



East
Northamptonshire
Council

Habitat Regulations Assessment (HRA) Screening for Neighbourhood Plans

Glaphorn Neighbourhood Development Plan

15 August 2017

European Union – “Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora”
 (“European Habitats Directive”, Article 6(3))

Introduction to Habitat Regulations Assessment (HRA)

Article 6(3) of the [European Habitats Directive](#) (1992) requires that any plan (or project), which is not directly connected with or necessary to the management of a European site [also known as a “Natura 2000” site], but would be likely to have a significant effect on such a site, either individually or in combination with other plans or projects, shall be subject to an ‘appropriate assessment’ of its implications for the European site in view of the site’s conservation objectives. The plan-making body shall agree to the plan only after having ascertained that it will not adversely affect the integrity of the site concerned, unless in exceptional circumstances the provisions of Article 6(4) are met.

The Habitats Directive was initially incorporated into national law through [The Conservation \(Natural Habitats, &c.\) Regulations 1994](#) (SI 1994 No 2716). These Regulations were amended in 2007 to include a requirement for the relevant body (i.e. East Northamptonshire Council (ENC) and/ or the relevant Town Council(s), Parish Council(s) or Neighbourhood Forums) to undertake a discrete ‘appropriate assessment’ or Habitat Regulations Assessment (HRA). The 2004/ 2007 Regulations were subsequently consolidated into [The Conservation of Habitats and Species Regulations 2010](#) (SI 2010 No 490), as amended.

Guidance regarding HRA

The [North Northamptonshire Neighbourhood Planning Toolkit](#) (December 2012) explains that: “The [Neighbourhood] Plan or [Neighbourhood Development] Order may also need to be subject to a Habitats Regulations Assessment if there might be an impact on the Nene Valley Special Protection Area (SPA)” (paragraph 3.16). It is therefore critical to establish at an early stage in the process whether or not their emerging Neighbourhood Plan/ NDO will require Habitat Regulations Assessment (HRA).

A range of guidance has been produced, regarding the methodologies and processes for undertaking HRA (also known as ‘appropriate assessment’). Key reference documents include:

- [Habitats Regulations Appraisal of Plans – Guidance for Plan-Making Bodies in Scotland](#) – Version 2.0 (David Tyldesley and Associates, August 2012)
- [Habitats Directive – Guidance on competent authority coordination under the Habitats Regulations](#) (Department for Environment, Food and Rural Affairs, July 2012)
- [Planning for the Protection of European Sites: Appropriate Assessment](#) (Department for Communities and Local Government, August 2006)
- [Assessment of plans and projects significantly affecting Natura 2000 sites – Methodological guidance on the provisions of Article 6\(3\) and \(4\) of the Habitats Directive 92/43/EEC](#) (European Commission, November 2001)

HRA Screening stages

A review of the various guidance documents has found that David Tyldesley and Associates’ (DTA) Scottish guidance provides the most up to date and systematic guidance currently available for undertaking HRA Screening. Reference to the DTA and other guidance has identified the following stages:

- Preliminary HRA stages:
 - Stage 1: Deciding whether a Neighbourhood Plan should be subject to HRA;
 - Stage 2: Identifying the European sites that should be considered;
 - Stage 3: Gathering information about the European sites;
 - Stage 4: Initial discussions on the method and scope of the appraisal.
- HRA Screening – testing whether a Neighbourhood Plan is ‘likely to have a significant effect’ on a European (“Natura 2000”) site (DTA Stage 5):
 - Step 1: Neighbourhood Plan vision and outcomes;
 - Step 2: Policies, proposals and projects referred to in, but not proposed by, the Neighbourhood Plan;
 - Step 3: Typologies of policies in Neighbourhood Plans – identifying if any are likely to have significant effects on any European site.
- Where any possible ‘likely significant effects’ of a Neighbourhood Plan are identified through the initial HRA Screening exercise, additional stages in the process are:
 - Applying mitigation measures at screening stage to avoid likely significant effects (DTA Stage 6);
 - Rescreening the Neighbourhood Plan and deciding upon on the need for appropriate assessment (i.e. full HRA).

The remainder of this toolkit will consider each of these HRA Screening stages, in turn.

Please note that only the parts of this form which are highlighted in red will need to be completed.

Preliminary HRA stages (stages 1-3)

Stage 1: Deciding whether a Neighbourhood Plan should be subject to HRA	Y/N	Commentary
<p>Is the whole of the plan directly connected with or necessary to the management of a European site for nature conservation purposes?</p>	N	<p><i>A Neighbourhood Plan is a statutory development plan document. By definition, it will have a broader scope than the management of a European “Natura 2000” site. It should be noted that the Habitats Directive does not specify the scope of either ‘plan’ or ‘project’ by reference to particular categories of either. Instead, the key limiting factor is whether or not they are likely to have a significant effect on a site.</i></p>
<p>Is the plan a development plan document?</p>	Y	<p><i>The Plan-making body (i.e. ENC and/ or the relevant Town Council(s), Parish Council(s) or Neighbourhood Forums) should proceed to identify the European sites that may potentially be affected, gather the information about them and ‘screen’ the plan for likelihood of significant effects on a European site.</i></p>
Stage 2: Identifying the European sites that should be considered	Y/N	Commentary
<p>Which European (Natura 2000) sites should be considered?</p> <p>[European sites, subject to the Habitats Directive, will have one or more of the following designations:</p> <ul style="list-style-type: none"> • Ramsar site • Special Area of Conservation (SAC) • Special Protection Area (SPA)] 	N/a	<p><i>The recent HRA screening opinion for the North Northamptonshire Joint Core Strategy (JCS) 2011-2031 (Local Plan Part 1) and 2012 screening report for the (now defunct) Four Towns Plan (to be replaced by the Local Plan Part 2) have already assessed the potential impacts of the Local Plan on the following designated Natura 2000 sites:</i></p> <ul style="list-style-type: none"> • Upper Nene Valley Gravel Pits SPA and Ramsar • Orton Pit SAC • Nene Washes SAC, SPA and Ramsar • Rutland Water SPA and Ramsar • The Wash SPA and Ramsar • The Wash and North Norfolk Coast SAC <p><i>The JCS and Four Towns Plan HRA Screening Reports, which relate to “higher level” Plans, concluded that these Plans (in combination, the Local Plan) could have a significant impact solely upon the Upper Nene Valley Gravel Pits SPA / Ramsar (Natura 2000) site.</i></p>

Stage 3: Gathering information about the Upper Nene Valley Gravel Pits SPA/ Ramsar site	Y/N	Commentary
<p>Is there data or information already available/ published regarding the Upper Nene Valley Gravel Pits SPA / Ramsar site?</p> <p>[The Upper Nene Valley Gravel Pits SPA / Ramsar site extends for approximately 35km along the alluvial deposits of the River Nene floodplain from Clifford Hill (Billing) on the southern outskirts of Northampton, downstream to Thorpe Waterville, north of Thrapston]</p>	Y	<p>The following documents provide detailed direction as to the characteristics (Habitats Directive qualifying species and vulnerabilities) of the Upper Nene Valley Gravel Pits SPA / Ramsar site:</p> <ul style="list-style-type: none"> • North Northamptonshire Joint Core Strategy Habitats Regulations Assessment (January 2015) • North Northamptonshire Joint Core Strategy Habitat Regulations Assessment Addendum (June 2015) • Four Towns Plan – Habitat Regulations Assessment – European Site Characterization (2012)
	Y	<p>The 1st draft (Regulation 14) version of the Glapthorn Neighbourhood Development Plan was subject to HRA screening in July 2017. At the time, Natural England was satisfied that: “From the evidence set out in your screening opinion it would seem unlikely that Likely Significant Effects (LSE) would result from the Neighbourhood Plan alone.”</p>
		<p>Policy 4 of the North Northamptonshire Joint Core Strategy (JCS) 2011-2031, adopted July 2016, requires the preparation of a Mitigation Strategy as an Addendum to the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document (SPD). This SPD Addendum and associated Mitigation Strategy, adopted by East Northamptonshire Council on 21 November 2016, includes a requirement for all residential development within a 3km buffer zone of the SPA/ Ramsar site to contribute towards delivering the Mitigation Strategy.</p> <p>The SPD Addendum proposes a flat rate (per-dwelling) financial contribution, to fund the HRA mitigation measures identified through the Mitigation Strategy.</p>

Stage 4: Initial discussions on the method and scope of the appraisal	Y/N	Commentary
Have preliminary discussions have taken place with relevant bodies regarding the HRA for the Neighbourhood Plan?	Y	<i>ENC has already consulted Natural England, the relevant statutory consultation body; during the earlier Neighbourhood Area consultation stages (Regulations 6 and 14, Neighbourhood Planning (General) Regulations 2012). All relevant feedback (relating to the Regulation 16 consultation) is attached at appendices 1-3 to this screening opinion.</i>

Preliminary HRA Screening stages – overview

The Local Plan Part 1 (JCS), which sets the strategic policy framework for the Neighbourhood Plan, has already been subject to HRA. This has identified specific measures (i.e. the implementation of a Mitigation Strategy) to ensure that the JCS fulfils the requirements of the Habitat Regulations.

The 2015 JCS HRA and 2012 Four Towns Plan Screening Assessment have both already concluded that the new Local Plan Part 1 (JCS) will not have any significant impacts upon any Natura 2000 sites, with the exception of the Upper Nene Valley Gravel Pits SPA / Ramsar site. These Assessments have already been endorsed by Natural England, the relevant statutory consultation body.

Natural England has already agreed specific Local Plan measures (JCS Policy 4), by which any potential significant impacts of residential development upon the Upper Nene Valley Gravel Pits SPA/ Ramsar site may be overcome; within a defined 3km buffer zone. By definition the draft Neighbourhood Plan is smaller and more localised, so the remainder of this HRA Screening Assessment will exclusively consider the possible significant impacts of emerging Plan policies upon this Natura 2000 site. Specifically, it is necessary for the **XX** Neighbourhood Development Plan to recognise the requirements of JCS Policy 4 with regard to the SPA/ Ramsar site.

The remainder of this screening process should consider whether a further bespoke “appropriate assessment” would need to be undertaken to fulfil the requirements of the Habitat Regulations; over and above that already prepared for the North Northamptonshire JCS (Local Plan Part 1: strategic policies).

HRA Screening – testing whether a Neighbourhood Plan is ‘likely to have a significant effect’ on a European (“Natura 2000”) site [the Upper Nene Valley Gravel Pits SPA / Ramsar site] (stage 5)

The process of HRA Screening is necessary to determine whether there are any potentially **significant** impacts upon the Upper Nene Valley Gravel Pits (UNVGP) SPA/ Ramsar site arising from individual policies or proposals in the **Glaphorn Neighbourhood Development Plan**.

The DTA guidance explains the role of HRA, as a whole. The fundamental test of significance is where a plan or project **could** undermine the conservation objectives of the UNVGP SPA / Ramsar site. Overall, this Neighbourhood Plan Screening exercise should:

- a) Identify all aspects of the plan which would have no effect on a European site, so that that they can be eliminated from further consideration in respect of this and other plans;
- b) Identify all aspects of the plan which would not be likely to have a significant effect on a European site (i.e. would have some effect, but minor residual), either alone or in combination with other aspects of the same plan or other plans or projects, which therefore do not require full ‘appropriate assessment’; and
- c) Identify those aspects of the plan where it is not possible to rule out the risk of significant effects on a European site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require appropriate assessment.

The emerging Neighbourhood Plan will include some, or all, of the following policy typologies:

- Overarching Neighbourhood Plan vision and outcomes
- Development management policies, e.g. detailed design policies and criteria
- Protection policies, e.g. zonal land designations
- Development land allocations
- Transport and connectivity policies
- Green infrastructure and tourism policies

Policy typology	Positive Impact	Negative Impact	Neutral Impact	Commentary
Step 1: Overarching Neighbourhood Plan vision and outcomes	✓	X	✓	The DTA guidance explains that parts of plans which are merely general policy statements, or which only show the general political will or intention of a public body, will not be likely to have a significant effect on a European site.

Policy typology	Positive Impact	Negative Impact	Neutral Impact	Commentary
Vision	✓	X	X	It may be appropriate, for completeness, to consider whether the overall Neighbourhood Plan vision or specific outcomes might have any conceivable potential negative implications for the UNVGP SPA/ Ramsar site
The vision is to make Glapthorn a sustainable community with modest housing development on small sites of 5 or less houses (giving a total of 22 houses) over the plan period to 2031 .	X	X	✓	Does not affect the SPA/ Ramsar site, as the whole of the Neighbourhood area lies beyond the 3km and 4km UNVGP buffer zones.
Step 2: Policies, proposals and projects referred to in, but not proposed by, the Neighbourhood Plan	X	X	✓	The introductory sections of the emerging Neighbourhood Plan will, inevitably, cross refer to other relevant plans, policies and programmes. The DTA guidance explains that a useful ‘test’ as to whether a project should be screened out at this stage is to consider whether the plan, project or programme would be likely to be implemented, irrespective of the Neighbourhood Plan? If the answer is “yes”, it will normally be appropriate to screen the project out at this stage.
Adopted North Northamptonshire JCS policies	X	X	✓	Separately screened through JCS Habitat Regulations Assessment process

Policy typology	Positive Impact	Negative Impact	Neutral Impact	Commentary
Step 3:				
Development Management policies				
Detailed design policies and criteria etc.	X	X	✓	Most detailed design policies set out locally significant design criteria. These small scale, development management policies are often most relevant for householder or other minor applications/ schemes. The detailed, localised nature of such policies enables these to be screened out, as not having any significant impact upon the UNVGP SPA / Ramsar site.
Protection policies	X	X	✓	Protection policies seek to maintain the 'status quo'. As such, by definition, any decision to retain existing land use types or operations at a particular location would not lead to any changes to 'baseline' circumstances. Therefore, these policies could not be expected to have a significant impact upon the UNVGP SPA / Ramsar site, so may be screened out at this stage.
Local green Space	X	X	✓	Proposed on land that was originally designated "Important Open Space" in a previous plan (Policy EN 20). This local designation seeks the protection and retention of an existing open space separating the main (Lower and Upper) built up areas of Glapthorn. Therefore, it is not considered that this could have a significant impact upon the UNVGP SPA/Ramsar site.

Policy typology	Positive Impact	Negative Impact	Neutral Impact	Commentary
Area of separation	X	X	✓	Concerns were raised during the Plan preparation process about the implications of potential development proposals to the north of Oundle upon the setting of Glapthorn. The Plan seeks to retain an area of separation between Oundle and Glapthorn, although this seeks to maintain the "status quo", so it is not considered that this could have any significant impact upon the UNVGP SPA/Ramsar site.
Community facilities	X	X	✓	The Plan seeks to ensure the retention of existing community services; namely the allotments and primary school facilities. Given that it seeks to maintain the "status quo", it is not considered that this could have any significant impact upon the UNVGP SPA/Ramsar site.
Development land allocations	X	X	X	Natural England has recently advised that: " <i>There may be a need for consideration of the Upper Nene Valley Gravel Pits SPA/ Ramsar site (under the Habitats Regulations) if any of the Neighbourhood Plans put forward new development in sensitive locations. We would expect to advise on this formally at the appropriate consultation stage but...understand that communities may appreciate an early steer before investing time developing options that may prove challenging with the SPA</i> " (June 2014).

Policy typology	Positive Impact	Negative Impact	Neutral Impact	Commentary
Smaller scale/ minor employment and housing land allocations (<100 dwellings or <1000m ² floorspace)	X	X	✓ ¹	<p>Natural England has advised that for sites within 3km of the UNVGP SPA/ Ramsar site, it cannot be regarded as possible to rule out the risk of significant effects. Therefore, in these circumstances a full HRA 'appropriate assessment' may be required.</p> <p>In the case of residential development, mechanisms for development contributions to mitigate the impact of increased visitor numbers from additional development are set out in JCS Policy 4 and Neighbourhood Plan Policy H.</p>
Major employment land allocations (>1000m ² floorspace)	X	X	✓ ²	<p>Natural England has advised that for sites within 500m (0.5km) of the UNVGP SPA/ Ramsar site, it cannot be regarded as possible to rule out the risk of significant effects. Therefore, in these circumstances a full HRA 'appropriate assessment' may be required.</p>
Larger scale housing land allocations (100 dwellings or more)	N/a	N/a	X³	<p>Natural England has advised that for major development sites within 4km (4000m) of the UNVGP SPA/ Ramsar site, it cannot be possible to rule out the risk of significant effects. Natural England has also identified potential significant adverse impacts from all residential development within 3km of the SPA/ Ramsar site.</p> <p>Therefore, in these circumstances a full HRA 'appropriate assessment' may be required. Reference ought to be made to the Strategic Housing Land Availability Assessment (SHLAA), to identify those potential sites within the SPA/ Ramsar site 4km buffer zone.</p>

¹ Impact may be regarded as neutral, unless a site is within 200m radius of the SPA/ Ramsar site

² Impact may be regarded as neutral, unless a site is within 500m radius of the SPA/ Ramsar site

XX Neighbourhood Development Plan

Policy typology	Positive Impact	Negative Impact	Neutral Impact	Commentary
[Housing policies]	X	X	✓	8 sites proposed to deliver 22 houses over the Plan period to 2031 on small sites which are extensions to the current built up area. These include criteria for maintaining the linear character of Glapthorn. Development management criteria seek to resist back-fill, cul-de-sacs or rear garden infill.
[Employment and Commercial policies]	N/a	N/a	N/a	None
Transport/ connectivity policies	X	X	X	Natural England has advised that for new transport connections or linkages within 500m (0.5km) of the UNVGP SPA/ Ramsar site, it cannot be regarded as possible to rule out the risk of significant effects. Therefore, in these circumstances a full HRA 'appropriate assessment' may be required.
Potential routes/ proposals to open up access to Nene Valley; e.g. additional links to East Northamptonshire Greenway	X	X	X	Neighbourhood Plans may consider specific proposals for new pedestrian and cycle links to the Nene Valley (including SPA/ Ramsar site). If specific proposals which could increase access (and therefore possible disturbance) to the UNVGP SPA/ Ramsar site are put forward through a Neighbourhood Plan; in such circumstances a full HRA 'appropriate assessment' may be required.

³ Impact cannot be regarded as neutral, unless a site is more than 3km (3000m) radius away from the SPA/ Ramsar site

Policy typology	Positive Impact	Negative Impact	Neutral Impact	Commentary
Other transport/ connectivity policies or proposals	X	X	✓	Other potential accessibility proposals are likely to be strategic in nature. As such, these are extremely unlikely that specific transport proposals would be put forward through a Neighbourhood Plan.
[Transport/ accessibility policies]				NONE
Green infrastructure/ tourism policies	✓	?	X	None
Potential green infrastructure connections to Nene Valley	✓	?	X	Neighbourhood Plans may consider specific proposals for new green infrastructure connections to the Nene Valley (including SPA/ Ramsar site). If specific proposals which could increase access (and therefore possible disturbance) to the UNVGP SPA/ Ramsar site are put forward through a Neighbourhood Plan; in such circumstances a full HRA 'appropriate assessment' may be required.
Proposals for tourist hubs or facilities	?	?	X	Neighbourhood Plans may put forward specific proposals to develop tourist or visitor facilities. Natural England has advised that where these are proposed within 200m of the UNVGP SPA/ Ramsar site, it cannot be regarded as possible to rule out the risk of significant effects. Therefore, in these circumstances a full HRA 'appropriate assessment' may be required.
NONE				

Policy typology	Positive Impact	Negative Impact	Neutral Impact	Commentary

In the event that any potential negative effects are identified at Stage 5 in respect of specific relevant policies, the screening opinion should be sent to Natural England for an initial view, to confirm that these really are “likely significant effects”. This preliminary consultation should take place in advance of the formal consultation stage.

Applying mitigation measures at screening stage to avoid likely significant effects (stage 6)

- **All** residential development within the 3km SPA/ Ramsar site buffer; large major housing developments (>100 dwellings) within the 4km SPA/ Ramsar site buffer.
- Smaller scale/ minor employment land allocations (<1000m² floorspace) within **200m radius** of the SPA / Ramsar site;
- Major employment land allocations (>1000m² floorspace) within **500m (0.5km) radius** of the SPA / Ramsar site;
- Potential routes/ proposals to open up access to Nene Valley; e.g. additional links to East Northamptonshire Greenway; Potential green infrastructure connections to Nene Valley;
- Proposals for tourist hubs or facilities) within **200m radius** of the SPA / Ramsar site.

If a potentially significant negative impact of an emerging Neighbourhood Plan policy or proposal upon the Upper Nene Valley Gravel Pits SPA / Ramsar sites has been identified, the questions below should be considered

Policy reference(s) and/ or proposal (s): *Policy XX could be regarded as having potential negative impacts upon the UNVGP SPA / Ramsar site.*

Is the policy or proposal essential to deliver the overall vision and objectives of the emerging Neighbourhood Plan?

N/a

If yes, could the policy or proposal be deleted, amended, or its scale reduced; so as to ensure that any potential harm is eliminated or minimised to the extent that it could not lead to any significant impact upon the SPA/ Ramsar site?

N/a

Commentary

JCS Policy 4, the Addendum to the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document and Policy H provide the relevant mechanisms for securing contributions from new residential developments within the 3km buffer zone towards specific UNVGP SPA / Ramsar site mitigation measures set out in the Mitigation Strategy.

The whole Neighbourhood Plan area of Glaphorn Parish lies beyond both the 3km and 5 km buffer zones for Upper Nene valley Gravel Pits SPA/Ramsar sites. The Plan seeks small scale sustainable development which respects the existing linear character of the village. Apart from this, it focuses upon the retention of existing assets, designating Local Green Space, an "Area of Separation" and community facilities. Overall the Neighbourhood Plan is not considered to give rise to any significant adverse impacts for the UNVGP SPA/Ramsar site.

Could the policy or proposal be redrafted or relocated respectively, to ensure that it is sufficiently well situated, so as to remove any potential significant impacts?		
<p>Commentary</p> <p><i>JCS Policy 4, the Addendum to the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document and Policy H already provide the relevant mechanisms for securing contributions from new residential developments within the 3km buffer zone towards specific UNVGP SPA / Ramsar site mitigation measures set out in the Mitigation Strategy.</i></p>		
Could the policy or proposal be developed in association with other policies or proposals being put forward through the Local Plan (i.e. JCS and/ or Local Plan Part 2)?	N/a	
<p>Commentary</p> <p><i>No amendments to policies are considered necessary to ensure that this is consistent with the JCS and therefore the requirements of the Habitat Regulations.</i></p>		
Could a “buffer” or exclusion zone be appropriate, to overcome any concerns regarding the potential impacts of a Neighbourhood Plan policy or proposal upon the SPA/ Ramsar site?	N/a	
<p>Commentary</p> <p><i>JCS Policy 4, the Addendum to the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document and Policy H already provide the relevant mechanisms for securing contributions from new residential developments within the 3km buffer zone towards specific UNVGP SPA / Ramsar site mitigation measures set out in the Mitigation Strategy.</i></p>		
<p>Conclusions regarding proposed mitigation measures</p> <p><i>The Local Plan (JCS) already provides the mechanism by which potential adverse impacts upon the UNVGP SPA / Ramsar site may be addressed. Modifications to policies XX have been proposed during the Neighbourhood Plan examination process to ensure that the Neighbourhood Plan is consistent with the JCS; with reference to the Habitat Regulations.</i></p>		

Conclusions: Rescreening the Neighbourhood Plan and deciding upon on the need for appropriate assessment (i.e. full HRA)

Screening has revealed that the following emerging Neighbourhood Plan policies and proposals, which are deemed essential and integral to the overall Plan vision and outcomes, could have a potentially significant impact upon the Upper Nene Valley Gravel Pits SPA / Ramsar site:

Policies XX

In order to overcome any potentially significant negative impact, the following amendments to policies or proposals within the emerging Neighbourhood Plan are proposed:

A view has been sought from Natural England, as to whether it will be necessary for the emerging Glapthorn Neighbourhood Development Plan to be accompanied by a full 'appropriate assessment' (HRA).

In accordance with the 2004 Environmental Assessment of Plans and Programmes Regulations 2004, 28 days have been allowed for Natural England and other relevant consultees to respond to this screening report. Comments will need to be received by 4:30pm on XX.

On this basis, this HRA Screening has revealed that it **will not** be necessary to undertake a full HRA 'appropriate assessment' to accompany the Neighbourhood Plan.

Please note that if a full HRA 'appropriate assessment' is deemed necessary, then it will be necessary for a full Strategic Environmental Assessment (SEA) to also be undertaken to accompany the Neighbourhood Plan.

[APPENDICES/ ATTACHMENTS]