Planning Act 1990. The 1990 Act, as amended by Schedule 10 of the Localism Act 2011, requires that NDPs meet a set of basic conditions, one of which being that the making of the plan does not breach, and is otherwise compatible with, EU obligations *incorporated into UK law*.
- 4.2. To ensure that a NDP meets this basic condition, a SEA may be required to determine the likely significant environmental effects of implementing the NDP. The basis for Strategic Environmental legislation is European Directive 2001/42/EC, which was initially transposed into domestic law by the Environmental Assessment of Plans and Programmes Regulations 2004, or 'SEA Regulations'. Detailed guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive'¹⁴ and paragraph 073 of National Planning Practice Guidance (NPPG) 'Neighbourhood Planning' section¹⁵. Paragraph 073 of the Neighbourhood Planning section advises that a NDP should be screened early. Whether a NDP proposal requires a SEA, and (if so) the level of detail needed, will depend on what is proposed within the plan.
- 4.3. Where a proposed plan is likely to have a significant effect on a European Site or European offshore marine site (in relation to the Habitats Regulations), this will also trigger the need to undertake a SEA. Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 makes provision in relation to the Habitats Regulations. The Regulations requires that any plan or project likely to have a significant effect on a European Site must be subject to an Appropriate Assessment. To achieve this, paragraph 1 of Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 prescribes a basic condition that the making of a NDP is not likely to have a significant effect on a European site or a European offshore marine site. Paragraphs 2 to 5 go on to amend the Conservation of Habitats and Species Regulations 2010 so as to apply its provisions to neighbourhood development orders and plans. A NDP's (or Neighbourhood Development Order) requirements for Appropriate Assessment are clarified further by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.
- 4.4. Article 3(5) of Directive 2001/42/EC details the criteria for determining whether plans are likely to have significant environmental effects. These criteria are outlined in **Figure 1**.
- 4.5. The Department of the Environment produced a flow chart diagram¹⁶ which sets out the process for screening a planning document to ascertain whether a full SEA is required. The flow chart diagram is provided in **Figure 2**.

¹⁴ Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

¹⁵ Available at: <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

¹⁶ Department of the Environment, A Practical Guide to the Strategic Environmental Assessment Directive (2005)

- 4.6. **Section 5** provides firstly, a screening assessment of the draft HANP, against the assessment criteria (in **Figure 1**) to identify the significance of effects which may arise as a result of the plan's implementation.
- 4.7. Secondly, **Section 5** applies the SEA Directive to the draft HANP, as per the flow chart in **Figure 2**, to determine whether the principle of the NDP would warrant the need for SEA.
- 4.8. In order to decide whether a SEA is required, the Council needs to consider the following:
- How the policies in the NDP might affect the environment, community or economy;
 - Whether the policies are likely to adversely affect a "sensitive area", such as a European Site (SAC, SPA, Ramsar) or a SSSI, NNR etc.;
 - Whether the policies propose a higher level of development than what is set out in the East Cambridgeshire Local Plan and that has been assessed by the SA of that Plan;
 - Whether the implementation of the policies is likely to lead to new development;
 - Whether the cumulative impact of the policies taken together may give rise to a significant effect.

Habitats Regulations Assessment

Case Law

- 4.9. A decision by the European Court of Justice (ECJ) (People Over Wind & Sweetman vs. Coillte Teoranta) in April 2018 has had a significant impact on the HRA process for both NDPs and Local Plans. In short, the ECJ ruled that in order to determine whether it is necessary to carry out a full HRA of the implications of a plan, it is not appropriate to take account of mitigation measures at the screening stage. Rather, consideration of mitigation will need to occur at the full Appropriate Assessment stage.
- 4.10. Following the UK's withdrawal from the EU, decisions by the ECJ are no longer legally binding but may continue to be relevant¹⁷.
- 4.11. A consequence of the ECJ's decision is that mitigation measures set out in a plan cannot be used at the screening stage to conclude there will be 'no likely significant effects' on European Sites. Therefore, if a NDP includes measures to counter the plan's effects on European Sites these should, in effect, be ignored at the screening stage.
- 4.12. Previously, plan-making in the UK has followed case law as set out in Application of Hart DC vs. Secretary of the State for Communities and Local Government in 2008, which concluded that: 'anything which encourages the proponents of plans and projects to incorporate mitigation measures at the earliest possible stage in the evolution of their plan or project is surely to be encouraged.'
- 4.13. The government has acknowledged that the ECJ's ruling has caused uncertainty in preparing NDPs, and could result in more plans requiring a full SEA or HRA. In December 2018, The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018¹⁸ came into force, amending the basic conditions and allowing affected NDPs and Orders to proceed.
- 4.14. For the avoidance of doubt, this screening report has been undertaken in accordance with the ECJ's ruling, insofar that in the context of HRA the effects of any mitigation measures set out in the policies of the HANP have not been considered.

¹⁷ <https://www.legislation.gov.uk/ukpga/2018/16/section/6/enacted>

¹⁸ <http://www.legislation.gov.uk/uksi/2018/1307/contents/made>

FIGURE 1: SEA ASSESSMENT CRITERIA

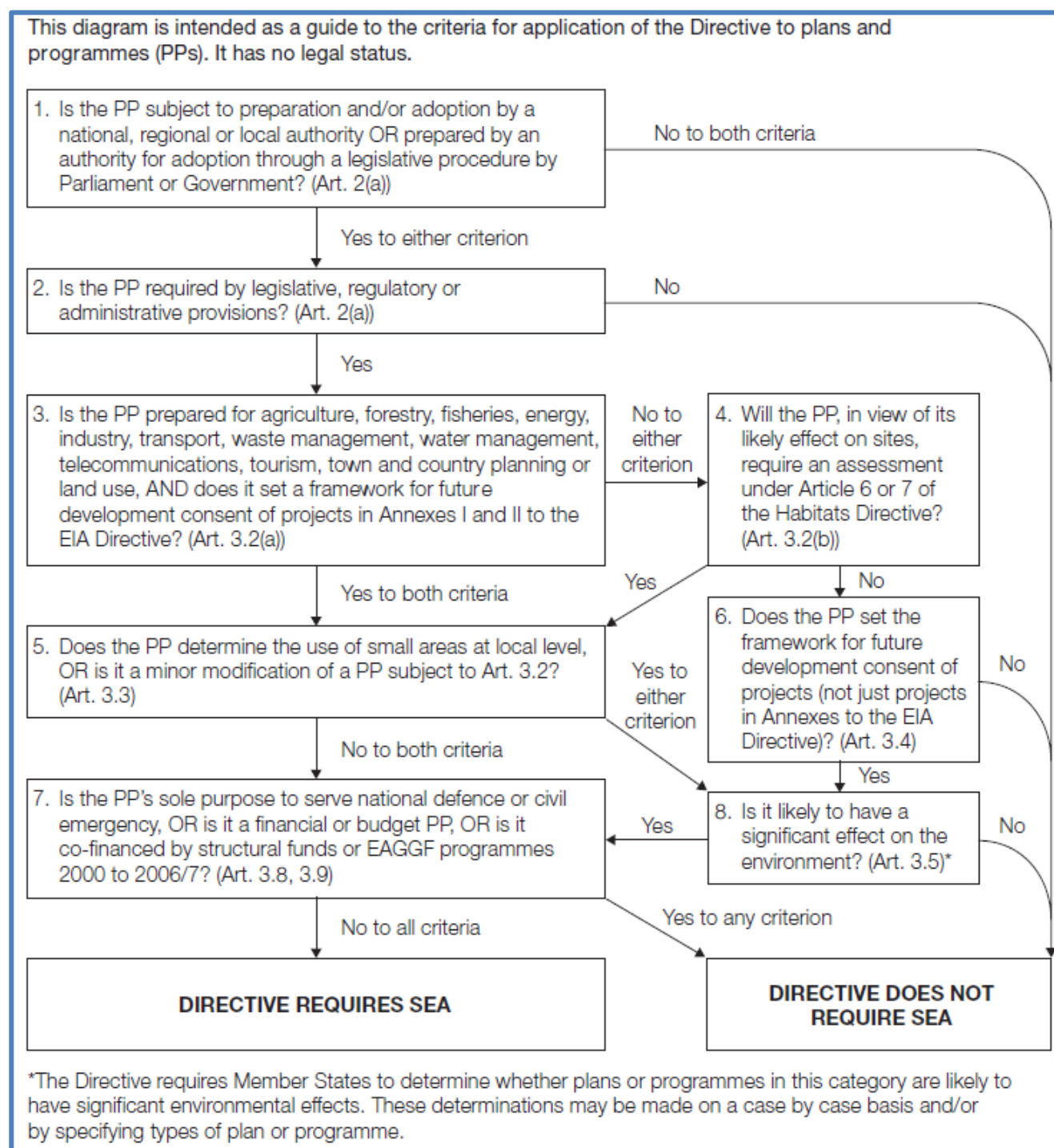
Article 3, Scope

5. Member States shall determine whether plans or programmes referred to in paragraphs 3 and 4 are likely to have significant environmental effects either through case-by-case examination or by specifying types of plans and programmes or by combining both approaches. For this purpose Member States shall in all cases take into account relevant criteria set out in Annex II, in order to ensure that plans and programmes with likely significant effects on the environment are covered by this Directive.

Annex II Criteria for determining the likely significance of effects referred to in Article 3(5)

1. The characteristics of plans and programmes, having regard, in particular, to
 - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
 - the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
 - the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
 - environmental problems relevant to the plan or programme;
 - the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to
 - the probability, duration, frequency and reversibility of the effects;
 - the cumulative nature of the effects;
 - the transboundary nature of the effects;
 - the risks to human health or the environment (e.g. due to accidents);
 - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
 - the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use;
 - the effects on areas or landscapes which have a recognised national, Community or international protection status.

FIGURE 2: APPLICATION OF THE SEA DIRECTIVE TO PLANS AND PROGRAMMES ¹⁹



¹⁹ Annexes I and II of Directive 2011/92/EU (as referred to in Figure 2, question 3) available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0092&from=EN> (see <http://ec.europa.eu/environment/eia/eia-legalcontext.htm> for details of amendments). Articles 6 and 7 of the Habitats Directive (as referred to in Figure 2, question 4) available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN>.

5. SEA and HRA Screening Assessment of Haddenham and Aldreth Neighbourhood Plan

Introduction

- 5.1. The 'responsible authority' in the case of SEA and the 'competent authority' in the case of HRA, must determine whether a plan or programme, in this case the HANP, is likely to have a significant environmental effect with reference to specified criteria. The following section sets out an assessment of the HANP against these criteria.
- 5.2. **Figure 3** and **Figure 4** consider the HANP against the criteria from Annex II of the SEA Directive and Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004. Paragraphs **5.4 to 5.57** that follow consider the likely environmental effects of the HANP policies in relation to the topics set out in Annex I (f) of the SEA Directive. These are biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and includes the interaction between these factors.
- 5.3. Paragraphs **5.58 to 5.82** consider the likely significant effects of the HANP policies in relation to the conservation objectives for European Sites.

Determination of likely significant environmental effects - SEA Screening

Local Plan Sustainability Appraisal Report 2015

- 5.4 The East Cambridgeshire Local Plan 2015 was subject to Sustainability Appraisal (incorporating SEA), and documented in a Sustainability Appraisal Report²⁰ which fully considered the environmental, social and economic impacts of each of the policies and site allocations within the Local Plan.
- 5.5 As discussed in Section 2, the Local Plan's growth strategy concentrates growth in the market towns, with lesser growth in the rural area. The SA Report considered a range of options for distributing growth and concluded a market towns-led approach was the most sustainable option:

The policy should help to deliver a range of social, environmental and economic benefits. In particular, it will help to reduce the need to travel, promote accessibility to services and facilities, protect the countryside, and help to support the rural economy. The approach represents a continuation of the current policy approach, so no significant temporal differences are identified.

p145 Sustainability Appraisal Report 2015

- 5.6 The growth strategy generally directs new development to market towns, with lesser volumes of growth in rural settlements, with strict limitations on development in the open countryside. The SA Report considered 19 site options for housing and employment development within Haddenham.
- 5.7 Two site options Land off Rowan Close (LP allocation HAD1) and Land at New Road (LP allocation HAD2) were identified by the SA Report as most suitable for housing growth, with concerns for landscape and visual impacts and other constraints cited against other site options.

²⁰ <https://www.eastcambs.gov.uk/local-development-framework/east-cambridgeshire-local-plan-2015>

- 5.8 Providing an extension to an existing employment area (as now allocated by the Local Plan allocation HAD3) was identified as the most sustainable option for employment growth, as '*it would provide synergies and economic benefits to the existing business park*'. Many other options were considered unsuitable for employment due to access problems or adverse visual impact.
- 5.9 The Local Plan sets Development Envelopes around Haddenham village and Aldreth within which development is, in principle, acceptable. The SA Report concluded:

In principle, development envelopes are sustainable if they help to concentrate development in the most sustainable locations, creating critical mass of services, jobs and homes...

p29 Sustainability Appraisal Report 2015

Withdrawn Local Plan 2019

- 5.10 As discussed in section 2, in February 2018, ECDC submitted for examination a new Local Plan along with a supporting evidence base. Examination of the Local Plan commenced in June 2018. However, in February 2019, East Cambridgeshire District Council withdrew the draft Local Plan. At the point of withdrawal, the draft Local Plan was at an advanced stage of its preparation and had been subject to a full Sustainability Appraisal incorporating SEA and a full HRA.
- 5.11 Following withdrawal of the Local Plan, East Cambridgeshire District Council has retained the HRA (dated June 2018) and other key documents which are potentially relevant to SEA & HRA matters, including the Water Cycle Study (2017).

Biodiversity, flora and fauna

- 5.12 As identified in section 3, there are a number of designated wildlife sites within, and in proximity of, the Neighbourhood Area. Notably this includes the Ouse Washes SAC, Ramsar and SSSI which intersects the Neighbourhood Area. (Note that the effects on internationally designated sites are considered at "*Determination of likely significant effects on European Sites - HRA Screening*" – paras 5.58 to 5.82).
- 5.13 The Ouse Washes lie between The Hundred Foot/New Bedford River to the south-east and the Old Bedford River/Counter Drain to the north-west. These rivers fall within the boundary of the Site of Special Scientific Interest. The Ouse Washes play a major land drainage role as a flood water storage area and the washland is thus subject to regular winter flooding. In the summer months the area provides grazing and hay. The regular winter flooding and the continuance of traditional management of cattle grazing and hay cutting maintains the nature conservation value of the area.
- 5.14 The site is one of the country's few remaining areas of extensive washland habitat. It is of particular note for the large numbers of wildfowl and waders which it supports, for the large area of unimproved neutral grassland communities which it holds and for the richness of the aquatic fauna and flora within the associated watercourse. The capacity of the site to hold wintering and breeding waterfowl and waders is of international significance.
- 5.15 Table 3 provides a summary of the condition of the Ouse Washes SSSI, using Natural England data.

TABLE 3: SUMMARY OF CONDITION OF OUSE WASHES SSSI (SOURCE: NATURAL ENGLAND)²¹

	% meeting area of favourable or unfavourable recovering	Favourable	Unfavourable - Recovering	Unfavourable - No change	Unfavourable - Declining	Partially destroyed	Destroyed	Not Recorded
Area (ha)	485.91	396.25	89.67	2,032.76				
Percentage	19.29%	15.73%	3.56%	80.71%	0.00%	0.00%	0.00%	0.00%

- 5.16 Whilst the Ouse Washes is located at the western edge of the Neighbourhood Area, its associated *Impact Risk Zones* extend across the whole Neighbourhood Area (as illustrated on Map 3). The IRZs covering the western ‘half’ of the Neighbourhood Area (and do not include Haddenham village and Aldreth) require applicants to consult Natural England on residential developments of 50 or more dwellings. The HANP does not propose new major residential development (>50 dwellings) or other form of development likely to require consultation with Natural England. Therefore, the HANP is not expected to lead to significant effects on the integrity of the Ouse Washes SSSI.
- 5.17 As discussed in Section 3, there are a number of County Wildlife Sites within the Neighbourhood Area. Development has the potential to impact on habitats located at County Wildlife Sites, such as through increased recreational pressure or urbanising effects.
- 5.18 Objective 7 of the HANP is of particular relevance to biodiversity, flora and fauna and aims to “*Maximise opportunities to improve natural habitats and biodiversity*”.
- 5.19 There are a number of policies in the HANP that seek to protect and enhance biodiversity and therefore could result in positive effects. For example, *Policy HAD1 – Spatial Strategy* updates the Development Envelopes at Haddenham village, Hill Row and Aldreth thereby concentrating development within the built areas and strictly limiting growth in the surrounding countryside, and requires proposals to have regard to a number of development principles, including: “...*being of an appropriate scale and not having an unacceptable impact on... ii. the historic and natural environment*”.
- 5.20 *Policy HAD13- Design Considerations* requires all development proposals to take measures to avoid adverse effects on “*Sites, habitats, species and features of ecological interest*”.
- 5.21 *Policy HAD11– Local Green Spaces* designates 18 green areas for protection from development, some of which may be of biodiversity value. In addition, *HAD6 – Sport and Recreation Facilities* seeks to protect and enhance existing open spaces and recreation facilities. By designating Local Green Spaces and protecting and enhancing other green areas, the HANP could potentially reduce the risk of recreational pressure on habitats within the Neighbourhood Area.
- 5.22 *Policy HAD15 – Flooding and Sustainable Drainage* requires provision of sustainable drainage systems, particularly encouraging those that enhance biodiversity and habitats.
- 5.23 *Policy HAD10 – Dark Skies* seeks to conserve darkness and avoid pollution, requiring any future outdoor lighting systems to “*have a minimum impact on the environment, minimising*

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<https://designatedsites.naturalengland.org.uk/ReportConditionSummary.aspx?SiteCode=S1000503&ReportTitle=Ouse%20Washes%20SSSI>

light pollution and adverse effects on wildlife...”, thereby reducing the urbanising effects of development on habitats.

- 5.24 Overall, the potential for significant negative impacts on biodiversity, flora and fauna to arise from the implementation of the plan are not likely as the HANP does not allocate sites for development. Other opportunities for development are relatively limited and broadly aligned with the East Cambridgeshire Local Plan (e.g. infill development).
- 5.25 It is expected that the HANP will help to protect and enhance biodiversity, flora and fauna in the Neighbourhood Area through the various policy measures it employs. Through the protection and enhancement of existing green spaces, the HANP could play a role in reducing recreational pressure on SSSIs and CWSs within and in proximity of the Neighbourhood Area. For the purposes of SEA, these effects are not considered significant.

Population and human health

- 5.26 As identified in section 3, the health of the population residing within Haddenham Neighbourhood Area is generally “very good” or “good”.
- 5.27 There are a number of policies within the HANP that are likely to contribute positively on population and human health, and the community’s wellbeing.
- 5.28 *Policy HAD3 – Housing Mix* requires proposals for housing developments to contribute to meeting existing and future identified needs of the Neighbourhood Area. Proposals for three-bedrooms are particularly favoured reflecting an identified need for family homes.
- 5.29 *Policy HAD5 – Protecting Existing Services and Facilities* resists the loss of existing community facilities, whereas *Policy HAD6 – Sport and Recreation Facilities* supports the provision, enhancement or expansion of existing open space, sport and recreation facilities, and resists the loss of such facilities. *Policy HAD11 – Local Green Spaces* proposes designation of 18 green areas for protection from development, which are publicly accessible and offer opportunities for different types of informal and formal recreation.
- 5.30 *Policy HAD13 – Design Considerations* seeks to ensure development proposals provide a high standard of residential amenity, for example “e. *do not locate sensitive development where its users and nearby residents would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented;*”. Similarly, *Policy HAD15 – Flooding and Sustainable Drainage* ensures the community is not put at increased risk from flooding as a result of new development.
- 5.31 *Policy HAD14 – Sustainable Building Practices* requires development proposals to incorporate best practice in energy conservation, which could play a role in addressing fuel poverty.
- 5.32 Overall, the HANP is not likely to have significant effects on population and human health, given the relatively small population that the HANP applies to and as no sites are specifically allocated for development within the plan. Through its various policy measures to improve design, amenity, community facilities and access to recreation and open space, it is likely that the needs of the population and standards of human health will be maintained and potentially enhanced. However, these effects are not considered ‘significant’ for the purposes of SEA.

Soil, air and water

- 5.33 In terms of soil, the HANP (*Policy HAD1 – Spatial Strategy*) supports additional infill and windfall residential development within Development Envelopes), and limits development in the countryside, which is predominantly in agricultural use. The policy therefore plays an important role in protecting agricultural land resources, and therefore those soils which form “best and most versatile agricultural land”.
- 5.34 There are no air quality management areas within the Neighbourhood Area and therefore no significant air quality issues. *Policy HAD14 – Sustainable Building* supports energy conservation and efficiency, which could contribute to reducing emissions.
- 5.35 As discussed in section 3, the vast majority of the Neighbourhood Area, including Haddenham village and Aldreth is in Flood Zone 1. Therefore, fluvial flood risk is relatively low.
- 5.36 *Policy HAD15 – Flooding and Sustainable Drainage* places specific requirements on development proposals to ensure that flood risk is reduced and surface water is sustainably managed.
- 5.37 Overall, it is unlikely that significant effects on soil, air or water would arise as a result of implementation of the HANP.

Climatic factors

- 5.38 Climatic factors involve the consideration of a plan or programme in relation to climate change. Climate change adaptation and mitigation are closely interrelated and are closely linked to other environmental issues.
- 5.39 The HANP includes policies which will contribute to reducing emissions and adapting to a changing climate. For example, *Policy HAD15 – Sustainable Building Practices* supports proposals which deliver energy conservation and efficiency; and *Policy HAD13 – Design Considerations* requires development proposals to provide one electric vehicle charging point per new off-street parking place created; and
- 5.40 Overall, it is considered unlikely that implementing the policies in the HANP, would give rise to significant effects on climatic factors.

Material assets

- 5.41 The SEA Directive does not define what is meant by ‘material assets’ and it can be interpreted in a number of ways. This screening report takes material assets to include a range of social, physical and environmental infrastructure, such as schools, health facilities, roads, railways, bus services, wastewater treatment works, flood defences, etc. Impacts on materials assets are likely to relate to a number of other SEA topics.
- 5.42 HANP objectives 3 and 4 are particularly relevant to material assets:
3. *To protect and improve the range of existing community facilities and services.*
4. *Maintain and improve employment opportunities that do not result in detrimental impacts on local infrastructure, the environment and residents’ amenity*

- 5.43 As previously discussed, *Policy HAD5 – Protecting Existing Services and Facilities* resists the loss of existing community facilities, while *Policy HAD6 – Sport and Recreation Facilities* supports the provision, enhancement or expansion of existing open space, sport and recreation facilities, and resists the loss of such facilities.
- 5.44 It is considered unlikely that that implementation of the HANP would have significant effects on material assets.

Cultural heritage, including architectural and archaeological heritage

- 5.45 As identified above in paragraphs section 3, there are a number of heritage assets within the Neighbourhood Area, including the Haddenham Conservation Area, 16 Listed Buildings, and six Scheduled Monuments.
- 5.46 The Heritage Gateway²² provides information from Cambridgeshire's Historic Environment Record on the various designated heritage assets within HANP area. However, this information does not identify specific threats to those assets.
- 5.47 The historic environment is central to the character and identity of the Neighbourhood Area. This is recognised by the HANP. Alongside preparation of the Neighbourhood Plan, Haddenham Parish Council commissioned the 'Haddenham Design Code' which accompanies the plan's design policies, further ensuring that design is of high quality, reflects local character and responds sensitively to the historic environment.
- 5.48 HANP objective 8 aims to "*Recognise and protect the importance of historic assets and their settings*".
- 5.49 *Policy HAD12 – Buildings and Features of Local Interest* includes measures to secure the conservation and enhancement of local importance. The policy affords protection to assets which otherwise lack statutory designation.
- 5.50 *Policy HAD13 – Design Considerations* provides a series of design principles, including requiring new development to avoid any adverse impacts on historic, architectural or archaeological heritage assets.
- 5.51 *Policy HAD11 – Local Green Spaces* proposes designation of 18 green areas, many of which may have local historic value.
- 5.52 The Haddenham Neighbourhood Area has a rich heritage with many assets of national significance, which have been afforded statutory designation. The HANP does not allocate any land or sites for development. Whilst opportunities for infill and windfall exist within the Development Envelope, the policies highlighted above include a number of measures to conserve heritage assets and also afford protection to other buildings of local significance, it is considered unlikely that any future development that may come forward within the Neighbourhood Area would adversely impact on any heritage assets or their settings.

Landscape

- 5.53 The Neighbourhood Plan Area is predominantly a fenland landscape. The main built-up areas of Haddenham and Aldreth sit above the surrounding Fens on low east-west, and north-south ridges of clay. The southern part of Aldreth is defined by its physical and visual connection to the River Great Ouse and its surrounding marshland.

²² <https://www.heritagegateway.org.uk/gateway/>

- 5.54 Policy *HAD8 – Protection of Important Views* includes measures to ensure proposed development do not detract from the key landscape and built development features from important views, including by adhering to the Haddenham Design Code, which accompanies the Neighbourhood Plan. The policy requires proposals outside Development Envelopes to provide evidence of visual and landscape impacts.
- 5.55 Policy *HAD9 – Settlement Gaps* conserves the essential landscape, heritage and rural character of the Neighbourhood Area. The policy requires development proposals to demonstrate how they would not result in the erosion of the settlement gaps identified on the Policies Map.
- 5.56 The HANP does not allocate sites for development and therefore, with the policies outlined above, it is considered not likely that the HANP would result in significant impacts on the local landscape.
- 5.57 **Following consideration of the HANP against the various SEA themes, this assessment concludes that HANP is not likely to give rise to significant effect on the environment.**

Determination of likely significant effects on European Sites - HRA Screening

Habitats Regulation Assessment (June 2018)

- 5.58 East Cambridgeshire's latest Habitats Regulation Assessment report²³ accompanied the submitted, but now withdrawn, Local Plan. The purpose of the HRA report was to set out the method, findings and conclusions of the Habitats Regulation Assessment (Stage 1 Screening and Stage 2 Appropriate Assessment) of the now withdrawn East Cambridgeshire Local Plan. The HRA was carried out by East Cambridgeshire District Council, as the competent authority, in consultation with Natural England.
- 5.59 Despite the Local Plan having been withdrawn, this HRA continues to be considered relevant and appropriate in the context of this SEA/HRA screening assessment since it relies on more up to date evidence than the HRA which supported the Local Plan 2015, such as evidence pertaining to designated sites, the current context of recent growth, other authorities' plans and strategies, and the views of stakeholders such as the statutory environmental bodies.
- 5.60 The HRA complies with the judgement of the Court of Justice for the European Union of 12th April 2018. Through the Local Plan examination process, Natural England confirmed the HRA is legally compliant.
- 5.61 The following European Sites, within and outside East Cambridgeshire's administrative boundary, were scoped into the HRA for consideration:
- Fenland SAC (including Wicken Fen, Woodwalton Fen and Chippenham Fen Ramsars)
 - Ouse Washes SAC/SPA/Ramsar
 - Devil's Dyke SAC
 - Breckland SAC/SPA
- 5.62 As discussed in section 3, there are no European Sites within the Haddenham Neighbourhood Area.
- 5.63 The HRA was prepared to assess the effects of the now withdrawn Local Plan. The withdrawn Local Plan proposed higher growth levels than the current adopted Local Plan 2015. The potential likely significant effects on designated sites arising from the withdrawn Local Plan were:
- Habitat damage and/or loss
 - Disturbance from urbanisation effects
 - Disturbance from increased recreational pressure
 - Reduced air quality as a result of increased vehicle journeys
 - Water quality changes from water consumption and abstraction
 - Reduced water quality from pollution due to increased demand for waste-water treatment

Fenland SAC - Wicken Fen

- 5.64 Haddenham Neighbourhood Area is located approximately 8 km from Wicken Fen. The HRA identified the following pressures and threats which could arise were the now withdrawn Local Plan implemented:

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<https://www.eastcambs.gov.uk/sites/default/files/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf>

- **Increased recreational pressure:** The site lies within the East Cambridgeshire area and Natural England have advised that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations being within 8km of the site boundary of the Ramsar. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
- **Water quality:** The features of this site are sensitive to water quality changes. Water quality is important for floodplain fen, which is dependent on an adequate supply of nutrients being maintained to support aquatic habitats and the range of species associated with them.
- **Water quantity:** The features of this site are water resource sensitive.

Fenland SAC – Chippenham Fen

5.65 Haddenham Neighbourhood Area is located approximately 17 km from Chippenham Fen. The HRA identified the following pressures and threats which could arise were the now withdrawn Local Plan implemented:

- **Increased recreational pressure:** This European Site lies within the East Cambridgeshire area and Natural England have advised (see Appendix 6) that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations being within 8km of the site boundary of the Ramsar. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
- **Urbanisation:** An employment allocation in Fordham is less than 400m from the site boundary of Chippenham Fen. The site's features are therefore potentially exposed to increased urbanisation pressure.
- **Water quality:** The features of this site are sensitive to water quality changes, particularly high nutrient water reaching the fen from a mixture of groundwater, rainwater and run-off.
- **Water quantity:** The features of this site are water resource sensitive, with concerns water does not seep into site compartments between ditches to the extent it once did.

Fenland SAC - Woodwalton Fen

5.66 Haddenham Neighbourhood Area is located approximately 18 km from Woodwalton Fen. Woodwalton Fen was screened in for consideration prior to Stage 1 Screening, however the screening assessment did not identify any potential impact pathways between this site and the proposals in the East Cambridgeshire Local Plan. On this basis, Woodwalton Fen was ruled out of further consideration of the HRA.

Ouse washes

5.67 The Ouse Washes SPA and Ramsar intersects the Haddenham Neighbourhood Area at its western boundary. The Ouse Washes SAC is located just 350m from the Neighbourhood Area boundary. The HRA identified the following pressures and threats which could arise were the now withdrawn Local Plan implemented:

- **Physical damage/ loss of habitat:** Some site allocations within the Local Plan fall within the 'Goose and Swan Functional IRZ' for this site, recently prepared by Natural England. Land within this zone is considered to be potentially functionally linked to the Ouse Washes and therefore there is the potential for likely significant effects on the integrity of the European Site.

- **Increased recreational pressure:** This European Site lies within the East Cambridgeshire area and Natural England have advised (see Appendix 6) that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations in the Plan being within 8km of the site boundary of the SPA. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
- **Water quality:** The features of this site are sensitive to water quality changes, particularly inappropriate levels of nutrients from diffuse pollution in combination with inappropriate water levels.
- **Water quantity:** The features of this site are water resource sensitive and are particular vulnerable to increased flooding.

5.68 The HRA identifies that land beyond the boundary of the Ouse Washes may also provide important functional habitat for qualifying bird species. The HRA provides advice on development proposals on greenfield sites that fall within the Goose and Swan Functional Land IRZ to ensure there are no adverse effects on the qualifying species of the Ouse Washes. The Goose & Swan Functional Land IRZ intersects the western boundary of the Haddenham Neighbourhood Area.

Devil's Dyke

5.69 The full extent of the Devil's Dyke is over 11km long. The section designated as the Devil's Dyke SAC is approximately 16 km from the Haddenham Neighbourhood Area.

5.70 The provides the following summary of threats and pressures to Devil's Dyke SAC, relating to habitat damage or loss and recreational pressure:

This species rich calcareous grassland is vulnerable to vegetation succession by rank grasses and requires active management by grazing. It is also vulnerable to increased recreational pressure. Habitat degradation is occurring, particularly through trampling of vegetation and soil enrichment from dog excrement. Antisocial behaviour such as littering, fires and other activities is damaging vegetation. Dogs off leads also pose a risk to the continuance of the essential long term management of the site through livestock grazing. The site is also potentially at risk from atmospheric nitrogen deposition, although the site improvement plan states this requires further investigation.

p16, Habitats Regulation Assessment 2018

5.71 In addition, the HRA identifies that air pollution is a key issue for the Devil's Dyke SAC, since it lies within 200m of the A14 and A1304. Natural England's Site Improvement Plan (SIP) for Devil's Dyke states: "nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site. This requires further investigation".

5.72 According to the SIP, Devil's Dyke SAC does not support any notified species that are sensitive to changes to water quality and/or quantity and does not list this impact as a priority pressure or threat.

5.73 In summary, potential pressures or threats to the Devil's Dyke SAC are:

- **Increased recreational pressure:** This European Site lies within the East Cambridgeshire area and Natural England have advised that the qualifying features of

the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations being within 8km of the site boundary of the SAC. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.

- **Reduced air quality:** The interest features of the SAC are sensitive to atmospheric pollutants and Devil's Dyke lies within 200m of the A14 and A1304, which may be used by new residents of site allocations in the settlements of: Bottisham, Burrough Green/ Burrough End, Dullingham, Swaffham Bulbeck, Swaffham Prior to access services and facilities in Newmarket. There is therefore potential for likely significant effects.

Breckland SAC/SPA

5.74 Haddenham Neighbourhood Area is located approximately 23 km from Breckland SAC/SPA. The HRA identified the following potential pressures and threats which could arise were the now withdrawn Local Plan implemented:

- **Physical damage/ loss of habitat:** Site allocation KEN.M1 within the Local Plan falls within the IRZ for Breckland Farmland SSSI, a component of Breckland SPA. Land within this zone is considered to be potentially functionally linked to Breckland and therefore there is the potential for likely significant effects on the integrity of the European Site.
- **Increased recreational pressure:** Whilst the site is outside of the East Cambridgeshire area, a mixed use site allocation at Kennett (KEN.M1) is approximately 2km from Breckland Farmland SSSI, a component of Breckland SPA and falls within the IRZ for this SSSI. The Breckland Farm SSSI has interest features that are potentially sensitive to increased recreational pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations in the Plan being within 8km of the site boundary of the SPA. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
- **Urbanisation:** Whilst urbanisation is recognised in the SIP for Breckland SPA/SAC as a priority issue, there is no development proposed in the Local Plan within 400m of the site boundary. The Local Plan will therefore have no effect via this pathway.

Potential for likely significant effects

5.75 The HRA concluded that:

...after taking into account the above mitigation measures and consideration of other plans, that there will be no likely significant effects, alone or in combination, on the Ouse Washes SAC/SPA or Fenland SAC, resulting from water quality or quantity changes through the implementation of the East Cambridgeshire Local Plan.

5.76 Natural England confirmed the HRA followed accepted methodology, was in line with relevant legislation and guidance, and agreed with the conclusion of the HRA²⁴.

5.77 Whilst growth is a potential threat to European Sites, the HANP does not make site allocations and provides only limited opportunities for new development, such as infill and

²⁴ Appendix 7, HRA 2018:

<https://www.eastcambs.gov.uk/sites/default/files/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf>

windfall development. Since such opportunities for development already exist through the Local Plan 2015, likely significant effects on the integrity of the Wicken Fen SAC are not expected to arise from implementation of the HANP.

5.78 Policy *HAD7 – Conserving and Enhancing Internationally Designated Sites* provides the highest level of protection to European Sites. The policy indicates that proposals likely to have an adverse impact on the integrity of such sites will not be permitted other than in exceptional circumstances. The policy requires certain developments to undertake a Habitats Regulations Assessment, and sets requirements for avoidance and mitigation measures.

5.79 Policy *HAD11 – Local Green Spaces* proposes 18 green areas for designation as 'Local Green Spaces', for protection in accordance with national policy for Green Belts. Policy *HAD6 - Sport and Recreation Facilities* supports proposals for the provision, enhancement and/ or expansion of sport or recreation open space or facilities, and resists the loss of existing sport and recreation facilities. By providing and maintaining opportunities for recreation could help to reduce visitor pressure on European Sites.

5.80 **Having regard to the nature of the policies in the HANP and vulnerabilities of European Sites, this HRA screening considers that the HANP is not likely to have a significant effect on any European Site, either alone or in combination, with other plans and projects.**

SEA/HRA Assessment

5.81 **Figure 3** provides assessment of the HANP against the SEA Directive criteria to identify likely *significant* effects on the environment.

5.82 **Figure 4** applies the SEA Directive criteria to the HANP as per the flow chart in **Figure 2**, to determine whether the *principle* of the HANP would warrant the need for SEA.

FIGURE 3: ASSESSMENT OF THE LIKELY SIGNIFICANT EFFECTS ON THE ENVIRONMENT

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely <i>significant</i> environmental effect
1. The characteristics of plans and programmes, having regard, in particular, to –		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The HANP has been prepared for town and country planning purposes and would, if adopted, form part of the statutory Development Plan and contribute to the framework for future development projects.</p> <p>The principle of development in the Neighbourhood Area, including the nature of development, location and scale, has already been determined by the East Cambridgeshire Local Plan 2015 and is therefore largely beyond the influence of the HANP. Any significant effects arising from the proposals in the Local Plan have already been identified through the SA of that plan, and through the updated HRA 2018.</p> <p>The HANP would only apply to a small geographical area (the Haddenham Neighbourhood Area) where a limited number of proposals are anticipated over the plan period, and any proposals are expected to be of a small scale.</p>	No
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	<p>The HANP must be in general conformity with the strategic policies of the East Cambridgeshire Local Plan and national planning policy as set out in the NPPF.</p> <p>The HANP provides policies for the Plan area, relevant to the parish area only. The HANP would therefore not strongly influence other plans and programmes higher up the spatial planning hierarchy.</p>	No
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	<p>It is a basic condition that a NDP must contribute to the achievement of sustainable development. The HANP seeks to ensure that environmental considerations are taken into account. It includes the following policies which promote environmental considerations with a view to promoting sustainable development:</p> <ul style="list-style-type: none"> • <i>Policy HAD1 – Spatial Strategy</i> • <i>Policy HAD7 – Conserving and Enhancing Internationally Designated Sites</i> • <i>Policy HAD8 – Protection of Important Views</i> • <i>Policy HAD9 – Settlement Gaps</i> • <i>Policy HAD10 – Dark Skies</i> • <i>Policy HAD11 – Local Green Spaces</i> • <i>Policy HAD12 – Buildings and Features of Local Interest</i> • <i>Policy HAD13 – Design considerations</i> 	No

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely <i>significant</i> environmental effect
	<ul style="list-style-type: none"> • <i>Policy HAD14 – Sustainable Building</i> • <i>Policy HAD15 – Flooding and Sustainable Drainage</i> <p>Other policies in the plan seek to address social and economic matters, such as ensuring that new development helps meet housing needs, community facilities and infrastructure, etc.</p> <p>These policies are compatible with the adopted East Cambridgeshire Local Plan, which was subject to both SA/SEA and HRA throughout the plan making process.</p>	
(d) environmental problems relevant to the plan or programme; and	There are no specific environmental problems relevant to the HANP that have not been identified and assessed through the higher-level Local Plan and its accompanying SA/SEA.	No
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The content of the HANP is not in conflict with any plans or programmes within the wider area for the implementation of Community legislation on the environment.	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to —		
(a) the probability, duration, frequency and reversibility of the effects;	<p>The probability, duration, frequency and reversibility of the effects has generally been tested through the SA/SEA of the Local Plan, since the HANP does not allocate new sites for development.</p> <p>Future development is likely to be principally ‘windfall’ development, the effects of which carries some uncertainty. However, opportunities for windfall development are likely to be on small-scale windfall sites, which are likely to be fairly limited in supply. Such opportunities for windfall development already exist through the Local Plan 2015, therefore the HANP does not deviate from the existing Development Plan’s spatial strategy. Therefore, the effects are not expected to be significant and are likely to be minimal.</p> <p>It is likely that some policies may result in positive effects (but not <i>significant</i> effects) by helping to preserve and enhance the environmental features within the Neighbourhood Area.</p>	No

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely <i>significant</i> environmental effect
	See also paragraphs 5.4 to 5.57 above.	
(b) the cumulative nature of the effects;	As above in 2(a)	No
(c) the transboundary nature of the effects;	The HANP is not expected to give rise to any transboundary effects.	No
(d) the risks to human health or the environment (for example, due to accidents);	The HANP is not anticipated to give rise to any significant environmental effects that would pose risk to human health or the environment: the effects of the policies in the HANP may enhance these elements.	No
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	<p>The Haddenham Neighbourhood Area is coterminous with the boundary of Haddenham parish.</p> <p>Haddenham parish has a population of 3,344 people at the time of the 2011 Census.</p> <p>The spatial extent of any effects of the implementation of the HANP are expected to be limited to the immediate local area (i.e. the Neighbourhood Area), therefore the magnitude and spatial extent of the effects are expected to be limited in both the local and wider district context.</p>	No
(f) 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; or (iii) intensive land-use; and	<p>As considered in paras 5.4 to 5.57 it is unlikely that the HANP would adversely impact the special natural characteristics or cultural heritage of the Neighbourhood Area. The HANP is not expected to exceed environmental quality standards or lead to intensive land use.</p> <p>The HANP does not allocate sites for development. Furthermore, the HANP includes policies which promote environmental considerations and seek to provide greater protection for the character of the area. Therefore, it is not considered that there will be any significant adverse impacts in terms of criteria (f) (i to iii).</p>	No
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	The Haddenham Neighbourhood Area includes a number of areas and assets benefitting from protection through statute of local policies, including a Conservation Area, Listed Buildings, Scheduled Monuments, SAC/Ramsar, SSSIs and County Wildlife Sites. Since the HANP offers limited opportunities for growth, and as the HANP includes a range of policies which seek to conserve such features, as discussed in paras 5.4 to 5.57, implementation of the HANP is not likely to result in significant effects on such assets.	No

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely <i>significant</i> environmental effect
	Effects of the HANP on landscapes are expected to be positive and localised. The HANP includes a range of measures to conserve landscapes, including defining settlement gaps, protection for locally important views, designation of Local Green Spaces, and requiring new development to adhere to a Design Code. However, the effects are not likely to be significant in the context of SEA.	

FIGURE 4: APPLICATION OF THE SEA DIRECTIVE TO HADDENHAM AND ALDRETH NEIGHBOURHOOD PLAN

Criteria	Response: Yes/ No/ Not applicable	Details
1. Is the NDP 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))	Yes	The preparation and adoption of the HANP is allowed under the Town and Country Planning Act 1990, as amended by the Localism Act 2011. Whilst the HANP has been prepared by Haddenham Parish Council, it will be adopted by ECDC as the local authority and will form part of the statutory development plan for the East Cambridgeshire area. GO TO STAGE 2
2. Is the NDP required by legislative, regulatory or administrative provisions? (Art 2 (a))	Yes	Whilst the production of a NDP is not a requirement and is optional, it will, if made, form part of the statutory development plan for the East Cambridgeshire area. It is therefore important that this screening process considers the potential effects. GO TO STAGE 3
3. Is the NDP 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))	Yes – Town & Country Planning / land use; No - EIA Directive Annex I & II	The HNP is being prepared for town and country planning and land use, setting a framework for future development consents within the Haddenham Neighbourhood Area. However, the NDP does not set a framework for consent of projects in Annexes I and II to the EIA Directive. GO TO STAGE 4
4. Will the NDP, 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))	No	See paras 5.58 to 5.82 and Figure 3 for assessment of the NP in terms of HRA. GO TO STAGE 6
5. Does the NDP determine the use of small areas at local level, OR is it a minor modification of an NDP subject to Art. 3.2? (Art 3.3)	n/a	
6. Does the NDP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Yes	Once 'made' the HANP forms part of the Development Plan and will be used in the decision making process on planning applications. It therefore sets the framework for future developments at a local level. GO TO STAGE 8

Criteria	Response: Yes/ No/ Not applicable	Details
7. Is the NDP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7?	n/a	The HANP does not deal with these issues.
8. Is it likely to have a significant effect on the environment?	No	A NDP could potentially have a significant effect on the environment, dependent on the proposed policies within the NDP. This requires detailed assessment to determine – see 5.4 to 5.57 and Figure 3 , which identify that no likely significant effects are expected to arise through implementation of the HANP.
Outcome: SEA NOT REQUIRED		

6 Consultation with Statutory Bodies

- 6.1 The assessment in **Section 5** concludes that it is not likely that significant environmental effects will arise from implementation of the HANP and concludes that SEA is not required. The relevant statutory consultation bodies, namely the Environment Agency, Historic England and Natural England, were consulted on this SEA/HRA screening opinion. Responses received from the consultation bodies are set out in full in Appendix 1 and summarised below.
- 6.2 The Environment Agency confirm that it considers the HANP to be in line with the NPPF's *Sequential Approach*, and indicate that based on the environmental constraints within the area, it has no detailed comments to make in relation to the HANP at this stage.
- 6.3 Historic England confirms that, on the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations, Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.
- 6.4 Natural England confirm that on the basis of the material supplied with the consultation, that, in so far as its strategic environmental interests, are concerned, there are unlikely to be significant environmental effects from the proposed HANP. In addition, Natural England agrees with the report's conclusions that the HANP would not be likely to result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work is required.
- 6.5 Through consultation on the draft screening report, the statutory bodies concur with the Council's view that a full Strategic Environmental Assessment and full Habitats Regulation Assessment is not required.

7 SEA/HRA Screening Outcome

- 7.1 Having reviewed the environmental characteristics of the HANP area and the vision, objectives and policies against the criteria set out in **Section 5** of this report, ECDC consider that no likely significant environmental effects will arise from implementation of the HANP. The HANP is **screened out** for further SEA.
- 7.2 **Section 5** of this report concludes that significant effects on designated European Sites are not likely, and therefore further HRA assessment under the Habitats Regulations is **screened out**.
- 7.3 Through consultation on the draft screening report, the statutory consultation bodies concurred with the Council's findings.
- 7.4 The HANP does not allocate land or sites for development, but provides guidance to be used to determine applications should they come forward. The policies in the HANP generally accord with the adopted East Cambridgeshire Local Plan, the potential environmental effects of which were duly assessed during the plan-making process through SA/SEA and HRA assessments. To take an alternative approach, such as preparing evidence bespoke to the HANP, would be disproportionate and result in unnecessary duplication. This would be contrary to national planning policy.
- 7.5 A number of HANP policies are particularly environmentally conscientious and address environmental issues positively by seeking to improve the quality of new development to reduce its impacts on the environment. For example, the HANP includes policies that: seek to protect the townscape and landscape character, seek to preserve or enhance heritage assets and their settings, protect and enhance biodiversity and open green spaces. However, for the purposes of SEA, these effects are not considered 'significant'.
- 7.6 In the event that the vision, objectives and/or policies covered by the HANP should change significantly during the plan-making process, or specific sites are allocated for development, this screening process should be repeated for the revised plan.

Appendix 1: Consultation Response from Statutory Bodies

Environment Agency's response

Thank you for consulting the Environment Agency on the SEA screening Report and Draft Haddenham Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

Policy HAD 15 - Flooding & Sustainable Drainage

The National Planning Policy Framework (NPPF) requires that a Sequential Approach is used to allocate areas for development.

The three Development Envelopes listed within the Neighbourhood Plan (Haddenham, Aldreth and Hill Row) are all located within Flood Zone 1 and located outside of the areas identified as being at risk of flood due to the failure of the middle level main drain.

We therefore consider that the Plan is in line with the NPPFs Sequential Approach.

There are areas within the Neighbourhood Plans Area that are identified as being at risk of flooding due to the failure of the Middle Level Barrier Bank flood defences. This is focused on the western section of the area. This information can be obtained from the Environment Agency or viewed within the East Cambridgeshire SFRA. We recommend that consideration is given to incorporating measures within the flood risk policy to ensure that flood resistance and resilience measures are designed into developments within the area at risk.

The Flood Map for Surface Water doesn't indicate large areas at risk of flooding. However, the road network is shown to be at various levels of risk. We would support the inclusion of policies that reduce the volume of run off of rainfall onto the road. This will help increase the resilience of the communities to the impacts of flooding.

Based on the environmental constraints within the area, we therefore have no detailed comments to make in relation to your Plan at this stage. However together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environmentagency.gov.uk/LIT_6524_7da381.pdf

Please note that the view expressed in this letter is a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.

I hope that this information is beneficial to you. Please do not hesitate to contact me if you have any further queries regarding this matter.

Yours faithfully

Mrs Dawn Porter

Sustainable Places Planning Advisor

Historic England's response

Thank you for inviting Historic England to comment on this consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Haddenham Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report indicates that the Council considers that the plan will not have any significant effects on the historic environment. We note that the plan does not propose to allocate any sites for development.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your correspondence. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Please do contact me, either via email or the number below, if you have any queries.

Kind regards,

Edward James

Historic Places Adviser - East of England

Historic England

Natural England's response

Thank you for your consultation on the above dated 06 September 2021 which was received by Natural England on 06 September 2021

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance 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
- 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.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

Habitats Regulations Assessment (HRA) Screening

Natural England agrees with the report's conclusions that the Haddenham and Aldreth Neighbourhood Plan Neighbourhood Plan would not be likely to result in a significant effect on any

European Site, either alone or in combination and therefore no further assessment work would be required.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Jacqui Salt

Consultations Team