



**Reydon Parish Council
 Reydon Neighbourhood Plan 2019-2036
 Basic Conditions Statement
 February 2020**

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1 INTRODUCTION

1.1 This Basic Conditions Statement has been produced to explain how the proposed Reydon Neighbourhood Plan (RNP) has been prepared in accordance with the Neighbourhood Planning (General) Regulations 2012 as amended and how the basic conditions of neighbourhood planning and other considerations as prescribed by Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 have been considered to have been met.

1.2 The Statement addresses each of the five ‘basic conditions’ required of the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8(2) of Schedule 4B to the 1990 Town & Country Planning Act.

1.3 The Regulations state that a Neighbourhood Plan will be considered to have met the basic conditions if:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- the making of the neighbourhood development plan contributes to the achievement of sustainable development;
- the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area); and
- the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations.
- Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

Supporting documents and evidence

1.4 The RNP is supported by a Consultation Statement and this Basic Conditions Statement.

Key statements

1.5 Reydon Parish Council is a qualifying body and entitled to submit a Neighbourhood Plan for its own parish. The RNP expresses policies that relate to the development and use of land only within the neighbourhood area.

1.6 The neighbourhood area is contiguous with the parish boundary, with the exception that it is slightly larger than the Parish of Reydon so that it includes the whole of two highly valued local wildlife sites: Reydon Wood and the Hen Reedbeds. The neighbourhood area was agreed after the required consultation by Suffolk Coastal and Waveney District Councils on 3 December 2018.

1.7 The Reydon neighbourhood area is set out in the RNP on Policy Map (RNP Map 1).

1.8 The RNP covers the period from 2019 to 2036.

1.9 No provision for excluded development such as national infrastructure is contained within the Neighbourhood Plan.

1.10 The RNP does not relate to more than one neighbourhood area. It is solely related to the area of Reydon as designated by Suffolk Coastal and Waveney District Councils on 3 December 2018.

1.11 There are no other Neighbourhood Development Plans in place for the Reydon Neighbourhood Area.

2 HAVING REGARD TO NATIONAL POLICIES AND ADVICE CONTAINED IN GUIDANCE ISSUED BY THE SECRETARY OF STATE

Introduction

2.1 The RNP is supplementary to the National Planning Policy Framework (NPPF) and the East Suffolk Council – Waveney Local Plan (WLP) and all the requirements of the NPPF and the policies of the WLP will continue to apply to development in Reydon. For this reason, the duration of the RNP has been aligned with that of WLP.

2.2 It is required that the RNP has appropriate regard to national planning policy. This is principally provided by the National Planning Policy Framework (NPPF) and National Planning Practice Guidance.

National Planning Policy Framework

2.5 The NPPF in paragraph 13 refers to Neighbourhood plans and that those plans should support the delivery of the strategic policies contained in local plans and should shape and direct development that is outside of these strategic policies.

2.6 This section demonstrates that the RNP has regard to relevant policies within the NPPF in relation to:

- Supporting a prosperous rural economy
- Delivering a wide choice of high quality homes
- Requiring good design
- Promoting healthy communities
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment

2.7 The vision behind the RNP is that Reydon should be a village which:

- Is attractive and sustainable
- Enjoys its surroundings in outstanding countryside

- Meets the needs of local people
- Contributes to the local economy, including tourism
- Is prepared for risks from flooding, erosion, traffic and pollution.

The RNP has been created to help realise this vision, based around six key issues, which have been tested in detail with the village community, and are summarised in Table 2.1 below with detail about which NPPF goals each objective seeks to address.

2.8 Table 2.2 then provides a summary of how each policy in the RNP conforms specifically to the NPPF.

Table 2.1: Assessment of RNP objectives against NPPF goals

RNP Objective	Relevant NPPF goal
1. Housing for local people	Delivering a wide choice of high quality homes Requiring good design Promoting healthy communities Building a strong, competitive economy
2. Protecting the countryside around the village	Contributes to the local economy, including tourism Supporting a prosperous rural economy Requiring good design Building a strong, competitive economy, including tourism Conserving and enhancing the natural environment
3. Protecting community assets and green spaces in the village	Conserving and enhancing the natural environment Conserving and enhancing the historic environment Contributes to the local economy, including tourism
4. Flood risks and erosion	Meeting the challenge of climate change, flooding and coastal change
5. Infrastructure needs (sewerage, drainage, roads)	Promoting healthy communities Contributes to the local economy, including tourism
6. Design principles for the village	Delivering a wide choice of high quality homes Requiring a good design Promoting healthy communities

Table 2.2: Assessment of how each policy in the RNP conforms to the NPPF

No.	Policy title and reference	NPPF ref. (para.)	Commentary
1	Policy RNP1: Tenure Mix of Affordable Housing	7,8,20,29,59,61,62,63	Provisions for developments to contain a mix of affordable housing to reflect the assessment of housing need. This aims to support delivery of a wide choice of high quality homes within financial reach of local people.
2	Policy RNP 2: Development Next to Educational Establishments	7,8,11,34,92,94	Prevents development which could limit future expansion of educational establishments. This aims to support a

			sustainable community and ensure that the village can meet the future needs of young families.
3	Policy RNP 3: Affordable Housing on the Boundary of the Settlement	7,8,20,28,29,59,61,62,63,69,77,78	If sites within the settlement boundary are not available small-scale development of affordable housing will be permitted adjacent to the settlement boundary. This aims to support delivery of a wide choice of high quality homes within financial reach of local people.
4	Policy RNP 4: Principal Residence Requirement:	7	Seeks to curtail the uncontrolled growth of dwellings used for holiday accommodation (as second or holiday homes) by a restriction on new open market housing to its occupancy as a Principal Residence. This aims to ensure a good supply of housing for local people.
5	Policy RNP 5: Maintaining Protection of the Countryside Around the Village:	8,96,170,174	Seeks to protect the most valued parts of the countryside as identified by the local community and conserve the natural environment.
6	Policy RNP 6: Improving Public Rights of Way and access to the Countryside from new Developments:	34,98	Seeks to protect and where appropriate enhance the Public Rights of Way network for access to the natural environment, avoiding disturbance to protected habitats.
7	Policy RNP 7: Local Green Spaces:	8,91,92,99,96,100,170,174	Seeks to safeguard from development defined green open spaces. This aims to conserve and enhance the natural environment.
8	Policy RNP 8: Safe Access To and From New Developments.	34,91,102	Seeks to ensure safe access to and from developments for all users including provision of more than one access point where appropriate. This will contribute to a healthy community.
9	Policy RNP 9: Safe Walking and Cycling Routes:	34,91,102	Seeks to ensure all developments should include provision for safe cycling and walking routes within the development and to and from the development to key places in the village, to the countryside and to the facilities and shops in Southwold. This aims to promote a healthy community.
10	RNP Policy 10: Reydon Neighbourhood Design Principles:	28,124	Sets out principles for the planning and design of developments in the Reydon Neighbourhood Area. Designs should make use of tree and hedge planting and the inclusion of green areas to maintain or, if possible, provide gains to biodiversity. This aims to promote good design and conserve and enhance the natural environment.

Parish Council support for RNP			
11	RPC Action 1: Protecting the Future Status of Affordable Housing	8,20,29,61	The Parish Council will work with the Housing Department of East Suffolk District Council and the developers to ensure that the status of affordable housing afforded by Reydon being within a Designated Area is maintained effectively.
12	RPC Action 2: Maintaining A Balanced Housing Mix.	8,20,29,61, 62	The Parish Council will work with East Suffolk District Council to ensure that its housing mix policy is implemented fully and applied evenly to market and affordable elements of any development.
13	RPC Action 3: Extending Public Rights of Way Access to the Countryside:	34,91,92	The Parish Council will seek to give priority in its use of Community Infrastructure Levy Funding to support the provision of new or extended Public Rights of Way to improve access to the countryside from the village.
16	RPC Action 6: Blyth Estuary Strategy:	20,149	The Parish Council will continue to support the Blyth Estuary Partnership in its work to develop a preferred strategy to maintain the Blyth Estuary.
17	RPC Action 7: Work to Ensure Adequate Provision for Sewerage and Drainage:	20	The Parish Council will continue to pursue issues of concern about sewerage and drainage with the relevant utility company and will work with East Suffolk District Council to ensure that any development proposal includes adequate provision for necessary improvements needed to the sewerage and drainage systems.
18	RPC Action 8: Provision of Safe Walking and Cycling Routes:	34,91,102	The Parish Council will seek to give priority in its use of Community Infrastructure Levy Funding to support the provision of safe walking and cycle routes around the village, to improve access to the countryside and to Southwold.
19	RPC Action 9: Adequate Parking Provision.	102,105,106	The Parish Council will work with the East Suffolk District Council to ensure that adequate parking provision is included in all new developments.
20	RPC Action 10: Protecting and Enhancing Green Areas and Verges	20,96,170	The Parish Council will work to ensure the protection of all open spaces and trees within the village and encourage new planting where appropriate, including the seeding of green areas and roadside verges with wild flowers and the creation of wildlife corridors.
21	Neither the RNP nor WLP allocate new land in or around	20,81	Allows the opportunity for development of the local economy.

<p>the village for business or employment use as land continues to be available for such development at the Reydon Business Park and this, together with current and planned development of new business premises in Southwold, is regarded as sufficient.</p>		
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3 CONTRIBUTION TOWARDS SUSTAINABLE DEVELOPMENT

3.1 The NPPF states in paragraph 10 that so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development as set out in paragraph 11.

3.2 Table 3.1 below summarises how the objectives and policies in the RNP contribute towards sustainable development, as defined in the NPPF.

Table 3.1: Assessment of RNP objectives and policies against sustainable development

Deliver Economic Sustainability	
NPPF Definition – ‘to help build a strong, responsive and competitive economy’	
RNP Objectives	The Reydon Business Park allows the opportunity for development of the local economy and this, together with current and planned development of new business premises in Southwold, is regarded as sufficient. The policies in the RNP for the protection of green spaces and the countryside in and around the village and access to it all sustain an environment to promote tourism and a healthy sustainable community.
RNP Policies	RNP policies 5 to 9 deal with these matters.
RNP Comments	The RNP supports the continued development of the Reydon Business Park and actions to promote tourism to provide employment opportunities.

Deliver Social Sustainability	
NPPF Definition – ‘to support strong vibrant and healthy communities’	
RNP Objectives	<ul style="list-style-type: none"> • provide a wide variety of housing types which are needed in the village, including a good proportion of smaller houses to meet the needs of younger people, new families and older people, including bungalows and adapted houses for elderly or disabled residents. It is important that this is applied evenly across the whole of any large development so that the full range of the mix is present in both the market and affordable housing elements of the development. • provide a diverse range of residential, community, leisure, employment and retail areas, linked by safe walking, cycling and public transport links, with these links extending to the nearby open countryside and beyond. • build on its strengths as a welcoming, safe and peaceful place to live with a strong sense of community with a thriving society of neighbours, groups and organisations providing support and facilities for all residents. • ensure that development is sensitively designed to protect and enrich the landscape, reduce or minimise flood risk, mitigate climate change, promote biodiversity and reduce our carbon footprint. • protect green spaces and facilities of value to the community and maintain the high quality natural and historic environment.
RNP Policies	RNP policies 1 to 10 all deal with these issues.
RNP Comments	The RNP seeks to maintain a thriving community within Reydon, requiring development to contribute positively to the existing character and context of the area while addressing residential needs. It recognises too that the community has certain infrastructure needs that must be addressed. It seeks to

achieve this by supporting development that contributes to the provision of new or improved facilities which encourage walking and cycling by identifying specific improvements needed.

Deliver Environmental Sustainability	
NPPF Definition – ‘to contribute to protecting and enhancing our natural, built and historic environment... and mitigating and adapting to climate change’	
RNP Objectives	<ul style="list-style-type: none"> • respect and protect the natural and historic environment and the open spaces. • provide a diverse range of residential, community, leisure, employment and retail areas, linked by safe walking, cycling and public transport links, with these links extending to the nearby open countryside and beyond.
RNP Policies	RNP policies 5 to 10 all deal with these matters.
RNP Comments	The RNP seeks to protect the character of Reydon by requiring good design of new development and by safeguarding defined spaces from development that make an important contribution to the place, setting, character and/or surrounding landscape. The plan seeks to ensure that the natural environment is protected from adverse development in terms of both the quality of the landscape or the loss of green space. Equally it protects the historic built environment.

3.3 As demonstrated in Table 3.1, the strategic objectives of the Neighbourhood Development Plan are considered to comprise a balance of social, economic and environmental goals.

3.4 East Suffolk District Council considered that a Strategic Environmental Assessment (SEA) was not required because the RNP is not likely to have a significant impact upon the environment. The Determination that a SEA is not required was made by ESDC on 15 April 2019. This Screening assessment was updated later in the light of the introduction of a new policy (RNP2). The Updated Determination was made in February 2020 and also concluded that a SEA was not required. The two screening determination reports are attached as Appendix 1 and 3 of this statement.

4 GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN.

4.1 The development plan currently consists of the following:

- 2019 East Suffolk Council Waveney Local Plan (WLP)
- 2011 Suffolk Waste Core Strategy
- 2008 Suffolk Minerals Core Strategy

4.2 The policies of relevance are shown in Table 4.1 below, along with a consideration of whether they represent the strategic policies of the development plan. Where they do, consideration is made of whether the RNP is in general conformity with them.

4.3 Any policy that is not identified in Table 4.1 is not considered to be relevant to the RNP because the RNP does not have any policies that directly relate to it.

4.4 It is confirmed that there are no policies in either the 2008 Suffolk Minerals Local Plan or the 2011 Suffolk Waste Local Plan to which the RNP policies have any relevance. Suffolk County Council is close to completing a new Minerals and Waste Plan. As currently proposed, it has no policies to which RNP policies have any relevance.

Table 4.1: Relevant strategic policies in the Waveney Local Plan (WLP)

Local Plan Policy	RNP policy
Waveney Local Plan references	
WLP 1.1 Scale and Location of Growth	Allocates 4% of housing growth to “Southwold and Reydon” but all of it is in Reydon. RNP Policy 2 accepts this and provides for additional affordable housing should the need be evidenced and seeks to ensure that the tenure mix and principal residence requirements will allow local people to access housing.
WLP 1.2 Settlement Boundaries	RNP Policy 3 allows development of affordable housing on the boundary of the settlement if the need arises and is in line with the provisions of this WLP policy that such minor adjustments may be made.
WLP 6.1 Land West of Copperwheat Avenue, Reydon	RNP accepts this policy and has taken this into account in developing RNP policies and RPC actions, for example RNP 1 Tenure Mix of Affordable Housing, RNP 6 Improving Rights of Way and RNP 8 Safe Access to and from developments.
WLP 8.1 Housing Mix	RNP policy 1 accepts this policy as applied to market housing.
WLP 8.2 Affordable Housing	RNP policy 1 endorses the provision of 40% affordable housing for Southwold and Reydon but seeks to ensure that the tenure mix of affordable housing will meet the local need now and in the future by restricting tenure to forms that can be retained long term, for example RPC Action 1.

WLP 8.6 Affordable Housing in the Countryside	RNP policy 3 allows development of affordable housing on the boundary of the settlement to ensure that policy WLP 8. 6 can be applied at Reydon should housing need be identified during the life of this plan.
WLP 8.12 Existing Employment Areas	RNP paragraph 4.26 accepts this and regards the Reydon Business Park and other developments in Southwold as sufficient to meet employment needs during the life of this plan.
WLP 8.21 Sustainable Transport	RNP policies 8.5 and 8.6 promote safe access to and from developments and safe walking and cycling routes as applied to residential developments.
WLP 8.22 Built Community Services and Facilities	RPC Action 4 proposes the registration of community assets.
WLP 8.23 Protection of Open Space	RNP policy 7 proposes designation of local green spaces and RNP policy 10 sets out design principles.
WLP 8.24 Flood Risk	RNP 7. Key Issue 4 provides for support to the Blyth Estuary Partnership as it develops a strategy to maintain the estuary and protect surrounding land from flooding.
WLP 8.25 Coastal Change Management	RNP 7. Key Issue 4 provides for support to the Blyth Estuary Partnership as it develops a strategy to maintain the estuary and protect surrounding land from flooding.
WLP 8.26 Relocation of premises affected by coastal erosion.	RPC Action 5 supports relocation and protection of premises at risk from coastal erosion.
WLP 8.28 Sustainable Construction	RNP policy 10 sets out design principles for sustainable construction.
WLP 8.29 Design	RNP policy 10 sets out design principles for developments in the RNP area.
WLP 8.34 Biodiversity and Geodiversity	RNP policy 10 sets out design principles for developments in the RNP area and includes proposals for maintaining hedges and verges and wildlife corridors.
WLP 8.35 Landscape Character	Policy RNP 5 to 7 seeks to protect the areas identified on the RNP Map 3 from development Policy RNP 10 seeks to ensure that new or redevelopment contributes positively to the character of the village and blends into surrounding countryside Policy RNP 10 seeks to ensure that new housing is in keeping with the existing local context Policy RNP 5 to 7 seek to protect Special Landscape Areas and respect the RNP area as an AONB.
WLP 8.37 Historic environment	RNP (paragraph 3.1) acknowledges the historic environment of the RNP area.
WLP 8.40 Archaeology	RNP (paragraph 3.1) acknowledges the archaeological significance of the RNP area from its agricultural background.

5 DOES NOT BREACH, AND IS COMPATIBLE WITH, EU OBLIGATIONS AND HUMAN RIGHTS REQUIREMENTS

5.1 The RNP has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act.

5.2 In February 2019 the Reydon Neighbourhood Plan Steering Group submitted a formal screening request to Waveney District Council (now East Suffolk Council) regarding the need for a Strategic Environmental Assessment (SEA). In April 2019, East Suffolk Council formally stated that an SEA was not required. The formal opinion is included as Appendix 1 to this report, Page 14. In September 2019, a new policy (RNP2) was added to the proposed Submission Draft of the Reydon Neighbourhood Plan. As a result, East Suffolk carried out an updated screening of the revised plan regarding the need for a SEA. In February 2020, East Suffolk Council issued an updated determination which also concluded that a SEA was not required. This is included as Appendix 3 to this report, page 38.

5.3. In September 2019, the Reydon Neighbourhood Plan Steering Group asked East Suffolk Council to carry out a Screening of the Submission Draft Plan for any requirement for a Habitat Regulation Assessment. In November 2019, East Suffolk Council issued an Opinion stating that this assessment was not required. The formal opinion is included as an Appendix 2 to this report, page 24

6 CONCLUSION

6.1 The Basic Conditions as set out in Schedule 4B to the TCPA 1990 are considered to be met by the Reydon Neighbourhood Plan and all the policies therein. It is therefore respectfully suggested to the Examiner that the Reydon Neighbourhood Plan complies with Paragraph 8(1)(a) of Schedule 4B of the Act.

APPENDIX 1: STRATEGIC ENVIRONMENTAL ASSESSMENT SCREENING OPINION EAST SUFFOLK COUNCIL APRIL 2019

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 3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC
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1. Introduction

In some circumstances a Neighbourhood Plan could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require Strategic Environmental Assessment.

One of the basic conditions that will be tested by the independent examiner is whether the making of the Plan is compatible with European Union Obligations. Whether a Neighbourhood Plan requires a strategic environmental assessment, and the level of detail needed, will depend on what is proposed in the draft Neighbourhood Plan.

This screening report is designed to test whether or not the contents of the Reydon Neighbourhood Plan Final (Pre-Submission) Draft April 2019 (the draft NP) requires a full Strategic Environmental Assessment (SEA). The legislative background below outlines the regulations that require the use of this screening exercise. Section 4 provides a screening assessment of the likely significant effects of the Plan and the need for a full SEA.

2. Legislative Background

The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC ‘on the assessment of the effects of certain plans and programmes on the Environment’. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations.

The SEA Regulations include a definition of ‘plans and programmes’ to which the regulations apply, and which programmes are required by legislative, regulatory or administrative provisions.

A Neighbourhood Plan is not required by legislative, regulatory or administrative provisions. It is an optional process under the provision of the Town and Country Planning Act 1990 (subsequently amended by the Localism Act 2011). However, once a Neighbourhood Plan is

‘made’ it becomes part of the statutory development plan for the area to which it applies. As such, it therefore forms part of a plan that is required by legislative provisions.

3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

The Neighbourhood Plan triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the ‘responsible authority’ being the authority by which or on whose behalf the plan is prepared. Before making a determination, the responsible authority shall: -

- a) Take into account the criteria specified in Schedule 1 to these Regulations (EIA Regulations); and
- b) Consult the consultation bodies.

The consultation bodies are defined in section 4 of the SEA Regulations. As the responsible authority, East Suffolk Council (formerly Waveney and Suffolk Coastal District Councils until 1st April 2019) has sought opinions from the statutory consultation bodies: Historic England; the Environment Agency; and Natural England. Their responses are in the Appendices to this screening determination.

Schedule 1 of the EIA Regulations sets out the criteria for determining likely significant effects as follows:

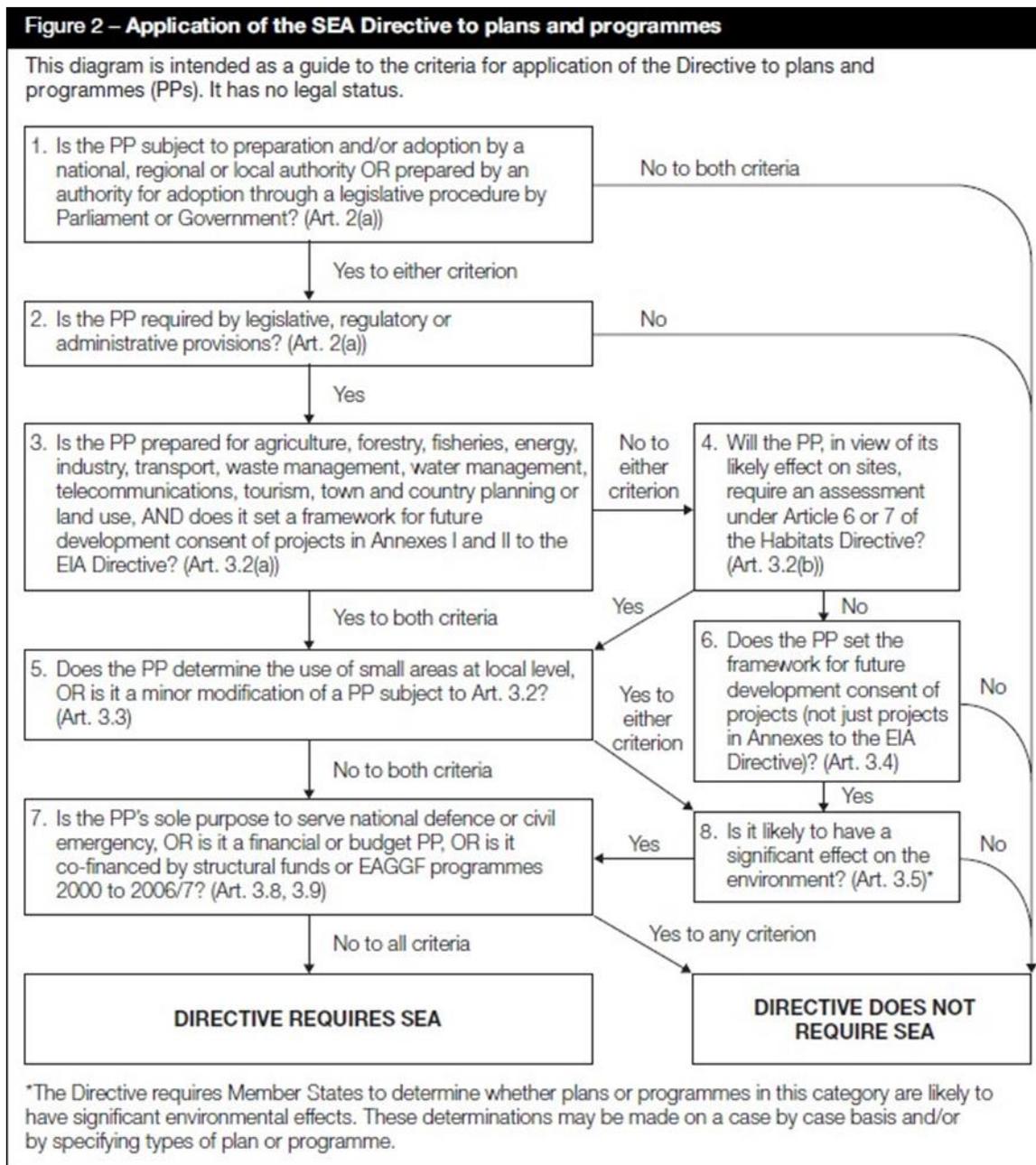
1. The characteristics of plans and programmes, having regard, in particular, to:
 - The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
 - The degree to which 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 trans boundary 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:
 - o special natural characteristics or cultural heritage;
 - o exceeded environmental quality standards or limit values;
 - o intensive land-use; and

o the effects on areas or landscapes which have a recognised national, community or international protection status.

Source: Annex 2 of SEA Directive 2001/42/EC

4. Assessment

The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: A Practical Guide to the Strategic Environmental Assessment Directive (2005)

The following assessment applies the questions from the preceding diagram. The answers determine whether the Neighbourhood Plan will require a full Strategic Environmental Assessment.

1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))

Yes. The preparation and adoption of the Neighbourhood Plan is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The Neighbourhood Plan is being prepared by Reydon Parish Council as the relevant body and, subject to successful completion of the relevant processes as set out in the Neighbourhood Planning (General) Regulations 2012 (as amended) and the Neighbourhood Planning (Referendums) Regulations 2012 (as amended), will be made by East Suffolk Council.

2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))

No. A Neighbourhood Development Plan is not required by legislative, regulatory or administrative provisions. It is an optional process under the Town and Country Planning Act 1990 (amended by the Localism Act 2011). However, once a Neighbourhood Plan is made it becomes part of the statutory development plan for the area to which it applies. As such it forms part of a plan that is required by legislative provisions.

3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))

Yes. The Neighbourhood Plan falls within the category town and country planning and relates to the local (parish) level. The designated neighbourhood plan area includes all of Reydon Parish and some small elements of the neighbouring Wangford with Henham Parish, all within the East Suffolk Council area. The current draft NP contains nine numbered policies. None of these allocate specific sites for development. Policy RNP 2 allows for small scale Affordable Housing developments to take place adjacent to the Settlement Boundary of Reydon (subject to criteria).

Policy support in the draft NP is provided for: development including Affordable Housing; Small-scale Affordable Housing development adjacent to the Settlement Boundary; new dwellings where they are used as a 'principal residence'; protecting areas of the countryside defined on the policy map; improving footpath access to the countryside; designation of local green spaces; safe access and walking and cycling routes for new development; and design principles. The draft NP policies have their basis in strategic policies set out in the East Suffolk - Waveney Local Plan (the local plan) which was adopted in March 2019.

The local plan identifies Reydon, together with neighbouring Southwold, as a location for growth and allocates 4% of growth here. Sites are allocated for housing; existing employment; and open space. The draft NP's Reydon Nature Designations map shows the neighbourhood plan area lies within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and partly within Heritage Coast. The map also shows that the neighbourhood plan area contains Ancient Woodland; County Wildlife Site; National Nature Reserve; Ramsar site; Site of Special Scientific Interest; Special Area of Conservation; and Special Protection Area.

The neighbourhood plan makes no change to these strategic policies and is not considered to impact on other strategic designations. The local plan has been subject to both sustainability appraisal (including strategic environmental assessment) and Appropriate Assessment under the Habitat Regulations.

The Local Plan including supporting documents and policy maps can be viewed here: <http://www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/>.

4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))

No. The draft NP does not allocate any land for built development over and above the local plan which has already been subject to Sustainability Appraisal (including Strategic Environmental Assessment) and Appropriate Assessment under the Habitats Regulations. Policy RNP 2 allows for small scale Affordable Housing development to take place adjacent to the settlement boundary, but it is not considered that this would result in significant environmental effects.

5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)

Yes. The draft neighbourhood plan relates solely to the neighbourhood plan area. This is marginally larger than the administrative Parish boundary. The policies do not relate to the allocation of land for built development. The local plan sets out settlement boundaries around Reydon within which residential and employment development is directed. As mentioned in 3., there are no specific sites allocated for development in the neighbourhood area. Policy RNP 2 allows for small scale Affordable Housing development to take place adjacent to the settlement boundary. This is considered to be a modification from the local plan of such a small order that it would not result in any significant environmental effects. Policies in the local plan would allow for minor infilling and limited residential development within the defined settlement boundaries. Policies also allow opportunities for development outside of the settlement boundaries but this can take place only when specific criteria are met. Development may also come forward as agricultural 'permitted development' .

6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3(4))

No. The draft NP does not allocate land for new built development. The draft NP is consistent with the local plan which has been subject to Sustainability Appraisal and Habitats Regulations Assessment.

7. Is the PP' s sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)

No. Not applicable.

8. Is it likely to have a significant effect on the environment? (Art. 3(5))

No. The plan does not allocate land for built development and is not considered to result in significant effects on the environment.

5. Conclusion

The Reydon Neighbourhood Plan Final (Pre-Submission) Draft April 2019 does not allocate land for built development and applies to a localised area. The policies reflect and implement strategic policies in the local plan to such a degree as to not result in any significant environmental effects. The local plan has been subject to Sustainability Appraisal including Strategic Environmental Assessment and Appropriate Assessment under the Habitats Regulations Assessment. It is considered by East Suffolk Council, in consultation with the Environment Agency, Historic England and Natural England, that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Reydon Neighbourhood Plan to ensure compliance with EU obligations.

Signed: Dated: 15th April 2019
Desi Reed
Planning Policy and Delivery Manager East Suffolk Council

Appendix 1 Response from Environment Agency

Thank you for consulting us on the draft SEA opinion on the 21 February 2019. We have reviewed the document as submitted and can confirm that we do not disagree with the report's conclusion. As no sites have been allocated within the Neighbourhood Plan the environmental risks are lowered.

We cannot conclude if a HRA is required as Natural England is the competent authority for HRAs, you should contact them regarding this, if not done so already.

Appendix 2 Response from Historic England

Thank you for your email of 20 February 2019 regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Reydon Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report indicates that the Council considers that the Reydon Neighbourhood Plan will not have any significant effects on the historic environment.

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

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

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

We should like to stress that this opinion is based on the information provided by you with your correspondence dated 20 February 2019. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment.

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

Appendix 3 Response from Natural England

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

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Annex 1 -Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic website(1) will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the

Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)(2).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)(3). Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)(4).

There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic(5) website and also from the LandIS website(6), which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework(7) sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance(8) sets out supporting guidance. Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness. If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)9), such as Sites of Special Scientific Interest or Ancient woodland10. If there are likely

to be any adverse impacts you' ll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You' ll also want to consider whether any proposals might affect priority species (listed here(11)) or protected species. To help you do this, Natural England has produced advice here(12) to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land(13).

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this(14)).

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.

- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Links:

1 <http://magic.defra.gov.uk/>

2 <http://www.nbn-nfbr.org.uk/nfbr.php>

3 <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

4 <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

5 <http://magic.defra.gov.uk/>

6 <http://www.landis.org.uk/index.cfm>

7 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

8 <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

9

<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

10 <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

11 <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

12 <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

13 <http://publications.naturalengland.org.uk/publication/35012>

14 <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

APPENDIX 2: HABITAT REGULATIONS ASSESSEMENT SCREENING



Habitats Regulations Assessment Screening Statement

Reydon Neighbourhood Plan

December 2019

Habitats Regulations Assessment
Screening Statement

Reydon Neighbourhood Plan

December 2019

1. Introduction

1.1 The European Habitats Directive¹ and Wild Birds Directive² provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection

Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) also states that Ramsar sites should be afforded the same level of protection as the European sites.

1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of development plans is set out in the Conservation of Habitats and Species Regulations (2017) (as amended). It is also a requirement of Regulation 32 schedule 2 of the Neighbourhood Planning Regulations 2012 (as amended). In order to proceed to referendum a Neighbourhood Plan must meet a series of ‘basic conditions’, which include that it does not breach, and is otherwise compatible with, EU obligations.

1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states:

‘Where a land use plan:

- (a) Is 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), and
- (b) Is not directly connected with or necessary to the management of the site,

The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives.’

1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy in the Plan would adversely affect the integrity of any sites.

Stage 1: Determining whether a plan is likely to have a significant effect on a European site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European Union³, which has ruled that where

1 92/43/EEC

2 2009/147/EEC

3 C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

mitigation is necessary this must be identified through an Appropriate Assessment.

Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a European site.

Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.

1.5 The Reydon Neighbourhood Plan is being produced by Reydon Parish Council. The Reydon Neighbourhood Plan Submission Draft July 2019 (referred to as the neighbourhood plan for the purposes of this document) has been sent to East Suffolk Council and this screening assessment

considers whether there are likely significant effects (LSEs) on protected European sites and whether a full Appropriate Assessment will be required.

1.6 The Reydon Neighbourhood Plan will need to be in general conformity with the strategic policies of the Local Plan. The adopted Local Plan is currently the East Suffolk Council Waveney Local Plan (2019) (referred to as the Local Plan for the purposes of this document). The Reydon Neighbourhood Plan has been developed within the context of the Local Plan.

1.7 The Local Plan was subject to Habitats Regulations Assessment as part of its production (see appendix 1). Where screening identified a likely significant effect, an Appropriate Assessment was undertaken and mitigation measures identified were incorporated within the Local Plan, resulting in a conclusion that the local plan will not lead to any adverse effects on European wildlife sites within and in the vicinity of the (then) Waveney District. Significant effects were identified in relation to recreation (including dog walking), air quality and biodiversity net gain. The Council has subsequently produced a Recreational Avoidance and Mitigation Strategy (RAMS) and requires payment towards mitigation from residential developments within 13km of the protected European sites.

1.8 This screening report contains the results of Stage 1 (above) in relation to the Reydon Neighbourhood Plan. Stages 2 and 3 are only required if the screening stage

concludes that there is likely to be a significant impact on a European site. The initial screening has been undertaken by East Suffolk Council and is subject to consultation with Natural England as a statutory consultee.

2. Protected sites covered by this screening report

2.1 Sites included in this assessment are listed in Table 1 below. This includes all sites that are within 20km of the Reydon Neighbourhood Plan area (for consistency with the distances applied within the HRA of the Local Plan and adopting the precautionary approach). The locations of the sites are shown on maps in Appendix 2 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 3, along with a summary of the pressures and threats as documented in the Appropriate Assessment for the Local Plan.

Table 1: Relevant European protected sites

Name

Alde-Ore & Butley Estuaries SAC

The Broads SAC

Benacre to Easton Bavents Lagoons SAC

Minsmere to Walberswick Heaths and Marshes SAC

Dews Ponds SAC

Alde-Ore Estuary SPA

Benacre to Easton Bavents SPA

Broadland SPA

Outer Thames Estuary SPA

Minsmere-Walberswick SPA

Sandlings SPA

Alde-Ore Estuary Ramsar

Broadland Ramsar

3. Reydon Neighbourhood Plan

3.1 Reydon Parish Council is producing a Neighbourhood Plan for Reydon, in order to set out the vision, objectives and policies for the development of the parish up to 2036, within the context of the Local Plan. This Habitats Regulations Assessment screening assessment reviews the Reydon Neighbourhood Plan (Submission Draft, July 2019).

3.2 The Neighbourhood Plan includes a range of policies covering the Reydon Neighbourhood Plan area. A number of policies relate to the full Neighbourhood Plan area whilst others are area/location specific. The Neighbourhood Plan does not allocate specific sites for development.

3.3 The policies in the Reydon Neighbourhood Plan are listed in Table 2 below. An assessment of whether each policy is likely to have a significant effect on European protected sites is included in section 5 of this report.

Table 2: List of Neighbourhood Plan policies

RNP1	Tenure Mix of Affordable Housing
RNP2	New Affordable Housing Within the Village
RNP3	Affordable Housing on the Boundary of the Settlement
RNP4	Principal Residence Requirement
RNP5	Maintaining Protection of the Countryside Around the Village
RNP6	Improving Public Rights of Way and Access to the Countryside from New Developments
RNP7	Local Green Spaces
RNP8	Safe Access to and from New Developments
RNP9	Safe Walking and Cycling Routes
RNP10	Reydon Neighbourhood Design Principles

4. Other Plans and Projects

4.1 Regulation 105 of the 2017 Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.

4.2 As noted in the introduction, the other key plan is the Local Plan. The Local Plan was adopted in March 2019. The Local Plan sets out the broad scale and distribution of

development across the area of East Suffolk formerly covered by the Waveney District and has been subject to an Appropriate Assessment.

4.3 Local plan policy WLP1.1 states that 4% of housing growth (approx. 387 dwellings) will take place in Southwold together with Reydon. The Draft Reydon neighbourhood plan policies interpret the strategy and policies of the local plan at a local level. The policies contained in the Draft Reydon neighbourhood plan are proposed to provide locally specific policy for the determination of planning applications in compliance with the local plan's strategy. It does not propose any additional site allocations.

4.4 A screening process considered each policy in the Local Plan and concluded that significant effects were likely and that an Appropriate Assessment was needed. The Appropriate Assessment subsequently considered the following themes - recreation pressure from new residential development, air quality from increased road traffic and biodiversity net gain. Mitigation measures were identified within the Appropriate Assessment and were incorporated within the Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on European wildlife sites within and in the vicinity of the (then) Waveney District.

4.5 The Council has subsequently produced a Recreational Avoidance and Mitigation Strategy⁴ and requires payment towards mitigation of significant effects from residential developments within 13km of the protected European sites.

5. Assessment of likely significant effects of the Reydon Neighbourhood Plan on European protected sites

5.1 Table 3 below considers each policy of the Reydon Neighbourhood Plan in relation to whether there is potential for a likely significant effect on protected European sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected sites. The policies are considered within the context of the Local Plan policies which they must be in general conformity with and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

4 <http://www.eastsuffolk.gov.uk/planning/s106/habitat-mitigation/>

Table 3: Likely significant effects of the Reydon Neighbourhood Plan

Policy	Assessment of potential impact on Natura 2000 sites possibly be affected	Likely significant effect identified	AA needed?	Natura 2000 sites that could
RNP1: Tenure Mix of Affordable Housing	This policy provides direction on how Affordable Housing should be provided. This policy reflects WLP8.2 of the local plan – the local plan HRA identified no likely significant effects from WLP8.2. RNP1 will not result in	None	None	No
RNP2: New Affordable Housing Within the Village	This policy directs affordable housing development to take place within the defined settlement boundary of Reydon wherever possible and seeks to avoid educational establishments being restricted from expanding in the future by such development. This policy will not enable additional development over and above that of the local plan and therefore will not	None	None	No
RNP3:				

Affordable Housing on the Boundary of the Settlement This policy permits small scale affordable housing development (up to around 25 dwellings) adjacent to the settlement boundary of Reydon subject to criteria. This policy is a minor extension to WLP8.6 of the local plan which allows similar development on the edge of villages or other rural settlements in the district (but not Reydon). The local plan HRA found no LSE' s in connection with WLP8.6 and it is not considered that this minor extension of the policy will result in any LSE' s. None None No

RNP4: Principal Residence Requirement This policy seeks all new dwellings to be restricted to use as a principal residence to help stop their use as holiday homes or second homes. This policy has no direct impacts on European sites and therefore no LSE' s have been identified. None None No

Policy Assessment of potential impact on Natura 2000 sites possibly be affected Likely significant effect identified AA needed? Natura 2000 sites that could

RNP5:

Maintaining Protection of the Countryside Around the Village This policy identifies valued parts of the countryside and provides protection to them from development unless criteria can be met. It also protects the remaining countryside from development unless certain circumstances are met. Some of the identified valued sites are European sites. The policy is considered to be compatible with policy in the NPPF and does not weaken this protection. This policy has no direct impacts on

European sites and therefore no LSE' s have been identified. None None No

RNP6:

Improving Public Rights of Way and Access to the Countryside from New Developments

This policy gives protection to existing public rights of way and supports improvements or extensions to the network. It requires new or extended routes to avoid disturbance to protected habitats. The policy is considered to incorporate sufficient protection to avoid LSE' s to protected sites. None None No

RNP7: Local Green Spaces This policy identifies areas to be designated as Local Green Spaces. This policy has no direct impacts on European sites and therefore no LSE' s have been identified. None None No

RNP8: Safe Access to and from New Developments This policy seeks to ensure that safe access is provided for all users of development. This policy has no direct impacts on European sites and therefore no LSE' s have been identified. None None No

RNP9: Safe Walking and Cycling Routes This policy supports provision of walking and cycling routes in new development. This policy has no direct impacts on European sites and therefore no LSE' s have been identified. None None No

Policy Assessment of potential impact on Natura 2000 sites possibly be affected Likely significant effect identified AA needed? Natura 2000 sites that could

RNP10: Reydon Neighbourhood Design Principles This policy applies design principles to new development which encourage gains to biodiversity. This policy has no direct impacts on European sites and therefore no LSE' s have been identified. None None No

6. Consultation Response

6.1 Natural England were consulted as part of the preparation of this statement. They have responded to say that they do not consider that there will be any likely significant effects on European sites from the Neighbourhood Plan. They have expressed the view that they would like to see the Neighbourhood Plan make reference to RAMS and the potential requirement for developments to carry out a project level HRA.

7. Summary and conclusions

7.1 The Reydon Neighbourhood Plan will provide policies which will be used for determining planning applications alongside the Local Plan. It includes policies with locally specific criteria to be used for the determination of planning applications within the Reydon Neighbourhood Plan area.

7.2 The Reydon Neighbourhood Plan has been prepared to be in general conformity with the relevant policies in the Local Plan and will not lead to likely significant effects on protected European sites.

Signed: Dated: 12/12/2019

Desi Reed
Planning Policy and Delivery Manager East Suffolk Council

Appendix 1: Sources of background information

- Habitats Regulations Assessment of the Waveney Local Plan (December 2018)
(<http://www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/>)

Appendix 2: Locations of European protected sites

RAMSAR

Special Areas of Conservation

Special Protection Areas

Appendix 3: Relevant European protected sites

Name	Qualifying Features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Waveney Local Plan)
Special Areas of Conservation	Alde-Ore & Butley Estuaries	H1130. Estuaries	
	H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats		
	H1330. Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)		The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:
			<ul style="list-style-type: none"> •the extent and distribution of qualifying natural habitats and habitats of the qualifying species •the structure and function (including typical species) of qualifying natural habitats •the structure and function of the habitats of the qualifying species •the supporting processes on which qualifying natural habitats and the habitats of qualifying species rely •the populations of each of the qualifying species •the distribution of
	qualifying species within the site		Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine)

Name	Qualifying Features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Waveney Local Plan)
The Broads	H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>		
	S1016 <i>Vertigo moulinsiana</i> : Desmoulin's whorl snail	H7230 Alkaline fens	
	H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt- laden soils (<i>Molinion caeruleae</i>)		
	H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>)		
	H7140 Transition mires and quaking bogs		
	H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp		
	H3150 Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i> -type vegetation	S1355	
	<i>Lutra lutra</i> : Otter		
	S1903 <i>Liparis loeselii</i> : Fen orchid	S4056 <i>Anisus vorticulus</i> : Little ramshorn whirlpool snail	
			Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
			The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats,
			The structure and function of the habitats of qualifying species,
			The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,
			The populations of qualifying species, and, The distribution of qualifying species

within the site. Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party

Benacre to Easton Bavents Lagoons H1150# Coastal lagoons, A195(B) *Sterna albifrons*: Little tern
 A021(B) *Botaurus stellaris*: Great bittern
 A081(B) *Circus aeruginosus*: Eurasian marsh harrier Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).

Name	Qualifying Features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations)
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Assessment for the Waveney Local Plan

	Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;		
	The extent and distribution of qualifying natural habitats,		
	The structure and function (including typical species) of qualifying natural habitats, and,		
	The supporting processes on which qualifying natural habitats rely.		

Minsmere to Walberswick Heaths and Marshes	H4030 European dry heaths H1210 Annual vegetation of drift lines		
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H1220 Perennial vegetation of stony banks			
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A052(B) <i>Anas crecca</i> : Eurasian teal			
--	--	--	--

A021(B) <i>Botaurus stellaris</i> : Great bittern			
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A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	A082(NB) <i>Circus cyaneus</i> : Hen harrier		
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A224(B) <i>Caprimulgus europaeus</i> : European nightjar			
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A056(B) <i>Anas clypeata</i> : Northern shoveler			
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A056(NB) <i>Anas clypeata</i> : Northern shoveler			
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A051(B) <i>Anas strepera</i> : Gadwall	A051(NB) <i>Anas strepera</i> : Gadwall	A132(B) <i>Recurvirostra avosetta</i> : Pied avocet	
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A195(B) <i>Sterna albifrons</i> : Little tern			
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A394(NB) <i>Anser albifrons</i> :			
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Greater white-fronted goose	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;		
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	The extent and distribution of qualifying natural habitats and habitats, The structure and function (including typical species) of qualifying natural habitats, and,		
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	The supporting processes on which qualifying natural habitats rely.	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)	
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Dew' s Ponds	S1166 <i>Triturus cristatus</i> : Great	Ensure that the	None identified
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Name	Qualifying Features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations)
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Assessment for the Waveney Local Plan

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

The extent and distribution of the habitats of qualifying species,

The structure and function of the habitats of qualifying species,

The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.

Special Protection Areas

Alde-Ore Estuary Avocet (*Recurvirostra avosetta*), Breeding

Avocet (*Recurvirostra avosetta*), Non-breeding

Lesser black-backed gull (*Larus fuscus*), Breeding

Little tern (*Sternula albifrons*), Breeding

Marsh harrier (*Circus aeruginosus*), Breeding Redshank (*Tringa totanus*), Non-breeding

Ruff (*Calidris pugnax*), Non-breeding

Sandwich tern (*Thalasseus*

sandvicensis), Breeding The objectives are to ensure that, subject to natural change, the

integrity of the site is maintained or restored as appropriate, and that the site contributes to

achieving the aims of the Wild Birds Directive, by maintaining or

restoring: •the extent and distribution of the habitats of the

qualifying features Hydrological changes, public access/disturbance, inappropriate coastal

management, coastal squeeze, inappropriate pest control, changes in species

distributions, invasive species, air pollution, fisheries

(commercial marine and estuarine)

Name	Qualifying Features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations)
------	---------------------	-------------------------	--

Assessment for the Waveney Local Plan

•the structure and function of the habitats of the qualifying features

•the supporting processes on which the habitats of the qualifying features rely

•the populations of each of the qualifying features

•the distribution of

qualifying features

within the site

Broadlands (also Ramsar site) H7210# Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*

S1016 *Vertigo moulinsiana*: Desmoulin's whorl snail H7230 Alkaline fens

H6410 *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)

H91E0# Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*)

H7140 Transition mires and quaking bogs

H3140 Hard oligo-mesotrophic waters with benthic vegetation of *Chara* spp

H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355

Lutra lutra: Otter

S1903 *Liparis loeselii*: Fen orchid S4056 *Anisus vorticulus*: Little ramshorn whirlpool snail

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

The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party

Name Qualifying Features Conservation Objectives Pressure and threats (as summarised in the Habitats Regulations

Assessment for the Waveney Local Plan

species rely,

The populations of qualifying species, and, The distribution of qualifying species within the site.

Benacre to Easton Bavents H1150# Coastal lagoons, A195(B) *Sterna albifrons*: Little tern

A021(B) *Botaurus stellaris*: Great bittern

A081(B) *Circus aeruginosus*: Eurasian marsh harrier Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely,

The population of each of the qualifying features, and,

The distribution of the qualifying features within the site. Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).

Minsmere to Walberswick (also

Ramsar site) H4030 European dry heaths H1210 Annual vegetation of drift lines

H1220 Perennial vegetation of stony banks

A052(B) *Anas crecca*: Eurasian teal

A021(B) *Botaurus stellaris*: Great

bittern Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of

the Wild Birds Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial

Name Qualifying Features Conservation Objectives Pressure and threats (as summarised in the Habitats Regulations

Assessment for the Waveney Local Plan

A081(B) *Circus aeruginosus*: Eurasian marsh harrier A082(NB) *Circus cyaneus*: Hen harrier

A224(B) *Caprimulgus europaeus*: European nightjar

A056(B) *Anas clypeata*: Northern shoveler

A056(NB) *Anas clypeata*: Northern shoveler

A051(B) *Anas strepera*: Gadwall A051(NB) *Anas strepera*: Gadwall A132(B) *Recurvirostra*

avosetta: Pied avocet

A195(B) *Sterna albifrons*: Little tern

A394(NB) *Anser albifrons*: Greater white-fronted goose Directive, by maintaining or restoring;

The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely,

The population of each of the qualifying features, and,

The distribution of the qualifying features within the site. marine and estuarine)

Outer Thames Estuary A001 (W) *Gavia stellata* Red-throated Diver

A195 (B) *Sterna hirundo* Common Tern

A193 (B) *Sternula albifrons* Little Tern Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features

Name Qualifying Features Conservation Objectives Pressure and threats (as summarised in the Habitats Regulations

Assessment for the Waveney Local Plan

rely,

The population of each of the qualifying features, and,

The distribution of the qualifying features within the site.

Sandlings A224(B) *Caprimulgus europaeus*: European nightjar

A246(B) *Lullula arborea*: Woodlark Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features

within the site. Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance,

Ramsar Sites

Alde-Ore Avocet (*Recurvirostra avosetta*), The objectives are to N/A

Estuary Breeding ensure that, subject to

Avocet (*Recurvirostra avosetta*), natural change, the

Non-breeding integrity of the site is

Lesser black-backed gull (*Larus* maintained or

fuscus), Breeding restored as

Little tern (*Sternula albifrons*), appropriate, and that

Breeding the site contributes to

Name Qualifying Features Conservation Objectives Pressure and threats (as summarised in the Habitats Regulations

Assessment for the Waveney Local Plan

Marsh harrier (*Circus* achieving the aims of

aeruginosus), Breeding the Wild Birds

Redshank (*Tringa totanus*), Non- Directive, by

breeding maintaining or
 Ruff (*Calidris pugnax*), Non-restoring: •the extent
 breeding and distribution of the
 Sandwich tern (*Thalasseus habitats of the*
sandvicensis), Breeding qualifying features
 •the structure and
 function of the
 habitats of the
 qualifying features
 •the supporting
 processes on which
 the habitats of the
 qualifying features rely
 •the populations of
 each of the qualifying
 features
 •the distribution of
 qualifying features
 within the site

Broadland Ramsar Criterion 1

The site contains a mosaic of marine, freshwater, marshland and associated habitats, complete with transition areas in between. Contains the largest continuous stand of reedbeds in England and Wales and rare transition in grazing marsh ditch plants from brackish to fresh water. Natural England considers the Conservation Advice packages for the overlapping European Marine Site designations to be, in most cases, sufficient to support the management of the Ramsar interests. N/A

Ramsar criterion 2

This site supports nine nationally scarce plants and at least 26 red data book invertebrates. Supports a population of the mollusc *Vertigo angustior* (Habitats Directive Annex II; British Red Data Book Endangered), recently discovered on the Blyth estuary river walls.

Minsmere- Ramsar Criterion 1 Natural England N/A

Name Qualifying Features Conservation Objectives Pressure and threats (as summarised in the Habitats Regulations

Assessment for the Waveney Local Plan

Walberswick The site contains a mosaic of marine, freshwater, marshland and associated habitats, complete with transition areas in between. Contains the largest continuous stand of reedbeds in England and Wales and rare transition in grazing marsh ditch plants from brackish to fresh water.

Ramsar criterion 2

This site supports nine nationally scarce plants and at least 26 red data book invertebrates.

Supports a population of the mollusc *Vertigo angustior* (Habitats Directive Annex II; British Red Data Book Endangered), recently discovered on the Blyth estuary river walls.

considers the Conservation Advice packages for the overlapping European Marine Site designations to be, in most cases, sufficient to support the management of the Ramsar interests.

Appendix 4: Natural England Consultation Response

From: Shapland, Francesca

Sent: 01 December 2019 15:31

To: Dickon Povey <Dickon.Povey@eastsoffolk.gov.uk>
Subject: Reydon Neighbourhood Plan HRA

Dear Dickon

I can confirm that Natural England does not consider that the Reydon Neighbourhood plan is likely to have a significant effect on designated sites. Therefore we do not recommend you carry out an Appropriate Assessment. However we would like clarification within the report regarding RAMS and the need for any developments to have a project level HRA.

Regards, Francesca Francesca Shapland

Lead Adviser, Planning & Conservation Suffolk Coast, Norfolk & Suffolk Team Tel: 0208 0265792

APPENDIX THREE: UPDATED STRATEGIC ENVIRONMENT ASSESSMENT SCREENING DETERMINATION BY EAST SUFFOLK COUNCIL, FEBRUARY 2020

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1. Introduction

In some circumstances a Neighbourhood Plan could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require Strategic Environmental Assessment.

One of the basic conditions that will be tested by the independent examiner is whether the making of the Plan is compatible with European Union Obligations. Whether a Neighbourhood Plan requires a strategic environmental assessment, and the level of detail needed, will depend on what is proposed in the draft Neighbourhood Plan.

This screening report is designed to test whether or not the contents of the Reydon Neighbourhood Plan Final (Submission) Draft November 2019 (the draft NP) requires a full Strategic Environmental Assessment (SEA). The legislative background below outlines the regulations that require the use of this screening exercise. Section 4 provides a screening assessment of the likely significant effects of the Plan and the need for a full SEA.

Minor changes to the Neighbourhood Plan have been made since the Plan had been screened for SEA. For this reason, the Neighbourhood Plan has been re-screened for SEA, which has concluded, as the initial SEA Screening had, that a full SEA is not required. The updated statutory consultee responses are appended to this SEA Screening determination.

2. Legislative Background

The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC ‘on the assessment of the effects of certain plans and programmes on the Environment’. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended, including through EU exit legislation), or SEA Regulations.

The SEA Regulations include a definition of ‘plans and programmes’ to which the regulations apply, and which programmes are required by legislative, regulatory or administrative provisions.

A Neighbourhood Plan is not required by legislative, regulatory or administrative provisions. It is an optional process under the provision of the Town and Country Planning Act 1990 (subsequently amended by the Localism Act 2011). However, once a Neighbourhood Plan is ‘made’ it becomes part of the statutory development plan for the area to which it applies. As such, it therefore forms part of a plan that is required by legislative provisions.

3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

The Neighbourhood Plan triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the ‘responsible authority’ being the authority by which or on whose behalf the plan is prepared. Before making a determination, the responsible authority shall: -

- a) Take into account the criteria specified in Schedule 1 to these Regulations (EIA Regulations); and
- b) Consult the consultation bodies.

The consultation bodies are defined in section 4 of the SEA Regulations (as amended, including through EU exit legislation). As the responsible authority, East Suffolk Council (formerly Waveney and Suffolk Coastal District Councils until 1st April 2019) has sought opinions from the statutory consultation bodies: Historic England; the Environment Agency; and Natural England. Their responses are in the Appendices to this screening determination.

Schedule 1 of the EIA Regulations sets out the criteria for determining likely significant effects as follows:

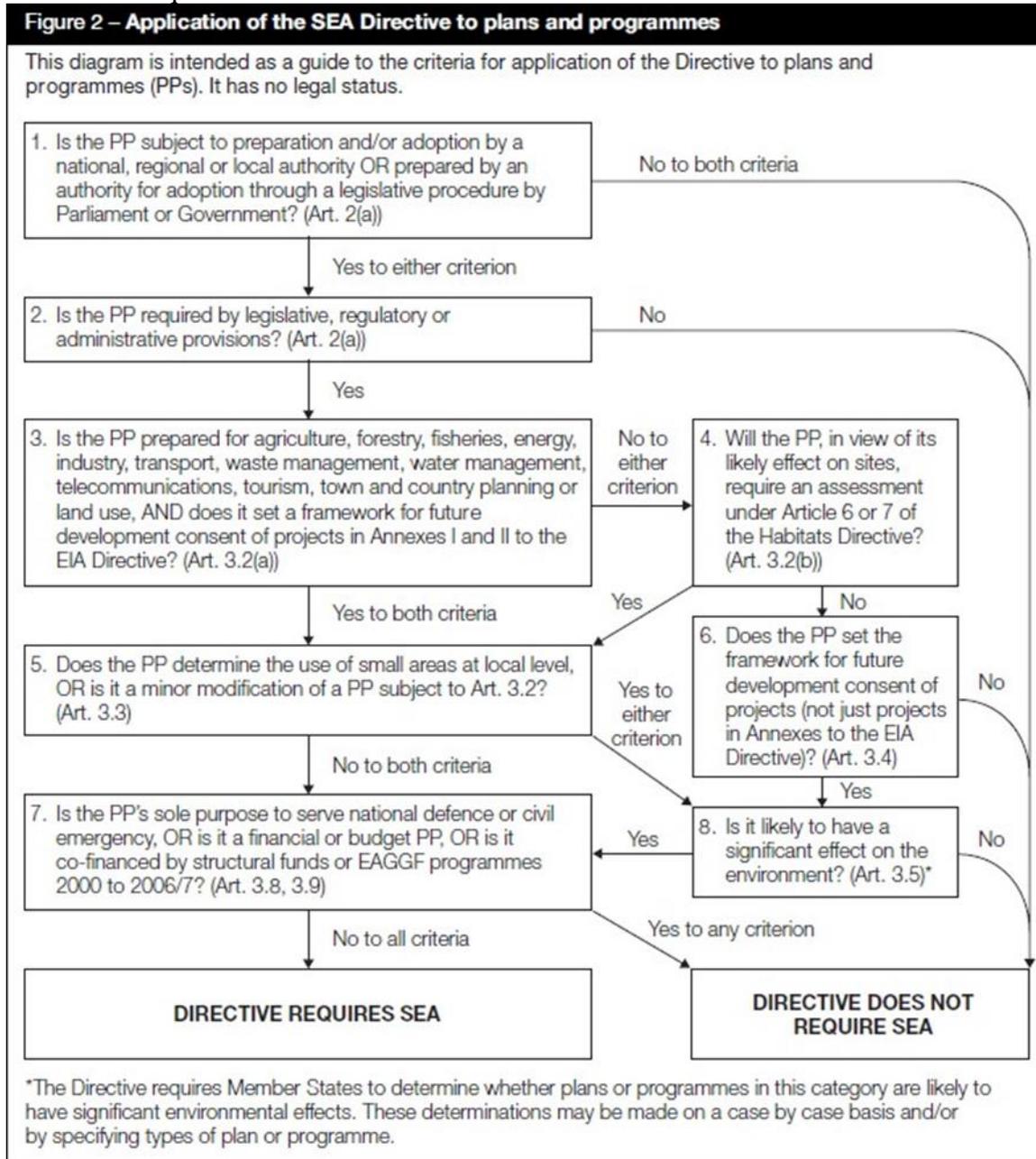
1. The characteristics of plans and programmes, having regard, in particular, to:
 - The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
 - The degree to which 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 trans boundary 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:
 - o special natural characteristics or cultural heritage;

- o exceeded environmental quality standards or limit values;
- o intensive land-use; and
- o the effects on areas or landscapes which have a recognised national, community or international protection status.

Source: Annex 2 of SEA Directive 2001/42/EC

4. Assessment

The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: A Practical Guide to the Strategic Environmental Assessment Directive (2005)

The following assessment applies the questions from the preceding diagram. The answers determine whether the Neighbourhood Plan will require a full Strategic Environmental Assessment.

1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))

Yes. The preparation and adoption of the Neighbourhood Plan is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The Neighbourhood Plan is being prepared by Reydon Parish Council as the relevant body and, subject to successful completion of the relevant processes as set out in the Neighbourhood Planning (General) Regulations 2012 (as amended) and the Neighbourhood Planning (Referendums) Regulations 2012 (as amended), will be made by East Suffolk Council.

2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))

No. A Neighbourhood Development Plan is not required by legislative, regulatory or administrative provisions. It is an optional process under the Town and Country Planning Act 1990 (amended by the Localism Act 2011). However, once a Neighbourhood Plan is made it becomes part of the statutory development plan for the area to which it applies. As such it forms part of a plan that is required by legislative provisions.

3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))

Yes. The Neighbourhood Plan falls within the category town and country planning and relates to the local (parish) level. The designated neighbourhood plan area includes all of Reydon Parish and some small elements of the neighbouring Wangford with Henham Parish, all within the East Suffolk Council area. The current draft NP contains ten numbered policies. None of these allocate specific sites for development. Policy RNP 3 allows for small scale Affordable Housing developments to take place adjacent to the Settlement Boundary of Reydon (subject to criteria).

Policy support in the draft NP is provided for: development including Affordable Housing; Small-scale Affordable Housing development adjacent to the Settlement Boundary; new dwellings where they are used as a ‘principal residence’; protecting areas of the countryside defined on the policy map; improving footpath access to the countryside; designation of local green spaces; safe access and walking and cycling routes for new development; and design principles. The draft NP policies have their basis in strategic policies set out in the East Suffolk - Waveney Local Plan (the local plan) which was adopted in March 2019.

The local plan identifies Reydon, together with neighbouring Southwold, as a location for growth and allocates 4% of growth here. Sites are allocated for housing; existing employment; and open space. The draft NP’s Reydon Nature Designations map shows the neighbourhood plan area lies within the Suffolk Coast and Heaths Area of Outstanding

Natural Beauty and partly within Heritage Coast. The map also shows that the neighbourhood plan area contains Ancient Woodland; County Wildlife Site; National Nature Reserve; Ramsar site; Site of Special Scientific Interest; Special Area of Conservation; and Special Protection Area.

The neighbourhood plan makes no change to these strategic policies and is not considered to impact on other strategic designations. The local plan has been subject to both sustainability appraisal (including strategic environmental assessment) and Appropriate Assessment under the Habitat Regulations.

The Local Plan including supporting documents and policy maps can be viewed here:
<http://www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/>.

4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))

No. The draft NP does not allocate any land for built development. The Local Plan, to which this Neighbourhood Plan must be in general conformity, has already been subject to Appropriate Assessment under the Habitats Regulations. A separate Habitats Regulations Assessment Screening Statement has been produced for the Neighbourhood Plan and this concludes that an Appropriate Assessment will not be required. Policy RNP 3 allows for small scale Affordable Housing development to take place adjacent to the settlement boundary, but it is not considered that this would result in significant environmental effects.

5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)

Yes. The draft neighbourhood plan relates solely to the neighbourhood plan area. This is marginally larger than the administrative Parish boundary. The policies do not relate to the allocation of land for built development. The local plan sets out settlement boundaries around Reydon within which residential and employment development is directed. As mentioned in 3., there are no specific sites allocated for development in the neighbourhood area. Policy RNP 3 allows for small scale Affordable Housing development to take place adjacent to the settlement boundary. This is considered to be a modification from the local plan of such a small order that it would not result in any significant environmental effects. Policy RNP 2 and the Policies in the local plan would allow for infilling and residential development within the defined settlement boundaries. Policies also allow opportunities for development outside of the settlement boundaries but this can take place only when specific criteria are met. Development may also come forward as agricultural 'permitted development' .

6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3(4))

No. The draft NP does not allocate land for new built development. The draft NP is consistent with the local plan which has been subject to Sustainability Appraisal and Habitats Regulations Assessment.

7. Is the PP' s sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)

No. Not applicable.

8. Is it likely to have a significant effect on the environment? (Art. 3(5))

No. The plan does not allocate land for built development and is not considered to result in significant effects on the environment.

5. Conclusion

The Reydon Neighbourhood Plan Final (Submission) Draft November 2019 does not allocate land for built development and applies to a localised area. The policies reflect and implement strategic policies in the local plan to such a degree as to not result in any significant environmental effects. The local plan has been subject to Sustainability Appraisal including Strategic Environmental Assessment and Appropriate Assessment under the Habitats Regulations Assessment. It is considered by East Suffolk Council, in consultation with the Environment Agency, Historic England and Natural England, that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Reydon Neighbourhood Plan to ensure compliance with EU obligations.

Signed: Dated: 11th February 2020
Desi Reed
Planning Policy and Delivery Manager East Suffolk Council

Appendix 1 Response from Environment Agency

Thank you for re-consulting us on the amended SEA screening opinion for the Reydon Neighbourhood Plan.

We have reviewed the screening opinion as submitted and can confirm that we do not disagree with the outcome that an SEA has been screened out under the constraints that fall under our remit.

Appendix 2 Response from Historic England

Thank you for your email of 20 February 2019 regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore, we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Reydon Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report indicates that the Council considers that the Reydon Neighbourhood Plan will not have any significant effects on the historic environment.

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

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

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

We should like to stress that this opinion is based on the information provided by you with your correspondence dated 20 February 2019. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment.

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

Appendix 3 Response from Natural England

Thank you for your consultation on the above dated 17 January 2020

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

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

Screening Request: Strategic Environmental Assessment

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

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Annex 1 -Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic website(1) will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves,

National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)(2).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)(3). Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)(4).

There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic(5) website and also from the LandIS website(6), which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework(7) sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance(8) sets out supporting guidance. Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness. If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here⁹), such as Sites of Special Scientific Interest or Ancient woodland¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here¹¹) or protected species. To help you do this, Natural England has produced advice here¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication *Agricultural Land Classification: protecting the best and most versatile agricultural land*¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.

- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Links:

- 1 <http://magic.defra.gov.uk/>
- 2 <http://www.nbn-nfbr.org.uk/nfbr.php>
- 3 <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>
- 4 <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>
- 5 <http://magic.defra.gov.uk/>
- 6 <http://www.landis.org.uk/index.cfm>
- 7 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 8 <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>
- 9 <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>
- 10 <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>
- 11 <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>
- 12 <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>
- 13 <http://publications.naturalengland.org.uk/publication/35012>
- 14 <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>