

Habitats Regulations Assessment: Diss and District Neighbourhood Plan

Diss and District Neighbourhood Plan Group

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Quality information

Prepared by	Checked by	Verified by	Approved by
Lisa Rigby Principal Ecologist	James Riley Technical Director	Max Wade Technical Director	James Riley Technical Director
Isla Hoffmann Heap Senior Ecologist			

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Prepared for:

Diss and District Neighbourhood Plan Group

Prepared by:

AECOM Environment and Sustainability UK & Ireland
4th Floor, Merchant's Court
2-12 Lord Street
Liverpool L2 1TS
United Kingdom

T: +44(0) 151 331 8900
aecom.com

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1. Introduction

Scope of project

- 1.1 AECOM was appointed by the Diss and District Neighbourhood Plan Group to undertake a Habitats Regulations Assessment (HRA) for the Diss and District Neighbourhood Plan (DDNP) Regulation 18 Pre-Submission Version 1. This is to inform the planning group and local councils of the potential effects of Neighbourhood Plan (NP) development on European Sites and how they are being, or should be, addressed in the draft NP.
- 1.2 The DDNP is a joint Neighbourhood Plan between Diss Town Council and surrounding parish councils: Roydon, Burston and Shimpling, and Scole in South Norfolk and Palgrave, Stuston, and Brome and Oakley in Mid-Suffolk.
- 1.3 The 1998 Mid-Suffolk adopted Local Plan document is being replaced by a new Joint Local Plan document for Babergh and Mid-Suffolk Districts¹, at the latest version of which is pre-submission (November 2020). This Joint Local Plan has been subject to its own HRA. For the purpose of informing this NP HRA, policies contained within both the adopted Core Strategy and the Joint Local Plan and the most up to date HRA have been referred to. The Joint Local Plan HRA report including Appropriate Assessment concluded that the Babergh & Mid-Suffolk Districts Joint Local Plan is not predicted to have any adverse effect on integrity on any European Sites, either alone or in combination with other plans and projects.
- 1.4 Similarly, policies contained within the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk² and the South Norfolk Local Plan³ have been referred to. Both the Joint Core Strategy and Local Plan HRA reports concluded that significant effects were unlikely.
- 1.5 In terms land allocation and housing numbers, numbers and locations differ between the Joint Core Strategy (JCS), Local Plans (LP) and the DDNP. This is shown in Table 1.

Table 1. Comparison Between Predicted Housing Requirements and Site Allocation

Parish	Predicted Housing Requirement		Number of Sites Allocated	
	JCS/ LP	DNPP	JCS/ LP	DNPP
Diss	300+	369	7 (2 sites mixed-use development)	10 (4 sites mixed use development)
Roydon	10-20	25	Not stated	1
Burston and Shimpling	0	25	0	1
Scole	10-20	51	1	3
Palgrave ⁴	0	0	0	0
Stuston ⁵	0	0	0	0
Brome and Oakley ⁶	0	24	0	3
Total	340+	494	8	18

Source: Greater Norwich Local Plan (Joint Core Strategy for Broadland, Norwich and South Norfolk; South Norfolk Local Plan; Babergh and Mid Suffolk Joint Local Plan) (pre-submission Dec 2020)

¹ <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLPReg19/Part-1-Objective-and-Strategic-Policies-Part-2-Local-Policies.pdf> [accessed 17/03/2021]

² https://www.south-norfolk.gov.uk/sites/default/files/JCS_Adopted_Version_Jan_2014.pdf [accessed 18/03/2021]

³ <https://www.south-norfolk.gov.uk/residents/planning/planning-policy/adopted-south-norfolk-local-plan/site-specific-allocations-and> [accessed 18/03/2021]

⁴ <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLPReg19/Part-3-Mid-Suffolk-Settlement-Maps-P-Z.pdf> [accessed 18/03/2021]

⁵ Ilib

⁶ <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLPReg19/Part-3-Mid-Suffolk-Settlement-Maps-A-O.pdf> [accessed 18/03/2021]

- 1.6 The objective of this HRA is to identify if any particular site allocation proposed by in the DDNP have the potential to cause an adverse effect on the integrity of European designated sites (Special Areas of Conservation, SACs, Special Protection Areas, SPAs, and Ramsar sites designated under the Ramsar convention), either in isolation or in combination with other plans and projects, and to determine whether site-specific or policy mitigation measures are required.

Legislation

- 1.7 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (as amended) and concerns the protection of European sites. European sites can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to European sites.
- 1.8 The HRA process applies the precautionary principle to protected areas. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

Conservation of Habitats and Species Regulations 2017 (as amended)

With specific reference to Neighbourhood Plans, Regulation 106(1) states that:

“A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority [the Local Planning Authority] may reasonably require for the purpose of the assessment under regulation 105... [which sets out the formal process for determination of ‘likely significant effects’ and the appropriate assessment].”

Box 1: The legislative basis for HRA

- 1.9 It is therefore important to note that this report has two purposes:
- To assist the Qualifying Body (Diss Town Council) in preparing their plan by recommending (where necessary) any adjustments required to protect European sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
 - On behalf of the Qualifying Body, to assist the Local Planning Authority (South Norfolk Council and Mid-Suffolk District Council) to discharge their duty under Regulation 105 (in their role as ‘plan-making authority’ within the meaning of that regulation) and Regulation 106 (in their role as ‘competent authority’).
- 1.10 As ‘competent authority’, the legal responsibility for ensuring that a decision of ‘likely significant effects’ is made, for ensuring an ‘appropriate assessment’ (where required) is undertaken, and for ensuring Natural England are consulted, falls on the local planning authority. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.
- 1.11 Over the years, ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of “Appropriate Assessment”. Throughout this Report the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

2. Methodology

Introduction

- 2.1 Figure 1 below outlines the stages of HRA according to current Ministry of Housing, Communities and Local Government guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan until no significant adverse effects remain.

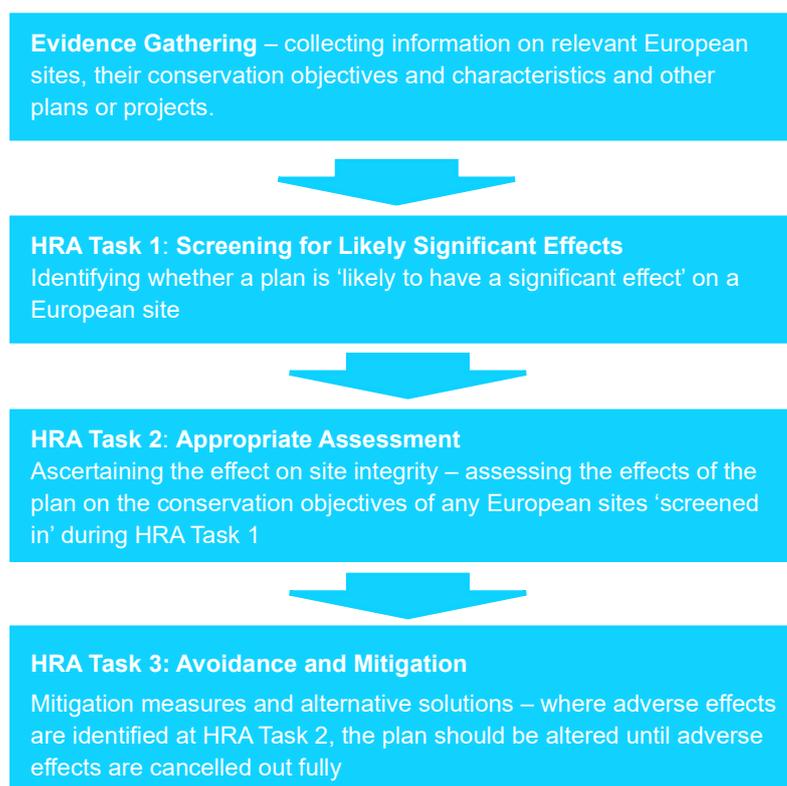


Figure 1: Four Stage Approach to Habitats Regulations Assessment. Source GOV.UK, 2019.

HRA Task 1 – Likely Significant Effects (LSE)

- 2.2 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

- 2.3 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is undertaken in Chapter 4 of this report.

HRA Task 2 – Appropriate Assessment (AA)

- 2.4 Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'appropriate assessment' is not a technical term. In other words, there are no particular technical analyses,

- or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects.
- 2.5 During July 2019 the Ministry of Housing, Communities and Local Government published guidance for Appropriate assessment⁷. Paragraph: 001 Reference ID: 65-001-20190722m explains: *'Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured'*.
- 2.6 As this analysis follows on from the screening process, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment takes any policies or allocations that could not be dismissed following the high-level screening analysis and analyses the potential for an effect in more detail, with a view to concluding whether there would be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).
- 2.7 A decision by the European Court of Justice⁸ concluded that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. The UK is no longer part of the European Union. However, as a precaution, it is assumed for the purposes of this HRA that EU case law regarding Habitat Regulations Assessment will still be considered informative jurisprudence by the UK courts. That ruling has therefore been considered in producing this HRA.
- 2.8 Also, in 2018 the Holohan ruling⁹ was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that *'As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area'* [emphasis added]. This has been taken into account in the HRA process.

HRA Task 3 – Avoidance and Mitigation

- 2.9 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Neighbourhood Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.10 In evaluating significance, AECOM has relied on professional judgement and the LP HRA regarding development impacts on the European sites considered within this assessment.
- 2.11 When discussing 'mitigation' for a Neighbourhood Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since the Local Development Plan document is a high-level policy document. A Neighbourhood Plan is a lower level constituent of a Local Development Plan.

⁷ <https://www.gov.uk/guidance/appropriate-assessment#what-are-the-implications-of-the-people-over-wind-judgment-for-habitats-regulations-assessments> [Accessed: 07/01/2020].

⁸ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

⁹ Case C-461/17

Confirming Other Plans and Projects That May Act 'In Combination'

- 2.12 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European site(s) in question.
- 2.13 In considering the potential for combined regional housing development to impact on European sites the primary consideration is the impact of visitor numbers – i.e. recreational pressure and urbanisation.
- 2.14 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans (which in themselves may have minor impacts) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in-combination assessment is therefore of greatest relevance when the plan or policy would otherwise be screened out because its individual contribution is inconsequential.

3. European Sites

- 3.1 In the case of the DDNP, it has been determined that the European sites identified in **Table 1** require consideration.
- 3.2 The locations of the below European sites in relation to the DDNP boundary and allocated sites are illustrated in **Appendix A, Figure 1A**.

Table 2. European Sites for Consideration and their Location in Relation to the Diss and District Neighbourhood Plan

European site	Location
Waveney & Little Ouse Valley SAC	Located c.2.2km from the DDNP boundary (Roydon)
Redgrave & South Lopham Fens Ramsar	Located c.2.2km from the DDNP boundary (Roydon)
Breckland SPA	Located c.9.6km from the DDNP boundary (Roydon)

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

- 3.3 The scoping process also evaluated whether pathways existed to the following European site as it is considered to be functionally linked to the Breckland SPA, but it was concluded that it could be scoped out of consideration:
- Breckland SAC – this site is designated for its dry heath and grassland communities and its meres support great crested newt *Triturus cristatus*. The site is over c.15.5km away from the DDNP boundary. Due to the distance of this site from the DDNP boundary, there are no realistic linking impact pathways to the environmental vulnerabilities of this site (under-grazing, water and air pollution, inappropriate management etc). Although the closest part of the SAC lies adjacent to the A11 north-east of Thetford, and thus may be susceptible to air quality impacts from the road, this is unlikely to be a significant journey to work route for residents of the DDNP area.
- 3.4 The reason for designation, conservation objectives and environmental vulnerabilities of the European sites are detailed below.

Waveney & Little Ouse Valley SAC

Introduction

- 3.5 This site occurs in the East Anglian centre of distribution of calcareous fens and contains very extensive great fen-sedge *Cladium mariscus* beds, including managed examples, as well as stands in contact zones between small sedge mire and species-poor *Cladium* beds. The habitat type here occurs in a spring-fed valley fen.
- 3.6 Purple moor-grass – meadow thistle (*Molinia caerulea* – *Cirsium dissectum*) fen-meadows are associated with the spring-fed valley fen systems. The *Molinia* meadows occur in conjunction with black bog-rush – blunt-flowered rush (*Schoenus nigricans* – *Juncus subnodulosus*) mire and calcareous fens with great fen-sedge. Where the fen-meadow is grazed it is more species-rich, with frequent southern marsh-orchid *Dactylorhiza praetermissa*.
- 3.7 A population of Desmoulin's whorl snail *Vertigo moulinsiana* occurs in a valley fen at Weston Fen.

Reasons for Designation¹⁰

- 3.8 Qualifying Annex I habitats:
- Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*. (Calcium-rich fen dominated by great fen sedge (saw sedge))*

¹⁰ <http://publications.naturalengland.org.uk/publication/4749900759695360> [Accessed 17/03/2021]

- Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinia caerulea*). (Purple moor-grass meadows)

3.9 Qualifying Annex II species:

- Desmoulin's whorl snail *Vertigo moulinsiana*

3.10 Annex I priority habitats are denoted by an asterisk (*).

Conservation Objectives¹¹

3.1 "With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

3.2 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site."

Current Pressures and Threats

3.3 The Site Improvement Plan¹² identifies the following pressures and threats to the SAC:

- Inappropriate scrub control
- Inappropriate water levels
- Air pollution: impact of atmospheric nitrogen deposition
- Water pollution

Redgrave & South Lopham Fens Ramsar

Introduction

3.4 The site is an extensive example of lowland base-rich valley, remarkable for its lack of fragmentation. The diversity of the site is due to the lateral and longitudinal zonation of the vegetation types characteristic of valley mires, such as dry birch woodland, scrub and carr, floristically-rich fen grassland, mixed fen, wet heath and areas of reed and saw sedge. The site supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*.

Reason for Designation¹³

3.5 The site is designated as a Ramsar for the following Criteria:

Criterion 1: The site is an extensive example of spring-fed lowland base-rich valley, remarkable for its lack of fragmentation.

Criterion 2: The site supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*.

¹¹ Ibid

¹² Ibid

¹³ <https://jncc.gov.uk/jncc-assets/RIS/UK11056.pdf> [accessed 17/03/2021]

Criterion 3: The site supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. The diversity of the site is due to the lateral and longitudinal zonation of the vegetation types characteristic of valley mires.

Factors (Past, Present or Potential) Adversely Affecting the Site's Ecological Character

3.6 The Information Sheet on Ramsar Sites¹⁴ identifies the following pressures and threats to the Ramsar site:

- Dredging (on-site with major impact)
- Eutrophication (on-site)
- Pollution – agricultural fertilisers (off-site)
- Pollution – pesticides/ agricultural runoff

Breckland SPA

Introduction

3.7 The Breckland SPA is located in parts of both Norfolk and Suffolk in the heart of East Anglia. It forms part of The Brecks National Character Area (NCA 85), which has a very particular land use history and a richly distinctive wildlife, which sets it apart from all surrounding landscapes. The area consists of a gently undulating plateau underlain by a bedrock of Cretaceous Chalk, which is covered largely by thin deposits of sand and flint of glacial origin. The semi-continental climate, with low rainfall and free-draining soils, has led to the development of dry heath and grassland communities. The complex of soils has led to the creation of intimate mosaics of heather dominated heathland with acid and calcareous grassland rarely found elsewhere. The remnants of the dry heath and grassland that remain within the SPA today support populations of Annex 1 heathland breeding birds, where grazing by sheep and rabbits is sufficiently intensive to create short turf and open ground. The Annex 1 breeding bird species have also adapted to live in arable and forestry habitats, which cover extensive areas of the SPA. The regular, rotational clear-felling of select areas of plantation forest creates suitable breeding habitat for SPA bird species which utilise the early years of re-planted blocks.

Reason for SPA Designation¹⁵

3.8 Qualifying individual species listed in Annex I of the Wild Birds Directive that are supported by the site are:

- Stone-curlew *Burhinus oedicnemus* (Breeding) - when classified, the SPA supported 115 breeding pairs (5 year mean 1994 – 1998) which represented 60.1% of the GB population,
- European nightjar *Caprimulgus europaeus* (Breeding) - when classified, the SPA supported 415 males breeding (Count as at 1998) which represented 12.2% of the GB population
- Woodlark *Lullula arborea* (Breeding) - when classified, the SPA supported 430 breeding pairs (Count as at 1997) which represented 28.7% of the GB population.

Conservation Objectives¹⁶

3.9 "Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features

¹⁴ Ibid

¹⁵ <http://publications.naturalengland.org.uk/publication/4572292419944448> [accessed 23/03/2021]

¹⁶ Ibid

- *The supporting processes on which the habitats of the qualifying features rely*
- *The population of each of the qualifying features, and,*
- *The distribution of the qualifying features within the site.”*

Current Pressures and Threats

3.10 The Site Improvement Plan¹⁷ identifies the following pressures and threats to the SPA:

- Lack of ground disturbance
- Under-grazing
- Forestry and woodland management
- Stone curlew monitoring and intervention
- Planning permission: general
- Monitoring
- Air pollution: impacts of atmospheric nitrogen
- Public access/ disturbance
- Climate change
- Inappropriate scrub control
- Inappropriate management practices
- Inappropriate weed control
- Inappropriate pest control

¹⁷<http://publications.naturalengland.org.uk/publication/5075188492271616#:~:text=The%20plan%20provides%20a%20high,the%20condition%20of%20the%20features>. [accessed 23/03/2013]

4. Test of Likely Significant Effects

Background to Diss and District Parishes

4.1 The following are located within the District of South Norfolk:

- Diss – a market town within a conservation area, close to Norfolk's border with Suffolk. The town lies in the valley of the River Waveney, has parkland and The Mere (a notable lake). In the 2011 census the population of Diss was 7,572¹⁸.
- Roydon – a small village about one mile west of Diss. In the 2011 census it had a population of 2,457.
- Burston and Shimpling - the villages of Burston and Shimpling form one parish, 5 miles to the north east of Diss. In the 2011 census the population was 568 in 234 households.
- Scole – a village 19 miles south of Norwich with a population of 1,367 at the 2011 Census. It lies on the north bank of the River Waveney.
- Palgrave - a village and civil parish in the Mid Suffolk district. It is located on the south bank of the River Waveney, opposite Diss and adjacent to the Great Eastern Main Line. In the 2011 census, Palgrave had a population of 905 people in 366 households.
- Stuston – a small village close to the border with Norfolk. In the 2011 census the population was 194.
- Brome and Oakley – a civil parish that lies immediately south of the River Waveney and 3 miles south-east of Diss. In the 2011 census the population was 475.

Physical scope of the HRA

4.2 There are no standard criteria for determining the ultimate physical scope of an HRA. Rather, the source-pathway-receptor model should be used to determine whether there is any potential pathway connecting development to any European sites.

4.3 The European sites that are described Section 3 are located within a 10km radius of the DDNP area: Waveney & Little Ouse Valley SAC (2.2km, west), Redgrave & South Lopham Fens Ramsar (2.2km, west) and Breckland SPA (9.6km, north-west).

4.4 Based upon Natural England Site Improvement Plans, there are several impact pathways that require consideration regarding increased development within the DDNP area and said European sites. These are:

- Recreational pressure;
- Air quality;
- Water quality (surface water runoff);
- Water quality (discharge of treated sewage effluent); and
- Hydrological changes, including water abstraction.

4.5 Table 3 describes these environmental impact pathways. The consideration of Neighbourhood Plan policies (the Test of Likely Significant Effects) is then documented in Table 4.

¹⁸<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/2011censuskeystatisticsandquickstatisticsforparishesandparliamentaryconstituenciesinenglandandwales> [accessed 25/03/2021]

Table 3. Description of potential impact pathways from increased development to European Sites.

Impact pathway	Discussion
Water quality (surface water runoff)	Increased residential development within Diss and the District villages could lead to the loss of previously undeveloped land and increased surface water runoff to nearby European Sites. Waveney & Little Ouse Valley Fens SAC and Redgrave & South Lopham Fens Ramsar are located 2.2km west of Roydon parish boundary; however, these sites are spring-fed as is the source of the River Waveney within the Ramsar site. However, the Waveney flows towards the DDNP area and therefore surface runoff within the area cannot affect the Ramsar upstream. Breckland SPA is located over 9km from the DDNP boundary. This is considered too great a distance to be impacted by issues of surface water runoff from increased development in the DDNP area. Changes in water quality through surface water runoff has therefore been screened out.
Water quality (discharge of treated sewage effluent)	Increased housing development within the DDNP area could lead to increased sewage production. Therefore, it is necessary to consider any risk that increased sewage could degrade the water quality (i.e. through increased phosphorus discharge) of European Sites, in the absence of environmental mitigation and adequate wastewater treatment works. There is no hydrological connection between the DDNP area and Breckland SPA. Waveney & Little Ouse Valley SAC and Redgrave & South Lopham Fens Ramsar are both spring fed fens. Waste water treatment within the Districts is currently handled by Anglian Water through their Waste Water Management Plan 2019 and Essex and Suffolk Water (part of the wider Northumbrian Water Group). Both companies are set to invest in wastewater treatment and sustainability and have the capacity to accommodate the additional allocated sites and housing numbers proposed within the DDNP. Changes in water quality as a result of the discharge of sewage effluent has therefore been screened out.
Hydrological changes, including water abstraction	The Waveney & Little Ouse Valley SAC and Redgrave & South Lopham Fens Ramsar are spring fed fens that are susceptible to changes in water table fluctuations. Impacts could occur from increased water abstraction for public water supply. Abstraction from Fenland Reservoir could also have an adverse effect on Breckland SPA through disturbance due to the construction of a new pipeline ¹⁹ .
Air quality	Increased residential development would likely lead to a greater number of vehicles within the DDNP area. As such, increased air pollution could arise relative to a situation of no growth. Pollutants released from vehicles may be carried directly by wind currents and deposited to the Waveney & Little Ouse Valley SAC, Redgrave & South Lopham Fens Ramsar and Breckland SPA or pollutants may become soluble and taken up during evaporation and deposited to said sites during precipitation. Guidance from the Institute of Air Quality Management and Highways England both set an impact zone of 200m from the roadside for potential significant air quality effects to vegetation from main road traffic. None of the European sites within the geographical scope of this HRA are within 200m of a main road and they have thus all been screened out.
Recreational pressure	Increased development within the DDNP area could lead to higher numbers of visitors to European Sites, particularly those within relatively easy recreational access. For example, the nature, scale, timing and duration of some human activities can result in the disturbance of birds at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the population. It is long standing knowledge that the European Sites located in Suffolk are attractive to visitors on a county, national and in some cases international level. Increased visitors can have direct and indirect impacts for a European Site that could prevent said site achieving its conservation objectives. The relevant European Site impacted by recreational pressure is Breckland SPA.

¹⁹ <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-2019-hra-task-i-screening.pdf> [accessed 01/04/2021]

Redgrave & South Lopham Fens Ramsar supports a diverse range of plants and animals. There are also areas of woodland, heath and the River Waveney. The site is managed by the Suffolk Wildlife Trust and has a visitor centre, car park, picnic and toilet facilities. There are also three designated nature trails²⁰. As the Ramsar is managed for public access an increase in recreational pressure is unlikely to cause a likely significant effect upon the site. Additionally, Waveney & Little Ouse Valley Fens SAC is not identified by Natural England to be impacted by recreational pressure. Therefore, these two SACs are screened out at this stage.

²⁰ <https://www.suffolkwildlifetrust.org/redgrave> [accessed 25/03/2021]

Table 4. Screening assessment (likely significant effect) of the DDNP.

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
Policy 1: Scale and location of Housing Growth	Redgrave & South Lopham Fens Ramsar – 2.2km west Waveney & Little Ouse Valley Fens SAC – 2.2km west Breckland SPA – 9.6km west	Policy describes requirements for developments to be in full compliance with national, local plan and neighbourhood plan policies and describes site allocations.	Likely Significant Effect. Screened in. This policy allocates 494 houses across 18 sites.
Policy 2: Regeneration of the Waveney Quarter, Diss	Redgrave & South Lopham Fens Ramsar – 2.2km west Waveney & Little Ouse Valley Fens SAC – 2.2km west Breckland SPA – 9.6km west	The policy provides development management policy for development within the Waveney Quarter. This policy also allocates one residential allocation, DDNP16: Land off Park Road, Diss (22 net new dwellings).	Likely Significant Effect. Screened in. This policy allocates 22 houses across one site allocation.
Policy 2a: Land off Park Road, Diss, DDNP16	Redgrave & South Lopham Fens Ramsar – 2.2km west Waveney & Little Ouse Valley Fens SAC – 2.2km west Breckland SPA – 9.6km west	The policy provides development management policy for allocation DDNP16: Land off Park Road, Diss (22 net new dwellings).	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 2: Housing Mix	N/A	Policy describes how all new residential development proposals should provide a mix of housing types and sizes or show that they are meeting specific housing needs.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 3: Affordable Housing	N/A	Policy describes how the relatively high need for Social Rent homes in the neighbourhood plan area will need to be a significant consideration when negotiating and agreeing the tenure mix for new affordable housing.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Community Policy 1: Affordable Housing Cascade	N/A	Supports the inclusion of the Mid-Suffolk parishes of Brome and Oakley, Palgrave and Stuston in South Norfolk Council's affordable housing cascade when this is next reviewed by South Norfolk Council.	No likely Significant Effect. Screened out. This is a community management policy and does not allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 4: Diss Business Park	N/A	Policy outlines criteria that development or redevelopment at Diss Business Park should adhere to.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
Policy 4: Design	N/A	Policy describes how new development within Diss and District that demonstrates high-quality design will be supported.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Community Policy 2: Maintenance of Drainage Ditches	N/A	The Policy describes that the town and parish councils will work proactively with landowners and statutory agencies, such as the Lead Local Flood Authority, to ensure that drainage ditches are properly maintained with a view to ensuring that they continue to play their role in the management of flood risk.	No likely Significant Effect. Screened out. This is a community management policy and does not allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 5: Green Corridors	N/A	Policy describes the requirement for all developments in the plan area to maximise habitat opportunities for local wildlife and to manage, enhance and create habitats within the 13 identified green corridors.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 6: Road Traffic Improvements	N/A	Policy describes the need to improve capacity at key junctions within Diss.	No likely Significant Effect. Screened out. This is a development management policy specifically for Diss. Therefore, no impact pathways exist to European Sites.
Community Policy 3: Village Traffic Speeds	N/A	The policy describes that rural parishes will in principle support actions by others, and carry out their own actions, to reduce speeding through the villages, for example by implementing vehicle activated signs or village gateway schemes. Funding to support this activity may derive from Community Infrastructure Levy or through the Parish Partnerships initiative.	No likely Significant Effect. Screened out. This is a community management policy and does not allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 7: Walking and Cycling Networks	N/A	Policy describes the need to improve the walking and cycling infrastructure and create a green walking and cycling network.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Community Policy 4: Routine Maintenance of Walking and Cycle Routes	N/A	This policy describes that the Parish Councils will work with other agencies to ensure effective management of the walking and cycling network, in particular coordinating regular cutting back vegetation where it infringes on the width of paths.	No likely Significant Effect. Screened out. This is a community management policy and does not allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 8: Diss Leisure Centre	N/A	Policy describes the need for a new leisure centre within or close to Diss town centre.	No likely Significant Effect. Screened out.

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
			This is a development management policy specifically for Diss town centre. Therefore, no impact pathways exist to European Sites.
Policy 9: Broadband	N/A	Policy describes the requirement for developers to ensure broadband infrastructure is provided for new developments.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 10: Funding and delivery of infrastructure	N/A	Policy states that new development must not overburden existing infrastructure, including sewage and highways. It also describes that funding will be spent on sustainable projects and/ or community priorities.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Community Policy 5: Town Centre Action Plan	N/A	Describes that the Town Council will lead on the development of an area action plan for the town centre with the aim of making it more pedestrian friendly and promoting its vitality. The Town Council's Strategy Plan includes a variety of objectives in line with this, for example improving cleanliness of the streets, improving the water quality of the Mere, attracting more footfall to the town centre by increasing market activity.	No likely Significant Effect. Screened out. This is a community management policy and does not allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 11: Strategic Gap between Diss/ Roydon village	N/A	Policy describes the need to maintain the gap between Diss and Roydon village. Development will not be permitted within this area.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 12: Local Green Space	N/A	Policy identifies areas that are designated as Local Green Space for special protection.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 13: Protection of local views	N/A	Policy identifies important local views and states that development proposals must demonstrate that they will not harm these key views.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Community Policy 6: Diss Heritage Triangle	N/A	Policy details that Diss Town Council will engage with the Corn Hall Trust, local businesses and other interested parties to promote and enhance the special character and commercial attractiveness of the Heritage Triangle within the core of the town centre.	No likely Significant Effect. Screened out. This is a community management policy and does not allocate sites for development. Therefore, no impact pathways exist to European Sites.

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
Policy 14: Designated and Non-Designated Heritage Assets	N/A	Policy states that heritage assets are to be protected and where possible enhanced.	<p>No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.</p>
Policy XX: Surface Water	N/A	A development management policy that identifies the requirement for development to manage flood risk, not increase flood risk and wherever possible reduce flood risk. It outlines the requirement for appropriate assessment which may include the provision of SuDS	<p>No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.</p>

5. The ‘in Combination’ Scope

- 5.1 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the internationally designated site(s) in question.
- 5.2 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee²¹ case.
- 5.3 For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects with potential for in combination likely significant effects are those schemes that have the following impact pathways: recreational pressure and hydrological changes. The following plans have been assessed for their in-combination impact to interact with the Diss and District Neighbourhood Plan:
- Babergh and Mid Suffolk Joint Local Plan – Pre-Submission Document (November 2020)
 - Babergh and Mid Suffolk Local Plan: Habitat Regulations Assessment and Appropriate Assessment (2019)
 - Anglian Water – Water Resources Management Plan
 - Anglian Water Drought Plan
 - Anglian Water – Water Recycling Long-Term Plan
 - Anglian Water – Drainage and Wastewater Management Plan
 - South Norfolk Local Plan HRA
 - Joint Core Strategy for Broadland, Norwich and South Norfolk (adopted 2014)
 - Emerging Greater Norwich Local Plan
 - Essex and Suffolk Water – Drought Plan
 - Essex and Suffolk Water - Water Resources Management Plan
 - St Edmundsbury Borough Council Core Strategy HRA screening (2010)
- 5.4 It should be noted that, while the broad potential impacts of these other projects and plans will be considered, we do not propose carrying out full HRA on each of these plans – we will however draw upon existing HRA that have been carried out for surrounding regions and plans.

²¹ Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

6. Appropriate Assessment

- 6.1 The law does not prescribe how an appropriate assessment should be undertaken or presented but the appropriate assessment must consider all impact pathways that have been screened in, whether they are due to policies alone or to impact pathways that arise in combination with other projects and plans. That analysis is the purpose of this section. The law does not require the 'alone' and 'in combination' effects to be examined separately provided all effects are discussed.
- 6.2 The main impact pathways of concern to this HRA (water quality, air quality, recreational pressure and hydrological changes including water abstraction) are inherently 'in combination' with neighbouring plans and projects. However, for completeness, potential impacts of the 494 net residential dwellings allocated within the Diss and District Neighbourhood Plan area in isolation are also assessed.
- 6.3 The HRA screening exercise undertaken in Table 2 indicates one potential NP policy (Policy 1) that will encompass the 18 potential site allocations. These may have likely significant effects on the European Sites due to recreational pressure and hydrological changes as a result of water abstraction for the public water supply. At the screening stage, the following potential housing allocations were screened in and require further assessment:
- DDNP01 - Land north of the Cemetery, west of Heywood Road and east of Shelfanger Road, Diss
 - DDNP02 - Site of derelict Victorian Infant School, the Causeway, Diss
 - DDNP03 - Site of the existing Leisure Centre, Victoria Road, Diss
 - DDNP04 - Land west of Nelson Road and east of Station Road, Diss
 - DDNP05 - Land north of Nelson Road, Diss (Planning Application 2020/0478 for extra care housing, approved with conditions on 25/02/2021²²)
 - DIS1 - Land north of Vince's Road, Diss
 - DIS2 - Land off Park Road, Diss (for open space and limited residential)
 - DIS3 - Land off Denmark Lane, Roydon
 - DIS6 / DDNP16 – Land behind Thatchers Needle, Diss
 - DIS7 – Feather Mills site, Park Road, Diss
 - DDNP06 - Site south of Roydon Primary School, Roydon
 - DDNP07 - Land west of Gissing Road, Burston
 - DDNP08 - Land east of Norwich Road, Scole
 - DDNP9 - Land at Rose Farm off Bungay Road, Scole
 - DDNP10 - Former Scole Engineering Site, Diss Road, Scole
 - DDNP11 - Land north east of Ivy House, Brome
 - DDNP12 - Land north of the B1118
 - DDNP13 - Land south of the B1118
- 6.4 Employment allocation DIS9 - Land at Sandy Lane (north of Diss Business Park) has been dismissed as not having any potential for a linking impact pathway and thus no likely significant effect would result.

Recreational pressure

- 6.5 There is growing concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels and

²² <https://info.south-norfolk.gov.uk/online-applications/simpleSearchResults.do?action=firstPage> [accessed 26/03/2021]

- impacts on European protected sites^{23 24}. This applies to any habitat, but the additional recreational pressure from housing growth on destinations with water features is likely to be especially strong and some of the qualifying waterfowl are known to be susceptible to disturbance. Different European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. HRAs of Plans tend to focus on recreational sources of disturbance as a result of new residents²⁵.
- 6.6 Human activity can affect organisms directly (e.g. loss of habitat or by causing species to flee) and indirectly (e.g. by damaging their habitat or reducing their fitness in less obvious ways e.g. stress). The most obvious direct effect is the loss of habitat as a result of increased visitors to a site (i.e. trampling). But human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes to species (e.g. an increase in heart rate). While these are less noticeable, they might result in major population-level changes by altering the balance between immigration/birth and emigration/death²⁶.
- 6.7 At the screening stage (Table 2) one European Site was identified that could be impacted by recreational pressure. This was Breckland SPA.
- 6.8 Impacts of recreational pressure for Breckland SPA would likely be through more indirect means such as disturbance of species. For example, the impact of bird disturbance has been particularly well studied. Much research concern stems from the fact that birds expend energy unnecessarily when disturbed and the time they spend responding to humans is time that is not spent feeding²⁷. Disturbance therefore risks increasing energy expenditure of birds while reducing their energy intake, which can adversely affect their 'condition' and ultimately their survival. Additionally, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they then must sustain a greater number of birds²⁸. Moreover, the more time a breeding bird spends disturbed from its nest, the more its eggs are likely to cool and the more vulnerable they, or any nestlings, are to predators. Recreational effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as nightjar^{29 30}.
- 6.9 Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance than hiking³¹. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers³². A UK meta-analysis suggests that important spatial (e.g. the area of a site potentially influenced) and temporal (e.g. how often or long an activity is carried out) parameters differ between recreational activities, suggesting that activity type is a factor that should be taken into account in HRAs³³.
- 6.10 The site specific allocations and policies document HRA³⁴ carried out for South Norfolk Council concludes no adverse effects on the integrity on the Breckland SPA as a result of recreational pressure from development within the South Norfolk area. However, this does not account for the full quanta which are

²³ Liley D, Clarke R.T., Mallord J.W., Bullock J.M. 2006a. The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.

²⁴ Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. 2006b. Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.

²⁵ The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

²⁶ Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

²⁷ Riddington, R. *et al.* 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

²⁸ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

²⁹ Clarke R.T., Liley D., Sharp J.M., Green R.E. 2013. Building development and roads: Implications for the distribution of stone curlews across the Brecks. PLOS ONE. doi:10.1371/journal.pone.0072984.

³⁰ Liley D., Clarke R.T. 2003. The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* 114: 219-230.

³¹ Banks P.B., Bryant J.Y. 2007. Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* 3: 14pp.

³² Miller S.G., Knight R.L., Miller C.K. 2001. Wildlife responses to pedestrians and dogs. 29: 124-132.

³³ Weitowitz D., Panter C., Hoskin R., Liley D. The spatio-temporal footprint of key recreation activities in European protected sites. Manuscript in preparation.

³⁴ <https://www.south-norfolk.gov.uk/residents/planning/planning-policy/adopted-south-norfolk-local-plan/site-specific-allocations-and> [accessed 26/03/2021]

considered in the DDNP. Therefore, the effects of recreational pressure resulting from the remaining additional dwellings proposed in the NP must be appropriately assessed in isolation and in combination with those already covered in the site allocations HRA.

- 6.11 Breckland SPA is a site where visitor surveys have been undertaken. These surveys were undertaken by Footprint Ecology (2010)³⁵ commissioned by Forest Heath District and St. Edmundsbury Borough Councils. With regards to current visitor pressure; the Footprint Ecology Visitor Survey found that the majority of visitors are local residents (87%) living within a 10km radius (of the survey location) and these visitors used the forest at least weekly as their local green space. The survey also highlighted that 91% of all visitors arrived by car and that dog walking was the most popular activity. The 10km distance was recorded between home postcode and survey location. However, these survey locations were often some distance into the SPA itself; analysing the data further visitor numbers to Breckland Forest (the relevant SPA parcel being designated for nightjar and woodlark) declined at around 7.5km from the actual SPA boundary. Therefore, it has been determined by West Suffolk Council that any development within 7.5km of SSSI units within the SPA that contain heathland or rotationally managed forestry, could cause an impact on nightjar and woodlark, in-combination with all other development within 7.5km of the SPA.
- 6.12 All of the proposed housing sites allocated by the DDNP are beyond 7.5km of the Breckland SPA. The closest site to the SPA boundary is DDNP06, which is 11.8km away. Therefore, it is highly unlikely that residential development within the DDNP area will lead to increased visitors to the Breckland SPA both alone and more significantly when considered in-combination with growth across the district and surrounding districts.
- 6.13 **Adverse effects from recreation on the integrity of the European site of relevance to the Diss & District Neighbourhood Plan area can be reasonably dismissed.**

Hydrological changes, including water abstraction for public water supply

- 6.14 Water abstraction reduces flow in rivers and streams, lowers groundwater levels and potentially depletes aquifers. Impacts potentially occur where the interest features are aquatic or depend on water. However, the issue of water abstraction is better served at LP level in collaboration with water companies and the Environment Agency.
- 6.15 Anglian Water 2019 Water Resources Management Plan indicates that drought is currently an issue but will be addressed via a new Potable Water Transfer system³⁶. The potable transfers are conduits for transferring water between Water Resources Zones (WRZs) rather than identifying new water resources. They can either transfer existing surpluses from one zone to another, or transfer water from new resource development in one zone to another zone in deficit.
- 6.16 The Habitats Regulations Assessment undertaken for the Anglian Water Resources Management Plan (WRMP) (December 2019) concluded that, with mitigation in place, there would be no temporary adverse effects on the features of Breckland SPA as a result of the delivery of the WRMP³⁷. Their 2019 Drought Plan³⁸ also aims to *“protect public water supplies whilst minimising any environmental impacts that may arise, as a result of our activities, during a prolonged period of low rainfall.”*
- 6.17 Essex and Suffolk Water also have a Water Resources Management Plan (2019 to cover 2020-2060)³⁹ as well as a Drought Plan (2018)⁴⁰ in place to avoid impacts on Redgrave and South Lopham Fens Ramsar and Waveney & Little Ouse Valley Fens SAC. This is because water levels have significantly dropped over time, which has impacted the qualifying features of both sites. As a result, the Wortham borehole (for potable supply) had to be located outside the impact risk zone for Redgrave & South Lopham Fens Ramsar and additional water needed for Category 1 demand is sourced from other boreholes.

³⁵ Fearnley, H., Liley, D. and Cruickshanks, K. (2010). Visitor survey from results Breckland SPA. Footprint Ecology.

³⁶ <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/> [accessed 29/03/2021]

³⁷ <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-2019-hra-task-ii.pdf> [accessed 29/03/2021]

³⁸ <https://www.anglianwater.co.uk/siteassets/household/about-us/aws-final-drought-plan-2019.pdf> [accessed 29/03/2021]

³⁹ <https://www.nwg.co.uk/responsibility/environment/wrmp/> [accessed 29/03/2021]

⁴⁰ https://www.nwg.co.uk/globalassets/corporate-images/about/esw_final_published_drought_plan_2018.pdf [accessed 29/03/2021]

- 6.18 Since the purpose of the WRMPs is to set out how water companies intend to meet public water supply requirements up to 2045 and 2060, it covers the period of the DDNP.
- 6.19 **Adverse effects from hydrological changes including water abstraction for public water supply, on the integrity of the European sites of relevance to the Diss & District Neighbourhood Plan area can be reasonably dismissed.**

7. Conclusions

- 7.1 This assessment undertook both Screening and Appropriate Assessment of the policies and the proposed allocations resulting from the Parish's Call for Sites.
- 7.2 The international designated sites considered within the Appropriate Assessment for impact pathways that could not be screened out at the screening stage were:
- Breckland SPA
 - Waveney & Little Ouse Valley Fens SAC
 - Redgrave and South Lopham Fens Ramsar
- 7.3 Impact pathways considered during the screening were: recreational pressure and hydrological changes.
- 7.4 Eighteen potential Site Allocations to provide net new residential development were subject to Appropriate Assessment as they were located within the accepted zones of influence of the aforementioned international sites and could result in adverse effects on the integrity of an international site in combination with other projects and plans.
- 7.5 Following Appropriate Assessment, it is concluded that the Diss and District Neighbourhood Plan will contain sufficient policy framework to ensure no adverse effects on the integrity of international designated sites will occur in isolation or in combination with other projects and plans.

Appendix A

Figure 1A – European Sites