

Habitats Regulations Assessment of Greater Norwich Local Plan – Addendum for Main Modifications

for

Greater Norwich Development Partnership

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Contents

Non-technical summary	1
1 Introduction	2
1.1 The Examination and Main Modifications	2
1.2 The purpose of this Addendum	2
1.3 Habitats Regulations Assessment process	2
1.4 Why is Appropriate Assessment required?	3
1.5 European sites	4
1.6 Iteration and consultation	5
2 Main modifications – Strategy	6
2.1 Assessment of Main Modifications	6
2.2 Conclusion of Main modifications – Strategy	7
3 Main modifications – Sites	8
3.1 Assessment of Main Modifications	8
3.2 Conclusion of Main modifications – Sites	9
4 Conclusion	10

Non-technical summary

The Landscape Partnership was commissioned by the Greater Norwich Development Partnership to undertake a Habitat Regulations Assessment (HRA) of the Greater Norwich Local Plan (GNLP). This report is an assessment of the Main Modifications of the Proposed Submission Reg 19 stage of the emerging Greater Norwich Local Plan, encompassing Norwich City, Broadland District (excluding the Broads Authority area), and South Norfolk District.

This addendum considers Main Modifications to the Greater Norwich Local Plan which are published with this Addendum in October 2023. It is to be read together with

- The GNLP Habitats Regulations Assessment (March 2023), which was an updated HRA to include an assessment of a proposed modification to policy 2 regarding Nutrient Neutrality. The HRA was also updated to reflect the coming into use of the Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy.
- The GNLP Habitats Regulations Assessment (May 2023) which assesses the proposals for Gypsy and Traveller sites which came forward as a separate Focussed Consultation.

Much of the content of those two Habitats Regulations Assessment is not repeated here, to avoid duplication and for simplicity. Please refer to those documents for further information. This Addendum points out where assessment of Main Modifications remain consistent.

The report was written by Nick Sibbett CEcol MCIEEM CEnv CMLI and reviewed by Dr Jo Parmenter CEcol MCIEEM CEnv MIEMA.

There are 20 Main Modifications to strategic policy, and 137 Main Modifications to sites policy.

Modification to Policy 3 safeguards European sites from in-combination effects of housing growth such as recreational impact, and nutrient pollution from waste water. There are a number of minor modifications proposed to the policy so its wording is more consistent with the Habitats Regulations. These minor modifications do not alter policy but make it more robust.

Main Modifications to Policies regarding strategy other than Policy 3 and sites do not result in any change from the previous Habitats Regulations Assessment of the whole plan (March 2023) and Gypsy and Traveller sites (May 2023). None of the modifications result in any change to impacts on European sites, nor any change to mitigation already embedded in the Local Plan.

It is ascertained that the Main Modifications to the Greater Norwich Local Plan regulation 19 Submission Draft would have no adverse affect upon the integrity of any European site acting alone.

Local Planning Authorities throughout Norfolk have implemented the GIRAMS scheme to mitigate for impacts on European site. This scheme ensures that in-combination effects of residential development would not have an adverse impact on the integrity of any European site. Nutrient Neutrality mitigation schemes are being prepared to assist developers should they need assistance in meeting Policy 3 Main modifications regarding nutrients entering European sites. No other plans or projects are known to have arisen that may provide other in-combination effects.

It is concluded that there would be no adverse affect upon the integrity of any European site from the Greater Norwich Local Plan, with its Main Modifications, alone or in combination with other plans or projects.

1 Introduction

1.1 The Examination and Main Modifications

1.1.1 Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council and Broads Authority, are working together to prepare the Greater Norwich Local Plan (GNLP). This will replace the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), which was adopted in March 2011, and other more recently adopted 'lower tier' Development Plan Documents. The three local Planning Authorities have come together to form the Greater Norwich Development Partnership to deliver the GNLP.

1.1.2 The Regulation 19 Local Plan has been subject to Examination. The scheduled hearing sessions on the Local Plan have now been completed. There are a number of main modifications required by the Inspectors to the Plan in order for them to consider it sound and legally compliant, without prejudice to their final conclusions on the Plan as a whole. The Main Modifications are subject to consultation, and that consultation is informed by this Habitats Regulations Assessment addendum.

1.2 The purpose of this Addendum

1.2.1 This addendum considers Main Modifications to the Greater Norwich Local Plan which are published together in October 2023. It is to be read together with

- The GNLP Habitats Regulations Assessment (March 2023), which was an updated HRA to include an assessment of a proposed modification to policy 2 regarding Nutrient Neutrality. The HRA was also updated to reflect the coming into use of the Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy.
- The GNLP Habitats Regulations Assessment (May 2023) which assesses the proposals for Gypsy and Traveller sites which came forward as a separate Focussed Consultation.

1.2.2 Much of the content of those two Habitats Regulations Assessment is not repeated here, to avoid duplication and for simplicity. Please refer to those documents for further information. This Addendum points out where assessment of Main Modifications remain consistent with the Habitat Regulations Assessment above, or where an inconsistency is introduced. If an inconsistency is found, a new assessment, and any mitigation or advice on how to ascertain no adverse on integrity of any European site is provided.

1.3 Habitats Regulations Assessment process

1.3.1 A Habitats Regulations Assessment is a step-by-step process which is undertaken in order to determine whether a project or plan will have a likely significant effect (LSE) upon a European site. Before a competent authority can authorise a proposal, they must carry out an Appropriate Assessment of a plan or project in line with procedure detailed in the Habitats Regulations. The whole procedure is called a Habitats Regulations Assessment, with the Appropriate Assessment being part of one of four stages necessary to complete an HRA. The results of the HRA are intended to influence the decision of the competent authority when considering whether or not to authorise a proposal.

Stages of Habitats Regulations Assessment

1.3.2 *Stage One of the HRA is 'Screening'.* Plans or projects will be investigated for their potential to have a likely significant effect upon a European site. If the plan is likely to have a significant effect, and is not connected to the management of the site, an Appropriate Assessment is required. Proposals that are found not likely to have a significant effect upon a European site will be 'screened out' at this stage and no further investigation will be required.

1.3.3 *Stage Two of the HRA is the 'Appropriate Assessment and the Integrity Test'.* The plan-making authority must undertake an Appropriate Assessment which seeks to provide an objective and scientific assessment of how the proposed Local Plan may affect the qualifying features and conservation strategies of European sites. The whole plan must be assessed, but a 'scoping'

exercise helps decide which parts of the plan have potential to give rise to significant effects and therefore where assessment should be prioritised. Natural England is an important consultee in this process and the public may also be consulted.

1.3.4 The UK Government accepts the definition for the ‘integrity’ of a site as *‘the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which the site is (or will be) designated.’* Other factors may also be used to describe the ‘integrity’ of a site. The plan-making authority must ascertain, using scientific evidence and a precautionary approach, that the plan will not adversely affect the integrity of a European site, prior to adopting the plan. Information provided in the Appropriate Assessment will be used when considering the Integrity test.

1.3.5 *Stage Three of the HRA is ‘Imperative reasons of overriding public interest and compensatory measures’.* If the Competent Authority determines that there are imperative reasons of overriding public interest notwithstanding adverse impacts upon the integrity of the European site, and there are no alternatives, the plan may be given effect. In this case, the plan-making authority must notify the Secretary of State at least 21 days before authorisation; the Secretary of State may give a direction prohibiting the plan from being given effect. It is unlikely that this stage would be reached.

Consultations

1.3.6 Natural England is a statutory consultee, and so should be consulted at the draft and final plan stage. The public may also be consulted if it is considered appropriate, for example if the appropriate assessment is likely to result in significant changes to the plan. In practice, Natural England has been consulted upon previous stages of the Local Plan and HRA, and the HRA has been included in previous public consultations of the emerging Local Plan.

Iterations and revision

1.3.7 The process is iterative; the conclusions of an earlier assessment may result in changes to the plan, and so a revision of the assessment would be required. If the revised assessment suggests further plan changes, the iteration will continue.

1.3.8 Iterative revisions typically continue until it can be ascertained that the plan will not have an adverse effect on the integrity of any European site.

1.3.9 There are further provisions for rare cases where over-riding public interest may mean that a land-use plan may be put into effect, notwithstanding a negative assessment, where there are no alternatives to development, but these provisions are not expected to be routinely used.

Guidance and good practice

1.3.10 This report has taken account of published guidance and good practice. A key source of information which summaries of legislative requirements, good practice guidance and case law (Tyldesley and Chapman 2013, regularly updated)¹ has been used during the writing of this report.

1.4 Why is Appropriate Assessment required?

1.4.1 The appropriate assessment process is required under the Conservation of Habitats and Species Regulations 2017 (as amended). Regulation 105 states that

(1) 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,

¹ Tyldesley, D., & Chapman, C. (2013). *The Habitats Regulations Assessment Handbook*. DTA Publications Ltd

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.

(2) The plan-making authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specify.

(3) The plan-making authority must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate.

(4) In the light of the conclusions of the assessment, and subject to regulation 107, the plan-making authority must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

(5) A plan-making authority must provide such information as the appropriate authority may reasonably require for the purposes of the discharge by the appropriate authority of the obligations under this chapter.

(6) This regulation does not apply in relation to a site which is—

(a) a European site by reason of regulation 8(1)(c); or

(b) a European offshore marine site by reason of regulation 18(c) of the Offshore Marine Conservation Regulations (site protected in accordance with Article 5(4) of the Habitats Directive.

1.4.2 The plan-making authorities, as defined under the Regulations, are Broadland District Council, Norwich City Council and South Norfolk District Council and the appropriate nature conservation body is Natural England.

1.4.3 This report is the assessment carried out on behalf of these three local authorities under Regulation 105. At Main Modification stage, this report determines any changes required so that the GNLP may progress to being adopted in due course.

1.5 European sites

1.5.1 European sites (also known as Natura 2000/N2K sites) are sites that have been classified or designated by Defra/Welsh Ministers or Natural England/Natural Resources Wales, as Special Protection Areas (SPA) for those sites where birds are the special interest feature, and Special Areas of Conservation (SAC) where the habitats or species (other than birds) are the reason for designation.

1.5.2 Wetlands of International Importance, designated under the Ramsar Convention, are not European sites. There may often be considerable overlap between the special interest features and boundaries of Ramsar sites, with European sites. However, for the purposes of planning and development, Government policy in the National Planning Policy Framework states that Ramsar sites should be treated equally/in the same way as European sites. The same applies for sites under consideration for designation including potential Special Protection Area (pSPA), Site of Community Importance (SCI), Candidate Special Area of Conservation (cSAC) and proposed Ramsar sites. In summary, although Appropriate Assessment only legally applies to European sites, National Planning Policy provides further obligations to ensure that all those sites previously mentioned are subject to assessment. Therefore, for the purposes of this report, the term 'European site(s)' refers to all sites under assessment.

1.5.3 As the interest features of the Ramsar sites are usually very similar to the interest features of the SPA and / or SAC designations, both geographically and ecologically, the assessment below, for clarity does not always repeat Ramsar site names. The assessment does however consider Ramsar sites fully, and if an assessment for a Ramsar site was found to differ from that for the respective SPA / SAC, this would be clearly identified.

1.5.4 European Marine Site (EMS) is a term that is often used for a SPA or SAC that includes marine components (i.e. land/habitats up to 12 nautical miles out to sea and below the Mean High Water Mark). A European Marine Site does not have a statutory designation of its own but is designated for the same reasons as the relevant SPA or SAC, and because of this they are not always listed as a site in their own right, to save duplication. For the purpose of this document, an EMS is referred to as an Inshore SPA (or SAC) with Marine Components and it will be made clear if an SPA/SAC has marine components.

1.6 Iteration and consultation

1.6.1 An interim Habitats Regulations Assessment (HRA)² was published in January 2018. It is available on Greater Norwich Development Partnership's website³. It identifies in detail how internationally designated ecological habitats and wildlife sites in the wider area, including the Broads and the Norfolk coast, would be potentially impacted by recreational pressures likely to be generated by growth in Greater Norwich. It looked at 22 strategic growth options.

1.6.2 This report was issued to stakeholders, and a meeting was held with stakeholders on 3rd April 2018. Attendees were John Hiskett (Norfolk Wildlife Trust) and Andrea Kelly (Broads Authority) with Nick Sibbett (The Landscape Partnership (TLP)) and Paul Harris (Broadland District Council) representing Greater Norwich Development Partnership.

1.6.3 A second stakeholder meeting was held on 28th March 2019. Attendees were Nick Sibbett (TLP, for Greater Norwich Development Partnership), Paul Harris (Broadland District Council, for Greater Norwich Development Partnership), Mike Jones (Norfolk Wildlife Trust), Kate Warwick (Environment Agency), Louise Oliver (Natural England), and Philip Pearson (RSPB).

1.6.4 Anglian Water representatives were unable to attend the stakeholder meetings but provided advice by email.

1.6.5 A Habitats Regulations Assessment for the Regulation 18 Draft Plan dated December 2019 was published in January 2020. It was open for public consultation with the draft Local Plan from 29 January - 16 March 2020. Comments on the HRA were received from Natural England and Norfolk Wildlife Trust. Comments on the Local Plan relating to HRA issues were also received from RSPB. Concerns were expressed on a number of topics such as whether the Local Plan policies were strong enough to prevent harm to European sites, over-reliance on studies not yet completed including Water Cycle Study and Green Infrastructure Recreation Avoidance Strategy, and impact of the Norwich Western Link Road.

1.6.6 A Habitats Regulations Assessment for the Regulation 19 Submission Draft Plan dated December 2020 was published in February 2021. It was open for public consultation with the Proposed Submission Draft Local Plan from 1st February 2021 – 22nd March 2021. At that time the Habitats Regulations identified that the Water Cycle Study and GIRAMS were in draft stage. The previous version (July 2021) of the HRA was submitted to the Secretary of State as part of the Examination in Public of the regulation 19 Local Plan submission draft.

1.6.7 In March 2023, a revised Habitats Regulations Assessment was provided, which assessed a proposed modification to policy 2. The HRA was also updated to reflect the coming into use of the Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy.

1.6.8 In May 2023, a Habitats Regulations Assessment was provided to assess the proposals for Gypsy and Traveller sites which came forward as a separate Focussed Consultation in 2023.

1.6.9 This Addendum assesses the Main Modifications to the Greater Norwich Local Plan required by the Inspectors after Examination so they can consider it sound and legally compliant, without prejudice to their final conclusion on the plan as a whole.

² Interim Habitats Regulations Assessment of Greater Norwich Local Plan Issues and Options stage, The Landscape Partnership, December 2017

³ https://gnlp.jdi-consult.net/documents/pdfs_14/reg.18_gnlp_interim_hra.pdf

2 Main modifications – Strategy

2.1 Assessment of Main Modifications

2.1.1 There are 20 main modifications to strategy of the Greater Norwich Local Plan, which are numbered MM1 – MM20. These are assessed in the table below.

Main modification	Brief summary of Main Modification	Implications for Habitats Regulations Assessment
MM1	Housing need changes from a target to a plan requirement	No change to any impact on a European site
MM2	Table 6 is amended to reflect completions in recent years and reduces the forecast supply	The reduction in forecast supply means that recreational impact and nutrient input will impact European sites. Less mitigation would be needed under GIRAMS and Nutrient Neutrality. Overall, there would be no changes to impact on European sites from this policy.
MM3	Amendments to paragraph 179 to be consistent with MM2	No implications in addition to MM2.
MM4	Review of local plan	No change to any impact on a European site
MM5	Revision to table 7 – reductions in housing growth for Norwich urban area, main towns and village clusters; slight increase in housing growth for key service centres, windfalls and policy 7.5 and small sites	The net reduction impacts are similar to MM2. There are no implications for the locational changes to housing growth.
MM6	Change to housing growth locations map	No implications as per MM5
MM7	Amendments to policy 1.	The reduction in forecast supply means that recreational impact and nutrient input will impact European sites. Less mitigation would be needed under GIRAMS and Nutrient Neutrality. Overall, there would be no changes to impact on European sites from this policy. There are no implications for the locational changes to housing growth.
MM8	Amendments to policy 2	In March 2023, under document reference G4.1, the Greater Norwich Development Partnership proposed a modification to policy 2 regarding Nutrient Neutrality. This is now in Policy 3.
MM9	Amendments to policy 3	<p>Policy 3 includes mitigation for impacts of residential development on European sites, including payments towards measures at European sites, provision of green infrastructure, and nutrient neutrality. There are a number of minor amendments needed to the policy so its wording is more consistent with the Habitats Regulations, as describe below.</p> <p>The policy refers to Regulation 62 of the Habitats Regulations, whereas it should refer to Regulation 64 (tests after determining an adverse affect on integrity).</p> <p>The paragraph beginning '<i>Any development that would...</i>' should refer to adverse affect, not adverse effect, to be consistent with the Habitat Regulations terminology. This paragraph would be better placed at the end of the policy because it</p>

Main modification	Brief summary of Main Modification	Implications for Habitats Regulations Assessment
		<p>applied to both the recreational issues and the water issues, as well as any other development.</p> <p>The last bullet point of the policy should omit the last four words, where it refers to the integrity of only those sites in an unfavourable condition. If sites are or become in favourable condition, it would still be necessary to provide evidence that proposals would not adversely affect the integrity of sites in favourable condition.</p>
MM10	Amendments to policy 4 Strategic Infrastructure	There is no change to impacts on any European site. Policy 3 provides safeguard for European sites.
MM11	Amendments to Policy 5 Homes.	Policy regarding affordable homes, space standards, accessible and specialist housing, student accommodation and self-build housing have no implications for European sites. Allocations for Gypsy and Traveller pitches have been assessed in a separate HRA (May 2023). Policy for additional windfall pitches and transit pitches are covered by Policy 3.
MM12	Amendments to Policy 6 The Economy	No change to any impact on a European site
MM13	Amendments to Policy 7.1 Norwich Urban Area including the fringe parishes	The amendments add more detail to that modified in MM1 – MM6 and have no additional implications
MM14	Amendments to Policy 7.2 The main towns	The amendments add more detail to that modified in MM1 – MM6 and have no additional implications
MM15	Amendments to Policy 7.3 The key service centres	The amendments add more detail to that modified in MM1 – MM6 and have no additional implications
MM16	Amendments to Policy 7.4 Village clusters	The amendments add more detail to that modified in MM1 – MM6 and have no additional implications
MM17	Amendments to Policy 7.5 Small scale windfall development	The amendments add more detail to that modified in MM1 – MM6 and have no additional implications
MM18	Deletion of Policy 7.6 New Settlements	No change to any impact on a European site
MM19	Monitoring Framework supplied as separate document rather than an appendix	No implications
MM20	Appendix 6 deleted and separate document provided.	No implications

2.2 Conclusion of Main modifications – Strategy

2.2.1 Modification to Policy 3 safeguards European sites from in-combination effects of housing growth such as recreational impact, and nutrient pollution from waste water. There are a number of minor modifications needed to the policy so its wording is more consistent with the Habitats Regulations. These minor modifications do not alter policy but make it more robust; they are described in the table above.

3 Main modifications – Sites

3.1 Assessment of Main Modifications

3.1.1 There are 135 main modifications to sites, numbered MM21 – MM157. These are assessed in the tables below. To reduce the length of the table, modifications are grouped together rather than listing each one separately. Each Main Modification was nonetheless considered individually.

Main modification	Brief summary of Main Modification	Implications for Habitats Regulations Assessment
MM21	Better presentation of policy	No implications
MM22 – MM90	Modifications to policies / sites in Norwich and surrounds	No implications
MM91 – MM102	Modifications to policies / sites in Main towns	No implications
MM103 – MM119	Modifications to policies / sites in Key Service Centres	No implications
MM120 – MM147	Modification to policies / sites in Broadland Village clusters	No implications
MM148	Modification to South Norfolk Villages non-residential sites – Policy BKE3	No implications
MM149	Deletion of Costessey Contingency Site	The assessment of this becomes redundant; there is no likely significant effect on any European sites arising from the deletion of the site
MM150	Policy GNLP5004R	The Gypsy and Traveller site was previously assessed in May 2023, with 4 pitches assessed then compared to 2 pitches in the policy. There are no changes to the assessment in the GNLP Habitats Regulations Assessment (May 2023) which assessed proposals for Gypsy and Traveller sites, including this site.
MM151	Policy GNLP5022	There are no changes to the assessment in the GNLP Habitats Regulations Assessment (May 2023) which assessed proposals for Gypsy and Traveller sites, including this site.
MM152	Policy GNLP5027	There are no changes to the assessment in the GNLP Habitats Regulations Assessment (May 2023) which assessed proposals for Gypsy and Traveller sites, including this site.
MM153	Policy GNLP5019	There are no changes to the assessment in the GNLP Habitats Regulations Assessment (May 2023) which assessed proposals for Gypsy and Traveller sites, including this site.
MM154	Policy GNLP5020	There are no changes to the assessment in the GNLP Habitats Regulations Assessment (May 2023) which assessed proposals for Gypsy and Traveller sites, including this site.
MM155	Policy GNLP5024	There are no changes to the assessment in the GNLP Habitats Regulations Assessment (May 2023) which assessed proposals for Gypsy and Traveller sites, including this site.
MM156	Policy GNLP5013	There are no changes to the assessment in the GNLP Habitats Regulations Assessment (May 2023)

Main modification	Brief summary of Main Modification	Implications for Habitats Regulations Assessment
		which assessed proposals for Gypsy and Traveller sites, including this site.
MM157	Policy GNLP5028 A/B	There are no changes to the assessment in the GNLP Habitats Regulations Assessment (May 2023) which assessed proposals for Gypsy and Traveller sites, including this site.

3.2 Conclusion of Main modifications – Sites

3.2.1 Main Modifications to Policies regarding sites do not result in any change from the previous Habitats Regulations Assessment of the whole plan (March 2023) and Gypsy and Traveller sites (May 2023). None of the modifications result in any change to impacts on European sites, nor any change to mitigation already embedded in the Local Plan.

4 Conclusion

- 4.1.1 It is ascertained that the Main Modifications to the Greater Norwich Local Plan regulation 19 Submission Draft would have no adverse affect upon the integrity of any European site acting alone. Minor modifications are recommended to Main Modifications to Policy 3 so that the text is more consistent with the Habitats Regulations.
- 4.1.2 Local Planning Authorities throughout Norfolk have implemented the GIRAMS scheme to mitigate for impacts on European site. This scheme ensures that in-combination effects of residential development would not have an adverse impact on the integrity of any European site. Nutrient Neutrality mitigation schemes are being prepared to assist developers should they need assistance in meeting Policy 3 Main modifications regarding nutrients entering European sites. No other plans or projects are known to have arisen that may provide other in-combination effects.
- 4.1.3 It is concluded that there would be no adverse affect upon the integrity of any European site from the Greater Norwich Local Plan, with its Main Modifications, alone or in combination with other plans or projects.

