



Long Melford Neighbourhood Plan 2019 - 2036 Pre-submission Consultation Draft

Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA):

Screening Report – March 2019





Contents

1.	Introduction	4
1.1	The Purpose of This Report	4
1.2	The Long Melford Neighbourhood Plan 2019-2036 Pre-Submission Consultation Version	4
1.3	The Babergh Core Strategy (2014)	6
1.4	The Emerging Babergh & Mid Suffolk (Joint) Local Plan	6
2.	Legislative Background	8
2.1	Strategic Environmental Assessment (SEA)	8
2.2	Habitats Regulations Assessment (HRA)	9
3.	SEA Screening	10
3.1	When is SEA Required?	10
3.2	Criteria for Assessing the Effects of the Neighbourhood Plan	13
3.3	Likely Significant Effects on the Environment resulting from the Neighbourhood Plan	14
4.	HRA Screening	23
4.1	Habitat Regulations Assessment of Development Plans	23
4.2	Recent Court Judgements and their consideration in this Report	24
4.3	Habitats Sites	24
4.4	Method and Approach	26
4.5	Results from HRA Screening of Draft Neighbourhood Plan Policies	29
4.6	Other Plans and Projects – In-combination Effects	41
5.	Conclusions	44
5.1	Strategic Environmental Assessment (SEA)	44
5.2	Habitats Regulations Assessment (HRA)	44
	Appendix 1	45
	Long Melford Neighbourhood Plan Area	45
	Appendix 2	46
	Long Melford Parish and Locations of the Habitats Sites' Zones of Influence	46



List of Tables

Table 1: Exploring whether the Principle of the Plan would warrant SEA.....	11
Table 2: Assessment of Likely Significant Effects on the Environment	14
Table 3: European Sites within 20km of the development	26
Table 4: Assessment of potential impacts	29
Table 5: Assessment of potential impacts	30
Table 6: Other plans or projects considered for in combination effects	42



1. Introduction

1.1 The Purpose of This Report

This screening report is an assessment of whether or not the contents of the Long Melford Neighbourhood Plan 2019-2036 Pre-Submission Consultation Draft requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/ EC and associated Environmental Assessment of Plans and Programmes Regulations. A SEA is required if the Neighbourhood Plan is deemed to have a likely significant effect on the environment.

This report will also screen to determine whether the Neighbourhood Plan requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) and (4) of the EU Habitats Directive and with Regulation 63 of the Conservation of Habitats and Species Regulations 2017. A HRA is required when it is deemed that likely adverse significant effects may occur on protected European Sites (Natura 2000 sites or 'Habitats Sites') as a result of the implementation of a plan/project.

1.2 The Long Melford Neighbourhood Plan 2019-2036 Pre-Submission Consultation Version

The Neighbourhood Development Plan will set out planning policies for Long Melford and within the confines of the Long Melford Parish boundary. Once formally adopted, a Neighbourhood Plan carries the same legal weight as Local Development Plans adopted up by the Local Planning Authority (LPA), in this case Babergh District Council.

The Vision of the Neighbourhood Plan is set out as follows:

This vision looks ahead to 2036, the final year of the Plan Period. Not all of it will be delivered by the Policies of the Plan; some things will follow as an addition to the Plan and others are included as Community Actions, which will be worked on with other parties as appropriate, after the Plan is adopted.

Long Melford is a large village and there are real constraints on further growth, largely because of the rich heritage and landscape assets of the village. There is also a sense that the character of Long Melford would change, for the worse, if significant additional development were to take place. However, any living organism needs to change, to adapt to a changing environment. So, in the vision of the Plan, by 2036 additional housing will have been provided in a sustainable fashion to enable all in the parish to access satisfactory housing. In particular young people will have been able to secure a suitable home in Long Melford.

The heritage assets (e.g. historic private houses) of the village, that are open to visitors, will be maintained and enhanced and they will attract visitors from all sections of the community. They will make a bigger contribution to the activities offered by the village. More generally the heritage assets will have been cared for and adapted to suit contemporary lifestyles and to ensure their viability.

The natural features that surround the village and which help to define it, will be preserved and enhanced. Where compatible with the main, usually agricultural, use of the land, access for the public will be facilitated. More people will want to walk or cycle in the countryside, either on their way to a destination or for the enjoyment of exercise and the natural world. The network of paths and bridleways will have been extended in order to open up either attractive circuits or more off-road routes to local destinations, with safe pedestrian routes joining all parts of the village.



Fundamental to Long Melford's success is the ability to access its services safely and conveniently. In an ideal world through-traffic will have been largely eliminated from Hall Street and there will be an easy mingling of shoppers parking, pedestrians, delivery vehicles and cars moving along Hall Street. This might borrow something from the concept of shared surfaces which have been successfully introduced elsewhere.

Increasingly the favoured mode of transport will be pollution-free electric vehicles, some of which will be operating as public transport. Walking is the ultimate sustainable form of transport and Long Melford will offer more attractive and safer opportunities for walking and cycling.

There will be a wide range of viable businesses and tourist facilities in and around the parish providing employment and contributing positively to the local economy and village life.

Long Melford, as a core village in the context of BDC's Core Strategy 2014, is a service centre for ten hinterland villages. For the sake of the people of the hinterland villages, Long Melford residents and the many visitors from further afield, it is essential that the services provided in Long Melford are maintained and improved. Key facilities that will be flourishing and offering a high standard of service in the future are the shops and services focused in Hall Street, the GP surgery, the primary school and the hospitality establishments.

This Neighbourhood Plan is seen as the beginning of a new era of localism, in which the village will take more control over facilities and the environment in Long Melford. Measures such as the Community Infrastructure Levy (CIL), of which the Parish Council will receive 25% once this Plan is adopted, will provide funds with which to secure greater local control. For more information about CIL, see Chapter 8.

Overall Long Melford will have been cared for, such that it remains an attractive place to live, work and enjoy for families, for retirees, for young people and children.

To deliver this Vision, the following Objectives have been established for the Plan:

Objectives whereby the Plan can achieve this Vision

- | | |
|----|---|
| a) | To protect and enhance the heritage assets of the parish and to promote access to those which are open to the public. |
| b) | To protect and enhance the green spaces in, and the landscapes around, the parish and to facilitate more people having the opportunity to enjoy those spaces, and to secure the valuable natural environment. |
| c) | To promote sustainable modes of travel, especially walking, cycling, electric cars and public transport. |
| d) | To improve amenities and the character and atmosphere of the village centre for residents, visitors and local businesses. |
| e) | To support and enhance viable businesses within the village and to provide the right conditions for the encouragement of employment. |
| f) | To encourage tourism and to provide the right environment for a wide range of events to take place in the village. |
| g) | To allocate land for housing development in sustainable locations to meet the demonstrated need for additional housing. |
| h) | To ensure that additional developments include sufficient affordable housing, housing for local people and housing of different types. |
| i) | To ensure that that the village services and facilities reflect the present needs of the population, with sufficient capacity to also meet future needs. This applies to services such as the GP surgery and primary school but also to the facilities for recreation in the village. |



1.3 The Babergh Core Strategy (2014)

The adopted Babergh Core Strategy (2014) contains current strategic planning policy for the District and thus Long Melford. The Core Strategy was originally adopted in 2014 and includes a number of policies related to a strategy for growth in the District, the delivery of growth and the provision of infrastructure. A Sustainability Appraisal was carried out for the Core Strategy as well as 'Appropriate Assessment' in accordance with the Habitats Directive and Regulations.

The Core Strategy categorised the settlement of Long Melford as a Core Village. It establishes that towns should be the main focus for development in the District. Policy CS2 Settlement Pattern Policy of the Core Strategy states that,

'Core Villages will act as a focus for development within their functional cluster and, where appropriate, site allocations to meet housing and employment needs will be made in the Site Allocations document'.

1.4 The Emerging Babergh & Mid Suffolk (Joint) Local Plan

Work has been underway for a new Local Plan for Babergh and Mid Suffolk District Council. At the time of writing, a Regulation 18 stage consultation had most recently closed on the 10th November 2017. This was accompanied by a Sustainability Appraisal.

The Regulation 18 stage Local Plan identifies Long Melford within the Core Villages category of the settlement hierarchy. A number of strategic options were explored relevant to Core Villages. These were:

- County Town Focus – 15% district growth in Core Villages
- Market town / rural area balance – 25%-35% district growth in Core Villages
- Transport corridor focus – 30% district growth in Core Villages
- New Settlement focus – 15% district growth in Core Villages

The emerging Local Plan has reviewed Settlement Boundaries. The Plan states that,

'The Councils have taken the approach that Urban Areas, Market Towns and Core Villages will have new growth identified and allocated in the new Local Plan through the allocation of new housing sites... Maps identifying 'committed boundaries' and potential SHELAA sites can be viewed in Appendix 3 and 4'

Within Appendix 3 of the Local Plan, there is included a map of Long Melford (North). The map shows two potential development sites, with both being adjacent to the existing settlement boundary of the village.

Since then, approximately eight further sites have been submitted for consideration as potential allocations within the emerging Local Plan (through the Regulation 18 consultation) in the Neighbourhood Plan area. An approximate total of ten sites have therefore been identified as needing exploration for their suitability as development schemes within the Long Melford Neighbourhood Plan area.



Of Neighbourhood Plans, the emerging Local Plan states that,

'Neighbourhood plans can be brought forward at any time and can be developed before or at the same time as the local planning authority is producing its Local Plan. It is for the local planning authority to work closely with neighbourhood planning groups to minimise any conflicts between policies in the neighbourhood plan and the emerging Local Plan.'

'There is an opportunity for local communities to bring forward sites for development in neighbourhood plans in parallel with the developing local plan process and in accordance with the emerging level of growth agreed with the local planning authority and share evidence the evidence being prepared by the Local Planning Authority and vice versa.'

The Local Plan at the current stage of process (at the time of writing) outlines high level options with initial preference for approaches included, however there is currently an absence of draft policy wording at this stage. With this in mind, the emerging Local Plan is unlikely to have any identifiable conflict with any of the content within the emerging Long Melford Neighbourhood Plan regarding the principle of development. Indeed, the Neighbourhood Plan is being prepared at a comparably advanced stage to that of the Local Plan and its evidence base.



2. Legislative Background

2.1 Strategic Environmental Assessment (SEA)

Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment states that,

'Environmental assessment is an important tool for integrating environmental considerations into the preparation and adoption of certain plans and programmes which are likely to have significant effects on the environment.

(10) All plans and programmes which are prepared for a number of sectors and which set a framework for future development consent of projects listed in Annexes I and II to Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment(7), and all plans and programmes which have been determined to require assessment pursuant to Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna(8), are likely to have significant effects on the environment, and should as a rule be made subject to systematic environmental assessment. When they determine the use of small areas at local level or are minor modifications to the above plans or programmes, they should be assessed only where Member States determine that they are likely to have significant effects on the environment.

(11) Other plans and programmes which set the framework for future development consent of projects may not have significant effects on the environment in all cases and should be assessed only where Member States determine that they are likely to have such effects.'

The Long Melford Neighbourhood Plan may influence frameworks for future development, or become used ancillary to those plans and programmes that do set such a framework, and as such it has been determined that the principle of the Neighbourhood Plan should be screened for the necessary application of the SEA Directive.

The Report from the Commission to The Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions states, on the application and effectiveness of the Directive on Strategic Environmental Assessment (Directive 2001/42/EC), that

'the following P&P, and modifications to them, are covered when prepared and/or adopted by an authority[2] and required pursuant to legislative, regulatory or administrative provisions:

- P&P prepared for certain sectors and which set the framework for future development consent in respect of projects under the Environmental Impact Assessment-EIA-Directive.*
- P&P requiring an assessment under the Habitats Directive (92/43/EEC).*
- P&P setting the framework for development consent in respect of projects (not*



limited to those listed in the EIA Directive; see above) and determined by "screening" as being likely to have significant environmental effects.'

This report represents this screening process in regard to the content and influence of the Long Melford Neighbourhood Plan.

2.2 Habitats Regulations Assessment (HRA)

Under the provisions of the EU Habitats Directive and translated into English law by the Habitats Regulations (*The Conservation of Habitats and Species Regulations 2017*), a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any European Site, in terms of impacting the site's conservation objectives.

HRA is the screening assessment of the impacts of a land use proposal against the conservation objectives of European sites. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. European sites are also known as Natura 2000 sites and Habitats Sites (NPPF 2019).

This HRA Screening Report has been undertaken in order to support the Long Melford Neighbourhood Plan which is being produced by Long Melford Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012.

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA.

In line with the recent Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats Site.



3. SEA Screening

3.1 When is SEA Required?

Planning Practice Guidance – Strategic environmental assessment requirements for neighbourhood plans (Paragraph: 026 Reference ID: 11-026-20140306) states that,

‘In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a strategic environmental assessment. Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is commonly referred to as a “screening” assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.

If likely significant environmental effects are identified, an environmental report must be prepared in accordance with paragraphs (2) and (3) of regulation 12 of those Regulations.

One of the basic conditions that will be tested by the independent examiner is whether the making of the neighbourhood plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive).

To decide whether a draft neighbourhood plan might have significant environmental effects, it must be assessed (screened) at an early stage of the plan’s preparation according to the requirements set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. These include a requirement to consult the environmental assessment consultation bodies.

Each consultation body will be able to advise on particular topics relevant to its specific area of expertise and responsibility, and the specific information that it holds.

Where it is determined that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), a statement of reasons for the determination should be prepared. A copy of the statement must be submitted with the neighbourhood plan proposal and made available to the independent examiner.’

Articles 2 and 3 of the SEA Directive set out the circumstances in which an SEA is required. Table 1 sets out the assessment of whether the principle of the Long Melford Neighbourhood Plan will require a ‘full SEA’, culminating in a SEA Environmental Report.

Table 1: Exploring whether the Principle of the Plan would warrant SEA

Q	Criteria	Response	Outcome	Commentary
1	Is the Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through legislative procedure by Parliament or Government	Yes	Go to question 2	The Neighbourhood Plan has been prepared for adoption through legislative procedure.
2	Is the Plan required by legislative, regulatory or <u>administrative provision</u> Typical characteristics of "administrative provisions" are that they are publicly available, prepared in a formal way, probably involving consultation with interested parties. The administrative provision must have sufficient formality such that it counts as a "provision" and it must also use language that plainly requires rather than just encourages a Plan to be prepared.	Yes	Go to question 3	The Neighbourhood Plan would be considered as falling within the category of an 'administrative provision'.
		No	DOES NOT REQUIRE SEA	
3	Is the Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Yes to both criteria	Go to question 5	The Neighbourhood Plan has been prepared for town and country planning and sets a framework for future development consent.
		No to either criteria	Go to question 4	
4	Will the Plan, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	Yes	Go to question 5	N/A
		No	Go to question 6	
5	Does the Plan determine the use of small areas at local level, OR is it a minor modification of a Plan likely to require assessment under the Habitats Directive?	Yes to either criteria	Go to question 8	The policies of the Neighbourhood Plan can be considered to determine the use of small areas at a local level commensurate with their status in determining local planning applications.
		No to both criteria	Go to question 7	

Q	Criteria	Response	Outcome	Commentary
6	Does the Plan set the framework for future development consent of projects (not just projects in the Annexes of the EIA Directive)?	Yes	Go to question 8	N/A
		No	DOES NOT REQUIRE SEA	
7	Is the Plans sole purpose to serve national defence or civil emergency, OR is it a financial or budget Plan, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7	Yes to any criteria	DOES NOT REQUIRE SEA	N/A
		No to all criteria	REQUIRES SEA	
8	Is it likely to have a significant effect on the environment?	Yes	REQUIRES SEA	Likely significant effects are explored in more detail elsewhere in this Screening Report.
		No	DOES NOT REQUIRE SEA	

The following section looks at the criteria for assessing the effects of the Neighbourhood Plan and the identified effects of the Neighbourhood Plan in line with the criteria. Crucially, it will determine whether there are any likely significant effects on the environment.



3.2 Criteria for Assessing the Effects of the Neighbourhood Plan

Criteria for determining the likely significant effects on the environment, referred to in Article 3(5) of Directive 2001/42/EC are set out below.

Annex II of SEA Directive 2001/42/EC – Significant Effects

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

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
- environmental problems relevant to the plan or programme,
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

- the probability, duration, frequency and reversibility of the effects,
- the cumulative nature of the effects,
- the transboundary nature of the effects,
- the risks to human health or the environment (e.g. due to accidents),
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
- the value and vulnerability of the area likely to be affected due to:
 - * special natural characteristics or cultural heritage,
 - * exceeded environmental quality standards or limit values,
 - * intensive land-use,
 - * the effects on areas or landscapes which have a recognised national, Community or international protection status.



3.3 Likely Significant Effects on the Environment resulting from the Neighbourhood Plan

The following assessment will consider the likelihood of the Long Melford Neighbourhood Plan Pre-Submission Consultation Draft (at the time of writing) to have significant effects on the environment.

Table 2: Assessment of Likely Significant Effects on the Environment

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>The Plan sets out relevant policies which will be used to determine proposals for development within the Neighbourhood Plan area once adopted. Policy LM-H1 – Growth and Sustainable Development outlines the Plan’s position on growth within the Plan area, and Policy LM-H10 – Size and Character of Developments specifies under which locational circumstances any forthcoming proposals would be supported. There are numerous policies that respond to housing allocations within the Plan area. At the time of writing, none of the allocations within these policies have been granted planning permission.</p> <p>The principle of development within the Neighbourhood Plan area is supported by the District Council through their categorisation of Long Melford as a Core Village within the settlement hierarchy of their emerging Local Plan. Despite this, the Local Plan is not yet at a stage to identify a quantum of development or sites for development within the Neighbourhood Plan area. As such, the degree to which the Plan sets a framework for projects is high. This warrants the full application of the SEA Directive in the form of a SEA Environmental Report in order to justify the Plan’s allocations and quantum of growth in light of reasonable alternatives.</p>
<p>The degree to which the plan or programme influences other plans or programmes including those in a hierarchy.</p>	<p>The Neighbourhood Plan provides policies for the Plan area, relevant to a local level only. The policies of the Neighbourhood Plan influence the emerging Babergh and Mid Suffolk Local Plan in so far as there is an intention for it to be ‘made’ prior to the adoption of the Local Plan, which is currently at the Regulation 18 stage.</p> <p>The Plan is however in general conformity to policies CS1, CS2 and CS3 of the Babergh adopted Core Strategy.</p> <p>The emerging Babergh and Mid Suffolk Local Plan recognises that many of the settlements (within Babergh and Mid Suffolk) have already expanded beyond defined settlement boundaries and that these have been / are being reviewed through the plan-making process. Further, the Councils have established a need for Core Villages to receive new growth as espoused in the emerging Local Plan. The stance of the Neighbourhood Plan in allocating land for development purposes can therefore be seen to strongly influence</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>the emerging Local Plan.</p> <p>Neighbourhood Plans are required to contribute to the achievement of sustainable development. The Neighbourhood Plan policies seek to ensure environmental considerations are taken into account. The Neighbourhood Plan is compatible and does not conflict with adopted Babergh Core Strategy policies CS1 and CS15 which have been subject to a thorough process of plan preparation and accompanying Sustainability Appraisal.</p> <p>No thematic policies exist within the Neighbourhood Plan relevant to environmental protection, however environmental protection criteria are included within Policy LM-H10, Size and Character of Developments. Additionally, environmental criteria exist within the Plan’s housing allocation policies relevant to specific sites.:</p> <p>Although many of the Plan’s policies focus on the built environment and social aspects of the environment, the policies contained within the Plan in addition to those adopted and emerging within the District Council’s Core Strategy / Local Plan are considered to be sufficient to ensure that effects on the environment are minimised.</p> <p>Appendix 3, Call for Sites, assesses 33 different sites against a variety of environmental criteria. This assessment serves to justify the Plan’s allocations as the most appropriate options, however does not cover the full suite of environmental considerations that would be required of a SEA Environmental Report.</p>
<p>Environmental problems relevant to the plan.</p>	<p>The Neighbourhood Plan reflects a small area. The policy content of the adopted Babergh District Council Core Strategy will additionally apply to any proposals within the Neighbourhood Plan area. These policies have been subject to Sustainability Appraisal And Habitats Regulations Assessment Screening within the context of the Core Strategy. The potential environmental problems relevant to the Neighbourhood development Plan area include:</p> <ul style="list-style-type: none"> • Long Melford lies within the project area that is under review for a possible extension to the Dedham Vale and Stour Valley Area of Outstanding Natural Beauty (AONB). • The town of Long Melford is bordered on its western and northern flanks by areas of flood risk zone 2 & 3, associated with the river Stour and Chad Brook. • There are approximately 200 listed buildings in Long Melford, predominantly associated with the Conservation Area. • Listed Buildings include the Grade II* listed: Bouchier Galleries; Bridge Street Farmhouse; Brook House; Bull Hotel; Chapel at Melford Place; Dovecote to the South West of Kentwell Hall; Gardens Walls to Melford Hall; Gateway and Lodges to Melford Hall; Premises Occupied by Cadge



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).</p> <p>The probability, duration, frequency and reversibility of the effects on the following factors:</p> <p>Sustainability Theme - Biodiversity</p>	<p>and Son, Builders; Summer House at Melford Hall; The Elms; and the Water Conduit .</p> <ul style="list-style-type: none"> • There are also four Grade I Listed Buildings: Church of the Holy Trinity; Kentwell Hall; Melford Hall; and the Trinity Hospital. • There are also three Scheduled Monuments in the Plan area: The Conduit, Melford Green; Roman villa at Liston Lane; and the Roman villa NE of Rodbridge House. • The Plan area is within a number of SSSI Impact Risk Zones that may render some types of development unsuitable, pending consultation with Natural England as required. • The Plan area contains a number of SSSIs, these being: Lineage Wood; Crabtree Wood; Ashen Grove; Cold Grove; Herbage Grove; Brakes Ley Grove; Kiln Grove; Doghouse Grove ; and Norman’s Grove. • The Plan area contains The Railway Walks Local Nature Reserve to the south of the town. • The Plan area contains a large number of scattered priority habitats. These include deciduous woodland, Woodpasture and Parkland BAP Priority Habitat and Good quality semi-improved grassland. • A small area in the south of Long Melford lays a Source Protection Zone (Zone I – inner protection zone). Land within Zone II & III – outer protection zones radiates out from Zone I and is within the settlement boundary. • The Plan area contains a broadly similar mix of Grade 3 (good to moderate) and Grade 2 (very good) agricultural land, which is defined as the “best and most versatile agricultural land” within the wider District. <p>The content of the Neighbourhood Plan is not in conflict with those relevant planning documents within the wider district and county area related to waste management or water protection.</p> <p>The following impacts have been identified within this Screening Assessment:</p> <p>There are wildlife designations within the Plan area (a LNR and SSSIs) and adjacent (a SSSI). The Plan area contains a number of scattered priority habitats and floodplain grazing marsh located around the settlement boundary. The Plan area is within the Impact</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>Risk Zones of numerous SSSIs; however there are no identified incompatibilities with any development relevant to Neighbourhood Planning in and around the settlement of Long Melford identified by Natural England.</p> <p>Of the Plan’s six residential site allocations, none of them would lead to the loss of any priority habitats..</p> <p>Subject to Natural England’s review, the HRA element of this Report indicates that the Long Melford Neighbourhood Plan is not predicted to have any likely significant effects on Habitats Site.</p>
- Population	<p>The Neighbourhood Plan allocates six sites for residential development (at a combined quantum of up to 85 homes). There is therefore expected to be some positive impacts on the general population resulting from the Plan.</p>
- Human health	<p>The Plan does not allocate any land for development purposes that could have any implications regarding human health. The Plan seeks to safeguard all local green spaces and promotes green space provision alongside developments within the Plan area in Policies LM-V2 & LM-V3 respectively in order to ensure that this space is preserved for the purposes of health and well-being.</p> <p>It can be considered that no significant effects will occur upon Human health in the Neighbourhood Plan area. Any potential impacts regarding contamination of any future proposals are best addressed at the ‘project level’, through the development management process and in adherence to relevant policies at the LPA level.</p>
- Fauna	<p>The impacts of the Neighbourhood Plan on fauna are not considered significant. It is possible that developments that could be forthcoming within the Plan area could have negative impacts on protected species; however these cannot be identified as strategically significant to warrant Strategic Environmental Assessment at the Plan level. Such issues are more appropriate to be considered on a case-by-case application basis at the development management stage in consideration of the Neighbourhood Plan policies and relevant policies contained within Babergh’s adopted Core Strategy and emerging Local Plan (commensurate to the level of weight those policies would have at the time of application).</p>
- Flora	<p>Priority Habitats exist in close proximity to the Long Melford development boundary, however no thematic policy exists to ensure that these will be retained. Protection in regard to flora does however exist within relevant policies contained within Babergh’s adopted Core Strategy and emerging Local Plan (commensurate to the level of weight those policies would have at the time of application). There is not considered to be any likely effects on Flora that would be of a</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>- Soil</p>	<p>significance that would warrant the application of the SEA Directive.</p> <p>The Plan area contains a broadly similar mix of Grade 3 (good to moderate) and Grade 2 (very good) agricultural land (ALC), which is defined as the “best and most versatile agricultural land” within the wider District. Of the Plan’s allocations, Policy LM-H6: Land west of High Street and Policy LM-H7: Land west of Rodbridge Hill and opposite Ropers Lane would see a loss of greenfield land.</p> <p>Both of the Plan’s greenfield allocations are on Grade 3 ALC. Although the Plan does not directly seek the protection of Grade 2 soils through any policy approach, no significant effects on soil can be expected as a result of the Plan content.</p>
<p>- Water</p>	<p>Adjacent to and partly within the Parish boundary of Long Melford to the south lays a Source Protection Zone (Zone I – inner protection zone). Land within Zone II – outer protection zone radiates out from Zone I and is within the settlement boundary. Source Protection Zones (SPZs) respond to sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The Neighbourhood Plan allocates land for residential development purposes; however such uses are not considered to give rise to ground water pollutants (e.g. give rise to hazardous substances such as pesticides, oils, petrol and diesel, solvents, arsenic, mercury or chromium VI; or non-hazardous substances such as ammonia or nitrates).</p> <p>The HRA Screening element of this report concludes that Long Melford is outside the Zone of Influence of any Habitats Sites regarding impacts on water quantity and quality.</p>
<p>- Air</p>	<p>No AQMAs or other identified air quality issues exist within or in close proximity to the Neighbourhood Plan area. As such, no significant effects on air quality have been deemed likely.</p>
<p>- Climatic factors</p>	<p>The majority of the Neighbourhood Plan area is within Flood Zone 1 however significant areas of land are identified within Flood Risk Zones 2 or 3 bound the settlement boundary, associated with the River Stour and Chad Brook. None of the Plan’s site allocations are included within these Flood Risk Zones, however, Policy LM-H5 Land in Borley Road is adjacent to both flood zone 2 & 3 on it’s western boundary. However, no significant effects have been identified.</p>
<p>- Material assets</p>	<p>The site is within a Minerals Consultation Area, indicating that potential mineral deposits are present. Despite this, the content of the Neighbourhood Plan is not considered to have any significant impacts on material assets due to the extent / size of the</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>- Cultural heritage</p>	<p>Neighbourhood Plan Area. Such issues are more appropriate to be considered on a case-by-case basis at the development management stage and in accordance with relevant development management policies contained within Babergh's adopted Core Strategy and adopted Minerals & Waste Local Plan policies at the County level.</p> <p>There are approximately 200 listed buildings in Long Melford, predominantly associated with the Conservation Area. Due to this, it can be considered inevitable that schemes coming forward within the Plan area, including those related to the site allocations, would need to strongly consider the historic environment. Allocations LM-H2, LM-H3 & LM-H4 are located within the core developed area of Long Melford. This puts all three within close proximity to a high density of grade II listed buildings. Although all three are small sites, allocation LM-H3 is adjacent to the grade II Belmont and LM-H4 is adjacent to the grade II* Bull Hotel. Policies LM-H6 and LM-H7 are allocations located on the outskirts of the developed area of Long Melford, LM-H6 is adjacent to a grade II listed Thatched Cottage and LM-H7 is within close proximity to a series of grade II listed buildings at Rodbridge House Farm, the site of a Roman villa and a scheduled monument.</p> <p>The Plan includes protection through the site specific housing allocation policies and additionally considers requirements for site allocation policies. Further, Policy LM-H10, Size and Character of Developments, directly includes overarching policy criteria related to the historic environment.</p> <p>Irrespective of the adequacy of the Plan's policies in regard to the protection and enhancement of the historic environment, further policy can be found in relevant policies at the LPA level. The Plan's allocations have also been subjected to a comparative assessment for site selection purposes within Appendix 3, Call for Sites. This broadly assesses the suitability of proposals but does not go into detail of the significance of any potential harm that would satisfy the SEA Regulations and Historic England guidance on SA/SEA. As a result of this, significant effects on cultural heritage/the historic environment cannot be ruled out.</p>
<p>- Landscape</p>	<p>The Babergh Landscape Character Assessment includes the parish of Long Melford within three Landscape types: Rolling Estate Farmlands; the Rolling Valley Farmlands; and finally the Valley Meadowlands. These character types includes the following key characteristics and recommendations:</p> <ul style="list-style-type: none"> • The Rolling Estate Farmlands contain an important array of landscape parks with a core of wood pasture, meadows and grassland associated with watercourses, a landscape of ancient settlement.



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<ul style="list-style-type: none"> • Rolling Valley Farmlands contains typically large moated houses, valley landscape formed of sunken lanes, organic regular field patterns. • Valley Meadowlands contain landscape which is typically unsettled interspersed with some significant medieval and Tudor moated sites, the grassland is divided by wet ditches. <p>Objectives related to this Landscape Character Area, include:</p> <ul style="list-style-type: none"> • Maintain and enhance landscape areas. • Safeguard woodland plantations and Parkland areas. • Safeguard the parkland areas, Village Greens and Tyes. • Safeguard and appropriately increase woodland cover. • Safeguard historic features such as moated sites. • Reinforce and enhance meadows and retain field boundaries. • Safeguard plantation areas. • Protect and enhance the ecological environment. • Safeguard floodplains. • Safeguard the tranquility of the area. <p>These objectives are partly reiterated within relevant policies of the Plan.</p> <p>The Heritage and Settlement Sensitivity Assessment for Babergh and Mid Suffolk Districts (March, 2018) states that Long Melford is, ‘a well preserved medieval and early modern historic linear settlement of high value. At the northern end of the settlement are two large country houses, set within their associated parkland, both of which are registered parks and gardens. The settlement is extremely susceptible to change, with very limited areas where development might sensitively be accommodated given the extent of the boundary which is defined by the registered parks and gardens and by the earthworks associated with the historic railway.’</p> <p>This Assessment also identifies key views towards, through, across and away from the settlement. These are: the view looking south-west through the settlement along Little Mary’s, the main axial road through the settlement; the view looking north-east through the settlement along Hall Street; the view looking north-west across Melford Green; the views looking east from footpaths to the west; the views looking east and west along Westgate Street, and north and south along High Street; and views looking north from the Roman Villa on Mills Lane.</p> <p>Policy LM-H10: Size and Character of Developments ensures that development proposals within the areas identified in the Settlement and Heritage Sensitivity Assessment, 2018 will be appraised to detect any required mitigation. To this extent, the Plan ensures that</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>potential landscape implications of proposals are suitably considered and significant effects minimised.</p> <p>Long Melford also lies within the project area that is under review for a possible extension to the Dedham Vale and Stour Valley Area of Outstanding Natural Beauty (AONB). Should the AONB be extended west to include the Long Melford Neighbourhood Plan area, then the Dedham Vale AONB team should be consulted upon for comments on any individual planning applications that if approved would have a positive or negative impact on the primary purpose (to conserve and enhance its natural beauty) of the AONB. This could be included within the Neighbourhood Plan policy should the AONB be extended.</p> <p>Appendix 3 of the Plan considers landscape. The assessment identifies impacts from proposed allocations that could occur on Special Landscape Areas and Conservation Areas among other designations. The location of the Plan’s site allocations and the inclusion of greenfield sites for development purposes would suggest that significant effects can not be ruled out and would warrant further technical assessment.</p>
<p>The cumulative nature of the effects.</p>	<p>The Plan allocates multiple sites for development purposes and therefore cumulative effects have not been formally identified and assessed to date. It is possible that cumulative effects could be forthcoming that would warrant the full assessment of alternative approaches. As such, the cumulative impacts of the Plan’s allocations can not be ruled out at this stage and should be identified through the application of the SEA Directive in the form of a SEA Environmental Report.</p>
<p>The trans boundary nature of the effects.</p>	<p>The findings of the HRA Screening element of this Report do not indicate any trans boundary effects.</p>
<p>The risks to human health or the environment (e.g. due to accidents).</p>	<p>The Neighbourhood Plan allocates land for residential development, however this land use is unlikely to give rise to any accidents that can be considered to have a significant risk to human health or the environment. There is therefore limited risk to human health or the environment as a result of the Neighbourhood Plan. This is in consideration of the above screening requirements related to sustainability themes.</p>
<p>The magnitude spatial extent of the effects (geographical area and size of the population likely to be affected).</p>	<p>The magnitude of effects can be considered small in the wider District context; however they could be considered significant in the local context given the quantum of development identified within the Plan area.</p>
<p>The value and vulnerability of the area likely to be affected due to:</p>	<p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has been assessed as having</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<ul style="list-style-type: none"> - special natural characteristics or cultural heritage - exceeded environmental quality standards - intensive land use 	<p>potential significant effects on environmental quality standards that would warrant further assessment through SEA.</p>
<p>The effects on areas or landscapes which have a recognised national, community or international protection status.</p>	<p>As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has been assessed as potentially having effects on areas or landscapes which have a recognised national, community or international protection status in conjunction with the historic fabric of the Plan area. The significance of effects will need to be identified through the process of a SEA Environmental Report.</p>



4. HRA Screening

4.1 Habitat Regulations Assessment of Development Plans

This section forms a plan level Habitats Regulations Assessment (HRA) as required by Regulation 63 of The Conservation of Habitats and Species Regulations 2017.

Under the provisions of the EU Habitats Directive and translated into English law by the Habitats Regulations (The Conservation of Habitats and Species Regulations 2017), a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any European Site, in terms of impacting the site's conservation objectives.

HRA is the screening assessment of the impacts of a land use proposal against the conservation objectives of European sites. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. European sites are also known as Natura 2000 sites.

This HRA Screening Report has been undertaken in order to support the Long Melford Neighbourhood Plan which is being produced by Long Melford Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012. The area covered by the Plan is shown in Appendix 1.

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA.

This section of this Report aims to:

- Identify the Habitats sites within 20km of Long Melford Neighbourhood Plan area
- Summarise the reasons for designation and Conservation Objectives for each site to be considered in this assessment.
- Screen the Long Melford Neighbourhood Plan for its potential to impact upon a Habitats site.
- Assess the potential for in combination effects from other projects and plans in the area.
- Identify if there are any outstanding issues that need further investigation.

4.2 Recent Court Judgements and their consideration in this Report

4.2.1 CJEU People Over Wind v Coillte Teoranta C-323/17

As previously mentioned, in line with the recent Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats Site.

This HRA Screening Report does not therefore consider mitigation measures within the assessment of Likely Significant Effects resulting from the Long Melford Neighbourhood Plan.

4.2.2 CJEU Holohan C- 461/17

This recent Court judgement now imposes more detailed requirements on the competent authority at Appropriate Assessment stage:

1. [...] 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.
2. [...] the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.
3. [...] where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'Appropriate Assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

Within this HRA Screening report, the assessment determines the requirement for whether or not an Appropriate Assessment is needed for the Long Melford Neighbourhood Plan.

4.3 Habitats Sites

Habitats Sites is the term used in the NPPF (2019) to describe any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations. European sites are the centrepiece of EU nature and biodiversity policy. It is an EU wide network of nature protection areas. The aim of the network is to assure the long-term survival of Europe's most valuable and threatened species and habitats.



The sites are designated under the European Union (EU) Birds Directive (Council Directive 79/409/EEC on the Conservation of Wild Birds) and the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora).

The Birds Directive requires the establishment of Special Protection Areas (SPAs) for birds. The Habitats Directive similarly requires Special Areas of Conservation (SACs) to be designated for other species, and for habitats. Wetlands of International Importance (Ramsar sites) are also part of the Natura 2000 network. This is because all SPAs and SACs are comprised of Sites of Special Scientific Interest (SSSIs) and all Ramsar sites in England are SSSIs. Together, SPAs, SACs and Ramsar Sites make up the Natura 200 network in England.

4.3.1 Explanation of SPAs, SACs and Ramsar Sites

Special Protection Areas (SPAs)

SPAs are areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries. Example: The Stour & Orwell Estuaries are internationally important for wintering waterfowl. Legislation: EU Birds Directive.

Special Areas of Conservation (SACs)

SACs are areas designated to protect habitat types that are in danger of disappearance, have a small natural range, or are highly characteristic of the region; and to protect species that are endangered, vulnerable, rare, or endemic. Example: Waveney and Little Ouse Valley Fens for calcareous fens, *Molinia* meadows and Desmoulin's whorl snail. Legislation: EU Habitats Directive.

Wetlands of International Importance (Ramsar Sites)

Ramsar Sites are designated to protect the biological and physical features of wetlands, especially for waterfowl habitats. For example, Redgrave and South Lopham Fens is an extensive example of lowland base-rich valley, remarkable for its lack of fragmentation which supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. Ramsar sites often overlap with SACs and SPAs and UK planning policy determines that they should be accorded the same importance when developments are proposed. Legislation: Ramsar Convention (1971) – Wetlands of International Importance.



4.3.2 Habitats Sites to be considered

There are two European sites which lie within 20 km of Long Melford parish.

Table 3: European Sites within 20km of the development

SPA	SAC	Ramsar
Stour & Orwell Estuaries	None	Stour & Orwell Estuaries

However the 13km Zones of Influence for the Habitats sites listed above do not overlap with the Long Melford parish boundary. A map of the SSSI Impact Risk Zones for these Habitats sites has been provided within Appendix 2.

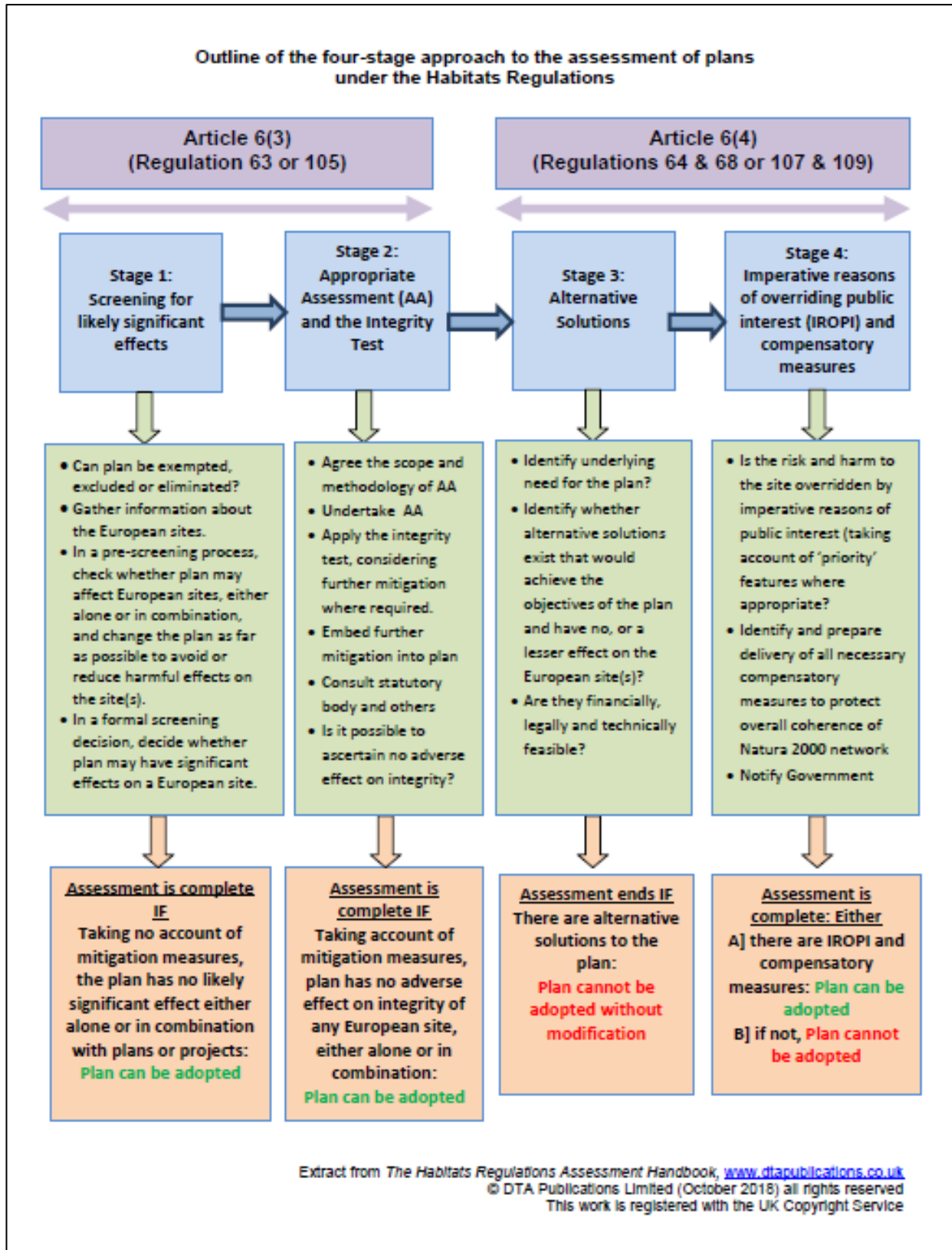
There are therefore no Habitats sites to be considered to be within scope for this assessment.

4.4 Method and Approach

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA screening report; this is necessary to ensure the making of the neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects.

This document relates only to Stage 1 of the HRA process as set out in Figure 1 below.

Figure 1. Outline of the Four Stage Approach to the Assessment of Plans under the Habitats Regulations (taken from the DTA handbook).





4.4.1 Stage 1: HRA Screening

The screening stage identifies if alternatives are needed because any policies or projects will have an impact on a Habitats Site, amendments need to be made in Neighbourhood Development Plans. Table 6 identifies the different categories assigned to each policy in the plan: Category A identifies those policies or projects that may not result in a Likely Significant Effect and are considered to have No Negative Effect. Category B identifies those policies or projects that will have No Likely Significant Effect. Category C identifies those policies or projects that might have Likely Significant Effect and thus upon a European Site either alone or in combination with other plans or projects. Section 4 considers each policy or projects and the results of the screening exercise recorded.

Table 4: Screening categorisation

Category A : No negative effect
Policies or projects that will not be likely to have any negative effect on a Habitats site.
Category B : No Likely Significant Effect
Policies or projects that could have an effect but would not be likely to have a <i>significant</i> negative effect on a Habitats site alone or in combination. This conclusion could only be reached if the effects, even in combination and taking the precautionary principle into account, are considered trivial.
Category C : Likely Significant Effect
Policies or projects which are predicted to have a likely significant effect on their own or in combination with other plans and projects.

4.4.2 Potential impacts of Long Melford Neighbourhood Plan on Habitats sites

There are a wide range of impacts and these can be summarised as -

- Land take by developments;
- Impact on protected species found within but which travel outside the protected sites may be relevant where development could result in effects on qualifying interest species within a Habitats site, for example through the loss of feeding grounds for an identified species.
- Increased disturbance, for example from recreational use resulting from new housing development and / or improved access due to transport infrastructure projects;
- Changes in water availability, or water quality as a result of development and increased demands for water treatment, and changes in groundwater regimes due to increased impermeable areas;
- Changes in atmospheric pollution levels due to increased traffic, waste management facilities etc. Pollution discharges from developments such as industrial developments, quarries and waste management facilities.

In line with the HRA for Babergh District Council Core Strategy, each policy will be assessed against the criteria in the table below.

Table 4: Assessment of potential impacts

Nature of potential impact	How the Long Melford Neighbourhood Plan (alone or in combination with other plans and project) could affect a Habitats site?	Why these effects are not considered significant?
Land take by development	Long Melford is outside the boundaries of any Habitats sites	N/A
Impact on protected species outside the protected sites	Long Melford is outside the Zone of Influence of any Habitats sites	N/A
Recreational pressure and disturbance	Long Melford is outside the Zone of Influence of any Habitats sites	N/A
Water quantity and quality	Long Melford is outside the Zone of Influence of any Habitats sites	N/A
Changes in pollution levels	Long Melford is outside the Zone of Influence of any Habitats sites	N/A

4.5 Results from HRA Screening of Draft Neighbourhood Plan Policies

The Screening exercise explores whether there will be any Likely Significant Effect resulting from the Plan's policies. These Policies are:

- Policy LM-H1: Growth and Sustainable Development
- Policy LM-H2: Allocation of Sites for Developments: G1, Spicers Lane
- Policy LM-H3: Allocation of Sites for Developments: L1, Cordell Road
- Policy LM-H4: Allocation of Sites for Developments: A1: Cordell road, adjacent to rear of Bull Hotel.
- Policy LM-H5: Allocation of Sites for Development: D1, Land in Borley Road
- Policy LM-H6: Allocation of Sites for Development: K1, Land west of High Street
- Policy LM-H7: Allocation of Sites for Development: F1, Land west of Rodbridge Hill and opposite Ropers Lane
- Policy LM-H8: Contingent Allocation of Sites, Northern Fringe of Sudbury
- Policy LM-H9: Contingent Allocation of Sites, Site off Station Road, known as Skylark Fields or Big Field, Chapel Farm
- Policy LM-H10: Size and Character of Developments
- Policy LM-H11: Affordable Housing
- Policy LM-H12: Housing Reserved for Local People



- Policy LM-H13: Size and Type of Houses
- Policy LM-H14: Design of Proposed Schemes
- Policy LM-H15: Local Green Space
- Policy LM-H16: Community Benefit
- Policy LM-T1: Sustainable Travel
- Policy LM-T2: Parking Guidelines
- Policy LM-T3: Charging Points in New Developments
- Policy LM-V1: Healthcare Services
- Policy LM-V2: Protection of Green Spaces
- Policy LM-V3: Provision of Green Space
- Policy LM-V4: Provision of Amenities
- Policy LM-V5: Provision of Allotments
- Policy LM-B1: Support for Local Businesses and the Local Economy
- Policy LM-B2: Change of Use: Residential to Employment
- Policy LM-B3: Change of Use: Employment to Residential
- Policy LM-B4: Allocation of Site for Development: S1, Land Adjacent to Nethergate Brewery at Junction of Borley Road and B1064, Sudbury Road

Each of the policies in the Long Melford Neighbourhood Plan has been screened to identify whether they would have any impact on a Habitats Site. This assessment can be found in the following table.

Table 5: Assessment of potential impacts

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
Policy LM-H1, Growth and Sustainable Development	Growth and sustainable development will be supported in Long Melford parish, growth for additional housing development, growth for additional employment and growth for additional infrastructure to support development for housing and employment. Growth will be supported subject to the policies of the development plan which currently comprises the saved policies of BDC's Local Plan 2006 and its Core Strategy 2014 and which in the future will include BDC's Joint Local Plan when it is adopted and this Neighbourhood Plan when it is made.	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
Policy LM-H2, Allocation of Sites for Developments: G1, Spicers Lane	<p>This a small site which the owner wishes to develop for his own occupation. It is located within the built-up area. Its advantages are that it is a small, brownfield site near to the village centre and there is a willing owner.</p> <p>Constraints which will need to be taken into account in the development of the site are its location in the Conservation Area, the proximity of neighbouring properties and the access.</p> <p>The site is allocated for the development of a single home.</p>	No, Category A	No specific recommendations
Policy LM-H3, Allocation of Sites for Developments: L1, Cordell Road	<p>This a small site which the owner wishes to develop. It is located within the built-up area. Its advantages are that it is a small, brownfield site near to the village centre with a willing owner.</p> <p>Constraints which will need to be taken into account in the development of the site are its location in the Conservation Area and the proximity of neighbouring properties.</p> <p>The proximity of the site to village facilities indicates that it would be suitable for small (one- and two-bedroomed) dwellings.</p> <p>Imaginative and careful design is needed for a small site within the built-up area and Conservation Area.</p> <p>On the assumption the site is in employment use, the applicant will need to make the case to the planning authority for a change from employment to residential use in accordance with prevailing development plan policies. The Parish Council will support such a case if it is properly made.</p> <p>The site is allocated for residential development and has been assumed to have a capacity of three homes. The capacity is notional and depends on the detailed layout of the site.</p>	No, Category A	No specific recommendations
Policy LM-H4, Allocation of Sites for Developments:	This a small site which the owner wishes to develop. It is located within the built-up area. Its advantages are that it is a small, brownfield site near to the village centre with a willing	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
A1: Cordell road, adjacent to rear of Bull Hotel.	<p>owner. The owner is being encouraged to explore the potential for combining the development of the site with the disused land to the north within the curtilage of the Bull Hotel.</p> <p>Constraints which will need to be taken into account in the development of the site are its location in the Conservation Area and the proximity of neighbouring properties.</p> <p>The proximity of the site to village facilities indicates that it would be suitable for small (one- and two-bedroomed) dwellings.</p> <p>Imaginative and careful design is needed for a small site within the built-up area and Conservation Area.</p> <p>On the assumption the site is in employment use, the applicant will need to make the case to the planning authority for a change from employment to residential use in accordance with prevailing development plan policies. The Parish Council will support such a case if it is properly made.</p> <p>The site is allocated for residential development and has been assumed to have a capacity of three homes. The capacity is notional and depends on the detailed layout of the site.</p>		
Policy LM-H5, Allocation of Sites for Development: D1, Land in Borley Road	<p>This is a brownfield site of approximately 0.7 hectares, which is currently used for the sale of produce and the storage of HGV's. The owner wishes to see the site brought forward for development. The site is accessed from Borley Lane.</p> <p>On the assumption the site is in employment use, the applicant will need to make the case to the planning authority for a change from employment to residential use in accordance with prevailing development plan policies. The Parish Council will support such a case if it is properly made.</p> <p>The site is allocated for residential development and it is estimated to have a capacity of about 18 homes.</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
<p>Policy LM-H6, Allocation of Sites for Development: K1, Land west of High Street</p>	<p>The advantages of this site are that it is owned by a charity willing to make the land available on terms which enable 100% affordable housing; the owner is working with a suitable developer.</p> <p>The constraints are its distance from village facilities, heritage concerns, and its location beyond but adjacent to the built-up area boundary.</p> <p>As an exception site it should be developed to optimise its use, subject to the protection of Kentwell grounds and views and subject to the provision of a public facility. The capacity of 30 homes is based on the standard density less a notional allowance for heritage protection and a public facility. The scheme should include a green or similar facility available to the public. A public footpath (St Edmund Way) runs into Kentwell grounds along the southern boundary of site; consideration should be given to linking a green or other public facility to this footpath. The scheme should include 100% affordable housing with a significant proportion of houses for local people, as defined in this Plan.</p> <p>The site is allocated for residential development and it is estimated to have a capacity of about 30 homes.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy LM-H7, Allocation of Sites for Development: F1, Land west of Rodbridge Hill and opposite Ropers Lane</p>	<p>This is a greenfield site of approximately 1.1 hectares (to be verified at design stage). The owner is willing to see the land brought forward for development. The site is part of a larger field and the part to be developed will be defined by extending a line south from the rear of the curtilages of the existing properties to the north. The proposed housing will then continue the line of the existing development. The developer must ensure that the scheme creates a new defensible boundary on its eastern side, such that the rest of the field is not opened up for development. The hedgerow and trees forming the boundary of the site to Rodbridge Hill must be retained in order to maintain a green aspect to the development at an important entrance to the village. Its proximity to the site of a Roman</p>	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<p>villa, an ancient monument, needs to be considered in the design of the scheme.</p> <p>The site is allocated for residential development and it is estimated to have a capacity of about 30 homes.</p>		
<p>Policy LM-H8, Contingent Allocation of Sites, Northern Fringe of Sudbury</p>	<p>The following sites have been identified in the Babergh and Mid Suffolk Joint Local Plan: Consultation Draft – August 2017: SS0811, SS0904, SS0297, SS1028. They are located adjacent to the northern edge of Sudbury and partly or wholly within Long Melford Parish. The Parish Council will support their development provided it is part of a strategic development to accommodate the growth of Sudbury, such strategic development being supported by both BDC and Suffolk County Council. Piecemeal development of the sites will be resisted. Long Melford Parish Council will expect to receive its proper share of any Community Infrastructure Levy (CIL) payments attributable to the sites and to have the opportunity to require s.106 contributions in respect of any impacts arising within Long Melford.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy LM-H9, Contingent Allocation of Sites, Site off Station Road, known as Skylark Fields or Big Field, Chapel Farm</p>	<p>An application has been submitted for 150 homes. The applicant has appealed against non-determination and BDC has formally confirmed that it would have refused the application. The appeal is due to be heard in the summer of 2019. The Parish Council has submitted a number of objections to the proposed development and the NPSG will give evidence against the proposal at the inquiry. The Parish Council could support a proposal for development on the land if:</p> <ul style="list-style-type: none"> • it was much smaller and confined to the part of the site fronting Station Road; • the rear of the development aligned with the rear of the properties to the south; • a defensible barrier is created at the rear of the development; • the boundary of the site left a sufficient buffer between the site and the Railway Walk County Wildlife Site, sufficiency to be assessed by the appropriate BDC officer or 	<p>No, Category A</p>	<p>No specific recommendations</p>



Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<p>Suffolk Wildlife Trust; and</p> <ul style="list-style-type: none"> the proposal complies with the policies of the development plan in other respects. 		
<p>Policy LM-H10, Size and Character of Developments</p>	<p>Proposals for residential development must be clearly demonstrated to be well related to the existing pattern of development in Long Melford.</p> <p>The scale and nature of all schemes must ensure that an appropriate level of services, facilities and infrastructure including GP Surgery and primary school capacity are available or provided to serve the proposed development.</p> <p>Based on an overriding objective to preserve the integrity of Long Melford, the community strongly prefer smaller development schemes of up to 20 units. There is a lesser preference for schemes of up to 40 units (Residents Survey, 2018).</p> <p>All proposals should be accompanied by a completed CS11 assessment checklist (BDC Core Strategy 2014), which takes into account firstly any cumulative impact taken with other existing commitments in the village, secondly the cumulative impact of different aspects of the proposal and which demonstrates:</p> <ul style="list-style-type: none"> that the scale and character of the proposal respects the landscape, landscape features, streetscape/town scape, heritage assets and important spaces and historic views into and out of the village; the proposal will make a positive contribution to the local character, shape and scale of the area; and new housing will be located within walking distances to the village centre, and where it can be demonstrated that the development (e.g. through its scale) will not detract from the existing focal points provided by the village centre and the historic core. <p>Where design and access statements are submitted alongside planning applications,</p>	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<p>they shall include a Townscape Impact Assessment and a Built Heritage Statement where appropriate.</p> <p>A landscape and visual impact appraisal will be required for all development proposals. Development proposals will have to demonstrate due regard to the particular sensitivities identified in the Settlement and Heritage Sensitivity Assessment, 2018 and seek ways to effectively mitigate against potential harm. In areas with higher sensitivity, where there is low capacity for development, this is particularly critical.</p>		
Policy LM-H11, Affordable Housing	Affordable housing, as defined in Annex 2 of the NPPF, will be provided at a rate of 35% of all housing units in schemes comprising ten or more units, unless it is demonstrated that the scheme would not be viable on that basis. The affordable housing will comprise affordable rented units (17.5%) and affordable home ownership units (17.5%).	No, Category A	No specific recommendations
Policy LM-H12, Housing Reserved for Local People	<p>Within the affordable housing to be provided, 10% shall be made available exclusively to local people. For clarity and purely as an illustration, were a development to comprise 100 dwellings, 35 would be affordable and 10 of the 35 would be reserved for local people</p> <p>Local people are defined as follows:</p> <ul style="list-style-type: none"> • Local means the parish of Long Melford together with the parishes of the 10 hinterland villages defined in Map 4 of the BDC Core Strategy 2014 (Acton, Alpheton, Boxted, Cockfield, Great Waldingfield, Lawshall, Shimpling, Stanstead and, outside Babergh, Borley, Foxearth & Liston). • Local people comprise: <ul style="list-style-type: none"> o People with full-time local employment or o People living locally but sharing accommodation or o People with dependent relations living locally. 	No, Category A	No specific recommendations
Policy LM-H13, Size and Type	The Parish Council will look favourably on developments that include a significant	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
of Houses	proportion of smaller (1, 2, 3-bedrooms) houses and fewer houses with four or more bedrooms. They will also favour schemes that include bungalows.		
Policy LM-H14, Design of Proposed Schemes	<p>When consulted on planning applications to be decided by the local planning authority, the Parish Council will consider the following factors, amongst others:</p> <ul style="list-style-type: none"> • The extent to which new development will have an impact on the main routes into and through the village. • The extent to which the layout and design of the proposed development is sympathetic to local materials and forms, without being a pastiche or caricature of local features. 	No, Category A	No specific recommendations
Policy LM-H15, Local Green Space	The area hatched green on Map 4H is designated as Local Green Space, within which development will generally not be supported.	No, Category A	No specific recommendations
Policy LM-H16, Community Benefit	The Parish Council will look for opportunities to achieve public benefits from development proposals. Priorities for s.106 contributions will be foot and cycle paths and safety measures to address the growing volume of traffic in the parish and contributions towards new and improved community facilities.	No, Category A	No specific recommendations
Policy LM-T1, Sustainable Travel	<p>New residential and commercial developments should encourage sustainable travel, reduce reliance on car use and, where possible, improve accessibility to public transport. Developers must ensure that their site is linked to village facilities (as a minimum, one of the village convenience stores, the GP practice and the primary school) by safe, and adequately lit footways and cycleways which connect with existing footways and cycleways.</p> <p>Planning applications for developments that will generate significant amounts of traffic movement must be accompanied by a Transport Assessment, which includes a Travel Plan that sets out how sustainable movement will be encouraged and car traffic accommodated satisfactorily. This will apply to residential development applications for 80 or</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	<p>more dwellings (SCC policy) and any commercial development application where a Travel Plan is considered appropriate by the Parish Council. For residential developments smaller than 80 units and larger than 10 units a simpler Transport Statement (including a Travel Plan) is required.</p> <p>Guidance on Transport Assessments, Transport Statements and Travel Plans should be sought from SCC.</p>		
Policy LM-T2, Parking Guidelines	<p>Proposals for all new homes to be built in Long Melford must comply with and preferably exceed the SCC Parking Guidance 2015 (https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/2015-11-16-FINAL-2015-Updated-Suffolk-Guidance-for-Parking.pdf) when calculating the minimum number and size of off-street parking spaces. Layout designs must demonstrate that street widths are sufficient to accommodate on-street parking within the design, to deter parking on or across foot and cycleways. A Transport Assessment or Statement (Policy LM-T1) must show how the proposed development would accommodate vehicles, cyclists and pedestrians safely and efficiently.</p>	No, Category A	No specific recommendations
Policy LM-T3, Charging Points in New Developments	<p>Electric vehicle charging points should be made available by developers at every new residential dwelling.</p>	No, Category A	No specific recommendations
Policy LM-V1, Healthcare Services	<p>The GP practice and related healthcare services are stretched in seeking to meet the current levels of need; any future housing developments will be required to contribute to additional capacity in primary health care that serves the village.</p>	No, Category A	No specific recommendations
Policy LM-V2, Protection of Green Spaces	<p>No development should take place on the existing green spaces listed above or where it would impact on their use or visual enjoyment.</p>	No, Category A	No specific recommendations
Policy LM-V3, Provision of Green Space	<p>Developments that provide multi-use green space within or alongside their site for nature and recreation will be encouraged.</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	Pedestrian links between green spaces will also be encouraged as part of the wider network of paths and cycleways being advocated in the Traffic, Parking and Sustainable Movement chapter of the Plan.		
Policy LM-V4, Provision of Amenities	<p>Developers will be encouraged to provide one or more of the following amenities, or to contribute towards their provision. The choice and details will depend on the scale and location of the proposed development:</p> <ul style="list-style-type: none"> • Equipped play areas, potentially one in the north and one in the south of the village; new or replacement playground equipment should be made from environmentally friendly and vandal resistant sources. • A youth shelter or 'hang out' area. • An outdoor gym. 	No, Category A	No specific recommendations
Policy LM-V5, Provision of Allotments	<p>Development proposals which include the provision of public allotments, particularly in locations outside the central part of the village, will be encouraged.</p> <p>Discussions will also be sought with landowners to investigate the availability of additional land, again outside the central part of the village, for use as allotments.</p>	No, Category A	No specific recommendations
Policy LM-B1, Support for Local Businesses and the Local Economy	<p>Local businesses and the local economy will be supported, subject to the protection of amenities and the environment, as set out in NPPF July 2018 and BDC Core Strategy 2014 policies CS11 and CS15.</p> <p>Applications for new businesses or tourism and leisure facilities (or expansion to existing businesses/facilities) will be viewed on their merits. In particular, there will be an inclination to support applications from small businesses (i.e. micro businesses of fewer than ten employees), especially where these can use existing employment land or premises for small scale commercial activities.</p>	No, Category A	No specific recommendations
Policy LM-B2, Change of	Applications for planning permission for existing residential property to be converted or	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
Use: Residential to Employment	<p>adapted for employment or mixed use will be viewed on their merits, subject to the proper protection of the environment and of residential amenities.</p> <p>Continued residential use of upper floors above commercial premises will be supported where appropriate in the circumstances.</p> <p>Where residents work from home, planning permission may not be required. However, if a business operating from home expands over time, careful consideration of the implications of such growth will be needed, including the possible requirement for planning permission.</p> <p>Activities that require or produce any of the following are unlikely to be suitable for the majority of domestic properties:</p> <ul style="list-style-type: none"> • Employment of people not normally resident at the address. • Generation of significant delivery or despatch traffic. • Activities that create any type of disturbance, for example, smell, noise or dust. • Retailing and visits by the general public. <p>If a building needs to be modified in any way, such physical changes may require both planning permission and compliance with Building Regulations.</p>		
Policy LM-B3, Change of Use: Employment to Residential	<p>Planning applications to redevelop or use existing or vacant employment land, sites and premises for non-employment purposes, will only be permitted if the applicant can demonstrate that their retention for an appropriate employment use has been fully explored. This may be undertaken in one of the two following ways:</p> <ul style="list-style-type: none"> • By an agreed and sustained marketing campaign, undertaken at a realistic asking price. • Where agreed in advance, the applicant can demonstrate that the land, site or premises are inherently unsuitable or not viable for all forms of employment related use. <p>It is recognised that there may be</p>	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on any Habitats Sites?	Recommendations
	countervailing benefits to such proposals (e.g. a recognised need to use employment land for other uses) and when these are relevant, they will be considered when applications are assessed.		
Policy LM-B4, Allocation of Site for Development: S1, Land Adjacent to Nethergate Brewery at Junction of Borley Road and B1064, Subury Road	Nethergate Brewery is seeking to expand by purchasing the adjacent site immediately to the north of its present site. The new site, currently used for car sales, is allocated for retail and/or leisure use, subject to uses not competing directly with the village centre.	No, Category A	No specific recommendations

4.5.3 Recommendations

There are no recommendations for the site allocation policies in this draft Neighbourhood Plan as they have all been assigned to Category A. There will therefore be no need for any development subsequently coming forward to be subject to a project level HRA and secure sufficient mitigation measures, to avoid a Likely Significant Effect on any Habitats sites. As such there is no requirement to progress to Appropriate Assessment.

The in-combination effects from other plans and projects are considered in the following section.

4.6 Other Plans and Projects – In-combination Effects

There are no relevant Plan level HRAs that have been carried out by Babergh & Mid Suffolk DCs or other organisations and none have been found to have a likely significant effect on any Habitats sites being assessed.

In the context of this HRA, the relevant other plans to be considered are listed below in combination with Long Melford Neighbourhood Plan HRA.

Table 6: Other plans or projects considered for in combination effects

Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
Mid Suffolk District Council	Core Strategy Habitats Regulations Assessment (Appropriate Assessment) October 2007)	The HRA found no likely significant effects from the Plan on the Breckland SAC/SPA and Waveney and Little Ouse Valley Fens SAC.	It is considered that in combination likely significant effects are not predicted.
St Edmundsbury Borough Council	Core Strategy HRA screening (2010)	The HRA found no potential for in combination effects as no other current plans or projects that are likely to lead to significant effects on the Breckland SAC/SPA or the Waveney and Little Ouse Valley Fens SAC have been identified, or where impacts have been identified they have been adequately mitigated.	It is considered that in combination likely significant effects are not predicted.
Babergh District Council	Habitat Regulations Assessment of Core Strategy 2011	The Core Strategy aims to minimise impacts on the Orwell and Stour estuaries, a European-designated site which supports species that are susceptible to disturbance. The principal potential impact on the European sites as a result of development proposed under the Core Strategy relates to increased recreational pressure. The Strategy therefore sets out a series of measures to ensure that the policies will not have a significant effect on the European sites.	It is considered that in combination likely significant effects are not predicted.
Suffolk Coastal District Council	Suffolk Coastal Core Strategy and Development Management Policies Document HRA (2011)	N/A	It is considered that in combination likely significant effects are not predicted.

Due to the Parish of Long Melford lying outside the Impact Risk Zone for any Habitats sites, this HRA screening concludes that it is possible to rule out likely significant effects. There is therefore no need for an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017.



References

- Atkins (2011) Habitats Regulations Assessment for Babergh District Council Core Strategy
- Atkins (2010) St. Edmundsbury Borough Council Core Strategy HRA screening
- Babergh District Council (2014) Local Plan Core Strategy and Policies
- Habitats Regulations Assessment (Appropriate Assessment) for Mid Suffolk District Council Core Strategy(2007)
- Long Melford Neighbourhood Plan 2018-2036 Pre-Submission Consultation Version (January 2019)
- Natural England Conservation objectives for European Sites: East of England Website
- The Landscape Partnership (2011) Suffolk Coastal District Council Habitats Regulations Assessment for Core Strategy and Development Management Policies Document
- Tydlesley,D., and Chapman, C., (2013) *The Habitats Regulations Assessment Handbook*, (Feb 2019) edition UK: DTA Publications Limited



5. Conclusions

5.1 Strategic Environmental Assessment (SEA)

The Neighbourhood Plan has been prepared for town and country planning purposes and sets a framework for future development consent. The policies of the Neighbourhood Plan can be considered to determine the use of small areas at local level commensurate with their status in determining local planning applications.

Planning Practice Guidance on SEA of Neighbourhood Plans indicates that a strategic environmental assessment may be required, for example, where a neighbourhood plan allocates sites for development; the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; or the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

The Plan allocates sites for development in advance of the emerging Babergh & Mid Suffolk Local Plan and therefore could give rise to significant effects on the environment that would warrant the application of the SEA Directive, in the form of a SEA Environmental Report. The Local Plan is not yet at a stage to identify a quantum of development or sites for development within the Neighbourhood Plan area. As such, the degree to which the Plan sets a framework for projects is high.

In regard to effects, the Plan's allocations have been subject to a site selection process within Appendix 3 of the Plan. Although a good first step in justifying the allocations in light of alternatives, unfortunately this exercise does not meet the requirements of the SEA Directive. To this extent the 'significance' of effects will need to be determined through a SEA Environmental Report as they can not be ruled out at this stage. Similarly, cumulative effects have not been formally identified and assessed to date. It is possible that cumulative effects could be forthcoming that would warrant the full assessment of alternative approaches. As such, the cumulative impacts of the Plan's allocations can not be ruled out at this stage and should be identified through the application of the SEA Directive in the form of a SEA Environmental Report

As such, the content of the Long Melford Neighbourhood Plan has therefore been **screened in** for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.

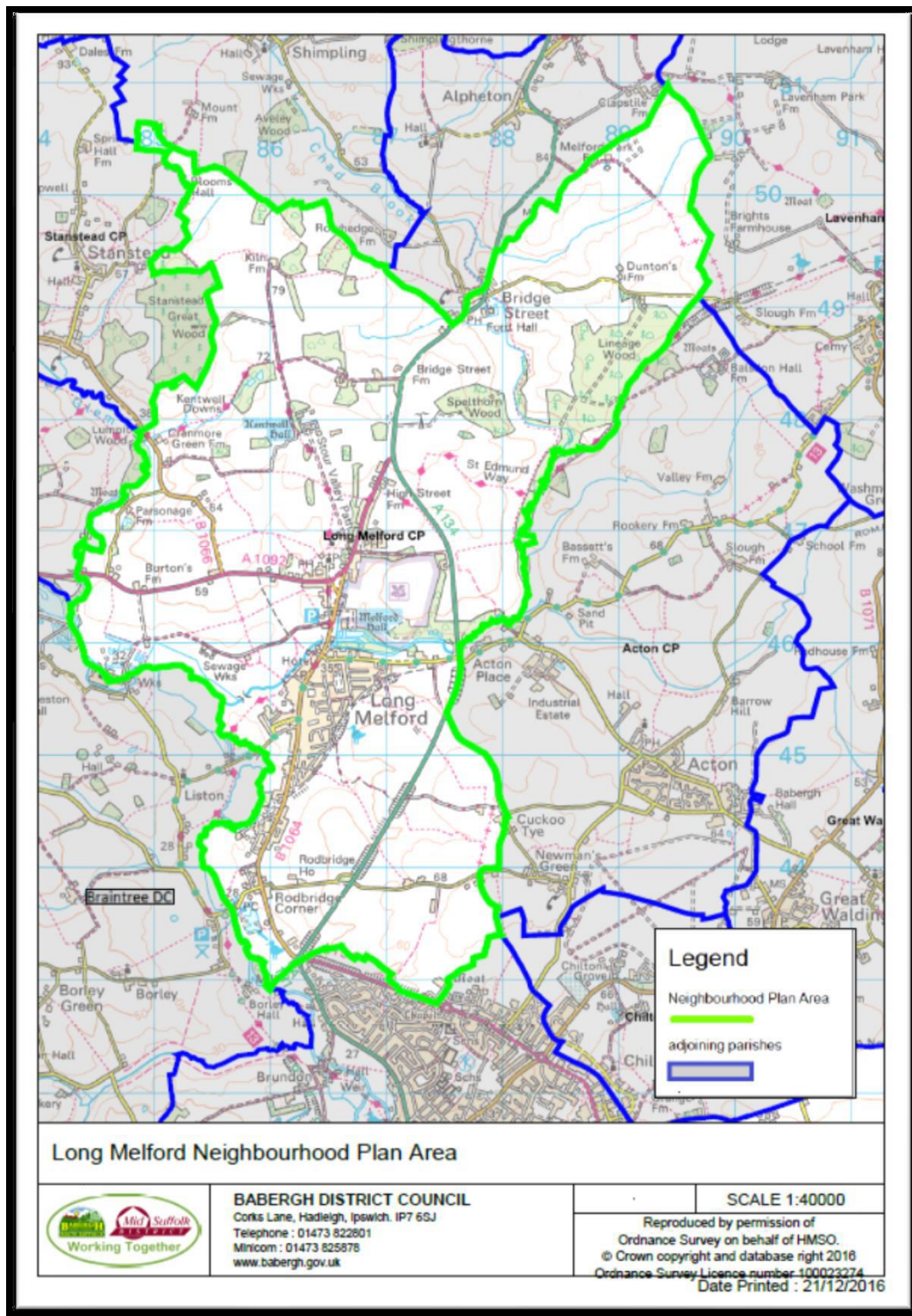
5.2 Habitats Regulations Assessment (HRA)

Subject to Natural England's review, this HRA screening report indicates that the Long Melford Neighbourhood Plan is not predicted to have any likely significant effects on a Habitats Site. The requirement for the Plan to undertake further assessment under the Habitats Regulations 2017 is therefore **screened out**.



Appendix 1

Long Melford Neighbourhood Plan Area

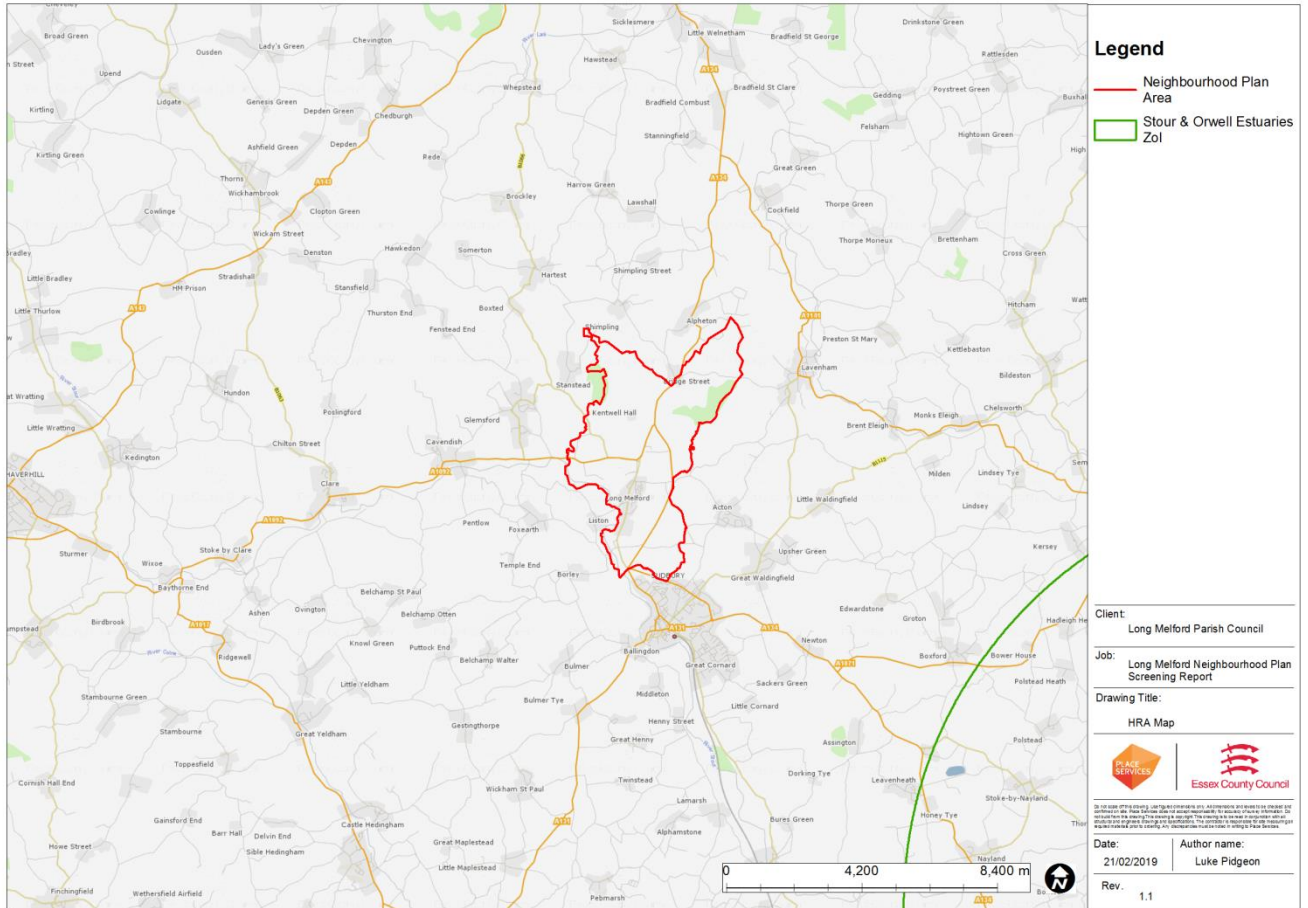


Source: Babergh District Council



Appendix 2

Long Melford Parish and Locations of the Habitats Sites' Zones of Influence



Source: Place Services, 2019



Place Services

Essex County Council
County Hall, Chelmsford, Essex CM1 1QH

T: +44 (0)333 013 6840

E: enquiries@placeservices.co.uk

www.placeservices.co.uk

March 2019



Essex County Council