



Brettenham Neighbourhood

Plan 2024-2037

Habitats Regulations Assessment Screening Report

Babergh & Mid Suffolk District Councils

Final report

Prepared by LUC

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Contents

Chapter 1 **5**

Introduction

The requirement to undertake Habitats Regulations Assessment of development plans	5
Stages of Habitat Regulation Assessment	8
Requirements of the Habitats Regulations	8
Typical stages	9
Case law	12
Structure of this report	16

Chapter 2 **17**

Brettenham Neighbourhood Plan

Vision	17
Policies	18

Chapter 3 **20**

Methodology

Screening Assessment	20
Interpretation of 'likely significant effects'	23
Mitigation provided by the plan	24
Assessment of potential in-combination effects	25

Chapter 4 **27**

Screening Assessment

Chapter 1 Introduction

HRA Screening of impacts 27
HRA Screening of policies 33

Chapter 5 34
Conclusions and Next Steps

Next steps 34

Appendix A 35
European Sites within 20km of Brettenham Neighbourhood
Plan Area

Appendix B 37
Attributes of European Sites

Appendix C 41
Detailed Screening Assessment of Policies

References 46

Chapter 1

Introduction

1.1 LUC has been commissioned by Babergh and Mid Suffolk District Councils (the Councils) to carry out Habitats Regulations Assessment (HRA) Screening of the Brettenham Neighbourhood Plan 2024-2037. The Neighbourhood Plan is being prepared by Brettenham Parish Council. This HRA Screening report relates to the Pre-Submission Draft version of the Brettenham Neighbourhood Plan (January 2024).

The requirement to undertake Habitats Regulations Assessment of development plans

1.2 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007 [See reference 1]; the currently applicable version is the Habitats Regulations 2017 [See reference 2], as amended. Neighbourhood Plans, once approved at referendum, become part of the statutory development plan; therefore an HRA is required by law to be carried out by the ‘competent authority’ (the Councils). The Councils can commission consultants to undertake HRA work on their behalf and this (the work documented in this report) is then reported to and considered by the Councils as the competent authority. The competent authority considers this work and would usually [See reference 3] only progress a plan if it considers that the plan will not adversely affect the integrity [See reference 4] of any ‘European site’, as defined below. The requirement for authorities to comply with the Habitats Regulations when preparing a plan is also noted in the Government’s online Planning Practice Guidance (PPG) [See reference 5].

1.3 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). These were classified under European Union (EU) legislation but, since 1 January 2021, are protected in the UK by the Habitats Regulations 2017 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive [\[See reference 6\]](#)) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Designation of SACs also has regard to the threats of degradation or destruction to which the sites are exposed and, before EU exit day, to the coherence of the 'Natura 2000' network of European sites. After EU exit day, regard is had to the importance of such sites for the coherence of the UK's 'national site network'.
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive [\[See reference 7\]](#)), and for regularly occurring migratory species not listed in Annex I.

1.4 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites [\[See reference 8\]](#) and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper [\[See reference 9\]](#) on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap

with SACs and SPAs and may be designated for the same or different species and habitats.

1.5 Although Ramsar sites do not form part of the new national site network, Government guidance [\[See reference 10\]](#) states that:

“Any proposals affecting the following sites would also require an HRA because these are protected by government policy:

- Proposed SACs
- Potential SPAs
- Ramsar sites – wetlands of international importance (both listed and proposed)
- Areas secured as sites compensating for damage to a European site.”

1.6 Furthermore, the NPPF [\[See reference 11\]](#) and practice guidance [\[See reference 12\]](#) currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

1.7 For simplicity, this report uses the term ‘European site’ to refer to all types of designated site for which Government guidance [\[See reference 13\]](#) requires an HRA.

1.8 The overall purpose of an HRA is to conclude whether or not a proposal or policy, or whole development plan would adversely affect the integrity of the European site in question. This is judged in terms of the implications of the plan for a site’s ‘qualifying features’ (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of Habitat Regulation Assessment

1.9 The HRA of development plans is undertaken in stages (as described below) and should conclude whether or not a proposal would adversely affect the integrity of the European site in question.

1.10 LUC has been commissioned by Babergh and Mid Suffolk District Councils to carry out HRA work on their behalf, and the outputs will be reported to and considered by the Councils as the competent authority.

1.11 The HRA also requires close working with Natural England as the statutory nature conservation body [See reference 14] in order to obtain the necessary information, agree the process, outcomes and mitigation proposals. The Environment Agency, while not a statutory consultee for the HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities.

Requirements of the Habitats Regulations

1.12 In assessing the effects of a Plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed, if necessary, by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, proceed to Step 2.

- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects (the 'Significance Test'). [These two steps are undertaken as part of Stage 1: Screening, shown below in the 'Typical stages' section.] If yes, proceed to Step 3.
- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the European site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public. [This step is undertaken during Stage 2: Appropriate Assessment, described in the 'Typical stages' section below.]
- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the land use plan only after having ascertained that the plan would not adversely affect the integrity of a European site. [This step follows Stage 2 where a finding of 'no adverse effect' is concluded. If it cannot be it proceeds to Step 5 as part of Stage 3 of the HRA process.]
- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a European site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for 'imperative reasons of overriding public interest' (IROPI). [This step is undertaken during Stage 3: Assessment where no alternatives exist and adverse impacts remain considering mitigation, described in the 'Typical stages' section below.]

Typical stages

1.13 The section below summarises the stages and associated tasks and outcomes typically involved in carrying out a full HRA of a development plan, based on various guidance documents [See reference 15, 16 and 17]. This report presents the methodology of findings of Stage 1: Screening.

Stage 1: Screening (the ‘Significance Test’)

Tasks

- Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites.
- Identification of potentially affected European sites and their conservation objectives [See reference 18].
- Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction (‘mitigation’) measures [See reference 19].

Outcome

- Where effects are unlikely, prepare a ‘finding of no significant effect report’.
- Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

Stage 2: Appropriate Assessment (the ‘Integrity Test’)

Task

- Information gathering (development plan and data on European sites [See reference 20]).
- Impact prediction.
- Evaluation of development plan impacts in view of conservation objectives of European sites.

- Where impacts are considered to directly or indirectly affect qualifying features of European sites, identify how these effects will be avoided or reduced ('mitigation').

Outcome

- Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, reduction, including the mechanisms and timescale for these mitigation measures.
- If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.

Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation

Task

- Identify and demonstrate 'imperative reasons of overriding public interest' (IROPI).
- Demonstrate no alternatives exist.
- Identify potential compensatory measures.

Outcome

- This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.14 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid or reduce effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called ‘imperative reasons of overriding public interest’ (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

Case law

1.15 This HRA has been prepared in accordance with relevant case law findings, including most notably the ‘People over Wind’ and ‘Holohan’ rulings from the Court of Justice for the European Union (CJEU).

1.16 The People over Wind, Peter Sweetman v Coillte Teoranta (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the Screening stage. The precise wording of the ruling is as follows:

“Article 6(3)... must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the Screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.”

1.17 In light of the above, the HRA Screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Neighbourhood Plan could result in likely significant effects on European sites.

Instead, any such measures are to be considered at the Appropriate Assessment stage as relevant.

1.18 This HRA also fully considers the *Holohan v An Bord Pleanala* (November 2018) judgment which stated that:

“Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘appropriate assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.”

1.19 In undertaking this HRA, LUC considered the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and/or species and habitats located beyond the boundaries of European site that may be important in supporting the ecological processes of the qualifying features, has also been fully considered in this HRA.

1.20 Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat have been considered in the HRA, in line with the High Court judgment in *RSPB and others v Secretary of State and London Ashford Airport Ltd* [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

“There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a protected site is to be ignored. The indirect effect was still protected. Although the question of its legal status was mooted, I am satisfied... that while no particular legal status attaches to FLL, the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice.”

1.21 In addition to this, the HRA takes into consideration the ‘Wealden’ judgment from the Court of Justice for the European Union.

1.22 Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

1.23 In light of this judgment, the HRA therefore considers traffic growth based on the effects of development from the Neighbourhood Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change. The HRA also takes into account the Grace and Sweetman (July 2018) judgment from the CJEU which stated that:

“there is a distinction to be drawn between protective measures forming part of a project and intended avoid or reduce any direct adverse effects that may be caused by the project in order to ensure that the project does not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project”

“As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future”

“A mitigation strategy may only be taken into account at AA (a.6(3)) where the competent authority is “sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area”

“Otherwise it falls to be considered to be a compensatory measure to be considered under a.6(4) only where there are “imperative reasons of overriding public interest”.

1.24 Therefore, if an Appropriate Assessment of the Neighbourhood Plan is required it will only consider the existence of measures to avoid or reduce its direct adverse effects (mitigation) if the expected benefits of those measures are beyond reasonable doubt at the time of the assessment.

Structure of this report

1.25 This chapter (Chapter 1) has described the background to the production of the Brettenham Neighbourhood Plan and the requirement to undertake HRA. The remainder of the report is structured as follows:

- Chapter 2: Brettenham Neighbourhood Plan – summarises the content of the plan, which is the subject of this report.
- Chapter 3: Method – sets out the approach used, and the specific tasks undertaken during the Screening stage of the HRA.
- Chapter 4: Screening assessment – describes the findings of the Screening stage of the HRA.
- Chapter 5: Conclusions and next steps – summarises the HRA conclusions for the Brettenham Neighbourhood Plan and describes the next steps to be undertaken.

Chapter 2

Brettenham Neighbourhood Plan

Vision

2.1 The overarching vision for Brettenham for the period up to 2038 is:

In 2037 Brettenham will be a distinct rural village accommodating limited sustainable development that:

- Meets the needs of the local community;
- Respects the high quality of the historic and natural environment.

2.2 The vision is supported by eight objectives which refine the vision and have guided the identification of the planning policies contained within the Neighbourhood Plan.

2.3 The objectives are as follows:

- Housing
 - 1. Ensure that new housing development is of a scale and location to minimise impact on the character of the village.
 - 2. Support the delivery of housing that meets identified local needs of the village.
- Landscape and Natural Environment
 - 3. Minimise the impact of development on the natural environment and improve biodiversity.
 - 4. Protect and enhance the local landscape and significant views.

- Built Environment and Design
 - 5. Ensure new development is appropriate to the character of the Village, is well designed and incorporates measures that reduces environmental impact.
 - 6. Recognise and protect the historic importance of buildings and features.
 - 7. Maintain and enhance a strong rural identity and sense of place for the parish.
- Infrastructure and Highways
 - 8. Improve road safety, protect and enhance Brettenham’s public rights of way and reduce the impact of traffic passing through the Parish.

Policies

2.4 The 13 policies within the Brettenham Neighbourhood Plan are as follows:

- Policy BRET 1 – Spatial Strategy
- Policy BRET 2 – Affordable Housing on Rural exception Sites
- Policy BRET 3 – Replacement dwellings and conversion of buildings to residential use outside Settlement Boundaries
- Policy BRET 4 – Protecting Brettenham’s Landscape Character
- Policy BRET 5 – Protection of Important Views
- Policy BRET 6 – Biodiversity and Wildlife Corridors
- Policy BRET 7 – Local Green Spaces
- Policy BRET 8 – Buildings of Local Heritage Significance
- Policy BRET 9 – Design Considerations
- Policy BRET 10 – Flooding and Sustainable Drainage
- Policy BRET 11 – Dark Skies and Streetlighting

- Policy BRET 12 – Parking Standards
- Policy BRET 13 – Public Rights of Way

2.5 In addition to planning policies, the Neighbourhood Plan contains a number of ‘community actions’. These identify local initiatives that address issues and concerns that were raised during community engagement. As they do not form part of the development plan, they have not been subject to HRA Screening in this report.

2.6 The Neighbourhood Plan does not allocate any sites for new housing or other built development, although it does define an updated settlement boundary. Within the settlement boundary, new development will be supported in principle. Proposals for rural exception sites outside of the settlement boundary will be supported in certain circumstances.

Chapter 3

Methodology

Screening Assessment

3.1 HRA Screening of the Brettenham Neighbourhood Plan has been undertaken in line with current available guidance and has sought to meet the requirements of the Habitats Regulations. The tasks that have been undertaken during the Screening stage of the HRA and the conclusions reached are described in detail below.

3.2 The purpose of the Screening stage is to:

- Identify all aspects of the plan that would have no effect on a European site. These can be eliminated from further consideration in respect of this and other plans.
- Identify all aspects of the plan that would not be likely to have a significant effect on a European site (i.e. would have some effect because of links/connectivity but the effect is not significant), either alone or in combination with other aspects of the same plan or other plans or projects. These do not require 'Appropriate Assessment'.
- Identify those aspects of the plan where it is not possible to rule out the risk of significant effects on a European site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require Appropriate Assessment.

Identifying European sites that may be affected and their conservation objectives

3.3 As a first step in identifying European sites that could potentially be affected by a development, it is established practice in HRA to consider sites within the area covered by the plan, and other sites that may be affected beyond this area.

3.4 A distance of 20 kilometres from the boundary of the plan area was used in the first instance to identify European sites with the potential to be affected by the proposals within the Neighbourhood Plan. Consideration was then given to whether any more distant European sites may be connected to the plan area via effects pathways, for example through hydrological links or recreational visits by residents. The 20 kilometre distance has been agreed with Natural England for HRAs in this region [See reference 21] and is considered precautionary. In line with HRA requirements, the application of a 20 kilometre buffer is considered a highly precautionary distance with relation to potential impacts to the surrounding area.

3.5 The assessment also considers areas that may be functionally linked to the European sites. The term 'functional linkage' is used to refer to the role or 'function' that land beyond the boundary of a European site might fulfil in terms of supporting the species populations for which the site was designated or classified. Such an area is therefore 'linked' to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status.

3.6 While the boundary of a European site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. Sometimes, the mobility of qualifying species is considerable and may extend so far from the key habitat that forms the SAC or SPA that it would be entirely impractical to attempt to designate or classify all of the land or sea that may conceivably be used by the species [See reference 22]. HRA therefore

considers whether any European sites make use of functionally linked habitats, and the impacts that could affect those habitats.

3.7 The only European site identified for inclusion in the HRA on the basis of being within 20 kilometres is Breckland SPA which is located just within 20 kilometres of the Brettenham Neighbourhood Plan Area. The location of the site is illustrated in Figure A.1 in Appendix A and detailed information about the SPA is provided in Appendix B, described with reference to Standard Data Forms for the SPA and Natural England's Site Improvement Plans [See reference 23]. Natural England's conservation objectives [See reference 24] for the SPA have also been reviewed. These state that site integrity must be maintained or restored by maintaining or restoring the habitats of qualifying features, the supporting processes on which they rely, and populations of qualifying species.

3.8 As required under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 [See reference 25] (as amended), an assessment has been undertaken of the 'likely significant effects' of the plan. The assessment has been prepared in order to identify which policies would be likely to have a significant effect on European sites. The Screening assessment has been conducted without taking mitigation into account, in accordance with the 'People over Wind' judgment.

3.9 If the potential for policies to have likely significant effects is identified, consideration would then be given to the potential for the development proposed to result in significant effects associated with:

- Physical loss or damage to habitat;
- Non-physical disturbance (noise, vibration and light pollution);
- Non-toxic contamination;
- Air pollution;
- Recreational pressure; and
- Changes to hydrology, including water quantity and quality.

3.10 This thematic/impact category approach also allows for consideration to be given to the cumulative effects of any site allocations rather than focussing exclusively on individual developments provided for by the plan.

3.11 For some types of impacts, the potential for likely significant effects was determined on a proximity basis. This approach and the assumptions applied are described in more detail in Chapter 4.

3.12 A Screening assessment was undertaken (Appendix C), to document consideration of the potential for likely significant effects resulting from each policy in the Neighbourhood Plan. A risk-based approach involving the application of the precautionary principle was adopted in the assessment, such that a conclusion of 'no significant effect' would only be reached where it was considered unlikely, based on current knowledge and the information available, that a development plan policy or site allocation would have a significant effect on the integrity of a European site.

Interpretation of 'likely significant effects'

3.13 Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan.

3.14 In the Waddenzee case [See reference 26], the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (paragraph 44). An effect should be considered 'significant', "if it undermines the conservation objectives" (paragraph 48). Where a plan or

project has an effect on a site “but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned” (paragraph 47).

3.15 A relevant opinion delivered to the Court of Justice of the European Union commented that:

“The requirement that an effect in question be ‘significant’ exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.”

3.16 This opinion (the ‘Sweetman’ case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered ‘trivial’ or de minimis; referring to such cases as those “that have no appreciable effect on the site”. In practice such effects could be screened out as having no likely significant effect – they would be ‘insignificant’.

3.17 The HRA Screening assessment therefore considers whether the Pre-Submission Draft Neighbourhood Plan policies could have likely significant effects either alone or in combination.

Mitigation provided by the plan

3.18 Some of the potential effects of a plan could be mitigated through the implementation of other policies in the plan itself, such as the provision of green infrastructure within new developments (which could help mitigate increased pressure from recreation activities at European sites). Nevertheless, in

accordance with the 'People over Wind' judgment, avoidance and mitigation measures cannot be relied upon at the Screening stage, and therefore, where such measures exist, they would be considered at the Appropriate Assessment stage for impacts and policies where likely significant effects, either alone or in-combination, cannot be ruled out.

Assessment of potential in-combination effects

3.19 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where “a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site”. Therefore, where likely insignificant effects are identified for the plan alone, it is necessary to consider whether these may become significant effects in combination with other plans or projects.

3.20 Where the plan is likely to have an effect on its own (due to impact pathways being present), but it is not likely to be significant, the in-combination assessment at Screening stage needs to determine whether there may also be the same types of effect from other plans or projects that could combine with the plan to produce a significant effect. If so, this likely significant effect arising from the plan in combination with other plans or projects, would then need to be considered through the Appropriate Assessment stage to determine if the impact pathway would have an adverse effect on integrity of the relevant European site. Where the Screening assessment has concluded that there is no impact pathway between development proposed in the plan and the conditions necessary to maintain qualifying features of a European site, then there will be no in-combination effects to assess at the Screening or Appropriate Assessment stage. This approach accords with recent guidance on HRA [\[See reference 27\]](#).

3.21 If impact pathways are found to exist for a particular effect but it is not likely to be significant from the plan alone, the in-combination assessment will identify which other plans and programmes could result in the same impact on the same European site. This will focus on planned growth (including housing, employment, transport, minerals and waste) around the affected site, or along the impact corridor.

3.22 The potential for in-combination impacts will therefore focus on plans prepared by local authorities that overlap with European sites that are within the scope of this HRA. The findings of any associated HRA work for those plans will be reviewed where available. Where relevant, any strategic projects in the area that could have in-combination effects with the plan will also be identified and reviewed.

3.23 The online HRA Handbook [[See reference 28](#)] suggests the following plans and projects may be relevant to consider as part of the in-combination assessment:

- Applications lodged but not yet determined, including refusals subject to an outstanding appeal or legal challenge;
- Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration;
- Projects authorised but not yet started;
- Projects started but not yet completed;
- Known projects that do not require external authorisation;
- Proposals in adopted plans; and
- Proposals in draft plans formally published or submitted for final consultation, examination or adoption.

Chapter 4

Screening Assessment

4.1 As described in Chapter 3, a Screening assessment was carried out in order to identify the likely significant effects of the Brettenham Neighbourhood Plan on the scoped-in European site (Breckland SPA). The detailed Screening assessment, which sets out the decision-making process used for this assessment, can be found in Appendix C and the findings are summarised below, firstly by impact types and then by considering the policies in the emerging Neighbourhood Plan.

HRA Screening of impacts

4.2 For some types of impacts, Screening for likely significant effects can be determined on a proximity basis, using GIS data to determine the distance of potential development locations to the European sites that were the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, during the Screening stage a number of assumptions were applied in relation to assessing the likely significant effects on European sites that may result from the plan, as described below.

Physical damage and loss (on-site)

4.3 Any development resulting from the plan would take place within the Brettenham Neighbourhood Plan area; therefore, only European sites within the boundary of the neighbourhood plan area could be affected through physical damage or loss of habitat from within the site boundaries. No European sites are located within the boundary of the Neighbourhood Plan area and therefore no likely significant effect is predicted in relation to physical damage and loss (on-site).

Physical damage and loss (offsite)

4.4 Habitat loss from development in areas outside of the European site boundaries may result in likely significant effects where that habitat contributes towards maintaining the interest feature for which the European site is designated. This includes land which may provide offsite movement corridors or foraging and sheltering habitat for mobile species such as birds, bats and fish. European sites susceptible to the indirect effects of habitat loss are restricted to those with qualifying species that rely on offsite habitat.

4.5 Breckland SPA is designated for supporting qualifying bird species and as such this European site is considered susceptible to impacts from development proposed outside the boundaries of the SPA. Natural England generally advises that 2 kilometres from European site boundaries is an appropriate distance for the consideration of offsite functionally linked land although for certain species, including most notably golden plover and lapwing, a much greater distance of up to 15 kilometres may be appropriate. These larger buffers have not been considered in relation to Breckland SPA as those qualifying species are not present within the SPA. As the Brettenham Neighbourhood Plan area is approximately 20 kilometres from Breckland SPA, no likely significant effect is predicted in relation to this site.

4.6 Therefore, no likely significant effects will occur from the Neighbourhood Plan as a result of physical damage and loss to offsite habitat, either alone or in-combination with other plans and policies.

Non-physical disturbance (noise, vibration and light)

4.7 Noise and vibration effects are most likely to disturb bird species and thus are a key consideration with respect to potential effects on European sites where birds are the qualifying features. Artificial lighting at night has the

potential to affect species where it occurs in close proximity to key habitat areas, such as key roosting sites of SPA birds.

4.8 It has been assumed that the effects of noise, vibration and light are most likely to be significant within a distance of 500 metres from the source. There is also evidence of 300 metres being used as a distance up to which certain bird species can be disturbed by the effects of noise [See reference 29]; however, it has been assumed (on a precautionary basis) that the effects of noise, vibration and light pollution are capable of causing an adverse effect if development takes place within 500 metres of a European site with qualifying features sensitive to these disturbances.

4.9 Breckland SPA is located significantly more than 500 metres from the Neighbourhood Plan area and therefore is not considered susceptible to non-physical disturbance from development in the plan area. Offsite impacts can also be screened out, due to the distance of the SPA from the Neighbourhood Plan area (see above).

Non-toxic contamination

4.10 Non-toxic contamination can include the creation of dust. This can smother terrestrial habitats, preventing natural processes, and as increased sediment, can potentially affect the turbidity of aquatic habitats. Dust/sediment may also contribute to nutrient enrichment, which can lead to changes in the rate of vegetative succession and habitat composition.

4.11 The effects of non-toxic contamination are most likely to be significant if development takes place within 500 metres of a European site with qualifying features sensitive to these effects, such as riparian and wetland habitats, or sites designated for habitats and plant species. This is the distance that, in our experience, provides a robust assessment of effects in plan-level HRA and meets with the agreement of Natural England.

4.12 Breckland SPA is located significantly more than 500 metres from the Neighbourhood Plan area and therefore is not considered susceptible to non-toxic contamination from development in the Neighbourhood Plan area and is screened out of the assessment.

Air pollution

4.13 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen levels, which can then affect plant health, productivity and species composition.

4.14 In terms of vehicle traffic, nitrogen oxides (NO_x, i.e. NO and NO₂) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO_x can cause eutrophication of soils and water.

4.15 Based on the Highways England Design Manual for Road and Bridges (DMRB) LA 105 Air quality (which sets out the requirements for assessing and reporting the effects of highway projects on air quality), it is assumed that air pollution from roads is unlikely to be significant beyond 200 metres from the road itself. Where increases in traffic volumes are forecast, this 200 metres buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

4.16 For highways developments within 200 metres of sensitive receptors, the DMRB provides the following Screening criteria to ascertain whether there are likely to be significant impacts:

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or

- There will be a change in speed band; or
- Road carriageway alignment will change by 5 metres or more.

4.17 Thus, where significant increases in traffic are possible on roads within 200 metres of European sites, traffic forecast data may be needed to determine if increases in vehicle traffic are likely to be significant. In line with the Wealden judgement [See reference 30], the traffic growth considered by the HRA should be based on the effect of development provided for by the plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

4.18 It has been assumed that only those roads forming part of the primary road network (motorways and 'A' roads) are likely to experience any significant increases in vehicle traffic as a result of development (i.e. greater than 1,000 AADT). As such, where a site is within 200 metres of only minor roads, no significant effect from traffic-related air pollution is considered to be the likely outcome.

4.19 There are no strategic roads within the Neighbourhood Plan area. Strategic roads within the wider area, which residents of Brettenham are likely to rely on, include the A131. While there are road links which connect the A134 at Bury St Edmunds with other A roads which are within 200 metres of Breckland SPA, there is no direct road between Brettenham and the SPA and much of the traffic joining the A134 will disperse in other directions, particularly at Bury St Edmunds, rather than continuing onto the roads going past the SPA. Therefore, Breckland SPA is not considered to be susceptible to impacts from air pollution caused by the Brettenham Neighbourhood Plan.

Recreation

4.20 Recreational activities and human presence can result in significant effects on European sites. European sites with qualifying bird species are likely to be particularly susceptible to recreational disturbances from walking, dog walking, angling, illegal use of off-road vehicles and motorbikes, wildfowling, and water

sports. In addition, recreation can physically damage habitat as a result of trampling, fire or vandalism and also through erosion associated with terrestrial activities.

4.21 Each European site will typically have a 'Zone of Influence' (ZOI) within which increases in population would be expected to result in likely significant effects. ZOIs are usually established following targeted visitor surveys and the findings are therefore typically specific to each European site (and often to specific areas within a European site). The findings are likely to be influenced by a number of complex and interacting factors and therefore it is not always appropriate to apply a generic or non-specific ZOI to a European Site.

4.22 Existing visitor survey work available for Breckland SPA has identified a Zone of Influence of 7.5 kilometres [See reference 31]. Brettenham is significantly more than 7.5 kilometres from the SPA and likely significant effects on Breckland SPA as a result of recreation can therefore be ruled out at this stage.

Reduced water quantity and quality

4.23 An increase in demand for water abstraction and treatment resulting from any growth proposed in the Neighbourhood Plan area could result in changes in hydrology at European sites. Depending on the qualifying features and particular vulnerabilities of the European sites, this could result in likely significant effects, for example, due to changes in environmental or biotic conditions, water chemistry and the extent and distribution of preferred habitat conditions.

4.24 The qualifying features of Breckland SPA are birds which are not directly susceptible to impacts from changes in water quantity and quality although it is possible that there may be indirect effects if habitats are affected, upon which the species depend. However, the SPA is located around 20 kilometres from the Neighbourhood Plan area and there is no indication of hydrological connectivity with the SPA. In addition, the HRA for the recently adopted

Babergh and Mid Suffolk Local Plan (Part 1), which was subject to consultation with Natural England, did not screen in likely significant effects on the Breckland SPA as a result of changes in hydrology when considering the overall scale of development proposed across Babergh and Mid Suffolk Districts. Therefore, likely significant effects on the SPA as a result of changes in water quantity and quality can be screened out for the Brettenham Neighbourhood Plan.

HRA Screening of policies

4.25 Appendix C sets out the HRA Screening assessment for the Neighbourhood Plan, by policy.

4.26 None of the policies in the Brettenham Neighbourhood Plan are expected to directly result in development; therefore they will not result in significant effects on European sites. While two of the policies (BRET 2 – Affordable Housing on Rural exception Sites and BRET 3 – Replacement dwellings and conversion of buildings to residential use outside Settlement Boundaries) set out criteria that would apply to any proposals for development outside of the settlement boundaries, these criteria are restrictive and the policies would not themselves lead to these types of developments.

4.27 In addition, the Screening assessment by impact concludes that there are no likely effects on European sites as a result of development within the Brettenham Neighbourhood Plan area, due to a lack of impact pathways. Therefore, no likely significant effects are predicted as a result of the plan.

Chapter 5

Conclusions and Next Steps

5.1 At the Screening stage of the HRA, no likely significant effects are predicted on European sites as a result of the Brettenham Neighbourhood Plan, either alone or in combination with other policies and proposals. Appropriate Assessment is therefore not required.

Next steps

5.2 HRA is an iterative process and as such, this assessment should be updated if any relevant, newly available evidence or comments from key consultees are received prior to the plan being finalised. It is recommended that this report is subject to consultation with Natural England and the Environment Agency to confirm that the conclusions of the assessment are considered appropriate at this stage of plan-making.

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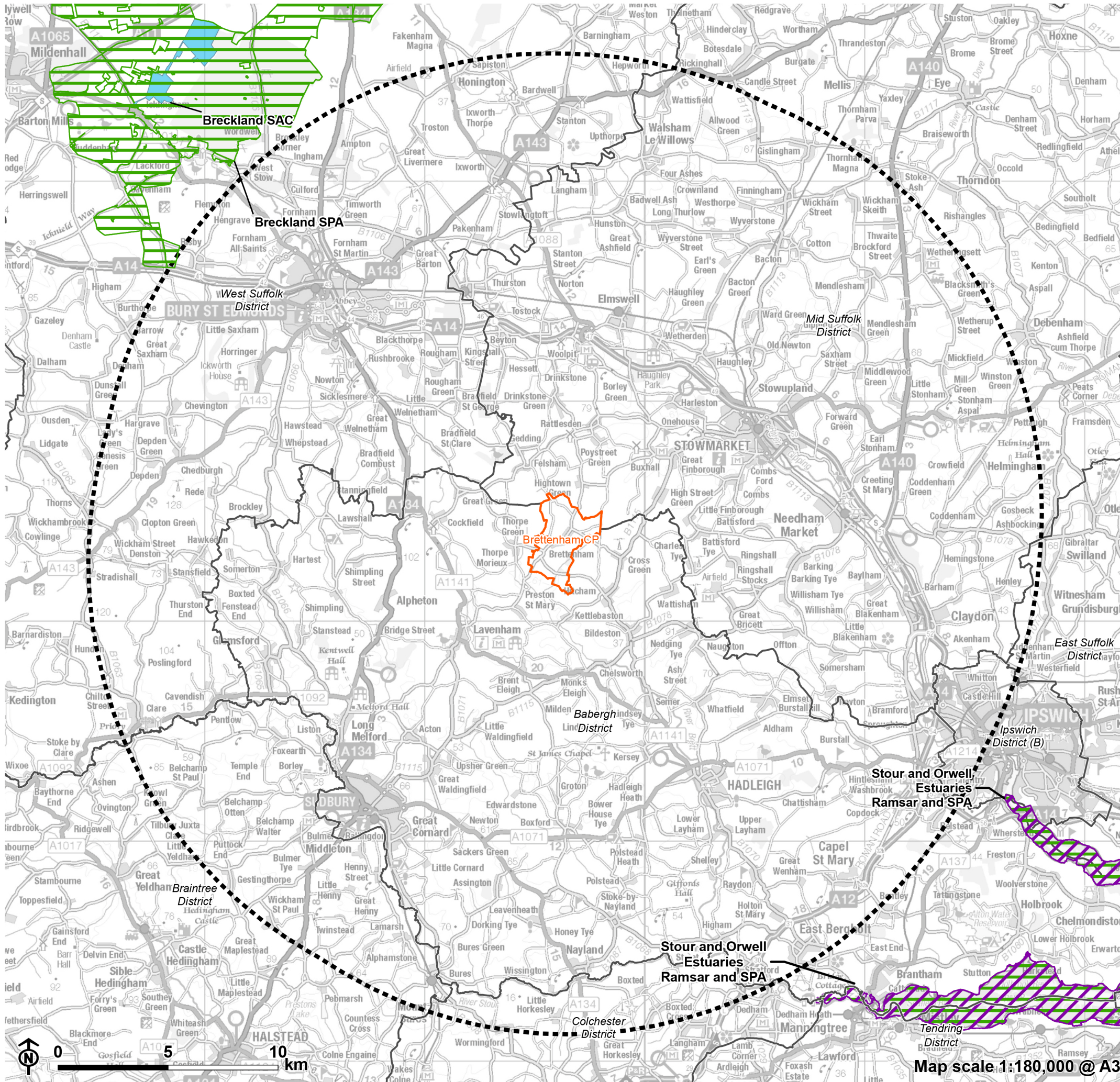
March 2024

Appendix A

European Sites within 20km of Brettenham Neighbourhood Plan Area



European Designated Sites within 20km of
Brettenham Neighbourhood Plan Area



- Neighbourhood Plan area
- 20km buffer from Neighbourhood Plan area
- Local Authority boundary
- Ramsar
- SPA
- SAC

Map scale 1:180,000 @ A3

Appendix B

Attributes of European Sites

B.1 This appendix contains information on the European site scoped into the HRA – Breckland SPA. Site area and designated features are drawn from the SPA Standard Data Form [See reference 32]. The overview of the site and its locations are drawn from Natural England’s Site Improvement Plan [See reference 33]. Site conservation objectives are drawn from Natural England’s website and are only available for SACs and SPAs [See reference 34].

Breckland SPA

Overview of site and its location

B.2 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 an ages-old identity, 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.

Qualifying features

B.3 Annex I of the Wild Birds Directive:

- A133 Stone-curlew; *Burhinus oedicnemus* (Breeding)
- A224 European nightjar; *Caprimulgus europaeus* (Breeding)
- A246 Woodlark; *Lullula arborea* (Breeding)

Conservation objectives

B.4 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change.

B.5 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;
- 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.

B.6 This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Key vulnerabilities

B.7 Key threats facing the Breckland SPA include:

- Air pollution and airborne contaminants;
- Human induced changes in hydraulic conditions;
- Changes in biotic conditions;
- Forest and plantation management and use; and
- Grazing.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

B.8 In general, the three qualifying species all rely on:

- The site's ecosystem as a whole (see list of habitats below).
- Maintenance of populations of species that they feed on (see list of diets below).
- Off-site habitat foraging habitat for these species. In particular, this includes open grassland, heathland and arable land.
- Open landscape with unobstructed line of sight within nesting, foraging or roosting habitat. The individual qualifying species of the SPA also rely on the following habitats and species:

Stone curlew; *Burhinus oedicnemus*

- Habitat preferences: This species breeds on grassland, heathlands, arable and sometimes conifer plantations, particularly in areas with heath glades.
 - In addition to this, stone curlew are known to use arable land and heathland for post-breeding flocks.

Appendix B Attributes of European Sites

- This species tends to prefer foraging within 1 kilometre from a nest site.
- Diet: Invertebrates that are found on the ground, including earthworms, ground and dung beetles.

Woodlark; *Lullula arborea*

- Habitat preferences: This species uses open grassland and heather heaths to breed; and grassland and arable land to forage. This species is also sometimes observed nesting along the margins of arable areas.
- More recently this species has taken to nesting on fallow land and the system of rotational clear-felling within the conifer plantations has provided ideal breeding conditions for woodlark.
- This species primarily uses the SPA for breeding; however they are also known to use the SPA during the winter.
- Diet: Insects, including beetles, caterpillars and spiders during the breeding season and seeds during the winter.

Nightjar; *Caprimulgus europaeus*

- Habitat preferences: This species exclusively uses afforested land, including clear fells and young plantations for breeding; and open heathlands, grasslands and arable land for foraging.
- Diet: Insects, especially moths and beetles.

Appendix C

Detailed Screening Assessment of Policies

Policy BRET 1 – Spatial Strategy

Potential likely significant effects

C.1 None – This policy states that the Neighbourhood Area will accommodate development as set out in the Local Plan (which is subject to its own separate HRA). The principle of development is accepted within the settlement boundary and development outside the boundary will only be acceptable where it in accordance with national, district and neighbourhood level policies. This policy will not directly result in development.

Policy BRET 2 – Affordable Housing on Rural Exception Sites

Potential likely significant effects

C.2 None – This policy allows for the development of small-scale affordable housing schemes on rural exception sites outside of the settlement boundary. This policy will result in development but development will be at a minimal level, already accounted for within policies in the local plan.

Policy BRET 3 – Replacement Dwellings and Conversion of Buildings to Residential Use Outside Settlement Boundaries

Potential likely significant effects

C.3 None – This policy states that the Neighbourhood Area will accommodate the replacement of dwellings, or the conversion of buildings to residential use outside of the settlement boundary. This policy will result in development but development will be at a minimal level, already accounted for within policies in the local plan.

Policy BRET 4 – Protecting Brettenham’s Landscape Character

Potential likely significant effects

C.4 None – This policy sets out additional landscape protection at the local level. This policy will not directly result in development.

Policy BRET 5 – Protection of Important Views

Potential likely significant effects

C.5 None – This policy sets out the protection of key views within the Neighbourhood Area. This policy will not directly result in development.

Policy BRET 6 – Biodiversity and Wildlife Corridors

Potential likely significant effects

C.6 None – This policy provides additional local level protection for wildlife corridors and encourages biodiversity. This policy will not directly result in development.

Policy BRET 7 – Local Green Spaces

Potential likely significant effects

C.7 None – This policy provides protection for Local Greenspace. This policy will not directly result in development.

Policy BRET 8 – Buildings of Local Heritage Significance

Potential likely significant effects

C.8 None – This policy provides additional local level protection for heritage assets. This policy will not directly result in development.

Policy BRET 9 – Design Considerations

Potential likely significant effects

C.9 None – This policy sets out criteria for sustainable design for development within the Neighbourhood Area. This policy will not directly result in development.

Policy BRET 10 – Flooding and Sustainable Drainage

Potential likely significant effects

C.10 None – This policy requires development proposals to provide supporting evidence in relation to flood risk and sustainable drainage. This policy will not directly result in development.

Policy BRET 11 – Dark Skies and Streetlighting

Potential likely significant effects

C.11 None – This policy requires new development to consider the effects of lighting on the local environment. This policy will not directly result in development.

Policy BRET 12 – Parking Standards

Potential likely significant effects

C.12 None – This policy sets out local parking requirements for new development. This policy will not directly result in development.

Policy BRET 13 – Public Rights of Way

Potential likely significant effects

C.13 None – This policy affords additional protection for Public Rights of Way. This policy will not directly result in development.

References

- 1 [HM Government \(2007\) The Conservation \(Natural Habitats, &c.\) \(Amendment\) Regulations 2007 \(SI No. 2007/1843\)](#)
- 2 [HM Government \(2017\) The Conservation of Habitats and Species Regulations 2017 \(SI No. 2017/1012\), as amended by HM Government \(2019\) The Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations 2019 \(SI No. 2019/579\)](#)
- 3 The exception to this would be where ‘imperative reasons of overriding public interest’ can be demonstrated; see paragraph 1.17.
- 4 The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)
- 5 [Department for Levelling Up, Housing and Communities \(2019\) Appropriate assessment: Guidance on the use of Habitats Regulations Assessment](#)
- 6 Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the ‘Habitats Directive’).
- 7 Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the ‘Birds Directive’).
- 8 The network of protected areas identified by the EU: [European Commission \(2008\) Natura 2000](#)
- 9 [Department of Environment, Food and Rural Affairs \(2021\) Changes to the Habitats Regulations 2017](#)
- 10 Department for Environment, Food and Rural Affairs, Natural England, Welsh Government and Natural Resources Wales (2021) Habitats regulations assessments: protecting a European site
- 11 [Department for Levelling Up, Housing and Communities \(2023\) National Planning Policy Framework \(paragraph 181\)](#)

References

- 12 [David Tyldesley & Associates \(undated\) The HRA Handbook \(Section A3\)](#)
– A subscription based online guidance document
- 13 [Department for Environment, Food and Rural Affairs, Natural England, Welsh Government and Natural Resources Wales \(2021\) Habitats regulations assessments: protecting a European site](#)
- 14 Regulation 5 of the Habitats Regulations 2017.
- 15 [Department for Levelling Up, Housing and Communities \(2019\) Appropriate assessment: Guidance on the use of the Habitats Regulations Assessment](#)
- 16 European Commission (2001) Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.
- 17 [David Tyldesley & Associates \(undated\) The HRA Handbook \(Section A3\)](#)
– A subscription based online guidance document
- 18 Conservation objectives are published by Natural England for SACs and SPAs.
- 19 In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.
- 20 In addition to SAC and SPA citations and conservation objectives, key information sources for understanding factors contributing to the integrity of the sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England: [Natural England \(undated\) Site Improvement Plans by region](#)
- 21 A buffer distance of 20 kilometres has been applied based on the buffer distance applied to North Essex HRAs. This seems relevant given the large distances identified in relation to recreation.
- 22 Chapman, C. & Tyldesley, D. (2016) Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects – a review of authoritative decisions. Natural England Commissioned Reports, Number 207.

References

- 23 Obtained from the [Natural England website](#).
- 24 [Natural England \(undated\) Conservation Objectives for European Sites](#)
- 25 SI No. 2017/2012
- 26 ECJ Case C-127/02 “Waddenzee” Jan 2004.
- 27 [David Tyldesley & Associates \(undated\) The HRA Handbook \(Section A3\)](#)
– A subscription based online guidance document
- 28 [David Tyldesley & Associates \(undated\) The HRA Handbook \(Section A3\)](#)
– A subscription based online guidance document
- 29 British Wildlife Magazine, October 2007.
- 30 Wealden v SSCLG [2017] EWHC 351 (Admin).
- 31 LUC (2019) HRA of Forest Heath SIR
- 32 [JNCC \(2019\) UK Protected Area Datasets for Download](#)
- 33 [Natural England \(2014-2015\) Site Improvement Plans: East of England](#)
- 34 [Natural England \(undated\) Conservation Objectives for European Sites](#)

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