20 August 2021

EAST CAMBRIDGESHIRE DISTRICT COUNCIL

Strategic Environmental Assessment Determination Statement:

Draft Reach 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 Reach Neighbourhood Plan. As part of this assessment, ECDC consulted the statutory bodies. The SEA Screening Report follows this Determination Statement.

The Screening Report examines the strategic policy and environmental context relevant to Reach, and presents the findings of the screening assessment. The report identifies that the draft Reach 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 (29 June to 03 August 2021). Responses were received from Historic England, Natural England and Environment Agency.

Through its response to the draft Screening Report consultation, the Environment Agency agreed with the conclusion that an SEA is not required for the Reach Neighbourhood Plan, noting that it is unlikely that significant environmental effects will arise from the Plan.

Historic England concurred with the Council that the preparation of a Strategic Environmental Assessment is not required.

Natural England confirm it agrees with the report's conclusions that the Reach 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 is required.

Based on the assessment undertaken in the SEA Screening Report and the responses received from statutory bodies, East Cambridgeshire District Council considers that no likely significant environmental effects will arise from implementation of the Reach Neighbourhood Plan. Strategic Environmental Assessment of the Reach Neighbourhood Plan is not required.

East Cambridgeshire District Council

Strategic Environmental Assessment & Habitats Regulations Assessment Screening Report

August 2021

On behalf of Reach Parish Council

Date of assessment:	20 August 2021
Date/ version of neighbourhood development plan to which Screening Report applies:	Reach Neighbourhood Plan Pre-Submission Consultation Version – June 2021

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Overview

Neighbourhood Development Plan to which this Screening Report applies:
Reach Neighbourhood Plan

Version/ date of Neighbourhood Development Plan to which this Screening Report applies:
Reach Neighbourhood Plan Pre-Submission Consultation Version – June 2021

Neighbourhood area to which the Neighbourhood Development Plan applies:
Reach Neighbourhood Area

Qualifying Body within the neighbourhood area:
Reach 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
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
RNP	Reach Neighbourhood Plan
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 Reach Neighbourhood Plan (RNP) requires a full Strategic Environmental Assessment (SEA) and / or Habitats Regulations Assessment (HRA). The screening exercise will therefore support the RNP in satisfying the basic conditions, and will be submitted as part of the evidence base which will accompany the Neighbourhood Development Plan (NDP).

1.2. This version of the Screening Report has been prepared following consultation with statutory consultation bodies. A draft version of this report was published for consultation from 29 June to 03 August 2021.

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

1.3. 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.

1.4. 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]*.*

1.5. 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.

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

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

1.7. 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.

1.8. *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.

1.9. 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.

1.10. 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.

1.11. In general terms, a NDP may require full SEA following screening, where its policies and proposals are likely to result in <u>significant</u> 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.

1.12. 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.

1.13. 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) are 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.

[2] https://www.legislation.gov.uk/uksi/2019/579/contents/made

Responsibilities

Local Planning Authority (ECDC)

1.14. As local planning authority, ECDC is ultimately responsible for ensuring that 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.

1.15. ECDC took responsibility for coordinating consultation on the Draft Screening Report.

Qualifying Body (Reach Parish Council)

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

Statutory Bodies

1.17. 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

1.18. For the purpose of SEA for the RNP, the statutory bodies were requested to review and make representations during consultation on the draft version of the Screening Report. Details of the representations received from the statutory bodies are provided in Section 6.

Report structure

1.19. Following this introductory section, Section 2 describes the strategic planning context against which the RNP is being prepared.

1.20. Section 3 provides key information about the RNP and Reach 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.

1.21. Section 4 describes the SEA methodology. Section 5 provides assessment of the RNP against various SEA themes to identify the likelihood of significant effects on the environment, drawing on the environmental constraints identified in section 3.

1.22. Section 6 sets out the responses from Statutory Bodies on the draft version of the Screening Report. 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 RNP 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 Reach

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 Reach Neighbourhood Area is contiguous with Reach parish boundary (which includes the small village of Reach) and is located within East Cambridgeshire's rural area. The Local Plan provides a description of Reach's characteristics, noting its relationship to some significant landscape features:

> *Reach is a small hamlet in a pleasant setting about 6 miles north-west of Newmarket. It has a clearly defined centre around Fair Green and the majority of the village is covered by a Conservation Area. Reach Lode is to the north of the hamlet and to the south is Devils Dyke an Anglo-Saxon earthwork which is classified as a Scheduled Ancient Monument, and as a Site of Special Scientific Interest.*
>
> p249 East Cambridgeshire Local Plan

2.12. The Local Plan expects only limited growth to occur within Reach over the course of the plan period:

> *Reach is likely to continue to grow at a slow rate, with new housing being built on suitable 'infill' sites within the village. No new housing allocation sites are proposed on the edge of Reach.*
>
> p250 East Cambridgeshire Local Plan

2.13. For the avoidance of doubt, Reach is not one of the 'market towns' described as the focus for growth in policy GROWTH 2. The Local Plan defines a Development Envelope around Reach village within which such 'infill' development will generally be acceptable. Applying policy GROWTH 2, Reach's 'place' in the locational strategy is as a '*village with a defined development envelope'* in which '*more limited development*' will take place.

2.14. The Local Plan does not identify any site allocations in Reach.

2.15. With only very limited growth opportunities, the Local Plan's top priority for the area is for improvements to pedestrian/cycle links in and around Reach. Other priorities include more school places, improvements to the sports ground/open space, the village hall and traffic calming.

Withdrawn Local Plan

2.16. 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.

2.17. 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. Development opportunities for Reach remained limited, mainly to windfall and infill within the Development Envelope.

2.18. Following withdrawal of the Local Plan, East Cambridgeshire District Council has retained 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.

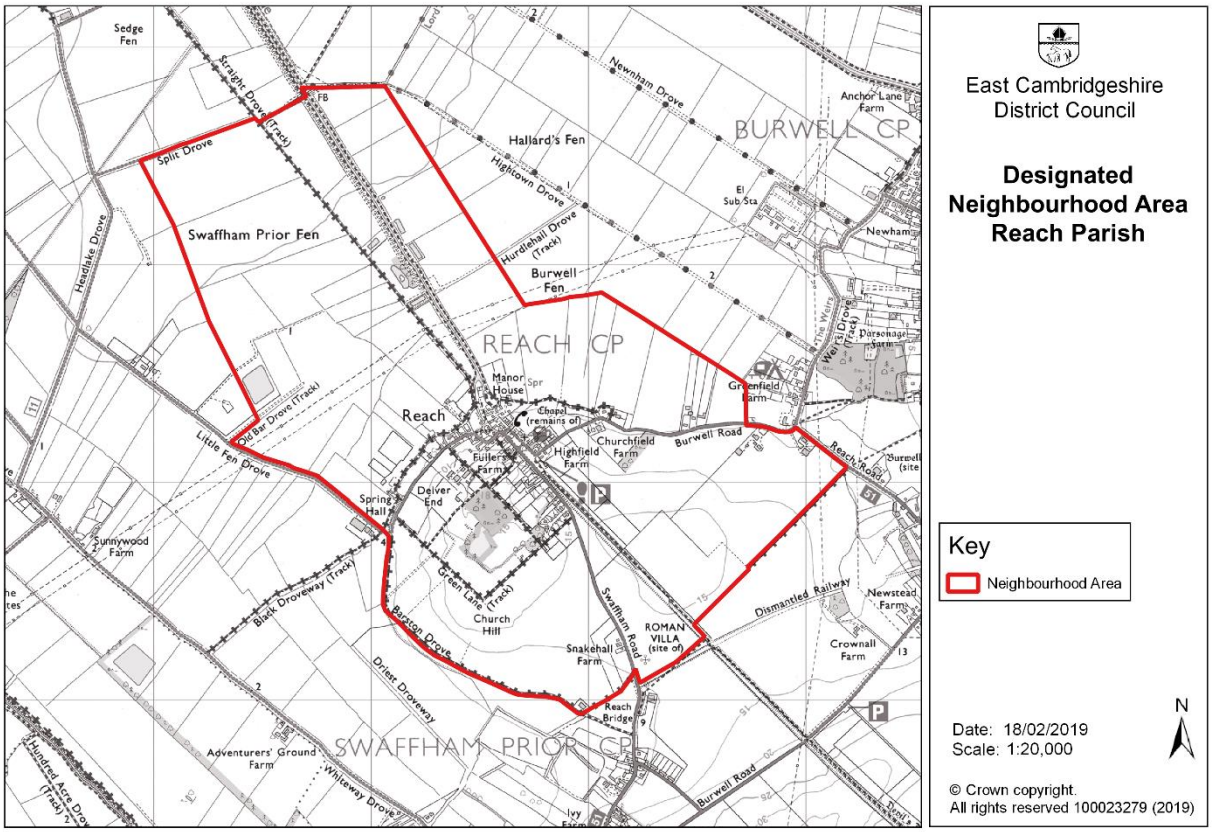
3. Summary of Reach Neighbourhood Plan

Overview of the Neighbourhood Development Plan

3.1. The subject of this screening report is the Reach Neighbourhood Plan, Pre-submission Consultation Version - June 2021. The next stage of the RNP will be the Regulation 14 consultation, which is expected to take place in June/July 2021.

3.2. The RNP has been prepared by Reach Parish Council, the 'qualifying body' for the purposes of neighbourhood planning. The Reach Neighbourhood Area was formally designated by ECDC on 18 February 2019 and comprises the whole of the parish area of Reach. The designated area is shown in **Map 1** below.

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



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

"In 2031 Reach will have retained its distinct identity where limited sustainable development has taken place that:

- ***meets identified needs of the local community;***
- ***respects the high quality historic and natural environment;***
- ***embraces new technology; and***
- ***makes a positive contribution towards reducing the impact of climate change."***

3.4. The RNP identifies a set of 15 objectives to achieve the vision, many of which echo the three over-arching objectives for sustainable development: environmental, social and economic:

Housing Objectives
1. **Meet the projected housing requirement for the village to 2031.**
2. **Ensure that new homes respond to the identified local needs of Reach.**

Economy and Tourism Objectives
3. Support small scale locally sustainable economic initiatives that support the village.
4. Manage opportunities for environmentally sensitive tourism related initiatives.

Natural Environment Objectives
5. Minimise impact on the natural environment and improve biodiversity.
6. Protect and enhance the rural setting of the village.

Historic Environment Objectives
7. Ensure new development is appropriate to the historic character of the village.
8. Recognise and protect the historic importance of buildings and character areas.

Development Design Objectives
9. Have a positive effect on the environment, by promoting actions that contribute to mitigating the Climate Crisis and reducing the carbon footprint.
10. Influence and guide suitable designs of new developments within the Parish.

Infrastructure and Services Objectives
11. Retain existing facilities and encourage the provision of new services and facilities.
12. Ensure that the essential infrastructure including highways is maintained and, where necessary, improved.

Travel Objectives
13. Minimise the impact of the motor vehicle on the village.
14. Improve public transport provision to Cambridge and Newmarket
15. Improve opportunities for non-motorised travel, especially to Burwell

3.5. To deliver the Vision and Objectives, the RNP proposes 19 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 Reach Neighbourhood Plan Policies

Policy	Summary
Policy RCH1 – Spatial Strategy	The policy updates the Development Envelope around Reach village, reflecting recent planning consents and completed developments. Sustainable development proposals within the Envelope are supported in principle, 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. The policy strictly limits development outside the Envelope (i.e. in the countryside) to essential utilities infrastructure, and proposals relating to existing businesses, agriculture, horticulture, forestry, outdoor recreation and other exceptional uses.
Policy RCH2 – Housing Development	The Plan provides for the development of around 8 additional dwellings over the plan period 2021 to 2031 through the implementation of existing planning permissions. No new sites are identified. The policy allows the development of small brownfield “windfall” sites and infill plots within the Development Envelope.
Policy RCH3 – Housing Mix	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.
Policy RCH4 – New businesses and employment	The policy supports proposals for small scale business development within the Development Envelope, where there is no detrimental impact on the amenity of residents, traffic volume, or on the character or appearance of the built environment.
Policy RCH5 – Farm Diversification	Proposals for new employment uses of redundant traditional farm buildings and other rural buildings are supported, where it is demonstrated that they are no longer viable or needed for farming.
Policy RCH6 – Landscape Quality	The policy seeks to conserve the landscape, heritage and rural character of the Neighbourhood Plan Area. The policy requires development proposals to demonstrate how they conserve or enhance the rural character and setting of Reach village; avoid the loss of 'settlement gaps'; avoid detrimental impact on important views; and have regard to the Landscape Appraisal Development Guidelines.
Policy RCH7 – Green Infrastructure	The policy seeks to resist proposals which would cause loss or harm to the green infrastructure network, and lends support to proposals which will strengthen the green infrastructure network and public enjoyment of it.
Policy RCH8 – Biodiversity	The policy requires development proposals to enhance the natural and local environment by avoiding impacts where possible, and where avoidance isn’t possible, minimising impacts on biodiversity and providing measurable net gains for biodiversity. In the absence of a national system to secure biodiversity net gains, the policy sets a series of requirements to mitigate impacts on habitats and biodiversity, utilising national tools and metrics. Proposals are required to demonstrate the value of the habitat through ecological surveys. The policy favours on-site biodiversity net gain, allowing off-site gains in exceptional circumstances.

Policy RCH9 – Local Green Spaces	The policy designates seven green areas as Local Green Spaces, providing protection from development in accordance with national policy for Green Belts.
Policy RCH10 – Heritage Assets	The policy seeks to conserve and enhance the village's heritage assets, and includes a range of requirements to ensure policies preserve or enhance the significance of heritage assets and their settings, and the wider built environment including views of the Conservation Area. Where a proposal affects a heritage asset, it must be accompanied by a Heritage Statement.
Policy RCH11 – Buildings of Local Significance	The Plan identifies local heritage assets and buildings of local significance. The policy seeks to ensure that such assets are protected, requiring proposals affecting such assets to be supported by analysis of the significance of the asset.
Policy RCH12 – Design Considerations	The policy requires proposals to reflect the local characteristics and contribute to a high quality, safe and sustainable environment, and requires proposals to demonstrate how they satisfy the requirements of a 'Development Design Checklist'. In addition, the policy sets a number of specific design requirements to ensure new development is of high-quality design.
Policy RCH13 – Mitigating the risk of flooding from development	The policy requires proposals within areas at risk from surface water flooding to be accompanied by a site-specific flood risk assessment, and sets requirements for the management of surface water.
Policy RCH14 – 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, maximise energy efficiency, avoid fossil fuel-based heating systems, incorporate current sustainable design and construction measures and energy efficiency measures, and make provision for grey water/rainwater, and/or surface water harvesting and recycling. The policy also encourages proposals on fen soils to incorporate offsetting measures.
Policy RCH15 – Community Energy Proposals	The policy lends support to proposals for community led renewable energy initiatives. The policy also includes requirements to ensure proposals are proportional in scale and that the siting, scale and design of the energy generating infrastructure will not adversely affect the visual impact, landscapes and heritage assets.
Policy RCH16 – Dark skies	The policy aims to protect dark skies. The policy requires outdoor lighting to minimise light pollution and adverse effects on wildlife, and reduce energy consumption.
Policy RCH17 – Protecting Existing Services and Facilities	The policy seeks to protect facilities and services. Proposals are resisted unless the facility is not economically viable, there is no demand for the facility, or alternative facilities are available.
Policy RCH18 – Open Space, Sport and Recreation Facilities	The policy supports proposals for recreation facilities, and seeks to resist the loss of existing facilities unless the facility is surplus to requirement or a replacement is available.
Policy RCH19 – New vehicle-free routes	The policy supports proposals which deliver new or improved vehicle-free walking, cycling and equestrian routes.

Summary of Reach Neighbourhood Area Characteristics

3.6. In order to determine the likely significant effects of the RNP 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 Maps[3], the Environment Agency Flood Risk Map for Planning[4], Nomis[5], Cambridgeshire Insight parish profile[6], and the East Cambridgeshire Local Plan and accompanying documents.

Geography

3.7. Reach parish covers a total area of 457.8 ha. It is located in the south of East Cambridgeshire, 11 miles to the north east of Cambridge and 5 miles to the east of Newmarket.

Population & households

3.8. The Census 2011 indicates there 358 residents in the parish at 2011. Estimates from the Office for National Statistics indicate that the parish population in mid-2018 was 339; or a population density of 1.35 persons per ha.

3.9. The Census 2011 shows there were 134 households in Reach parish at 2011. Of which 85.8% were owned outright or owned with a mortgage or loan. Reach has an average household size of 2.67 people per household (Nomis). This is greater than the East Cambridgeshire average of 2.34 people per household.

3.10. The mean age of the population living in the parish of Reach at the time of the Census 2011 was 41.3 years. This is higher than the national average of 39.3 years and the average for East Cambridgeshire of 40.2 years. There were 58 residents aged 65 and over living within the RNP area.

3.11. In terms of the health of the population living within the RNP, at the time of the 2011 Census, 55% of the population of Reach described their health as ‘very good’ and 29.9% as ‘good’.

3.12. Just 3.7% of all households in Reach at the time of the 2011 Census had no cars or vans in the household. This is markedly lower than the figure for East Cambridgeshire (13.0%), and significantly lower than the figure for England (25.8%).

Internationally Designated Sites

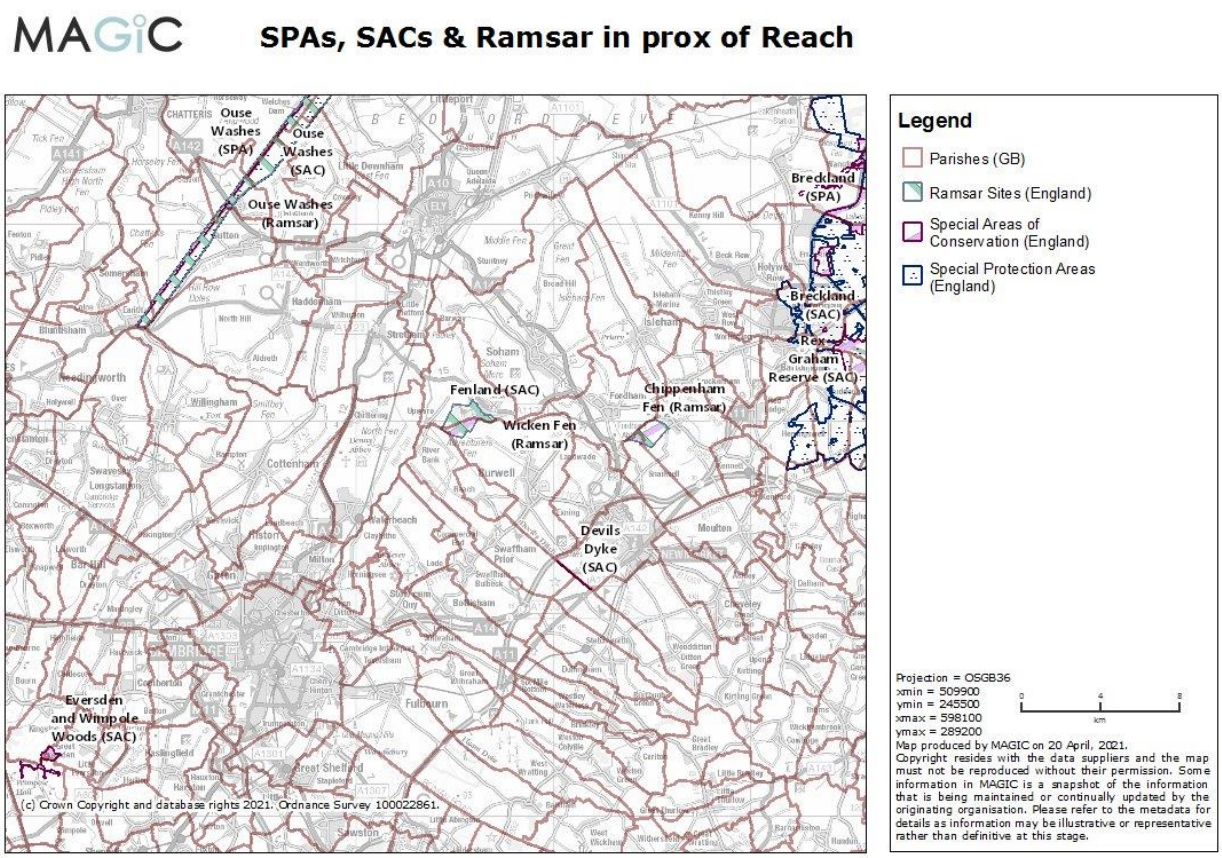
3.13. There are no internationally designated sites of nature conservation interest sites within the Reach Neighbourhood Area. The following European Sites (Special Protection Areas & Special Areas of Conservation, Ramsar) lie within approximately 30km of Reach parish (see **Map 2** for their location):

- Breckland SPA and SAC
- Devil’s Dyke SAC
- Eversden and Wimpole Woods SAC
- Fenland SAC (Chippenham Fen Ramsar)
- Fenland SAC (Wicken Fen Ramsar)
- Ouse Washes SPA, SAC and Ramsar
- Rex Graham Reserve SAC

[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=E04001639

3.14. There are no Proposed Ramsar sites, Possible Special Areas of Conservation, or Potential Special Protection Areas.

MAP 2: INTERNATIONALLY DESIGNATED SITES IN PROXIMITY OF REACH



Sites of Special Scientific Interest

3.15. There is one Site of Special Scientific Interest (SSSI) within the boundary of the RNP area:

- Devil's Dyke SSSI

3.16. The Devil's Dyke is an ancient linear earthwork, thought to be of Anglo-Saxon origin comprising a deep ditch and high bank which extends for around 7 miles from Woodditton south of Newmarket to Reach, north-west of the town, across open chalk country.

3.17. Also designated as a Scheduled Monument, the Devil's Dyke is thought to have been constructed to control the movement of people restricted by wetland to the north and thickly wooded claylands to the south at that time. The banks of the ditch were constructed from chalk dug from the surrounding land.

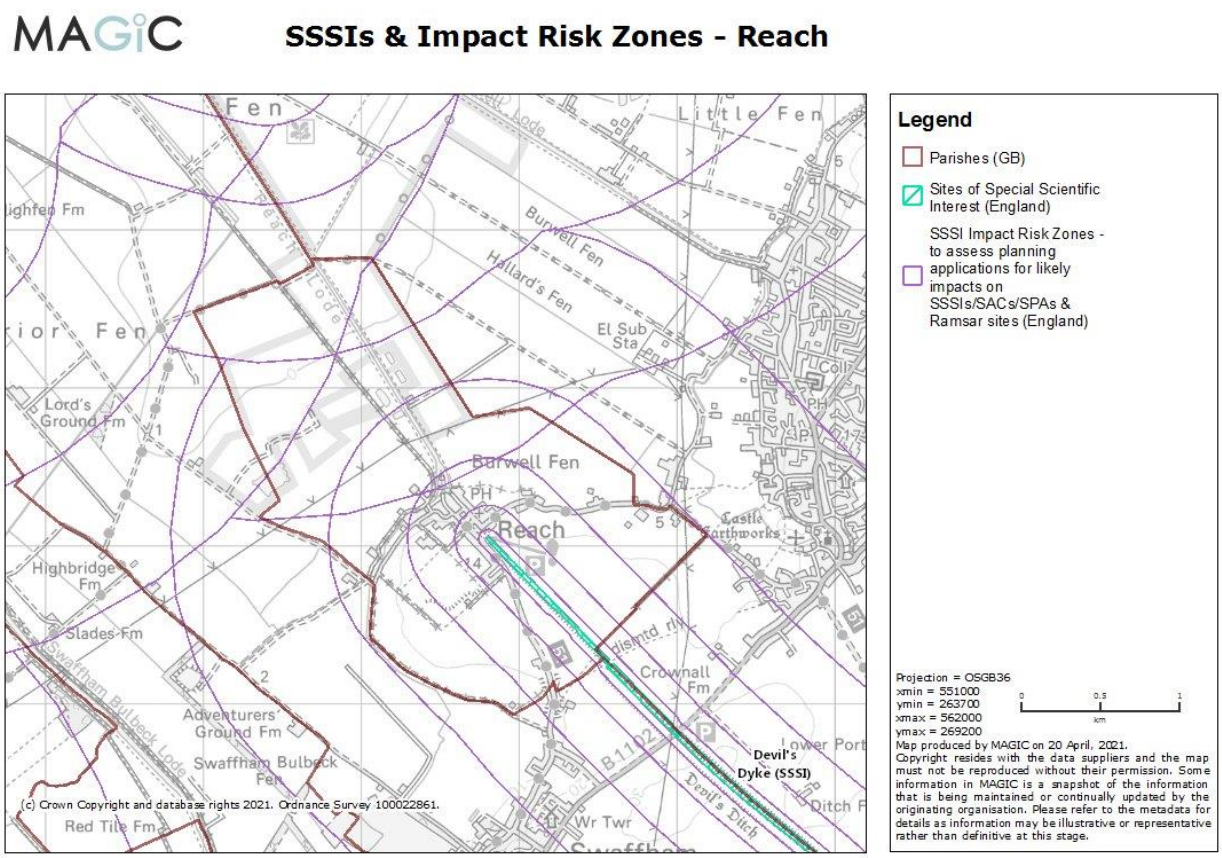
3.18. In the past sheep would have grazed Devil's Dyke and this management encouraged the development of grassland rich in a diversity of plants and animals originating from the surrounding chalk grassland, much now degraded or destroyed. For this reason the Dyke is important as one of the few remaining areas still supporting the relict chalkland vegetation communities. It holds one of the best and most extensive area of species-rich chalk grassland in the area, of a type characteristic of south, central and eastern England and represents a habitat now very restricted in distribution and extent throughout its British range.

3.19. A Public Right of Way runs along the top of the Dyke bank for the whole of its length and is very popular for the dramatic effect of the elevated route, extensive views across the gently rolling countryside and the rare plants and animals to be found. The section of Devil's Dyke SSSI adjacent to Newmarket Racecourse (also a SSSI, Newmarket Heath), Unit 3 of the SSSI, is designated a SAC. (NB. Whilst the SSSI section of Devil's Dyke is located within the Reach Neighbourhood Area, the Devil's Dyke SAC is located outside the Neighbourhood Area approximately 3.5km to the south-east.)

SSSI Impact Risk Zones

3.20. There are several SSSI Impact Risk Zones (IRZs), as defined by Natural England, that extend into the Reach Neighbourhood Plan Area (see **Map 3**), including the IRZ relating to the Devil's Dyke SSSI, Cam Washes SSSI and Wicken Fen SSSI. IRZs define zones around each SSSI site and reflect the particular sensitivities of the features for which it has been notified and indicate the types of development proposal which could potentially have adverse impacts.

MAP 3: SSSIS & IRZS IN REACH



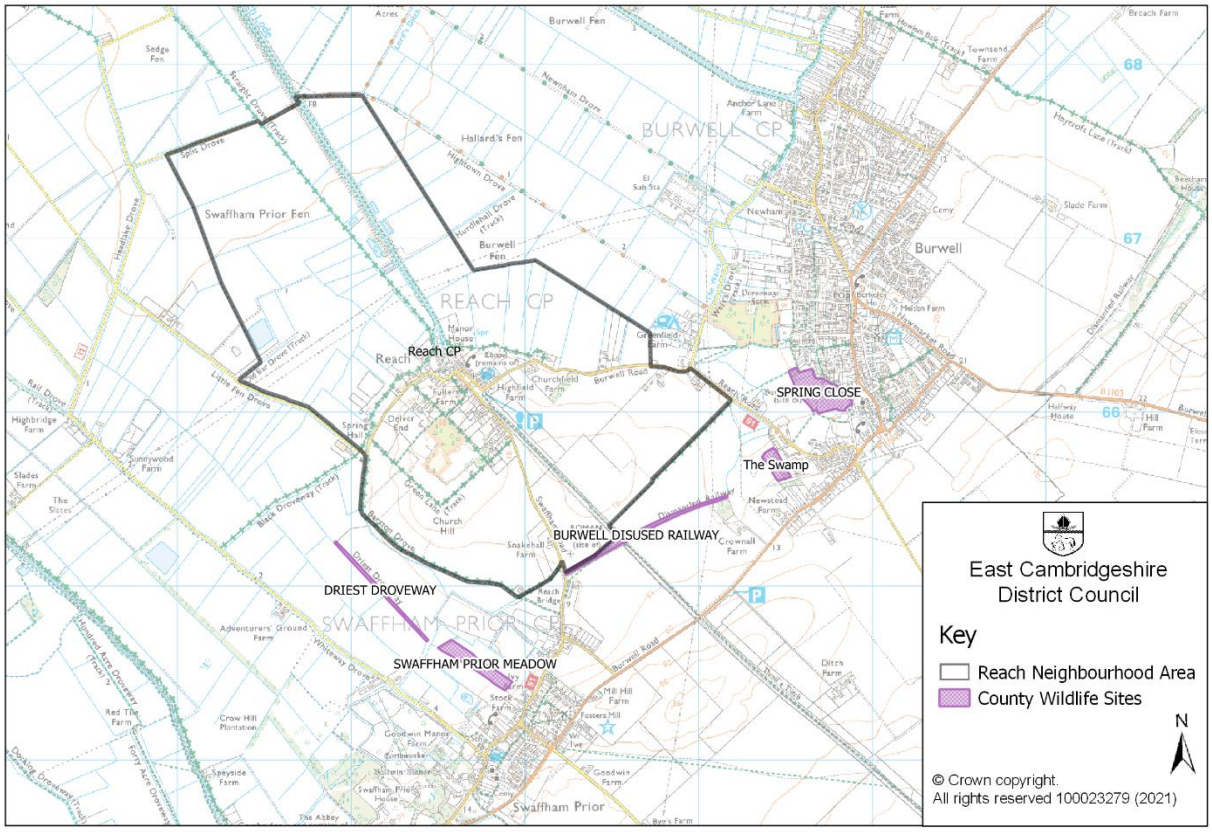
Locally Designated Sites

3.21. There are no Local Nature Reserves within the RNP area. There is one County Wildlife Site within the boundary of the RNP area – Burwell Disused Railway County Wildlife Site, which intersects the southern boundary of Reach parish, but is mainly located in adjoining Swaffham Prior parish and Burwell parish (see **Map 4**).

3.22. A number of County Wildlife Sites (CWS) are located in close proximity of the RNP area. For example, the following CWSs are located within 400m of Reach parish:

- Burwell Disused Railway CWS
- Driest Droveway CWS
- Swaffham Prior Meadow CWS
- The Swamp CWS
- Spring Close CWS

MAP 4: COUNTY WILDLIFE SITES IN CLOSE PROXIMITY OF REACH



National Character Areas

3.23. The RNP area lies within two National Character Areas (NCAs). The north-western 'half' of the parish is located in The Fens NCA, and the south eastern half of the parish is located in the East Anglian Chalk NCA. The key characteristics of these NCAs include:

The Fens NCA[7]

- 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.
- 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.

[7] 46 The Fens 240215.pdf

East Anglian Chalk NCA[8]

- The underlying and solid geology is dominated by Upper Cretaceous Chalk, a narrow continuation of the chalk ridge that runs south-west–north-east across southern England, continuing in the Chilterns and along the eastern edge of The Wash. The chalk bedrock has given the NCA its nutrient-poor and shallow soils.
- Distinctive chalk rivers, the River Rhee and River Granta, flow in gentle river valleys in a diagonally north-west direction across the NCA.
- The chalk aquifer is abstracted for water to supply Cambridge and its surroundings and also supports flows of springs and chalk streams; features associated with a history of modification include watercress beds, culverts and habitat enhancements.
- The rolling downland, mostly in arable production, has sparse tree cover but distinctive beech belts along long, straight roads. Certain high points have small beech copses or 'hanger', which are prominent and characteristic features in the open landscape. In the east there are pine belts.
- Remnant chalk grassland, including road verges, supports chalkland flora and vestigial populations of invertebrates, such as great pignut and the chalkhill blue butterfly.
- Archaeological features include Neolithic long barrows and bronze-age tumuli lining the route of the prehistoric Icknield Way; iron-age hill forts, including that at Wandlebury; impressive Roman burial monuments and cemeteries such as the Bartlow Hills; a distinctive communication network linking the rural Roman landscape to settlements and small towns, such as Great Chesterford; the four parallel Cambridgeshire dykes that cross the Chalk: the Anglo-Saxon linear earthworks of Devil's Dyke, Fleam Dyke, Heydon/Bran Ditch and Brent Ditch; ridge-and-furrow cultivation remains of the open field systems of the earlier medieval period; and large numbers of later moated enclosures, park lands created, sheepwalks, arterial routes and nucleated villages that emphasise the land use change of this period.
- Brick and 'clunch' (building chalk) under thatched roofs were the traditional building materials, with some earlier survival of timber frame. Isolated farmhouses built of grey or yellowish brick have a bleached appearance.
- Settlement is focused in small towns and in villages. There are a number of expanding commuter villages located generally within valleys. Letchworth Garden City is a nationally significant designed garden city.
- In and around the wider area of Newmarket, stud farms impose a distinctive geometric, enclosed and manicured pattern to the landscape.
- The NCA is traversed by the Icknield Way, an ancient route that is now a public right of way. Roads and lanes strike across the downs perpendicularly and follow historical tracks that originally brought livestock to their summer grazing. Today major roads and railways are prominent landscape characteristics of the NCA.

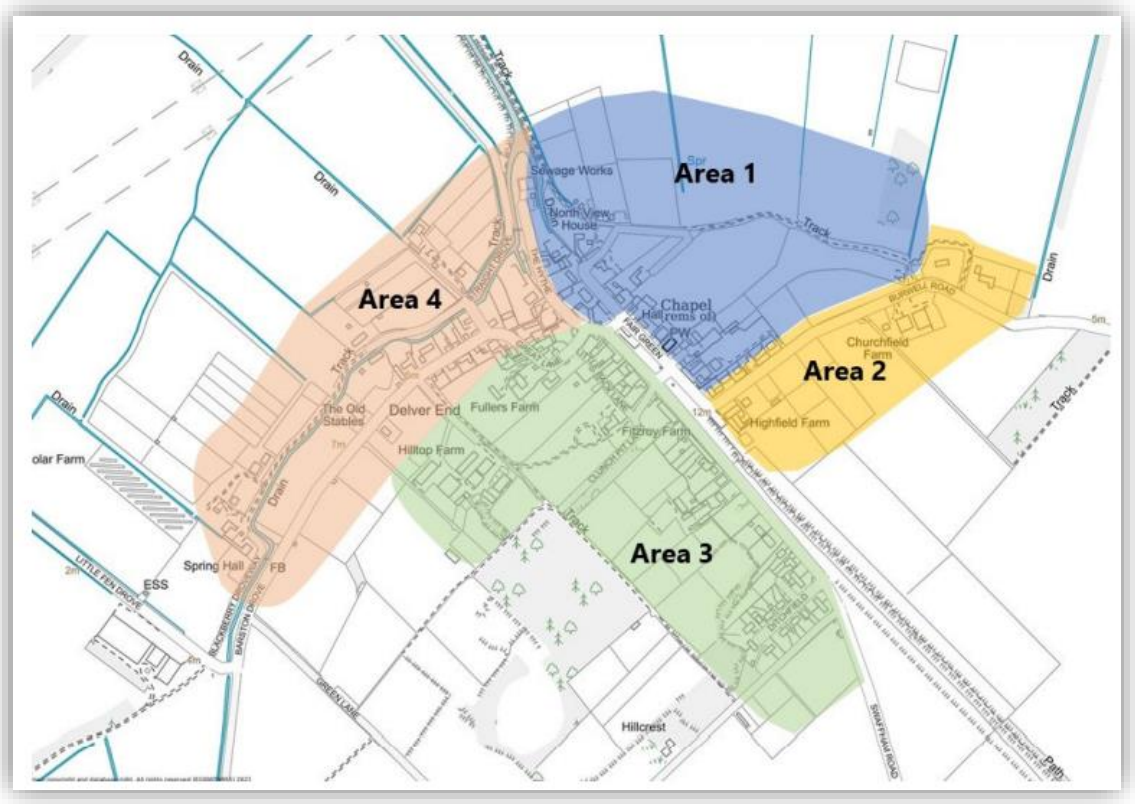
Landscape Character Assessment

3.24. A Landscape Appraisal of the Neighbourhood Area was commissioned by Reach parish Council in order to provide a robust evidence base to support the development of policies in the Neighbourhood Plan. The *Reach Neighbourhood Plan: Landscape Appraisal Final Report (May 2020)* will be available from the Reach Neighbourhood Plan website[9].

[8] NCA Profile: 87 East Anglian Chalk - NE529 (naturalengland.org.uk)
[9] http://reach-village.co.uk/neighbourhood_plan.html

3.25. The Landscape Appraisal identifies four distinct character areas in the village and adjoining areas. These are illustrated on **Map 5**.

MAP 5: REACH LANDSCAPE CHARACTER AREAS (LANDSCAPE APPRAISAL MAY 2020)



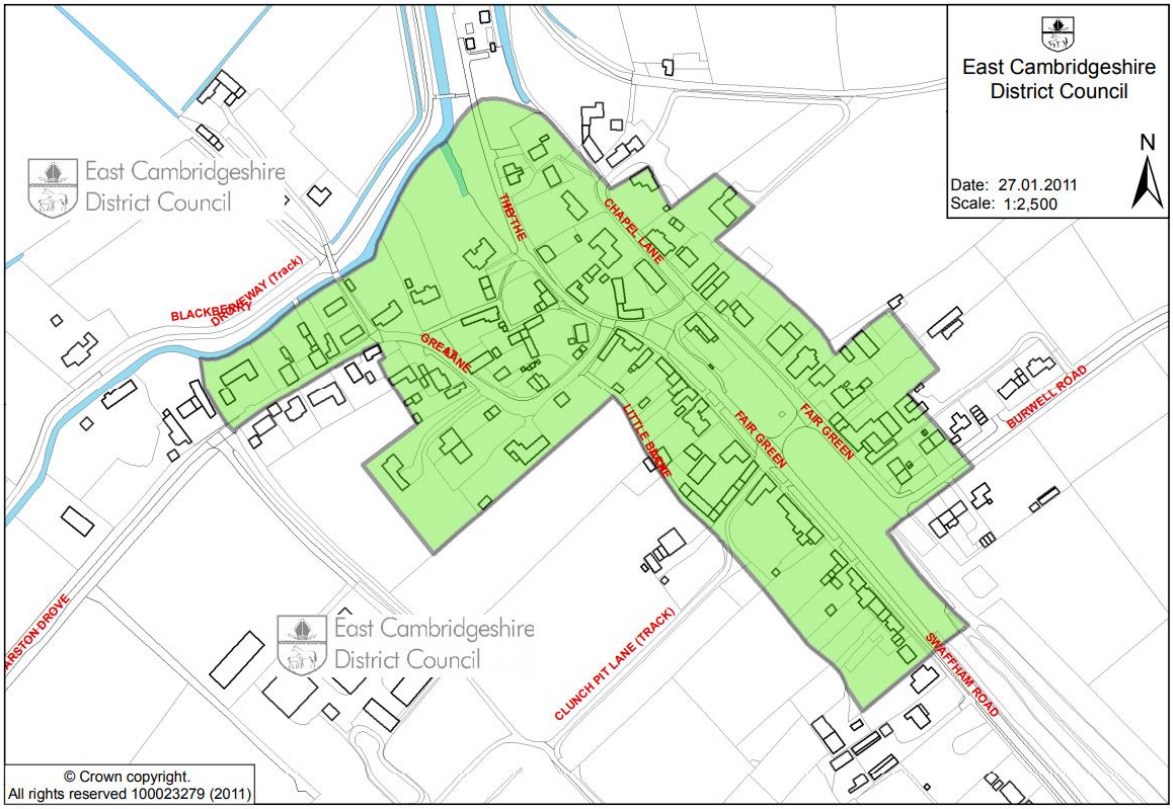
3.26. The Landscape Appraisal also identified the importance of the gaps between the village and Burwell and Swaffham Prior and the need to limit any erosion of these

Historic environment

Conservation Area

3.27. The majority of the built area of Reach village is designated as a Conservation Area, as illustrated on **Map 6**.

MAP 6: REACH CONSERVATION AREA



Listed Buildings

3.28. There are 14 listed buildings within the RNP[10] area and their location is shown on **Map 7**. They are concentrated within the village centre. The listed buildings within the RNP area are:

- Moon and Sixpence (Grade II)
- Market Cross (Grade II)
- War Memorial (Grade II)
- 24, High Street (Grade II)
- 21, Great Lane (Grade II)
- Barn to north east of Fullers Farmhouse (Grade II)
- The Post Office (Grade II)
- 22 and 23, High Street (Grade II)
- Myster House (Grade II)
- Hill Farmhouse (Grade II)
- White Roses (Grade II)
- Manor House (Grade II)
- K6 telephone kiosk (Grade II)
- Parish Church of St Ethelreda (Grade II)

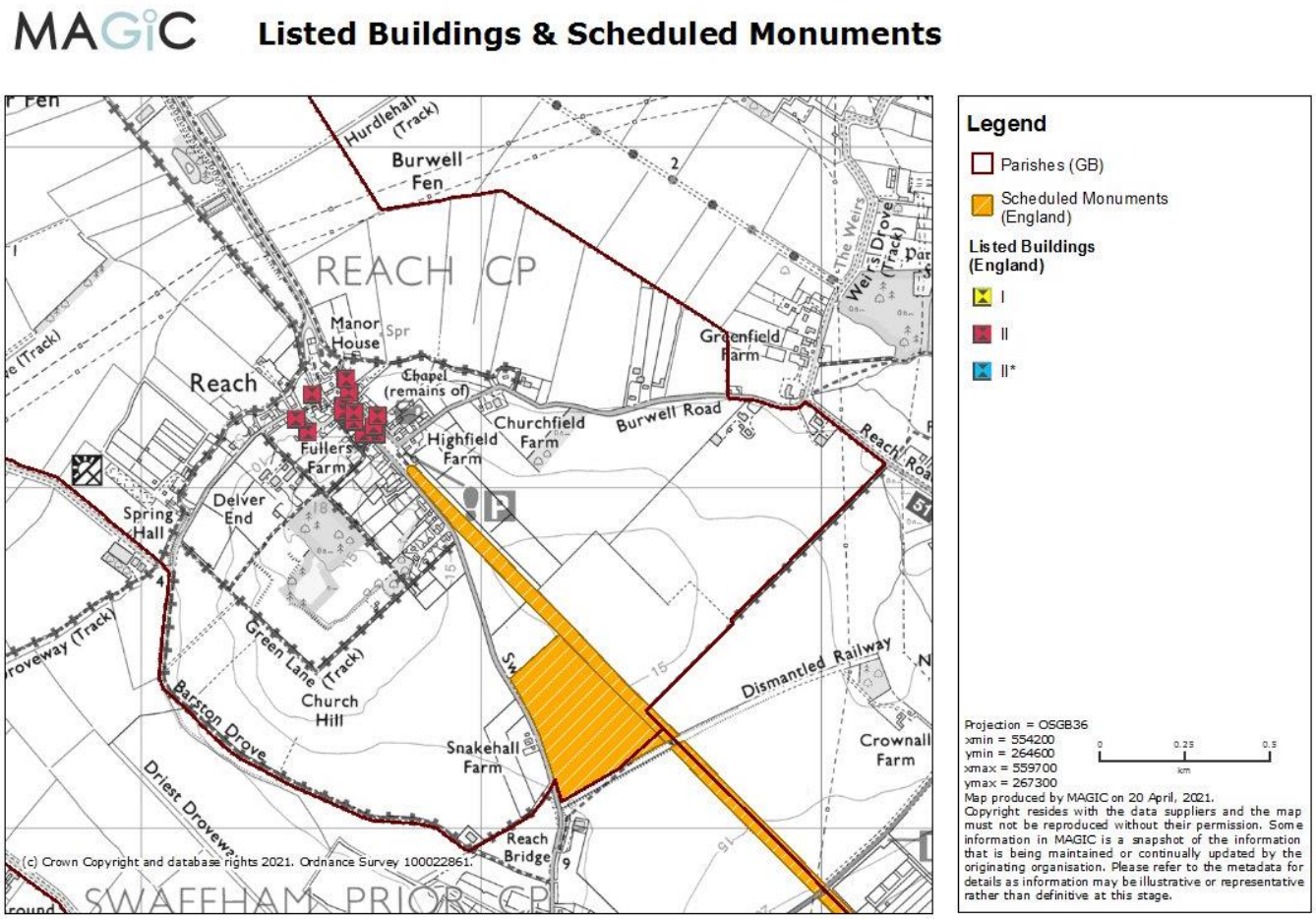
[10] https://historicengland.org.uk/listing/

Scheduled Monuments

3.29. There are two Scheduled Monuments within the RNP area, as indicated on **Map 7**:

- Devil's Ditch, Reach to Woodditton
- Roman villa and Iron Age settlement North of Reach Bridge

MAP 7: LISTED BUILDINGS & SCHEDULED MONUMENTS IN REACH



3.30. There are no Registered Parks and Gardens in the RNP area, and no buildings or structures identified as Heritage at Risk[11].

[11] https://historicengland.org.uk/listing/the-list/

Environmental Designations

Air

3.31. There are no Air Quality Management Areas designated within the RNP area.

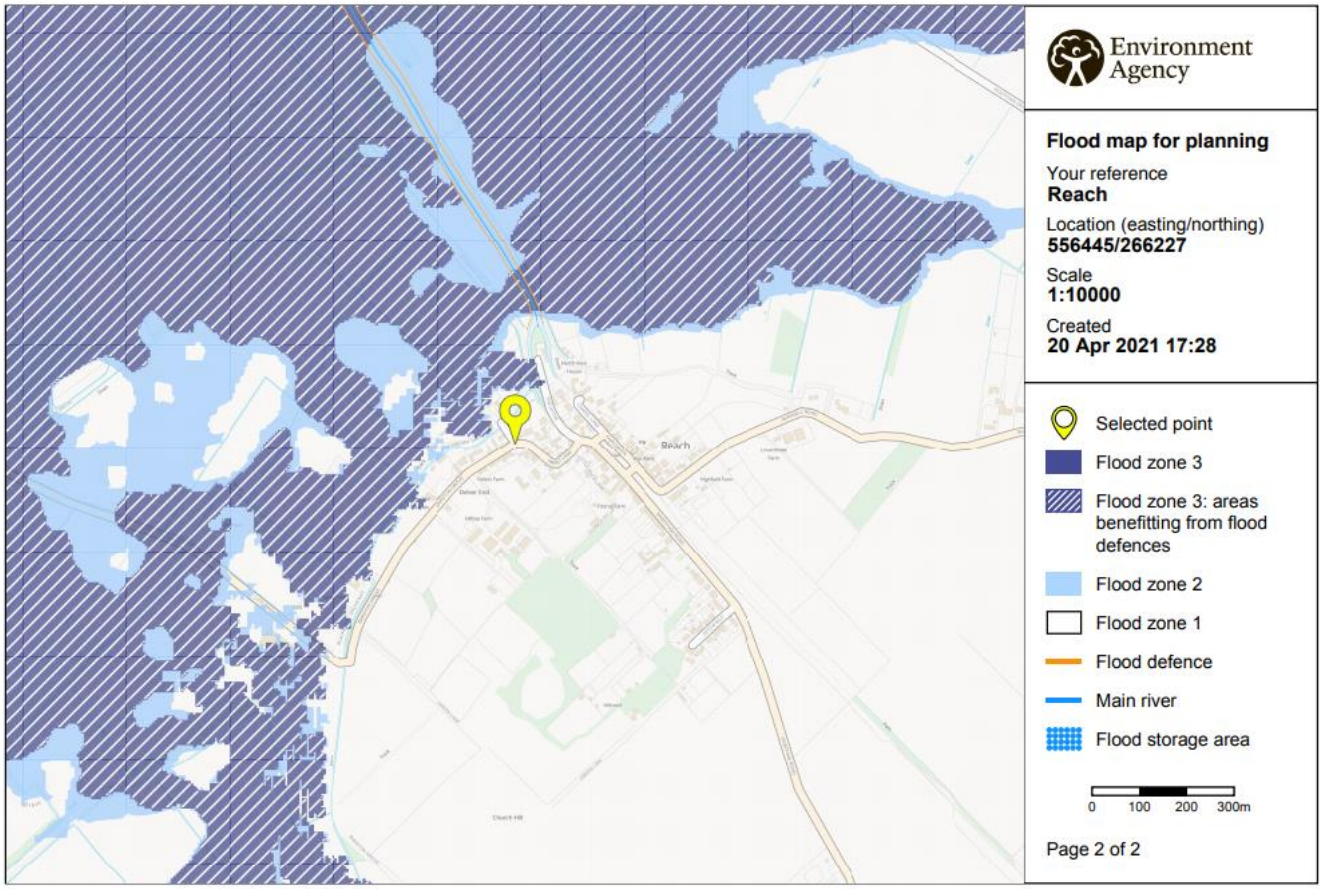
Water environment & flood risk

3.32. In terms of the water environment, the RNP area falls within the Environment Agency's Cam and Ely Ouse Management Catchment.

3.33. The Burwell Lode runs from the western edge of Reach village to the north, and flows downstream to the River Cam. Burwell Lode is monitored by the Environment Agency for its chemical and ecological status and is currently classified as moderate (base date 2019).

3.34. According to the Environment Agency's Flood Risk Maps (see **Map 8**), there are areas of fluvial flood risk (i.e. flood risk zones 2 and 3) within the RNP area. These areas are largely located to the north and west of Reach village, reflecting the low-lying fen topography in those areas of the parish. Higher land principally in the south of the parish, and within the East Anglian Chalk NCA, is predominantly in Flood Zone 1.

MAP 8: FLUVIAL FLOOD RISK (ENVIRONMENT AGENCY FLOOD MAP FOR PLANNING)



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Source Protection Zones & Groundwater Protection Zones

3.35. Source Protection Zones are defined around large and public potable groundwater abstraction sites, including wells, boreholes and springs. The RNP area does not fall within a Source Protection Zone.

3.36. 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 RNP area does not fall within a Groundwater Protection Zone.

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'[12] and paragraph 073 of National Planning Practice Guidance (NPPG) 'Neighbourhood Planning' section[13]. 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 diagram[14] 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**.

[12] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf
[13] Available at: https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum
[14] 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 RNP, 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 RNP, 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 relevant[15].

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 2018[16] 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 the effects of any mitigation measures set out in the policies of the RNP have not been considered.

[15] https://www.legislation.gov.uk/ukpga/2018/16/section/6/enacted
[16] 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)

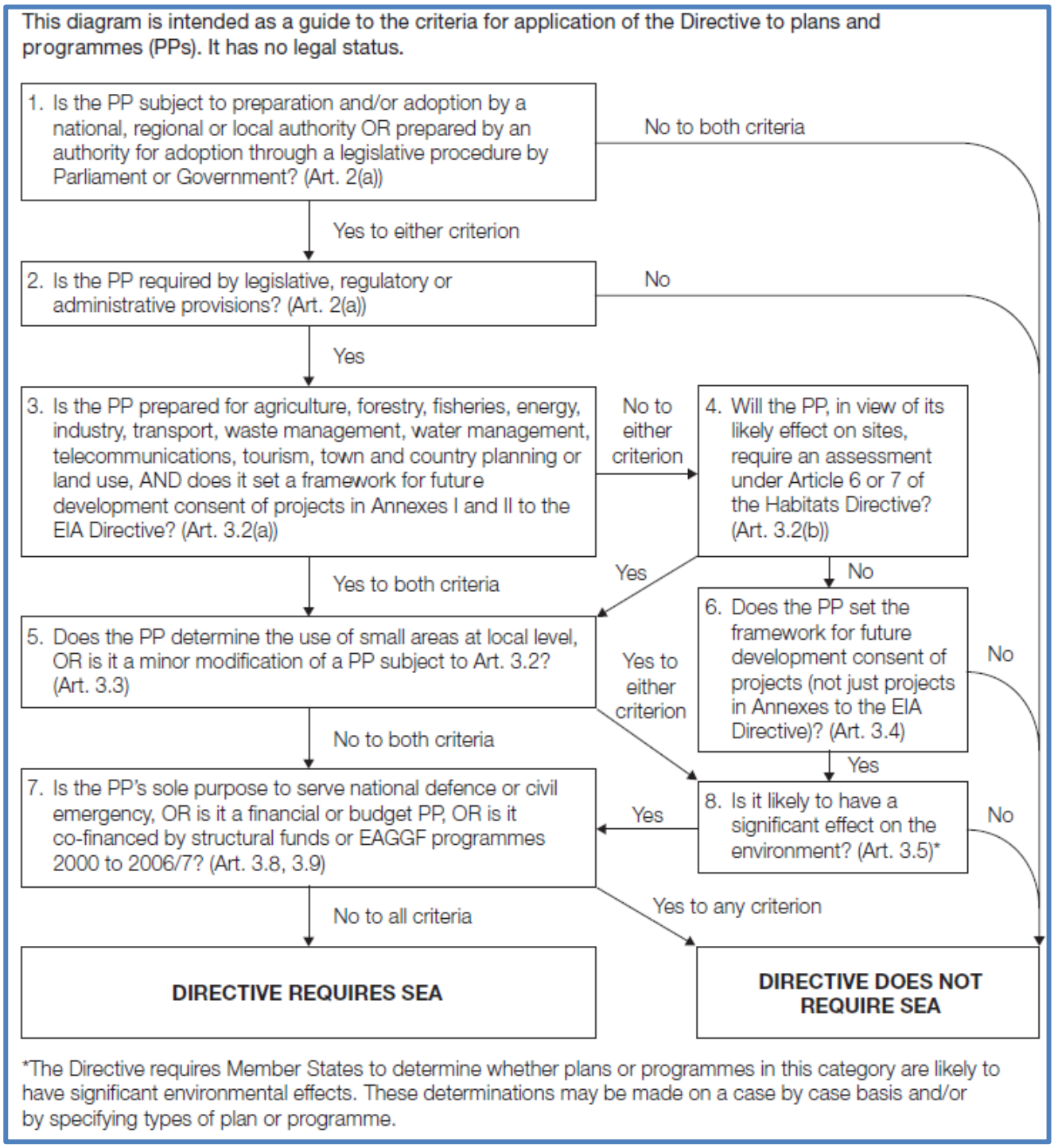
1. The characteristics of plans and programmes, having regard, in particular, to

- 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 [17]



[17] 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 Reach 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 RNP, is likely to have a significant environmental effect with reference to specified criteria. The following section sets out an assessment of the RNP against these criteria.

5.2. **Figure 3** and **Figure 4** consider the RNP against the criteria from Annex II of the SEA Directive and Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004. Paragraphs **5.9 to 5.69** that follow consider the likely environmental effects of the RNP 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 **5.70 to 5.98** consider the likely significant effects of the RNP 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 Report[18] 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-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 Since the growth strategy directs new development away from small, rural villages such as Reach village, and limits development in the open countryside, no site options were considered in Reach by the SA Report. However, the Local Plan sets a Development Envelope around Reach village within which development is, in principle, acceptable. The SA Report concluded:

[18] https://www.eastcambs.gov.uk/local-development-framework/east-cambridgeshire-local-plan-2015

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

5.7 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.

5.8 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

5.9 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 Devil's Dyke 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 5.70 to 5.98).

5.10 Natural England provides data on the condition and management of the Devil's Dyke SSSI[19]. The data shows the condition of the Devil's Dyke SSSI as:

- Favourable: 49.57%
- Unfavourable – recovering: 50.43%

5.11 Natural England provides the following views on the management of the Devil's Dyke SSSI[20]:

The habitats within this site are highly sensitive to inorganic fertilisers and pesticides, applications of which should be avoided both within the site itself and in adjacent surrounding areas. Herbicides may be useful in targeting certain invasive species, but should be used with extreme care. Access to this site, and any recreational activities within, may also need to be controlled and managed.

5.12 In addition, several SSSI Impact Risk Zones extend into the Neighbourhood Area, notably those relating to the Devil's Dyke SSSI, Cam Washes SSSI and Wicken Fen SSSI. The IRZs identify that residential development outside existing settlements/urban areas could potentially have adverse impacts, and that any new housing developments will require an assessment of recreational pressure on relevant SSSIs and measures to mitigate adverse impacts e.g. alternative open space provision.

5.13 As discussed in Section 3, there are also a number of County Wildlife Sites in proximity of the Neighbourhood Area.

[19] Report generated 22 Apr 2021: https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1000404

[20] https://designatedsites.naturalengland.org.uk/PDFsForWeb/VAM/1000404.pdf

5.14 The potential effects of the RNP on these SSSIs and CWSs is of relevance to this screening report, as development has the potential to increase recreational pressure on habitats.

5.15 Objective 5 of the RNP is of particular relevance to biodiversity, flora and fauna and aims to "*Minimise impact on the natural environment and improve biodiversity*".

5.16 There are a number of policies in the RNP that seek to protect and enhance biodiversity and therefore could result in positive effects. For example, *Policy RCH 1 – Spatial Strategy* updates the Development Envelope thereby concentrating development within Reach village 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;".*

5.17 *Policy RCH7 – Green Infrastructure* offers protection to the existing green infrastructure network by resisting proposals which would result in harm to it. The policy supports proposals which "*a. Reinforce, link, buffer and create new green infrastructure; and b. Promote, manage and interpret green infrastructure and enhance public enjoyment of it.".*

5.18 *Policy RCH8 – Biodiversity* provides the NP main response to biodiversity issues. The policy requires all development proposals to "*...contribute to and enhance the natural and local environment by firstly avoiding impacts where possible, where avoidance isn't possible minimising impacts on biodiversity and providing measurable net gains for biodiversity*".

5.19 The policy requires all development proposals to provide "*clear and robust evidence setting out:*
(a) information about the steps taken, or to be taken, to avoid and minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat,
(b) the pre-development biodiversity value of the onsite habitat based on an up to date survey and ideally using the Defra metric,
(c) the post-development biodiversity value of the onsite habitat ideally using the Defra metric; and
(d) the ongoing management strategy for any proposals."

5.20 Crucially, the policy seeks to deliver significant enhancement of biodiversity value: "*Proposals which do not demonstrate that the post-development biodiversity value of the onsite habitat will not significantly* exceed the pre-development biodiversity value of the onsite habitat will be refused.".*

5.21 *Policy RCH9 – Local Green Spaces* designates seven green areas for protection from development, some of which may be of biodiversity value. In addition, the RNP includes policies to protect and enhance existing open spaces and recreation facilities, and establish new green leisure routes, notably *Policy RCH18 – Open Space, Sport and Recreation Facilities*, and *Policy RCH19 – New vehicle-free routes*. By designating Local Green Spaces and protecting and enhancing other green areas, could potentially reduce the risk of recreational pressure on the Devil's Dyke SSSI and other SSSIs in the vicinity of the Neighbourhood Area.

5.22 *Policy RCH12 – Design Considerations* sets design principles and requirements which all development proposals must satisfy to ensure they create and contribute to a high quality, safe and sustainable environment. This includes requirements for development proposals to

retain certain 'green' features which may contribute to biodiversity value, for example "*b. do not involve the loss of gardens, important open, green or landscaped areas… [c] ii. important landscape characteristics including trees and ancient hedgerows and other prominent topographical features; … [c] iv. sites, habitats, species and features of ecological interest;*"

5.23 *Policy RCH13 – Mitigating the risk of flooding from development* lends support to sustainable drainage systems which "…*benefit Reach's biodiversity and wildlife*…".

5.24 *Policy RCH16 – Dark Skies* seeks to conserve darkness and avoid pollution, requiring any future outdoor lighting systems to "*have a minimum impact on the environment, minimising light pollution and adverse effects on wildlife…*".

5.25 Overall, the potential for significant negative impacts on biodiversity, flora and fauna to arise from the implementation of the plan are unlikely as the RNP does not allocate sites for development, and other opportunities for development are relatively limited and broadly aligned with the East Cambridgeshire Local Plan.

5.26 It is expected that the RNP 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 RNP could play a role in reducing recreational pressure on SSSIs and CWSs within and in proximity of the Neighbourhood Area.

Population and human health

5.27 As identified in section 3, the health of the population residing within Reach Neighbourhood Area is generally "very good" or "good".

5.28 Whilst the RNP includes no specific objective addressing human health, objective 2 is relevant to meeting the population's housing needs: "*Ensure that new homes respond to the identified local needs of Reach".*

5.29 There are a number of policies within the RNP that are likely to have a positive impact on population and human health and the community's wellbeing.

5.30 *Policy RCH3 – Housing Mix* requires proposals for housing developments to contribute to meeting existing and future identified needs of the Neighbourhood Plan Area. Proposals three-bedrooms are particularly supported reflecting an identified need for family homes.

5.31 *Policy RCH9 – Local Green Spaces* designates seven green areas for protection from development, all of which are publicly accessible and offer opportunities for informal or formal recreation.

5.32 *Policy RCH12 – 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 RCH13 – Mitigating the risk of flooding from development* ensures the community is not put at increased risk from flooding.

5.33 *Policy RCH14 – Sustainable Building* requires development proposals to incorporate best practice in energy conservation and be designed to achieve maximum achievable energy efficiency, and *Policy RCH 15 – Community Energy Proposals* supports proposals for

community led renewable energy initiatives, especially those providing a long-term source of income for the community and reducing bills by enabling local supply. These policies could play an important role in combating fuel poverty.

5.34 *Policy RCH17 – Protecting Existing Services and Facilities* resists the loss of existing community facilities, whereas *Policy RCH18 – Open Space, 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.

5.35 *Policy RCH19 – New vehicle-free routes* supports the formation of "*new or improved vehicle-free walking, cycling and equestrian routes to neighbouring villages, or as part of a wider network of provision*" thereby furthering opportunities for informal recreation and leisure.

5.36 Overall, the RNP is not likely to have a significant negative impact on population and human health, given the relatively small population that the RNP applies to and as no sites are specifically allocated for development within the plan. Through its various policy measures, 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

5.37 In terms of soil, the RNP (*Policy RCH 1 – Spatial Strategy*) supports additional infill and windfall residential development within Reach village's Development Envelope), and strictly 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".

5.38 The RNP indicates that around one third of the Neighbourhood Area is underlain by peat soils, and recognises the potential peat soils offer for environmental enhancement. The RNP estimates that its peat soils hold "*over 120,000 tonnes of carbon which, under current management, is being lost to the atmosphere at the rate of over 900 tonnes per year*"[21].

5.39 *Policy RCH14 – Sustainable Building* requires development proposals on fen soils to consider and offset the carbon losses associated with building, through the incorporation of commensurate carbon offsetting measures.

5.40 There are no air quality management areas within the Neighbourhood Area and therefore no significant air quality issues. *Policy RCH14 – Sustainable Building* supports energy conservation and efficiency, and non-fossil fuel-based heating systems, including renewable energy technologies, thereby contributing to reducing emissions. In addition, *Policy RCH 15 – Community Energy Proposal* lends support for community led renewable energy initiatives. In addition, *Policy RCH19 – New vehicle-free routes* supports proposals that deliver new or improved vehicle-free walking, cycling and equestrian routes.

5.41 As discussed in section 3, Reach village and the land to the south and east of the village is predominantly in Flood Zone 1, with low-lying fenland immediately north and west of the village mainly in Flood Zones 2 & 3. Flood risk is therefore an important issue for the RNP.

[21] Page 7, Reach Neighbourhood Plan

5.42 *Policy RCH13 – Mitigating the risk of flooding from development* places specific requirements on development proposals to ensure that flood risk is reduced and surface water is sustainably managed.

5.43 *Policy RCH14 – Sustainable Building* favours proposals which "*e. make provision for grey water/rainwater, and/or surface water harvesting and recycling.*"

5.44 Policy 4: Enabling Employment Opportunities, sets out criteria for proposals that generate new business and employment opportunities, which includes: "*It must not exacerbate flooding and must satisfactorily deal with waste, emissions and effluent*".

5.45 Overall, it is unlikely that significant effects on soil, air or water would arise as a result of implementation of the RNP.

Climatic factors

5.46 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.

5.47 Through objective 9, the RNP aims to: "*Have a positive effect on the environment, by promoting actions that contribute to mitigating the Climate Crisis and reducing the carbon footprint.*"

5.48 As previously discussed, the RNP includes a number of policies which will contribute to reducing emissions and adapting to a changing climate. For example

- *Policy RCH14 – Sustainable Building* supports proposals which deliver energy conservation and efficiency, utilise non-fossil fuel-based heating systems including renewable energy technologies, and requires development proposals on fen soils to consider and offset the carbon losses associated with building, through the incorporation of commensurate carbon offsetting measures;

- *Policy RCH12 – Design Considerations* requires development proposals to provide one electric vehicle charging point per new off-street parking place created;

- *Policy RCH 15 – Community Energy Proposal* lends support for community led renewable energy initiatives; and

- *Policy RCH19 – New vehicle-free routes* supports proposals that deliver new or improved vehicle-free walking, cycling and equestrian routes.

5.49 Green infrastructure plays an important role in CO2 absorption. *Policy RCH7 – Green Infrastructure* protects and seeks enhancement of Reach's Gren Infrastructure network.

5.50 Overall, it is considered unlikely that implementing the policies in the RNP, would give rise to significant effects on climatic factors.

Material assets

5.51 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.

5.52 RNP objectives 11 and 12 are particularly relevant to material assets:

> "*11. Retain existing facilities and encourage the provision of new services and facilities.*
>
> *12. Ensure that the essential infrastructure including highways is maintained and, where necessary, improved.*"

5.53 As previously discussed, *Policy RCH17 – Protecting Existing Services and Facilities* resists the loss of existing community facilities, while *Policy RCH18 – Open Space, 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.

5.54 *Policy RCH19 – New vehicle-free routes* support the formation of "*new or improved vehicle-free walking, cycling and equestrian routes to neighbouring villages, or as part of a wider network of provision*" thereby furthering opportunities for informal recreation and leisure.

5.55 It is considered unlikely that that implementation of the RNP would have significant effects on material assets.

Cultural heritage, including architectural and archaeological heritage

5.56 As identified above in paragraphs section 3, there are a number of heritage assets within the Neighbourhood Area, including a Conservation Area, 14 Listed Buildings, and two Scheduled Monuments.

5.57 The Heritage Gateway[22] provides information from Cambridgeshire's Historic Environment Record on the various designated heritage assets within RNP area. However, this information does not identify specific threats to those assets.

5.58 The historic environment is central to the character and identity of RNP. This is recognised by the RNP. Alongside preparation of the Neighbourhood Plan, Reach Parish Council commissioned the 'Reach Design Code' which accompanies the plan's design policies, further ensuring that design is of high quality, and reflects local character and responds sensitively to the historic environment.

5.59 RNP objective 7 aims to "*Ensure new development is appropriate to the historic character of the village*", and objective 8 aims to "*Recognise and protect the historic importance of buildings and character areas*".

5.60 *Policy RCH10 – Heritage Assets* provides a series of detailed policy requirements to ensure development proposals conserve and enhance heritage assets, and resists schemes which will result in harm.

[22] https://www.heritagegateway.org.uk/gateway/

5.61 *Policy RCH11 – Buildings of Local Significance* identifies and describes the significance of local heritage assets and buildings of local significance, and includes measures to secure their conservation and enhancement. Therefore the policy affords protection to assets which otherwise lack statutory designation.

5.62 *Policy RCH12 – Design Considerations* sets out a number of development principles to ensure new development reflects local characteristics, including conserving heritage assets and the historic environment.

5.63 *Policy RCH9 – Local Green Spaces* designates seven green areas, many or all of which have local historic value.

5.64 The RNP has a rich heritage with many assets of nationally significance, which have been afforded statutory designations. The RNP does not allocate any land or sites for development. Whilst opportunities for infill and windfall exist within the Development Envelope, taking into account the policies highlighted above which include a number of measures to conserve heritage assets and also affords 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

5.65 Conservation of the parish's landscapes is an important theme of the Reach Neighbourhood Plan. Reach Parish Council commissioned a Landscape Character Appraisal to inform the preparation of the Neighbourhood Plan.

5.66 *Policy RCH6 – Landscape Quality* includes a range of measures to ensure development proposals conserve the essential landscape, heritage and rural character of the Neighbourhood Plan Area.

5.67 The protection offered to Reach's Green Infrastructure network by *Policy RCH7*, is likely to also contribute to conserving landscape quality.

5.68 The RNP does not allocate sites for development and therefore, with the policies outlined above, it is considered unlikely that the RNP would result in a significant impact on the local landscape.

5.69 **Following consideration of the RNP against the various SEA themes, this assessment concludes that RNP 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)

5.70 East Cambridgeshire's latest Habitats Regulation Assessment report[23] 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.

5.71 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.

5.72 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.

5.73 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

5.74 As discussed in section 3, there are no European Sites within the Reach Neighbourhood Area[24].

5.75 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

5.76 Like the RNP, the withdrawn Local Plan did not propose site allocations at Reach. The HRA therefore remains a relevant consideration for the screening assessment of the RNP.

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

24 Whilst the Devil's Dyke is partly located within Reach Neighbourhood Area, the section designated as SAC is outside the Neighbourhood area boundary.

Fenland SAC - Wicken Fen

5.77 Reach Neighbourhood Area is located approximately 1.4 km from Wicken Fen. The HRA identified the following pressures and threats which could arise were the now withdrawn Local Plan implemented:

- **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.

5.78 Whilst growth is a potential threat to the Fenland SAC – Wicken Fen, the RNP does not make site allocations and provides only limited opportunities for new development. This approach reflects the growth strategy of the now withdrawn Local Plan (the subject of the HRA), and the current adopted Local Plan 2015. Therefore likely significant effects on the integrity of the Wicken Fen SAC are not expected to arise from implementation of the RNP.

Fenland SAC – Chippenham Fen

5.79 Reach Neighbourhood Area is located approximately 6.5 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.

5.80 Whilst growth is a potential threat to the Fenland SAC – Chippenham Fen, the RNP does not make site allocations and provides only limited opportunities for new development. This approach reflects the growth strategy of the now withdrawn Local Plan (the subject of the HRA), and the current adopted Local Plan 2015. Therefore likely significant effects on the integrity of the Chippenham Fen SAC are not expected to arise from implementation of the RNP.

Fenland SAC - Woodwalton Fen

5.81 Reach Neighbourhood Area is located approximately 36 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

5.82 Reach Neighbourhood Area is located approximately 17 km from the Ouse Washes SAC/SPA/Ramsar. 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.

5.83 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. Reach Neighbourhood Area is located outside of the Goose & Swan Functional Land IRZ.

5.84 Whilst growth is a potential threat to the Ouse Washes SAC/SPA/Ramsar, the RNP does not make site allocations and provides only limited opportunities for new development. This approach reflects the growth strategy of the now withdrawn Local Plan (the subject of the HRA), and the current adopted Local Plan 2015. Therefore likely significant effects on the integrity of the Ouse Washes SAC/SPA/Ramsar are not expected to arise from implementation of the RNP.

Devil's Dyke

5.85 The Devil's Dyke runs from Reach village, through the Reach Neighbourhood Area and extends to Woodditton. The full extent of the Devil's Dyke is over 11km long. The section designated as the Devil's Dyke SAC falls outside of Reach Neighbourhood Area, approximately 3.5 km from the Neighbourhood Area boundary. Of the European Site scoped into the HRA, the Devil's Dyke is in closest proximity to Reach Neighbourhood Area.

5.86 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

5.87 In addition, the HRA identifies that air pollution is a key issue for the Devil's Dyke SA, 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".

5.88 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.

5.89 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.

5.90 Whilst growth is a potential threat to the Devil's Dyke SAC, the RNP does not make site allocations and provides only limited opportunities for new development. This approach reflects the growth strategy of the now withdrawn Local Plan (the subject of the HRA), and the current adopted Local Plan 2015. Therefore likely significant effects on the integrity of the Devil's Dyke SAC are not expected to arise from implementation of the RNP.

Breckland SAC/SPA

5.91 Reach Neighbourhood Area is located approximately 14 km from Breckland SAC/SPA. The HRA identified the following potential pressures and threats which could arise were the now withdrawn Local Plan implemented:

5.92 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.

5.93 Whilst growth is a potential threat to the Breckland SPA/SAC, the RNP does not make site allocations and provides only limited opportunities for new development. This approach reflects the growth strategy of the now withdrawn Local Plan (the subject of the HRA), and the current adopted Local Plan 2015. Therefore likely significant effects on the integrity of the Breckland SPA/SAC are not expected to arise from implementation of the RNP.

Potential for likely significant effects

5.94 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.

5.95 Natural England confirmed the HRA followed accepted methodology, was in line with relevant legislation and guidance, and agreed with the conclusion of the HRA[25].

5.96 Since the RNP does not make site allocations and provides only limited opportunities for new development, the RNP's growth strategy reflects that of the now withdrawn Local Plan and the current adopted Local Plan 2015. As discussed in section 4, the RNP includes several policies which protect, enhance or support the provision of open space for recreation and informal leisure, for example:

- Policy RCH7 – Green Infrastructure
- Policy RCH9 – Local Green Spaces
- Policy RCH17 – Protecting Existing Services and Facilities
- Policy RCH18 – Open Space, Sport and Recreation Facilities
- Policy RCH19 – New vehicle-free routes

5.97 It is possible that such policies could help to reduce recreational pressure on designated sites.

[25] 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

5.98 **Having regard to the nature of the policies in the RNP and vulnerabilities of European Sites, this HRA screening considers that the RNP 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

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

5.100 **Figure 4** applies the SEA Directive criteria to the RNP as per the flow chart in **Figure 2**, to determine whether the *principle* of the RNP 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 *significant* 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.	The RNP 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. 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 RNP. 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. The RNP would only apply to a small geographical area (the Reach 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.	No
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The RNP 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. The RNP provides policies for the Plan area, relevant to the parish area only. The RNP would therefore not strongly influence other plans and programmes higher up the spatial planning hierarchy.	No
(c) the relevance of the plan or programme for the integration of environmental considerations in particular	It is a basic condition that a NDP must contribute to the achievement of sustainable development. The RNP seeks to ensure that environmental considerations are taken into account. It includes the following policies which	No

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely *significant* environmental effect
with a view to promoting sustainable development;	promote environmental considerations with a view to promoting sustainable development: • *Policy RCH 1 – Spatial Strategy* • *Policy RCH6 – Landscape Quality* • *Policy RCH7 – Green Infrastructure* • *Policy RCH8 – Biodiversity* • *Policy RCH9 – Local Green Spaces* • *Policy RCH10 – Heritage Assets* • *Policy RCH11 – Buildings of Local Significance* • *Policy RCH12 – Design Considerations* • *Policy RCH13 – Mitigating the risk of flooding from development* • *Policy RCH14 – Sustainable Building* • *Policy RCH 15 – Community Energy Proposals* • *Policy RCH16 – Dark skies* 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. 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.	
(d) environmental problems relevant to the plan or programme; and	There are no specific environmental problems relevant to the RNP 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 RNP 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;	This has been tested through the SA/SEA of the Local Plan. The RNP does not allocate sites for development. The effects of the implementation of the RNP are therefore uncertain to a certain extent, as they will depend on windfall sites that may come forward. However, such	No

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely *significant* environmental effect
	opportunities for windfall sites are expected to be limited and small scale, infill development, therefore the effects are not likely to be significant and are expected to be minimal. It is likely that some policies may result in positive effects by helping to preserve and enhance the environmental features within the Neighbourhood Area. See also paragraphs 5.9 to 5.69 above.	
(b) the cumulative nature of the effects;	As above in 2(a)	No
(c) the transboundary nature of the effects;	The RNP 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 RNP 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 RNP 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);	The Reach Neighbourhood Area is coterminous with the boundary of Reach parish. Reach parish has a small population of just 358 people at the time of the 2011 Census. The spatial extent of any effects of the implementation of the RNP 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.	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	As considered in paras 5.9 to 5.69 it is unlikely that the RNP would adversely impact the special natural characteristics or cultural heritage of the Neighbourhood Area. The RNP is not expected to exceed environmental quality standards or lead to intensive land use. The RNP does not allocate any sites for development. Furthermore, the RNP 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).	No
(g) the effects on areas or landscapes which have a recognised national,	The Reach 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, SSSIs and	No

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	**Assessment**	**Likely *significant* environmental effect**
Community or international protection status.	County Wildlife Sites. Since RNP offers limited opportunities for growth, and since the RNP includes a range of policies which seek to conserve such features, as discussed in paras 5.9 to 5.69, implementation of the RNP is not likely to result in significant effects. Effects of the RNP on landscapes are expected to be positive and localised, as a Landscape Character assessment has been undertaken to inform the RNP's policies. However, the effects are not likely to be significant in the context of SEA.	

FIGURE 4: APPLICATION OF THE SEA DIRECTIVE TO REACH 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 RNP is allowed under the Town and Country Planning Act 1990, as amended by the Localism Act 2011. Whilst the RNP has been prepared by Reach 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 RNP is being prepared for town and country planning and land use, setting a framework for future development consents within the Reach 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 5.70 to 5.98 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 RNP 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 RNP 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 5.9 to 5.69 and **Figure 3**, which identify that no likely significant effects are expected to arise through implementation of the RNP.
Outcome: SEA NOT REQUIRED		

6 Consultation with Statutory Bodies

6.1 The assessment in **Section 5** concludes that it is unlikely that significant environmental effects will arise from the RNP (as submitted at the date of this assessment) 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 between 29 June and 03 August 2021. The responses received during this consultation are summarised below.

Environment Agency response

6.2 Through their response to the draft Scoping Report consultation, the Environment Agency agreed with the conclusion that an SEA is not required for the Reach Neighbourhood Plan, noting that it is unlikely that significant environmental effects will arise from the Plan.

Historic England response

6.3 Historic England concurred with the Council that the preparation of a Strategic Environmental Assessment is not required.

Natural England response

6.4 Natural England confirm it agrees with the report's conclusions that the Reach 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 is required.

7 SEA/HRA Screening Outcome

7.1 Having reviewed the environmental characteristics of the RNP 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 RNP. The RNP 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**. This conclusion was supported by each of the three statutory consultation bodies (Environment Agency, Natural England, Historic England).

7.3 The RNP 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 RNP 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.

7.4 A number of the RNP 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 RNP includes policies that: encourage active travel and travel by modes other than the car, seek to protect the townscape, surrounding landscape character and setting of the town, seek to preserve or enhance heritage assets and their settings, and seek to protect and enhance biodiversity and open green spaces. However, for the purposes of SEA, these effects are not considered 'significant'.

7.5 To take an alternative approach, such as preparing evidence bespoke to the RNP, would be disproportionate and result in unnecessary duplication. This would be contrary to national planning policy.

7.6 In the event that the vision, objectives and/or policies covered by the RNP 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 email response received 22 July 2021

Good afternoon

Thank you for your email.

We agree with the conclusion that an SEA is not required for the Reach Neighbourhood Plan. It is unlikely that significant environmental effects will arise from the Plan.

We hope that this information is of assistance to you. If you have any further queries please do not hesitate to contact us.

Kind regards

Elizabeth

Elizabeth Mugova

Sustainable Places

East Anglia Area (West)

Historic England email response 30 July 2021

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 Reach 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

Edward James

Historic Places Adviser - East of England

Historic England

Natural England email response received 29 July 2021

Thank you for your consultation on the above dated and received by Natural England on 14 June 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 (SEA) Screening request

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. HRA Screening Natural England agrees with the report's conclusions that the Reach 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

Dawn Kinrade

Consultations Team