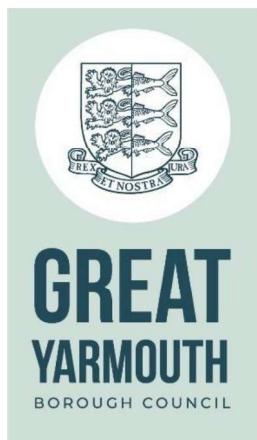


# SEA Screening Opinion for Draft Review Filby Neighbourhood Plan (dated May 2025)

**November 2025**



**GYBC Strategic Planning**

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## SEA Screening Opinion

### *Introduction*

This screening opinion determines whether or not the Draft Filby Neighbourhood Plan 2022-2041 (May, 2025) is likely to have significant environmental effects and therefore require a Strategic Environmental Assessment (SEA) in accordance with the [European Directive 2001/42/EC](#) (the 'Strategic Environmental Assessment Directive') and implemented through the [Environmental Assessment of Plans and Programmes Regulations \(2004\)](#).

### *Background*

In order to meet one of the 'Basic Conditions' (tests that the neighbourhood plan is examined with), a neighbourhood plan must not breach or be otherwise incompatible with EU obligations which includes the Strategic Environmental Assessment (SEA) Directive. In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a SEA. Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is commonly referred to as a "screening" assessment and the requirements are set out in Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.

As part of the screening exercise, the neighbourhood plan will be assessed for likely significant effects upon the environment in light of across the 'plan characteristics', the 'effects and area characteristics' including the environmental areas listed under Schedule 2 Part 6 of the Environmental Assessment Regulations (2004) such as biodiversity and human health. In most cases, neighbourhood plans will not require a SEA but are more likely to be required where the neighbourhood plan allocates sites for development, contains policies that may affect sensitive environmental assets, or where significant environmental effects have not been addressed through a sustainability appraisal of the local plan.

### *Strategic Plan*

The Draft Filby Neighbourhood Plan, subject to the suggested changes within the Borough Councils Regulation 14 Response, is largely in conformity with the Borough Council's currently adopted Local Plan Part 1: Core Strategy and the strategic policies of Local Plan Part 2. The Core Strategy was subject to a full Sustainability Appraisal (incorporating SEA) and ensured that generally there were no adverse environmental effects, and where there were effects, these were adequately mitigated through the plan.

The Draft Filby Neighbourhood Plan, subject to the suggested changes within the Regulation 14 Response, is largely in conformity with the Broads Authority's currently adopted Local Plan for the Broads. The Local Plan for the Broads was subject to a full Sustainability Appraisal (incorporating SEA) and ensured that generally there were no adverse environmental effects, and where there were effects, these were adequately mitigated through the plan.

The Draft Filby Neighbourhood (subject to the suggested changes) is also in broad conformity with the emerging Great Yarmouth Local Plan, which is likely to be adopted before the final Filby Neighbourhood Plan. The emerging Local Plan has also been subject to

full Sustainability Appraisal (incorporating SEA) and similarly considers that adverse effects are unlikely or could be adequately mitigated through the Local Plan.

#### *Draft Filby Neighbourhood Plan proposals*

The draft policies of this plan generally detail a restrictive stance on development, with particular focus to preserving both the historic character and sensitive environment of the settlement and parish. Within the designated neighbourhood area, the draft policies will seek to:

- Support affordable housing, elderly housing and lower occupancy housing
- Encourage locally distinctive homes which reflect the character of the village
- Conserve and enhance Filby's natural environment, including the local ecological network, trees and hedgerows and protecting higher graded agricultural land
- Designating Local Green Spaces
- Protect and maintain Dark Skies, key views and gaps between development
- Manage flooding and drainage
- Protect local heritage assets
- Support sustainable transport measures
- Protect existing community facilities

The policies generally focus development away from sensitive environments and seek to protect the plan area's landscape and heritage value. This approach combined with existing local and national planning policies to protect environmental assets, will ensure that likely significant effects on the environment are negligible, and will generally seek improvements.

A 'Habitat Regulations Assessment' (HRA) Screening Assessment has also been reviewed (this is detailed below) and has informed the overall assessment of environmental effects.

This Opinion is taken together with the appended '*Filby Neighbourhood Plan 2022-2041 Strategic Environmental Assessment and Habitat Regulations Assessment 2025*' which was submitted to the Borough Council and the Broads Authority in May 2025.

It is relevant that the Draft Filby Neighbourhood Plan 2022-2041 is an update on the currently adopted Filby Neighbourhood Plan 2020-2030 and broadly similar in many respects. In February 2020, the Borough Council and the Broads Authority issued its SEA Screening Opinion on the current adopted Filby Neighbourhood Plan, concluded that it be 'screened out' for Strategic Environmental Assessment, and that the Neighbourhood Plan would have 'no likely significant effects' through the Habitats Regulations Assessment.

#### *Suggested amendments to submitted SEA Screening Report*

- Paragraph 33 - Erroneously refers to Belton and Browston, Burgh Castle and Fritton with St Olaves NP
- Figure 15 - Erroneously refers to Belton and Browston, Burgh Castle and Fritton with St Olaves NP

#### *Responses from statutory consultees*

The relevant statutory 'consultation bodies' (Environment Agency, Natural England and

Historic England) were consulted on the SEA Screening Assessment, and the responses have been summarised in the following paragraphs. The full consultation body responses are appended to this opinion.

#### Environment Agency

The Environment Agency (EA) identifies that parts of the Filby Neighbourhood Plan area extend into areas of Flood Zones 2 and 3. The EA did not consider there to be potential significant environmental effects on the basis that future development is steered away from the sensitive aspects of the environment. The EA also recommended the inclusion of policies relating to the management of flood risk and to ensure that any allocated or windfall development through the plan should follow the sequential approach.

The EA identified that the NP area boundary includes the Caister Water Recycling Centre which is operating close to its permitting capacity. The EA did not have any significant concerns providing that the plan does not allocate sites for growth across the plan period. The EA stated that they would still expect to see consideration for any windfall developments captured in a relevant policy for Water Quality in the catchment of the Plan Area and serving WRC.

#### Natural England

Natural England (NE) confirmed that significant effects on statutorily designated nature conservation site or landscapes are unlikely, including Habitat sites, either alone or in combination.

#### Historic England

Historic England (HE) confirmed that based on the information supplied, that neither a full SEA nor further stages of HRA are required.

#### *SEA Screening Opinion Checklist*

The neighbourhood plan has been assessed using the 'Practical Guide to SEA Directive's' application chart.

\*PP = Plan or Programme

1. SEA Guide Criteria - 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. If passed through a referendum, the neighbourhood plan becomes part of the Borough Council's and Broads Authority's adopted Development Plan.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))  
No. Communities have the choice to prepare a neighbourhood plan. However, because the plan (if adopted) will from part of the Development Plan, it must be screened for SEA and will be subject to relevant legislation and regulatory 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 is prepared for town and country planning and land use. The plan sets out a framework (within the neighbourhood plan area) for the design of housing and the protection of the environment, which may fall under part 10 of Annex II of the EIA Directive.

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

No. For full details, see this HRA screening opinion. (No likely significant 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 neighbourhood plan does not specifically allocate any sites for development. The policies relating to residential use have the potential to lead to small areas of development, and the plan designates 'Local Green Spaces' as well as other environmental protections.

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)

Yes. The Neighbourhood Plan sets a framework for future development within the neighbourhood plan area up to 2041.

7. Is the PP's sole purpose to serve 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. This is not applicable to neighbourhood plans.

8. Is it likely to have a significant effect on the environment? (Art. 3.5)

No. The plan has been assessed for the potential to result in "likely significant effects" across the 'plan characteristics', the 'effects and area characteristics' including the environmental areas listed under Schedule 2 Part 6 of the EA Regulations (2004). Overall, the plan is considered to have a negligible effect on the environment. While there are several sensitive environmental assets (The Broads SAC in particular) within the neighbourhood area, impacts upon the environment are considered to be minimal owing to the limited potential of future development, the environmental protection-based policies, and absence of any site allocations, and the level of conformity with the respective local plans which were supported by their own SEA.

9. Requires / Does not require SEA.

No. The Draft Filby Neighbourhood Plan 2022-2041 does not require SEA for the reasons set out above (and discussed in further detail within this report).

#### *SEA Screening Opinion Conclusion*

In accordance with the Environmental Assessment of Plans and Programmes Regulations (2004) as informed by the 'Strategic Environmental Assessment' Directive, the Borough Council and the Broads Authority is satisfied to conclude that through the information submitted by the SEA Screening Assessment (subject to some suggested policy amendments

as set out within the Borough Councils Regulation 14 response) and the statutory body responses along with this Screening Opinion, the draft Filby Neighbourhood Plan is **not likely to have significant environmental effects**. The main reasons for this conclusion are that the draft neighbourhood plan:

- generally conforms to the adopted Core Strategy and Local Plan Part 2, The Local Plan for the Broads, and the Great Yarmouth emerging Local Plan (subject to suggested amendments as set out within the Borough Councils Regulation 14 response).
- operates at relatively small scales of development or land use.
- does not contain site allocations.
- offers limited opportunity for new development beyond the Local Plan.
- recognises its sensitive landscape and largely seeks to conserve and enhance its environmental assets.

The draft Filby Neighbourhood Plan is therefore 'screened out'.

# Habitat Regulations Assessment (HRA) Screening Opinion

## *Introduction*

This screening opinion determines whether or not the draft Filby Neighbourhood Plan 2022-2041 (May 2025) will have 'likely significant effects' upon internationally designated habitat sites (or UK National Site Network sites). If 'likely significant effects' are established, an 'Appropriate Assessment' will need to be undertaken, this is usually incorporated into a 'Habitat Regulations Assessment' (HRA), in accordance with the [Conservation of Habitats and Species Regulations 2017](#).

## *Submitted HRA Screening Assessment*

The Borough Council and the Broads Authority has assessed the submitted HRA screening report (submitted in May 2025) in consultation with Natural England.

Within the designated neighbourhood plan area there is only one designated International / European Site, the Broads Special Area of Conservation (SAC). The HRA screening report also considered the potential impacts on other international sites within a 20km radius of the designated neighbourhood plan area, including the Broadland SAC/SPA and Ramsar; Broads SPA and Ramsar; Southern North Sea SAC and Greater Wash SPA, through the in-combination assessment of the SEA.

The draft neighbourhood plan does not allocate any sites for development, and sets out a generally restrictive approach to development, with many policies seeking to conserve and enhance the natural environment.

In this context the plan is highly unlikely to present additional residential or recreational disturbance (likely significant effects) beyond that identified in the Borough Council's Local Plan Core Strategy and the Local Plan Part 2, The Local Plan for the Broads, nor the emerging Great Yarmouth Local Plan. The policies and proposals of the neighbourhood plan also do not pose likely significant effects in relation to air quality, water quality or urban impacts.

While the HRAs supporting the Borough Council's Core Strategy, Local Plan Part 2, the Local plan for the Broads and emerging Great Yarmouth Local Plan do conclude in-combination likely significant effects from increased visitor pressures (resulting from new residential and tourist growth), the neighbourhood plan does not contain site allocations, and the policies generally do not directly enable further residential or tourist development. No in-combination effects have been identified from the neighbourhood plan.

Any residential or tourist developments coming forward within the parish will still be subject to a project level screening or HRA in accordance with the Borough Council's existing strategic policy, Policy GSP5 of the Local Plan Part 2 or The Broads Authority's Policy DM13, and the 'Norfolk green infrastructure and recreational avoidance mitigation strategy' (GIRAMS), or equivalent emerging Policy NAT4 in the new Great Yarmouth Local Plan.

Natural England has been consulted and responded as follows:

*'It is Natural England's advice, on the basis of the material supplied with the consultation, that significant effects on statutorily designated nature conservation sites or landscapes are*

*unlikely and, significant effects on Habitats sites either alone or in combination, are unlikely. The proposed neighbourhood plan is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.'*

#### *HRA Screening Opinion Conclusion*

As the 'Competent Authorities' Great Yarmouth Borough Council and the Broads Authority, in accordance with the Conservation of Habitats and Species Regulations 2017, identifies **no 'likely significant effects'** on nearby internationally protected wildlife sites resulting from the draft Filby Neighbourhood Plan 2022-2041 either alone or in combination with other projects and programmes. No 'appropriate assessment' or full 'Habitat Regulations Assessment' is therefore required.

#### **Note**

Should the neighbourhood plan content change significantly from that of the May 2025 submitted draft, there may be potential for likely significant effects on the environment which have not been considered in this 'Screening Opinion', in such cases the neighbourhood plan may need to be re-screened for both SEA and HRA by the Borough Council and the Broads Authority.

## Appendices



Ms Nicole Jarmey  
Great Yarmouth Borough Council

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CW1 6GJ

**BY EMAIL ONLY**  
[localplan@great-yarmouth.gov.uk](mailto:localplan@great-yarmouth.gov.uk)

T 0300 060 3900

Dear Ms Jarmey

### **Filby Neighbourhood Plan 2020-2030 - SEA & HRA Screening Consultation**

Thank you for your consultation on the above dated and received by Natural England on 9 June 2025.

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.

#### **Screening Request: Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)**

**It is Natural England's advice, on the basis of the material supplied with the consultation, that:**

- **significant effects on statutorily designated nature conservation sites or landscapes are unlikely; and,**
- **significant effects on Habitats sites<sup>1</sup>, either alone or in combination, are unlikely.**

The proposed neighbourhood plan is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.

Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of Plans and Programmes Regulations 2004 is contained within the [Planning Practice Guidance](#). This identifies three triggers that may require the production of an SEA:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent

<sup>1</sup> Habitats sites are those referred to in the [National Planning Policy Framework](#) (Annex 2 - glossary) as "any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites".

as to require an SEA. Further information is included in Natural England's [standing advice](#) on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an SEA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a SEA is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Please send any new consultations, or further information on this consultation to  
[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

Yours sincerely

Sally Wintle  
Consultations Team

**Sent:** 07 July 2025 10:07  
**To:** Local Plan <localplan@great-yarmouth.gov.uk>  
**Subject:** SEA & HRA Screening - Draft Filby Neighbourhood Plan 2022-2041

Dear Nicole,

**Re: SEA & HRA Screening - Draft Filby Neighbourhood Plan 2022-2041**

Thank you for consulting us on the Screening of the draft Filby Neighbourhood Plan Review 2022-2041. As the Government's adviser on the historic environment, Historic England is keen to ensure that heritage considerations are fully integrated into all stages of the local planning process. We therefore welcome the opportunity to comment on these proposals.

Having read the report I can confirm that we support the conclusion that neither a full SEA nor further stages of HRA are required. I would be grateful if you could confirm receipt of this email.

Kind regards,

Andrew Marsh BSc MA MRTPI

Historic Environment Planning Adviser

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Historic England

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Please note my usual working days are Monday to Thursday, finishing at 5:30pm.



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Great Yarmouth Borough Council  
Town Hall  
Great Yarmouth  
NR30 2QF

**Our ref:** AC/2025/132843/01-L01  
**Your ref:** FilbyNHP  
**Date:** 13 June 2025

Dear Sir/Madam

## **FILBY NEIGHBOURHOOD PLAN SEA & HRA SCREENING**

### **FILBY**

Thank you for consulting us on the Strategic Environmental Assessment Screening Report for the Filby Neighbourhood Plan.

#### **Flood Risk**

Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area. In particular, we note that the boundary does extend into areas of Flood Zones 2 and 3.

On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. National Planning Policy Framework (NPPF) paragraph 161 sets this out.

#### **Water Quality**

We have identified that the Plan area boundary includes the Water Recycling Centre Caister, which is currently operating close to its permitted capacity. Providing the Plan does not allocate sites for growth development across the Plan period, we do not have any significant concerns. We would still expect to see consideration for any windfall developments captured in a relevant policy for Water Quality in the catchment of the Plan Area and serving WRC.

#### **Informative**

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and Environment Agency  
Iceni House Cobham Road, Ipswich, IP3 9JD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..

ideas on incorporating the environment into plans. This is available at: [How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning.](#)

We trust that this advice is useful.

Yours sincerely

A handwritten signature in black ink that reads "Lucy Fielder". The signature is fluid and cursive, with "Lucy" on the top line and "Fielder" on the bottom line.

**Miss Lucy Fielder**  
**Sustainable Places - Planning Advisor**

Team e-mail [Planning.eastanglia@environment-agency.gov.uk](mailto:Planning.eastanglia@environment-agency.gov.uk)  
Team number 02084 745242



Preliminary Screening Strategic Environmental Assessment  
and Habitats Regulation Assessment 2025

FILBY  
NEIGHBOURHOOD PLAN  
2020-2041

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## Introduction

1. Filby Parish Council is preparing a review of their Neighbourhood Development Plan known as FNDP throughout this document. The planning period will be 2020-2041 and the designated area (**See Figure 1**) is located within Great Yarmouth Borough and the Broads Authority Executive Area. Collective Community Planning has been appointed by the parish councils to consider whether there is a need for a Strategic Environmental Assessment (SEA) to be undertaken on FNDP. This is required under European Directive 2001/42/EC (the SEA Directive), transposed into UK law through the SEA Regulations<sup>1</sup>.
2. SEA may be required for a Neighbourhood Development Plan if it is likely to have significant environmental effects. A Sustainability Appraisal (SA) is like an SEA but includes assessment of the likely significant effects of a plan or programme on economic and social factors, as well as environmental factors. Planning Practice Guidance (PPG) clarifies that there is no legal requirement for a Neighbourhood Development Plan to be subject to a SA, but that SA can be used to demonstrate how the plan will contribute to sustainable development.

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<sup>1</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by the Environmental Assessment and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.



Figure 1: Designated Neighbourhood Area

## SEA Screening

### Scope of the Filby Neighbourhood Development Plan Review

3. A draft (Regulation 14) version of FNDP is currently being prepared. It is intended that this is subject to public consultation in mid-2025. FNDP includes a vision for the long-term future of Filby, along with aims to support delivery of this vision. The current draft vision is:

*The rural character and special identity of Filby, nestled as it is alongside the Norfolk and Suffolk Broads, will be protected and enhanced. The rural character is defined by many features, but especially habitats and green infrastructure for wildlife, the openness of the landscape, historic buildings, and the tranquility of the parish and village.*

*In protecting and enhancing this rural character, the plan will result in a more coherent, connected and expansive ecological network of key habitats that delivers a significant net ecological gain for wildlife over the plan period. The plan will ensure that the openness of the landscape is retained for the enjoyment of residents and visitors alike, adding as it does to the tranquility of Filby, and that the parish's historic and heritage assets continue to provide a sense of place. Where possible, the plan will help ensure that the impact on*

*tranquility of the heavy traffic flows through the parish are minimised. Underpinning life in Filby is the wonderful community spirit, and the plan will build on this, helping people to stay in the parish, and creating opportunities for people to meet, interact, and get to know each other.*

*Finally, the plan will make a key contribution towards addressing climate change, both through reducing greenhouse gas emissions and overseeing a radical change in the development of a network of trees and hedgerows to absorb CO2.*

4. The draft plan currently includes 12 specific aims to deliver this vision:

- A. *Ensure the natural environment, including water management, is a key consideration in all decisions about how Filby changes.*
- B. *Conserve and enhance Filby's ecological network.*
- C. *Ensure any future housing development including the tenure, mix and size, meets the needs of the current and future local population of Filby to help retain usual residents.*
- D. *Promote sensitive development that protects and enriches the landscape of the parish, safeguarding key views and protecting valuable agricultural land.*
- E. *Respond to climate change, promoting sustainable development and energy efficiency.*
- F. *Preserve and enhance the significance of local heritage assets.*
- G. *Protect important green spaces within Filby.*
- H. *Promote nature friendly and sustainable access to the countryside for recreation and enjoyment.*
- I. *Reduce the impact and speed of traffic through the village, creating safer routes for pedestrians, cyclists and residents.*
- J. *Promote the improvement needed to current infrastructure in Filby including broadband, drainage and transport, engaging with necessary key stakeholders.*
- K. *Encourage and promote opportunities to improve the access to services and community facilities which will benefit all age groups in Filby with a particular focus on the needs of the younger generation including children, young couples and families to retain these age groups in the parish.*

L. *Where development takes place, seek a design that contributes to the objectives of the Neighbourhood Plan.*

5. FNDP will have a range of non-strategic planning policies to realise and deliver the above vision and aims. This includes policies:

- To ensure the housing mix and type on new development sites meets local need;
- To achieve high quality design with the input of the Filby design guidance and codes, that reinforces and complements local distinctiveness;
- Protect Filby's natural environment such as the local biodiversity, trees and hedgerows and encourage habitat improvement along local wildlife corridors;
- Focus on dark skies and limiting light pollution in new developments;
- To protect the village gap, local green spaces, important local views and the landscape character within the plan area for future enjoyment;
- Promote managing water efficiently including the use of Sustainable drainage systems (SuDS);
- To protect Filby's Heritage Assets;
- To promote improvements to active travel routes and connectivity including new and existing walking routes that can be a focus for investment;
- Protect existing community facilities.

## 6. The plan does not allocate land for development.

### Baseline Information

7. This section summarises baseline information for the FNDP area, drawing on the Evidence Base which will accompany the Neighbourhood Development Plan.

### Biodiversity, Flora, and fauna

8. The NPA is rich in wildlife and in recognition there are a number of International and National statutory designated sites in the neighbourhood area or in close proximity as shown in **Figure 2**. The designations situated to the west of the parish includes:

- **The Broads Authority Executive Area**
- **The Broads - Special Area of Conservation (SAC)**
- **Trinity Broads- Site of Special Scientific Interest (SSSI) and SAC**

9. Those in close proximity but outside of the designated area includes **Broadland** a Ramsar Site and Special Protection Area (SPA).

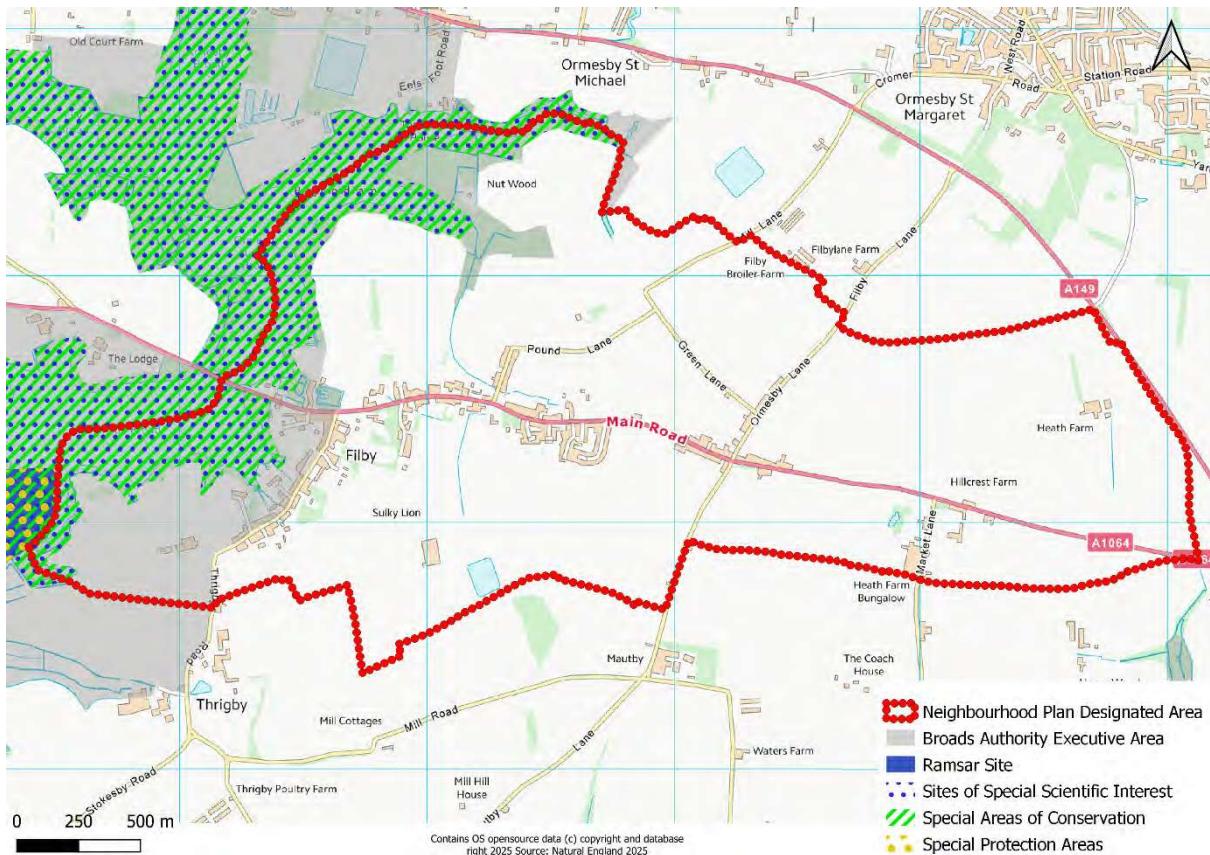


Figure 2-Wildlife Designations (Source: Natural England, 2025)

## 10. The Broads (SAC) contain several examples of naturally nutrient-rich lakes.

Although artificial, having been created by peat digging in medieval times, these lakes, and the ditches in areas of fen and drained marshlands support relict vegetation of the original Fenland flora, and collectively this site contains one of the richest assemblages of rare and local aquatic species in the UK<sup>2</sup>. The Broads falls within the NPA to the west and the area is designated a SAC for the following features: H3140 Hard oligo-mesotrophic waters with benthic veg of *Chara* spp. · H3150 Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition* · H6410 *Molinia* meadows on calcareous, peat or clay-silt soil · H7140 Transition mires and quaking bogs · H7210 Calcareous fens with *C. mariscus* and species of *C. davallianae* · H7230 Alkaline fens · H91E0 Alluvial woods with *A. glutinosa*, *F. excelsior* · S1016 Desmoulin's whorl snail, *Vertigo moulisiana* · S1355 Otter, *Lutra lutra* · S1903 Fen orchid, *Liparis loeselii* · S4056 Little ram's-horn whirlpool snail, *Anisus vorticulus*.

<sup>2</sup> Natural England. 2024. The Broads Special Area of Conservation/Broadland Ramsar Evidence Pack First published August 2022, revised June 2024. Source: [The Broads Special Area of Conservation \(SAC\)/Ramsar - Evidence Pack - TIN205](https://www.gov.uk/government/publications/the-broads-special-area-of-conservation-sac-broadland-ramsar-evidence-pack-tin205)

11. The **Trinity Broads** are extremely rich in wildlife with some species rarely found outside of the Broads fen habitats. Habitats include wide expanses of lowland floodplain fen, lowland wetland, mesotrophic lakes and wet woodland. These habitats support a wealth of wildlife, from the tiniest rare snail, to stands of bulrushes which virtually disappeared from the rest of the Broads area, to the bittern. The Trinity Broads SSSI has a number of features which make the area an important site including a number of different breeding birds: Aggregations of breeding birds - Marsh harrier, *Circus aeruginosus* · Natural England Technical Information Note TIN205 · Aggregations of breeding birds - Pochard, *Aythya ferina* · Aggregations of breeding birds - Shoveler, *Anas clypeata* · Aggregations of breeding birds - Tufted duck, *Aythya fuligula* · Aggregations of non-breeding birds - Bittern, *Botaurus stellaris* · Aggregations of non-breeding birds - Pochard, *Aythya ferina* · Aggregations of non-breeding birds - Shoveler, *Anas clypeata* · Aggregations of non-breeding birds - Tufted duck, *Aythya fuligula* · Assemblages of breeding birds - Lowland open waters and their margins · Floodplain fen (lowland) · Lowland wetland including basin fen, valley fen, floodplain fen, waterfringe fen, spring/flush fen and raised bog lagg · Otter, *Lutra lutra* · Vascular plant assemblage.

12. **Broadland (Ramsar; SPA)** is a low-lying wetland complex straddling the boundaries between east Norfolk and northern Suffolk in eastern England. Broadland SPA falls outside of the NPA to the west. The Broadland Ramsar is designated for the following features: · Bewick's swan, *Cygnus columbianus bewickii* - Wintering · Floodplain alder woodland · Floodplain fen · Gadwall, *Anas strepera* - Wintering · Shoveler, *Anas clypeata* - Wintering · Wetland invertebrate assemblage · Wetland plant assemblage · Wigeon, *Mareca penelope* – Wintering.

13. There are no County Wildlife Sites within the NPA. However, a large proportion of the parish, particularly to the west, contains priority habitat – those which have been identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (BAP). The Priority Habitat Inventory (England) is a spatial dataset that describes the geographic extent and location of habitats of principal importance under Section 41 of the Natural Environment and Rural Communities Act (2006).

14. There are 7 main types of priority habitat (see **Figure 3**), within or adjacent to the NPA, including coastal and floodplain grazing marsh; deciduous woodland; lowland fens; no main habitat but additional habitats present; purple moor grass and rush pastures; reedbeds and traditional orchard. The most apparent priority habitat in the parish is deciduous woodland. Not all of these will be protected under national

designation, though they can be sensitive to development and should be considered when growth is being planned to avoid negative impacts.

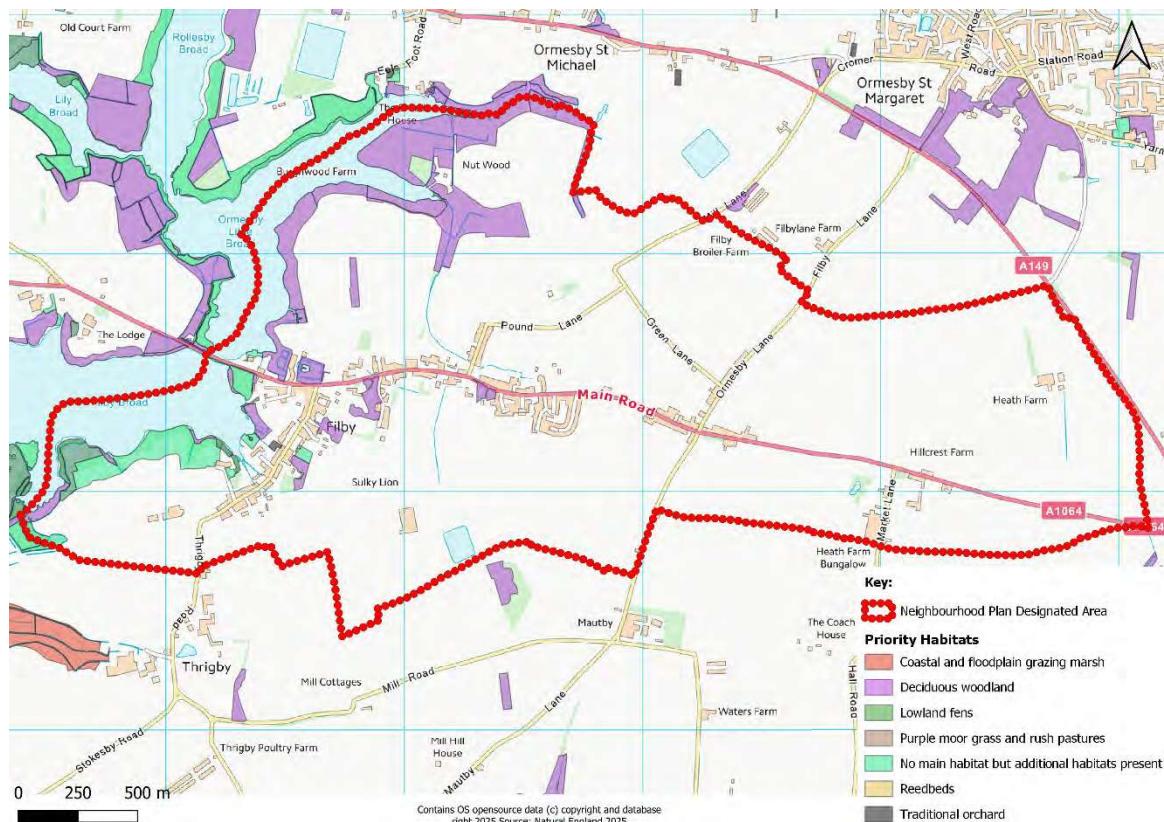


Figure 3-Priority Habitats (Source: Natural England, 2025)

#### Population

15. According to the 2021 Census Filby has a population of approximately 890<sup>3</sup>. Analysis shows that this is a slight increase (14%) from the 2011 population which was 765 people<sup>4</sup>. Looking at **Figure 1** the population of the parish, county and country have all been ageing with age groups above 65 years increasing and age groups below this decreasing. Overall, a quarter of the population in Filby is aged 65 and over, which is now higher than the Norfolk and England averages. It is also a significant increase since 2011 when the proportion was 20% and 2001 when the proportion was 15%.

<sup>3</sup> [Build a custom area profile - Census 2021, ONS](#)

<sup>4</sup> [2011 Census Report for areas in England and Wales - Nomis \(nomisweb.co.uk\)](#)

Age (Census 2021)	Filby	Norfolk	England
0-24	23.4%	25.9%	29%
25-64	50.1%	49.6%	52.4%
65-74	15.9%	12.7%	9.9%
75+	10.6%	11.7%	8.5%
Total population	890	916,100	56.5m

Age (Census 2011)	Filby	Norfolk	England
0-24	25%	28%	31%
25-64	55%	51%	53%
65-74	12%	11%	9%
75+	8%	10%	8%
Total population	765	857,888	53m

Figure 4-Population comparisons 2011 and 2021

## Human Health

16. Provision of age-related services is likely to become an increasing consideration for the Neighbourhood Development Plan area as the proportion of over 65s according to the Census 2021 makes up 26.5% of the NPA.

## Soil

17. The built-up area of Filby, which predominantly runs along the main road is surrounded by a patchwork of arable fields. A good number of these fields are classified as the best and most versatile agricultural land, or Grade 1 according to the Agricultural Land Classification Scale, see **Figure 5**.

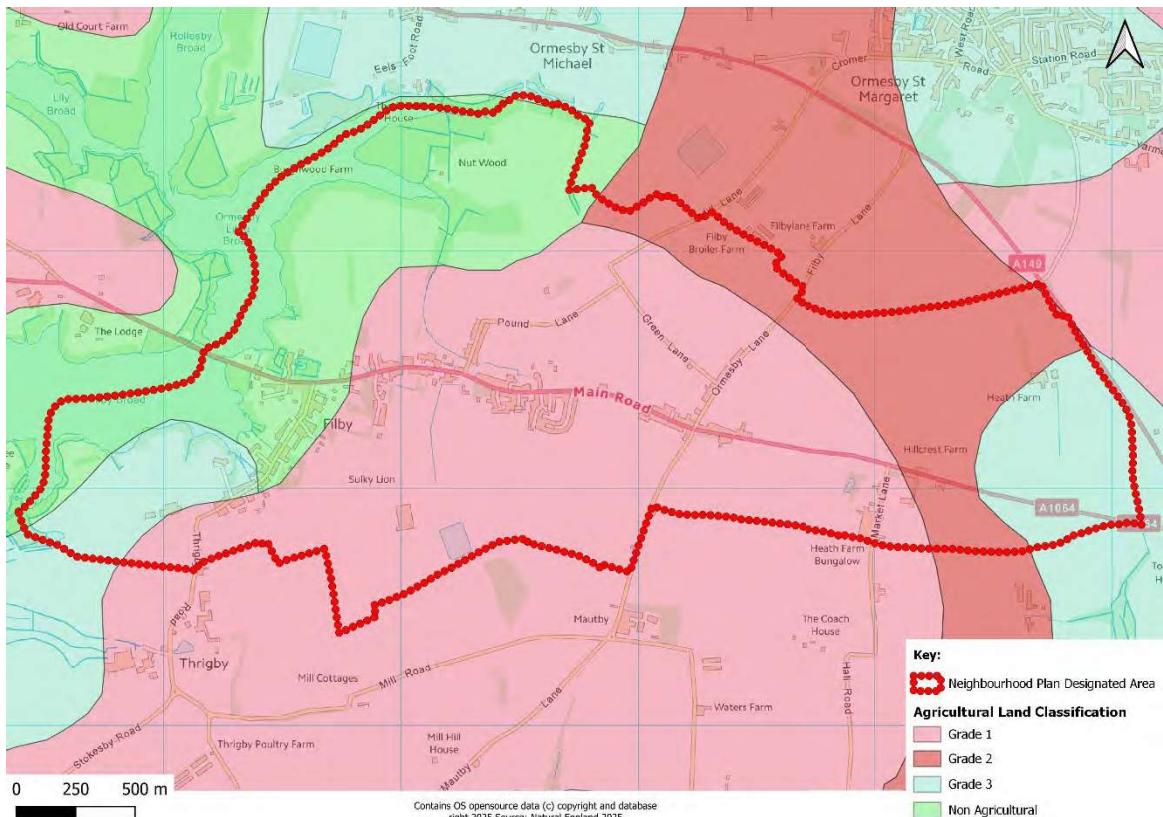


Figure 5-Agricultural Land Classification (Source: Natural England, 2025)

## Water

18. The Environment Agency provides an indication of the long-term risk of flooding based on fluvial, surface water and reservoirs data<sup>5</sup>. **Figure 6** highlights risk of flooding from rivers or the sea. The area to the west of Thrigby Road, and a smaller area to the west of Pound Lane are identified as being within fluvial flood risk zones 2 and 3, medium and high risk. Here the risk of surface water flooding is also greater – see **Figure 7**. There is also existence of flooding along the main A1064 and Mill Lane, Green Lane and Filby Lane. Flooding from reservoirs, **Figure 8**, is an issue around the north-west of the parish, affecting Mill Lane. The Lead Local Flood Authority (LLFA) datasets show no report/investigation of flooding in the parish over recent years.

<sup>5</sup> See flood risk on a map - Check your long term flood risk - GOV.UK ([check-long-term-flood-risk.service.gov.uk](https://check-long-term-flood-risk.service.gov.uk))

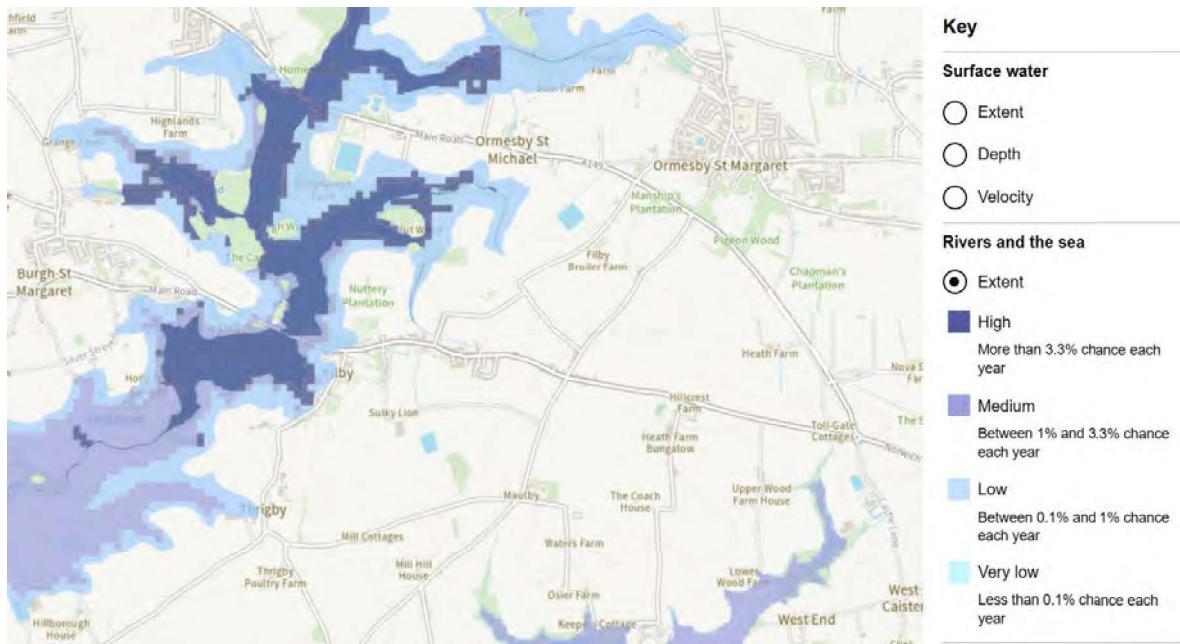


Figure 6-Flood Risk from Rivers or the Sea (Environment Agency 2024 )

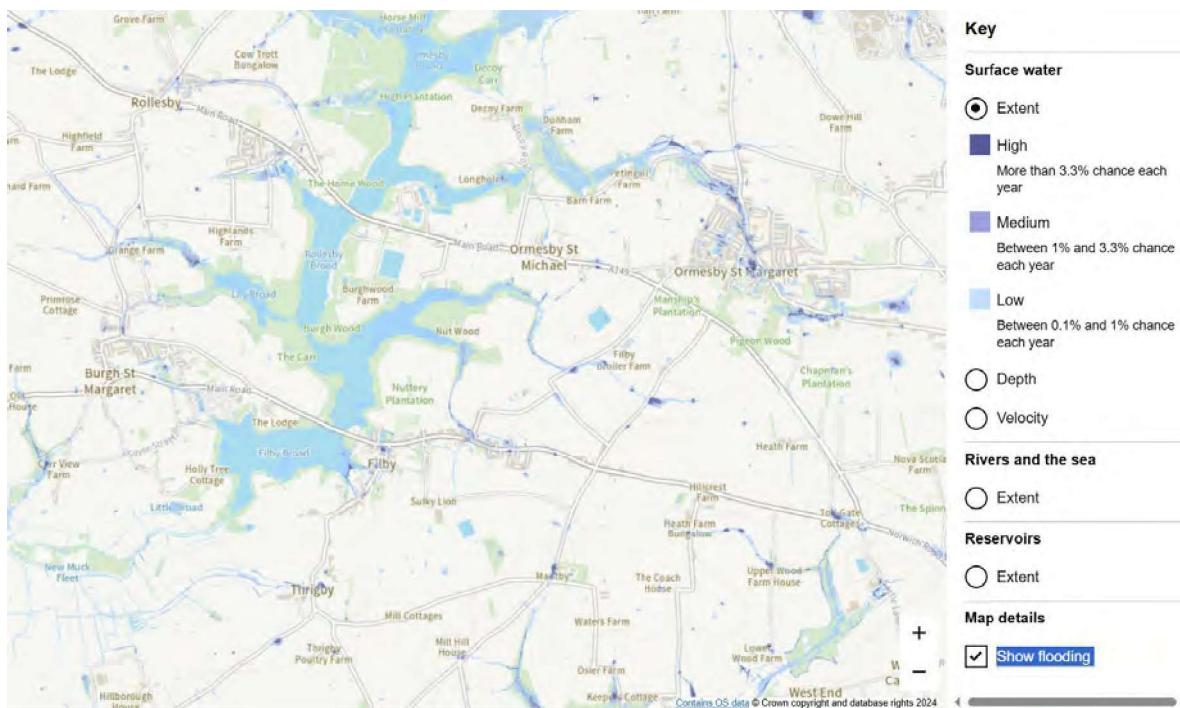


Figure 7-Flood Risk from Surface Water (Environment Agency 2024)

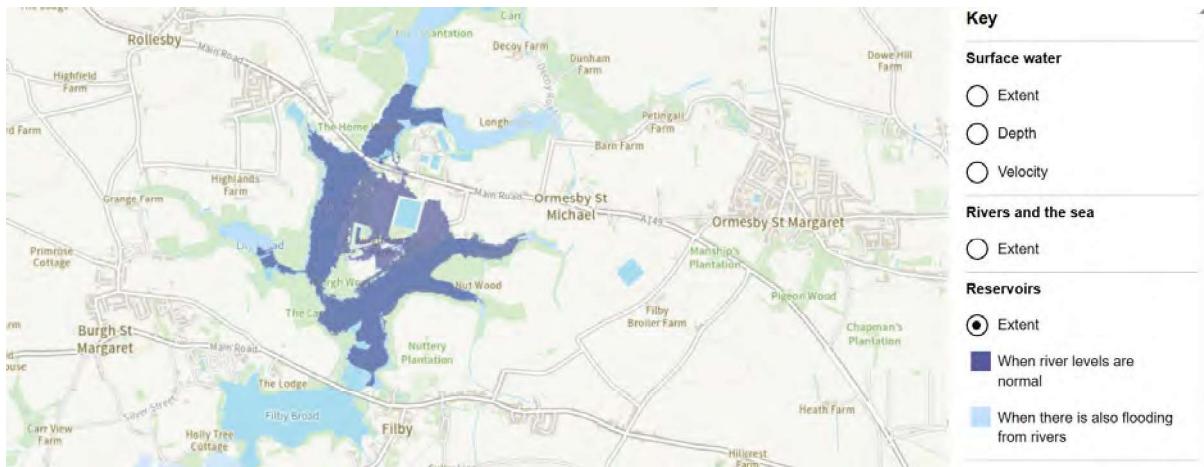


Figure 8-Flood Risk from Reservoirs (Environment Agency 2024)

### Air and Climatic Factors

19. As part of the National Air Quality Strategy all local authorities are obliged to establish air quality levels in their area that meet national air quality objectives. If an area does not meet these objectives Air Quality Management Areas (AQMAs) are declared. The latest Great Yarmouth Borough Council Air Quality Annual Status Report (2023) confirms that there are no Air Quality Management Areas in the borough or nearby to the FNDP area<sup>6</sup>. This would suggest that air quality is generally not of a concern, and indeed the report confirms that air quality within Great Yarmouth is good.

### Material Assets

20. There is reasonable access to a range of services and facilities as measured by distance, many within walking distance in the NPA. Services within the village include but not limited to :

- Primary school
- Pre-School
- Church
- Community Orchard
- Village Hall
- Post office
- Village shop
- Community Centre
- Playing fields

21. The neighbourhood plan area lies around 6 miles north-west of Great Yarmouth, with the A1064 running through it. This connects the village with neighbouring parishes

<sup>6</sup> Great Yarmouth Borough Council. 2023. Air Quality Annual Status Report (ASR) . Source: <https://docs.great-yarmouth.gov.uk/article/10381/Air-Quality-Annual-Status-Report-2023>

including Fleggburgh and Caister-on-Sea. Traffic is often diverted along the A1064 through the village if the Acle Straight is closed, which can make it very busy. Despite the closeness of this road Filby remains a tranquil parish. The roads through the village are subject to a 30mph limit, however local monitoring as part of Community Speedwatch indicates that average speeds are nearer 40mph and sometimes considerably higher.

22. Filby is served by public transport, with bus stops mainly along the main road. There are limited bus services to Acle and Great Yarmouth. There is a footway along one side of the main road through the village, though no footway along Ormesby Lane, which is narrow, for residents to gain access to the village centre. Filby has a number of Public Rights of Way that connect the village with surrounding countryside. Many of these run along field boundaries and there is a concentration to the south around the Broads.

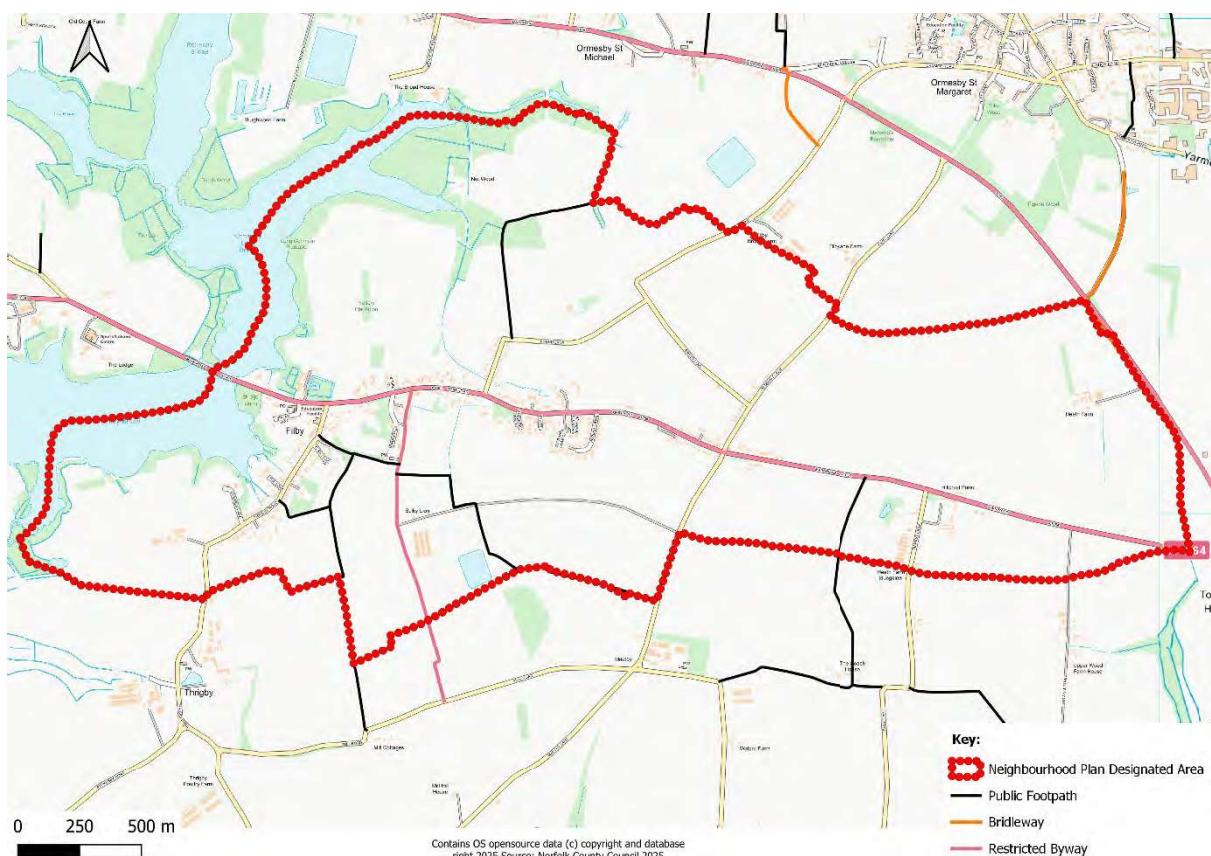


Figure 9- Public Rights of Way

## Cultural Heritage

23. Filby is a long, linear settlement with the main built-up area straddling the A1064. The road is somewhat dominating, though there are open breaks along the length of the settlement providing views into the open countryside, including onto arable farmland.

24. Historically the built environment of Filby revolved around agriculture. It was known for its market gardens, and particularly noted for growing raspberries. This declined in the 1960s as land was taken for property development. In recent years a number of redundant farms fronting the A1064 have been converted into residential use, which has reduced the number of open breaks.

25. East of the main village lies a smaller cluster of dwellings that are positioned around the junction of Main Road and Ormesby Lane. Whilst this area is connected to the main village by a footpath, it is both physically and visually distinct from the main village.

26. Filby has nine Listed Buildings all of which are Grade II, see **Figure 10<sup>7</sup>**. The majority of these buildings are along the main road through the village and cluster around the Church of All Saints. Filby House, and its private grounds, is recognised in the Great Yarmouth Local Plan to contribute towards the character of the village and has been omitted from the development boundary.

27. Norfolk Heritage Explorer identifies there to be 101 records of historic artefacts, structures, buildings, and marking in the landscape such as crop marks and ditches within the neighbourhood area. These include assets from multiple time periods including the Bronze Age, Roman, Medieval, Post-medieval and World War Two. Finds have included but are not limited to brooches, cropmarks/field boundaries, barrows, coins, flint flakes, ring ditches and sites of historic buildings including Filby House, Grange Farmhouse, Homestead Barn and Toll House. See **Figure 11<sup>8</sup>**. There are no Ancient Monuments and no Borough Council designated Conservation Areas.

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<sup>7</sup> [The List Search Results for filby | Historic England](#)

<sup>8</sup> [Your Search Results - Norfolk Heritage Explorer](#)



Figure 10- Listed Buildings within Filby



Figure 11-Areas of heritage importance within Filby (Source: Norfolk Heritage Explorer Interactive Map<sup>9</sup>)

<sup>9</sup> [Your Search Results - Norfolk Heritage Explorer](#)

## Landscape

28. The Great Yarmouth Borough Landscape Character Assessment (2008)<sup>10</sup> classifies the parish as 'Ormesby and Filby Settled Farmland', an enclosure of arable landscape. The character area is fringed by and forms the landscape setting of the Broads. The wooded backdrop of the Broads creates a sense of heightened tranquillity and wildness, in an otherwise arable landscape. Key considerations in relation to development include ensuring that settlement edges are transitional in character and integrate within their landscape setting. Existing hedgerows should be reinforced and wooded wetlands which form part of the Broadland landscape setting should be conserved.

29. In the Broads Landscape Character Areas Assessment<sup>14</sup>, Filby parish falls within **Character Area 26- Muck Fleet Valley- The Trinity Broads (Figure 12)**. A summary of points from the Landscape Character Area have been drawn out below:

30. **Character Area 26** primarily comprises a network of large, deep broads known as the Trinity Broads which occupy the upper part of the Muck Fleet Valley, which is a tributary valley of the River Bure. Despite the name that has been attached to these broads, five individually named broads are mapped, along with the detached Little Broad on Fleggburgh Common. In addition to the network of broads, two adjacent areas within the valley, Fleggburgh Common, which is an area of more open fen vegetation to the south of the broads, and Hall Farm Fen, Hemsby, which is an area of species rich fen grazing to the north east of the area, are notable examples of their type. Aside from the roads, parking opportunities near them via a couple of commercial developments, access is quite limited and the broads themselves often appear empty and tranquil. Boating in this area is limited mainly to nonpowered craft. The area sits in the middle of an area known as Flegg, an 'island' of higher ground between the Rivers Bure and Thurne. Flegg was historically separated into the two administrative units of East and West Flegg by the Muck Fleet Valley. The soils of the Flegg area are a deep, fertile loam which have made this one of the most intensively farmed areas in the county.

31. The area is a series of deep interconnected broads occupying a large tributary valley of the River Bure. The valley sides are very gentle rising to around 4m OD. The skylines are wooded and mostly undeveloped, with adjacent settlements heavily foiled by woodland.

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<sup>10</sup> [https://www.great-yarmouth.gov.uk/media/1236/Landscape-Character-Assessment/pdf/Landscape\\_Character\\_Assessment.pdf](https://www.great-yarmouth.gov.uk/media/1236/Landscape-Character-Assessment/pdf/Landscape_Character_Assessment.pdf)

### 32. Points to keep the area special:

- Care needs to be taken when **landscape change** occurs, to ensure that those positive characteristics that contribute to an areas unique sense of place are conserved and enhanced. What follows are examples of local issues and opportunities.
- **Landscape** – Although settlement is limited in the area, where it does exist it can impact on the tranquillity and naturalness of the area. Where new development opportunities are being pursued care needs to be taken to ensure that proposals do not adversely affect the key landscape characteristics of the area.
- **Nature conservation** – water quality is an issues for the Broads in part as a result of the adjacent farming activities. Initiatives are currently underway in relation to catchment management to help resolve these issues.

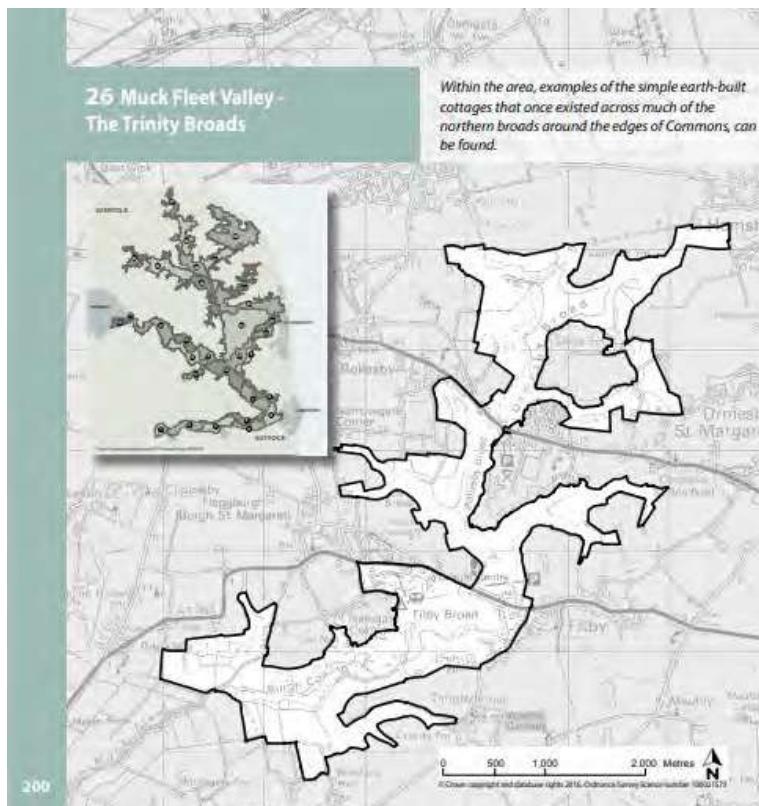


Figure 12-Character Area 26- Muck Fleet Valley- The Broads Landscape Character Areas Assessment)

## SEA Screening

### Legislative Background

33. The European Directive 2001/42/EC<sup>11</sup> is the basis for Strategic Environmental Assessments and Sustainability Appraisal legislation, which was transposed into English secondary legislation by the Environmental Assessment of Plans and Programmes Regulations 2004 otherwise known as the SEA Regulations. A SEA would be required if the implementation of the contents of the Belton with Browston, Burgh Castle and Fritton with St Olaves Neighbourhood Development Plan are likely to cause significant environmental effects.

34. The assessment undertaken will follow and answer specific questions using criteria drawn from the European SEA Directive and Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004 when determining the likely significance of effects as shown in **Figure 13**<sup>12</sup>.

35. **Figure 14** presents the flow diagram entitled Application of the SEA Directive to plans and programmes which is taken from the Practical Guide to the Strategic Environmental Assessment Directive, published in September 2005<sup>13</sup>. **Figure 15** below assesses whether FNDP will require a full SEA. The questions in the first column are drawn from **Figure 14** which sets out how the SEA Directive should be applied.

36. An assessment has been undertaken to determine whether the draft FNDP requires SEA in accordance with the SEA Regulations. Where the results can be viewed below.

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<sup>11</sup> [EUR-Lex - 32001L0042 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eli/leg/2001/l/0042/0001/_/en)

<sup>12</sup> [The Environmental Assessment of Plans and Programmes Regulations 2004 \(legislation.gov.uk\)](https://www.legislation.gov.uk/2004/1004/20040101/contents.html)

<sup>13</sup>

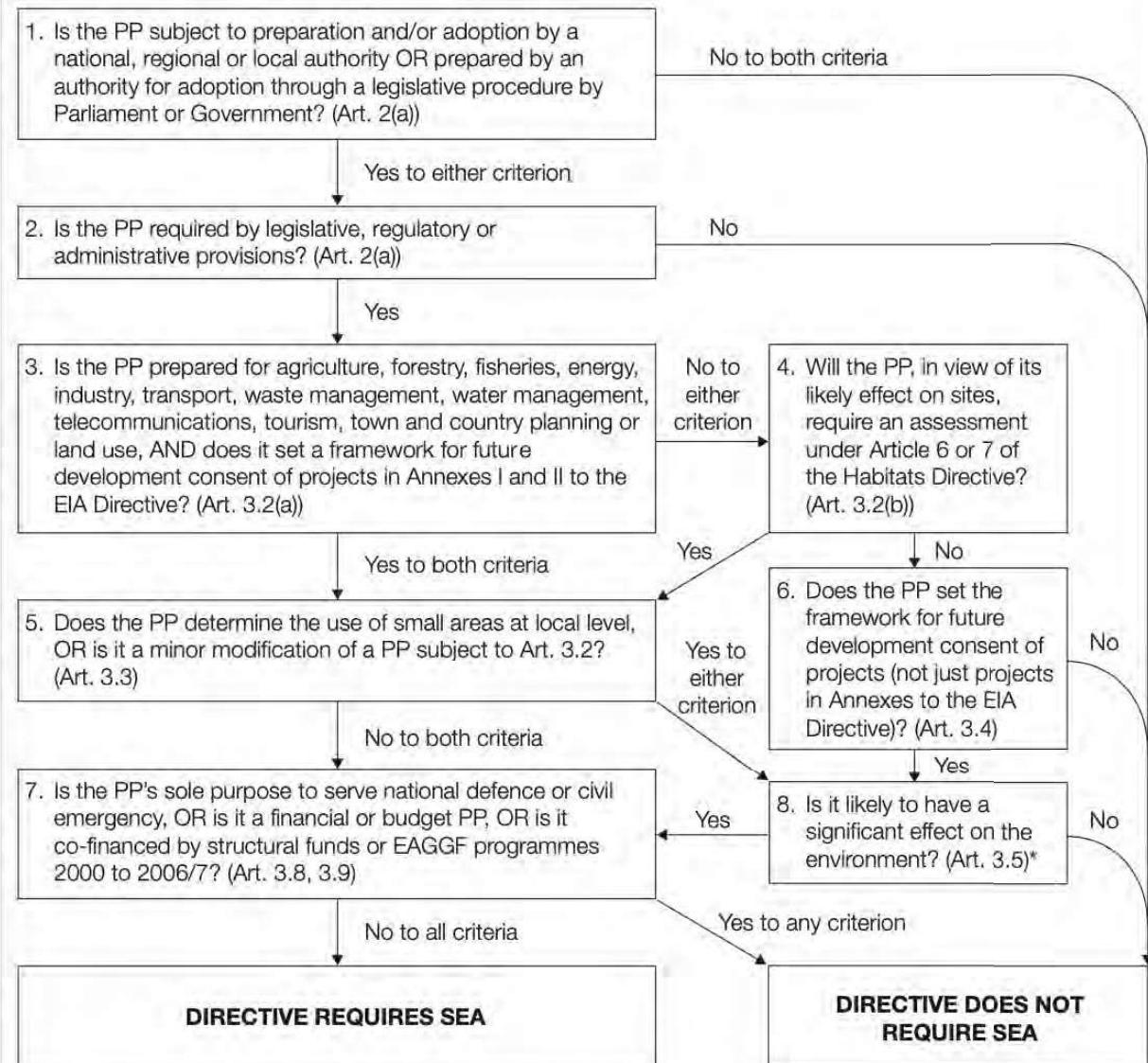
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## **SCHEDULE 1- CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS ON THE ENVIRONMENT**

1. The characteristics of plans and programmes, having regard, in particular, to:
  - a) 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;
  - b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
  - c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
  - d) environmental problems relevant to the plan or programme; and
  - e) the relevance of the plan or programme for the implementation of [F1retained EU law] on the environment (for example, 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:
  - a) the probability, duration, frequency and reversibility of the effects;
  - b) the cumulative nature of the effects;
  - c) the transboundary nature of the effects;
  - d) the risks to human health or the environment (for example, due to accidents);
  - e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
  - f) the value and vulnerability of the area likely to be affected due to—
    - (i)special natural characteristics or cultural heritage;
    - (ii)exceeded environmental quality standards or limit values; or
    - (iii)intensive land-use; and
  - g) the effects on areas or landscapes which have a recognised national, Community or international protection status.

Figure 13-Schedule 1 Criteria for determining the likely significance of effects

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



\*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

Figure 14-Application of the SEA Directive to plans and programmes

	Stage	Y/N	Justification
1	Is the Neighbourhood Development Plan (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))	Y	<p>The NP is being prepared by Filby Parish Council (as the “relevant qualifying body”) and will be made by Great Yarmouth Borough Council and The Broads Authority, subject to the NP Review passing an independent examination and local community referendum.</p> <p>The preparation of the Filby Neighbourhood Development Plan is allowed under primary legislation: The Town and Country Planning Act (1990) as amended by the Localism Act (2011).</p> <p>The preparation of NP's are subject to several relevant regulations as shown below (not intend to be a complete list):</p> <ul style="list-style-type: none"> <li>• The Neighbourhood Development Planning (General) Regulations 2012,</li> <li>• the Neighbourhood Development Planning (referendums) Regulations 2012</li> <li>• the Neighbourhood Development Planning (General)(Amendment) Regulations 2015</li> <li>• the Neighbourhood Development Planning (General)and Development Management Procedure (Amendment) Regulations 2016</li> <li>• the Neighbourhood Development Planning (General)and Development Management</li> </ul>

	Stage	Y/N	Justification
			<p>Procedure (Amendment) Regulations 2017</p> <p><b>GO TO QUESTION 2</b></p>
2	Is the Neighbourhood Development Plan (PP) required by legislative, regulatory, or administrative provisions? (Art. 2(a))	Y	<p>Whilst it is not a requirement for a parish to review a Neighbourhood Development Plan under the Town and Country Planning Act (1990) and Localism Act (2011), the NP will eventually be “made” and form part of the Development Plan for the Borough Council of Great Yarmouth and The Broads Authority Executive Area. These authorities are directed by legislative processes, and it is important that the screening process considers whether it is likely to have significant environmental effects and hence whether an SEA is required under the Directive.</p> <p><b>GO TO QUESTION 3</b></p>
3	Is the Neighbourhood Development Plan (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))	Y	<p>Developments that fall within Annex I are ‘excluded’ development for Neighbourhood Development Plans (as set out in Section 61(k) of the Town and Country Planning Act 1990 (as subsequently amended)<sup>14</sup> and the Localism Act 2011 Schedule 9 Part 2 Para 7 Section 38 B (1)(b),(6)<sup>15</sup>.</p> <p>A Neighbourhood Development Plan is prepared for Town and Country Planning and Land use. The Belton with Browston, Burgh Castle and Fritton with St Olaves Neighbourhood Development</p>

<sup>14</sup> [Town and Country Planning Act 1990 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

<sup>15</sup> [Localism Act 2011 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

	Stage	Y/N	Justification
			<p>Plan can include at a neighbourhood level, through different policy areas, the framework for development that would fall within Annex II of the EIA Directive.</p> <p>The Neighbourhood Development Plan is being prepared to set out a framework for town and country planning and land use within the parish of Filby. Its intention is to complement the higher order strategic framework that already exists for land use planning across the Borough of Great Yarmouth and the Broads Authority. The Neighbourhood Development Plan seeks to align and be in general conformity with the strategic framework.</p> <p>The Neighbourhood Development Plan is not allocating any development itself but anticipates being one of the key tools to manage future development of Filby.</p> <p><b>GO TO QUESTION 4</b></p>
4	Will the Neighbourhood Development Plan (PP), in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.3)	N	<p>A Habitats Regulations Assessment (HRA) screening of the Neighbourhood Plan has been undertaken in the next section and has concluded that the Neighbourhood Plan is not likely to have a significant effect on any European site, either alone or in combination.</p> <p><b>GO TO QUESTION 6</b></p>
6	Does the Neighbourhood Development Plan (PP) set the framework for future	Y	Although the Neighbourhood Plan does not allocate sites for development, it includes non-strategic policies which

	Stage	Y/N	Justification
	development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)		proposals for development within the parish will be assessed against when materially relevant.  <b>GO TO QUESTION 8</b>
8	Is it likely to have a significant effect on the environment? (Art. 3.5)	N	<b>SEE FIGURE 14 – PLAN DOES NOT REQUIRE SEA</b>

Figure 15-Application of SEA Directive to FNDP

*\*PP in this instance refers to Neighbourhood Development Plan*

37. Schedule 1 of the SEA Regulations sets out the criteria for determining the likely significance of effects. These are listed in **Figure 16** below along with comments on the extent to which the FNDP meets these criteria.

SEA Directive Criteria (Annex II)	Comments	Likely Significant Effect? Y/N
<b>Characteristics of the plan and programmes, having regard in particular, to:</b>		
a) 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	Once made, FNDP will become part of the statutory development plan and will guide the delivery of development within the designated plan area.  The parish is located within the district of Great Yarmouth. The Great Yarmouth Core Strategy (2015) Policy 1 sets to accommodate around 5% of new development in secondary and tertiary villages within the settlement hierarchy. Filby is identified as a Secondary Village.	N

SEA Directive Criteria (Annex II)	Comments	Likely Significant Effect? Y/N
	<p>There are no housing allocations in Filby within the Great Yarmouth Local Plan Part 2 (2021) or the Broads Local Plan (2019).</p> <p>An indicative housing requirement for FNDP has been set as zero as justified in Policy GSP2 of the Great Yarmouth Local Plan Part 2 (2021) because provision of housing is being met in this parish and elsewhere.</p> <p><b>In terms of the degree to which FNDP sets a framework, it does not allocate land for development.</b></p>	
<p>b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy</p>	<p>The Neighbourhood Development Plan Review will be adopted alongside the higher order adopted Local Plans and National Planning Policy Framework and form part of the Borough Council and The Broads Authority Development Plans. The Neighbourhood Development Plan must be in general conformity to the strategic framework and will expand upon some of the Local Plan policies, providing supplementary information on a local scale.</p> <p>It does not have an influence over other plans. However, once made FNDP will form part of the statutory development plans for Filby and will be used in conjunction with the</p>	N

SEA Directive Criteria (Annex II)	Comments	Likely Significant Effect? Y/N
	current development plans to determine planning applications.	
c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	<p>One of the Basic Conditions which FNDP must meet is to contribute towards sustainable development. Several policies within the plan will focus on environmental protection and mitigation, including designation of Local Green Spaces, protection of important public views and green corridors. These aim to ensure effects on the environment are minimised within the plan area and promote positive action. Given the non-strategic nature of the FNDP this does not have the potential to restrict the delivery of other plans or programmes.</p>	N
d) Environmental problems relevant to the plan or programme	<p>Baseline information relating to FNDP was described earlier in this Screening Document. Some of these designations are of international and national importance and are of high conservation value, including:</p> <ul style="list-style-type: none"> <li>• <b>The Broads</b> - Special Area of Conservation (SAC)</li> <li>• <b>Trinity Broads</b>- Site of Special Scientific Interest (SSSI) and SAC</li> </ul> <p>Those in close proximity but outside of the designated area includes <b>Broadland</b> a Ramsar Site and Special Protection Area (SPA).</p>	N

SEA Directive Criteria (Annex II)	Comments	Likely Significant Effect? Y/N
	<p>There are several priority habitats in the NPA. The plan seeks to provide protective policies that will have influence over these environmental assets.</p> <p><b>The plan itself will not specifically allocate land for development and will not exacerbate any significant known environmental problems to the plan area or adjacent sites.</b></p>	
<p>e) The relevance of the plan or programme for the implementation of community legislation on the environment (eg plans and programmes linked to waste management or water protection)</p>	<p>The implementation of community legislation is unlikely to be significantly compromised by the Neighbourhood Development Plan.</p>	N
<p><b>Characteristics of the effects and of the area likely to be affected, having regard, in particular, to</b></p>		
<p>a) The probability, duration, frequency, and reversibility of the effects</p>	<p>FNDP does not contain any site-specific development proposals that will result in complex, widespread, long lasting, or serious environmental effects.</p>	N
<p>b) The cumulative nature of the effects</p>	<p>As it will not allocate land for development FNDP will not lead to any cumulative effects in combination with existing or emerging plans.</p>	N

SEA Directive Criteria (Annex II)	Comments	Likely Significant Effect? Y/N
c) Transboundary nature of effects	The emerging FNDP area provides supplementary policy areas on a local scale. The impacts for transboundary effects beyond the designated area are unlikely to be significant.	N
d) The risks to human health or the environment (for example, due to accidents)	FNDP is unlikely to produce any significant effects to human health or the environment.	N
e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The FNDP area has a total population of around 890 (Census, 2021). This sits within the context of a total population in Great Yarmouth of 99,700 (Census, 2021 <sup>16</sup> ). FNDP remains a non-strategic plan and the principle of development that will take place has already been established within the Great Yarmouth Local Plan and The Broads Local Plan.	N
f) The value and vulnerability of the area likely to be affected due to – <ul style="list-style-type: none"> <li>i. Special natural characteristics or cultural heritage;</li> <li>ii. Exceeded environmental quality standards or limit values; or</li> <li>iii. Intensive land-use</li> </ul>	i) As noted earlier, there are a few national and international designations located within FNDP such as the Broads to the west. There are also priority habitats within the plan area and 9 Listed Buildings. The plan does not allocate land itself, so it is not anticipated to have likely significant effects.  ii) FNDP is unlikely to result in exceedance of environmental quality standards, such as those	N

<sup>16</sup> Census 2021. Age Profile. Source: [Build a custom area profile - Census 2021, ONS](#)

SEA Directive Criteria (Annex II)	Comments	Likely Significant Effect? Y/N
	<p>relating to air, water, and soil quality.</p> <p>iii) FNDP is unlikely to bring forward development of an extent that would result in a significant intensification of Local Land Use.</p> <p><b>The emerging FNDP does not include site allocations and therefore are not anticipated to have likely significant effects on the parish.</b></p>	
g) The effects on areas of landscapes which have a recognised national, Community or international protection status	<p>FNDP is not anticipated to have likely significant effects on areas of landscape which have recognised protection status given the plan will not allocate land for development and it contains various protecting policies to conserve landscape quality.</p> <p>The environmental effects on areas of biodiversity designations have also been considered through the Local Plans.</p>	N

Figure 16-Likely Significant Effects

#### SEA Screening Conclusion

38. A Screening Assessment has been undertaken by applying the criteria from the SEA Directive and Schedule 1 of the SEA Regulations to determine whether or not the FNDP is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

39.FNDP will set out a vision and non-strategic planning policies to shape development in Filby up to 2041. The plan does not allocate sites for development but does contain policies that protect locally important assets and promotes environmental improvement. Such mitigating policies will compliment those set out in the local plans. The assessment concludes that this will not result in likely significant effects on the environment.

**40.On this basis, it is considered that FNDP does not have the potential to have significant environmental impacts, and SEA is not required.**

## HRA Screening Assessment

### What is a Habitats Regulation Assessment?

41. A Habitats Regulations Assessment (HRA) is the process by which a 'competent authority' is required to assess the potential impacts of plans and projects (such as Local Plans, Neighbourhood Development Plans or development proposals put forward in planning applications) on International Sites in accordance with Article 6 (3) of the EU Habitats Directive and Regulation 61 of the [Conservation of Habitats and Species Regulations 2017 \(as amended\)](#). A competent authority, such as the Local Planning Authority, must determine if a plan or project may affect the protected features set out in the Conservation Objectives of an International habitat site before deciding whether to undertake, permit or authorise it.

### What are the International (European) Designated Sites?

42. There are three types of International Sites designations:

- **Ramsar:** Ramsar sites are wetlands of international importance, designated under the Ramsar Convention on Wetlands<sup>17</sup>.
- **Special Area of Conservation (SAC):** Areas which have been given special protection for a variety of wild animals, plants and habitats.
- **Special Protection Area (SPA):** Identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries.

### Screening

43. To fulfil the legal requirements if likely significant effects will occur with the implementation of the FNDP upon the International Sites (Natura 2000 sites) an initial screening assessment has been undertaken which is the first stage of the HRA process. If any likely significant effects on International Sites will occur then the screening is followed by an appropriate assessment (second stage of the HRA process) which needs to consider these impacts in more detail and what mitigation measures, if any, can be achieved to address these<sup>18</sup>.

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<sup>17</sup> The Ramsar Convention on Wetlands is an international treaty for the conservation and sustainable use of wetlands. It is named after the city of Ramsar in Iran, where the Convention was signed in 1971. It came into force in 1975.

<sup>18</sup> [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](#)

44. The purpose of the Screening stage is to:

- Identify all features of the FNDP that would have **no effect** on an International/European site. These features can be eliminated from further consideration in respect of this and other plans.
- Identify all aspects of the FNDP that would **not be likely to have a significant effect** on an International/European site (i.e. would have some effect because of links/connectivity but the effect is not significant), either alone or in combination with other aspects of the same plan or other plans or projects. These do not require 'Appropriate Assessment'.
- Identify those aspects of the FNDP 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.

### **Case Law and the Interpretation of 'likely significant effects'**

45. Before undergoing the assessment, it is useful to reflect on relevant case law to help interpret when effects should be considered as a likely significant effect, when carrying out HRA of a Neighbourhood Development Plan. In the Waddenze case<sup>19</sup> the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 105 in the Conservation of Habitats and Species Regulations 2017<sup>20</sup>):

*"An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (paragraph 45). An effect should be considered 'significant', "if it undermines the conservation objectives" (paragraph 48). Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (paragraph 47)."*

46. As well as this another relevant opinion delivered to the Court of Justice of the European Union stated: *"The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no*

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<sup>19</sup> Case C-127/02 Landelijke Vereniging tot Behoud van de Waddenze and Nederlandse Vereniging tot Bescherming van Vogels v Staatssecretaris van Landbouw, Natuurbeheer en Visserij. Directive 92/43/EEC – Conservation of natural habitats and of wild flora and fauna – Concept of 'plan' or 'project' – Assessment of the implications of certain plans or projects for the protected site

Source: [EUR-Lex - 62002CJ0127 - EN - EUR-Lex](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02002CJ0127-EN- EUR-Lex)

<sup>20</sup> [The Conservation of Habitats and Species Regulations 2017](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02017R0105-EN- EUR-Lex)

*appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill (Paragraph 48).<sup>21</sup>*

47. This opinion on the interpretation of significant effects in the 'Sweetman' case allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or de minimis; referring to such cases as those "that have no appreciable effect on the site". In practice such effects could be screened out as having no likely significant effect – they would be 'insignificant'. The HRA Screening assessment therefore considers whether the Pre-Submission Draft of Hellesdon Neighbourhood Development Plan and its policies could have likely significant effects either alone or in combination.

## **Assessment**

48. Firstly, it is established practice in HRA to identify any International/European Sites that could possibly be affected within the area covered by the plan proposal or project and other sites that may be affected beyond this area. In this screening assessment the area screened was the FNDP designated area as well as a distance of 20 kilometres (km) taken from the centre of FNDP as shown in **Figure 18**. A distance of 20 kilometres from the centre point of the FNDP area was used in the first instance because this has been agreed with Natural England for the relevant Local Plans HRAs in this region<sup>22</sup> and is considered precautionary. In line with HRA requirements, the application of a 20-kilometre buffer is considered a highly precautionary distance with relation to potential impacts to the surrounding area.

49. The assessment also considers areas that may be functionally linked to the International/European sites. The term 'functional linkage' refers to the role or 'function' that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore 'linked' to the European site in question because it

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<sup>21</sup>Case C-258/11 Peter Sweetman Ireland Attorney General Minister for the Environment, Heritage and Local Government v An Bord Pleanala (Reference for a preliminary ruling from the Supreme Court (Ireland)) (Environment – Special conservation areas – Assessment of the impact of a plan or project on a protected site – Adverse effect on the integrity of the site). Source: [CURIA - Documents](#)

<sup>22</sup>Greater Norwich Local Plan HRA Interim Report 2018. Source. [Microsoft Word - E16845 GNLP Interim HRA of GNLP Issues and Options v3 2017-12-06 issue](#)

provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status<sup>23</sup>.

50. Whilst the boundary of an International/European site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. The mobility of qualifying species is considerable and may extend so far from the key habitat that forms the designated area (SAC or SPA) that it would be entirely impractical to attempt to designate or classify all of the land or sea that may conceivably be used by the species.

51. In the FNDP area there is one designated International/European sites. This screening assessment has also considered the impact on International Sites within a 20km radius of the FNDP area as an in-combination assessment (**Figure 17**). The point for measuring 20km has been taken from the centre of FNDP as shown in **Figure 18**. A number of International Sites are shown to be located within 20km radius of the FNDP area including:

Special Areas of Conservation	Special Protection Areas	Ramsar Sites
<ul style="list-style-type: none"><li>• Broadland</li><li>• The Broads</li><li>• Southern North Sea</li></ul>	<ul style="list-style-type: none"><li>• Broadland</li><li>• The Broads</li><li>• Greater Wash</li></ul>	<ul style="list-style-type: none"><li>• Broadland</li><li>• The Broads</li></ul>

Figure 17- Table of the International Designated Wildlife Sites within 20km radius of FNDP

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<sup>23</sup> [Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions - NECR207 \(naturalengland.org.uk\)](#)

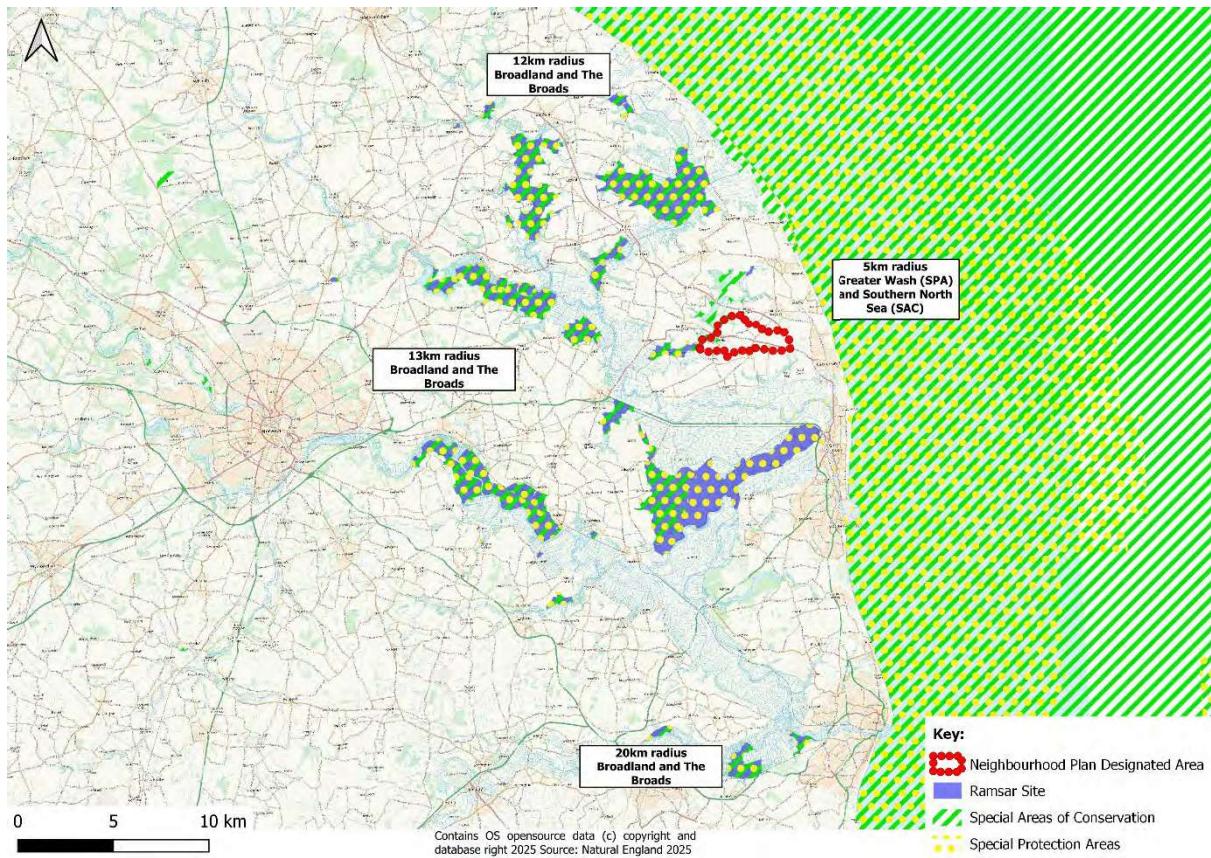


Figure 18- Map of the International Designated Wildlife Sites within 20km radius of FNDP

52. Natural England provides detailed information about the European Sites with reference to Standard Data Forms for the SPA sites and Natural England's Site Improvement Plans<sup>24</sup>. Natural England's conservation objectives<sup>25</sup> for the SPA sites have also been reviewed when writing this report. These state that site integrity must be maintained or restored by maintaining or restoring the habitats of qualifying features, the supporting processes on which they rely, and populations of qualifying species.

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

<sup>24</sup> [Natural England Access to Evidence - Site Improvement Plans: East of England](#)

<sup>25</sup> [Natural England Access to Evidence - Conservation Objectives for European Sites](#)

April 2018<sup>26</sup>. The judgment clarified that when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any mitigation measures in Neighbourhood Development Plans, permissions in principle and certain development orders<sup>27</sup>.

54. Each European site has a set of interest features which are the ecological features for which the site is designated or classified, and the features for which Member States should ensure the site is maintained or where necessary restored. European sites are at risk if there are possible means by which any aspect of a plan or project can, when being taken forward for implementation, pose a potential threat to the wildlife interest of the sites. This is often referred to as the 'impact pathway'. Potential impact pathways causing significant effects are:

- Physical loss or damage to habitat;
- Non-physical disturbance (noise, vibration and light pollution);
- Pollution Impacts (Air, Non-toxic contamination, Wastewater) ;
- Recreational pressure;
- Increased pressure on water resources
- Urban effects

### **HRA Impacts Screening**

55. A risk-based approach involving the application of the precautionary principle was adopted in the assessment, such that a conclusion of 'no likely significant effect' (LSE) would only be reached where it was considered unlikely, based on current knowledge and the information available, that a FNDP policy would have a significant effect on the integrity of a European site. FNDP does not allocate land for development and therefore will not directly result in an increase in the number of new dwellings within the vicinity of European Sites. A summary of findings linked to potential impact pathways are considered in **Figure 19** and an assessment of potential impacts of the draft policies contained within FNDP is provided in **Figure 20**.

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<sup>26</sup><sup>26</sup> The Court of Justice of the European Union delivered its judgment in [Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta \('People over Wind'\)](#).

<sup>27</sup> GOV. Para 009 . Source: [Appropriate assessment - GOV.UK \(www.gov.uk\)](#)

Impact Pathway	Findings
<b>Physical loss or damage to habitat</b>	<p>Habitat loss from development in areas outside of the European site boundaries may result in likely significant effects where that habitat contributes towards maintaining the interest feature for which the European site is designated. This includes land which may provide offsite movement corridors such as sheltering habitat for mobile species including birds, bats and fish. European sites susceptible to the indirect effects of habitat loss are restricted to those with qualifying species that rely on offsite habitat.</p> <p>As FNDP is not allocating any sites for development in the area it is considered there will be no likely significant effects of physical loss or damage to a habitat and is screened out of the assessment.</p>
<b>Non-physical disturbance (noise, vibration and light pollution)</b>	<p>Non-physical disturbance effects such as noise and vibration are most likely to disturb bird species and thus are a key consideration with respect to potential effects on European sites where birds are the qualifying features. Light pollution from artificial lighting at night also has the potential to affect species where it occurs in close proximity to key habitat areas, such as key roosting sites of SPA birds.</p> <p>It has been assumed that the effects of non-physical disturbances are most likely to be significant within a distance of 500 metres from the source.</p> <p>The Broads (SAC) falls within the Neighbourhood Area and the other SAC/SPA/Ramsar Sites are located adjacent to the parish. As FNDP is not allocating any sites for development in the area it is considered there will be no likely significant effects of non-physical disturbance to a habitat and is screened out of the assessment.</p>
<b>Non-toxic contamination</b>	<p>A non-toxic environment is understood to be an environment that is free from chemical pollution and of exposures to hazardous chemicals at levels that are harmful to human health and to the environment. An example of non-toxic contamination in the environment is the creation of dust from human activities such as</p>

Impact Pathway	Findings
	<p>road transport, construction and industry<sup>28</sup>. Dust can smother terrestrial habitats, preventing natural processes, and an increased sediment can potentially affect the aquatic habitats/species.</p> <p>As FNDP is not allocating any sites for development in the area it is considered there will be no likely significant effects of non-contamination and is screened out of the assessment.</p>
<b>Air pollution</b>	<p>There are number of atmospheric pollutants which can result in direct or indirect impacts to Habitats sites. These impacts are usually caused when the qualifying features are plants, soils and wetland habitats. However, some species may also be indirectly impacted from air pollution causing changes in habitat composition.</p> <p>Around the world the primary contributors to atmospheric pollution is transport and industry related activities<sup>29</sup>. The main pollutants to atmospheric pollution are considered to be oxides of nitrogen (NOx) or sulphur dioxide (SO2)<sup>30</sup>. In England, road transport is a major source of emissions of nitrogen oxides contributing to 30% of emissions in 2022 alone. It has been stated that excess deposition of nitrogen (NOx) compounds may lead to a cascade of environmental problems including both soil and freshwater acidification, the reduction of biodiversity (Zhang et al; 2021<sup>31</sup>) and cause eutrophication of soils and water affecting nutrient levels and reducing the diversity of species in sensitive environments<sup>32</sup>.</p> <p>Based on the 2019 Highways England Design Manual for Road and Bridges (DMRB) LA 105 Air quality<sup>33</sup> (which sets out the requirements for assessing and reporting the effects of highway projects on air quality), the report states that an assessment of the</p>

<sup>28</sup> [Monitoring ambient air: particulate matter - GOV.UK](#)

<sup>29</sup> [Air quality, energy and health](#)

<sup>30</sup> [Emissions of air pollutants in the UK - Summary - GOV.UK](#)

<sup>31</sup> [Atmospheric nitrogen deposition: A review of quantification methods and its spatial pattern derived from the global monitoring networks - ScienceDirect](#)

<sup>32</sup> [Emissions of air pollutants in the UK - Background - GOV.UK](#)

<sup>33</sup> [LA 105 - Air quality \(standardsforhighways.co.uk\)](#)

Impact Pathway	Findings
	<p>impact of pollutant concentrations on sensitive receptors should be done within 200m from the road itself.</p> <p>As FNDP is not allocating any sites for development in the area it is considered there will be no likely significant effects of air pollution on the European Sites and is screened out of the assessment.</p>
<b>Recreational pressure</b>	<p>Recreational activities can result in significant effects on European sites. European sites with qualifying bird species are likely to be particularly susceptible to recreational disturbances from walking, dog walking, angling, off-road vehicles and motorbikes, wildfowling, and water sports. In addition, recreation can physically damage habitat as a result of trampling, fire or vandalism and also through erosion associated with terrestrial activities.</p> <p>Each European site will typically have a 'Zone of Influence' (ZOI). A Zone of Influence (ZOI) is a designated distance that establishes where development is likely to have a significant effect on a Habitats Site. It is an area stemming outwards from a Habitats Site within which development can be expected to have a negative effect on the integrity of the Habitats Site in question. It is deemed there will be likely significant effects arising from additional residents living within the zone and travelling to European sites for recreation. ZOI determines where new development may result in changes in recreation and therefore where mitigation will be necessary.</p> <p>In 2015 and 2016 Norfolk County Council/the Norfolk Biodiversity Partnership (NBP) commissioned visitor surveys on behalf of all LPAs (including Great Yarmouth and the Broads Authority), to determine current and projected visitor patterns to habitats sites across Norfolk. This then led to adoption of the Norfolk Green Infrastructure and Recreational Avoidance Mitigation Strategy (GIRAMS<sup>34</sup>). Based on this work, a ZOI was established for each habitats site within the study area based on resident and tourist visitor data.</p>

<sup>34</sup> Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy. Source: [Document.ashx](#)

Impact Pathway	Findings
	<p>The ZOI for the European Sites within 20km to the FNDP Include:</p> <ul style="list-style-type: none"> <li>• Broadland (25km for residents only or 248km tourism)</li> <li>• The Broads (25km for residents only or 248m tourism)</li> <li>• East Coast Sites (30km for residents only or 202km tourism)</li> <li>• The Wash (61km for residents only or 162km tourism)</li> </ul> <p>Essentially now the GIRAMS has been adopted in Norfolk, any allocation (small scale or large scale) should require a full SEA or HRA to ensure that there are no likely effects. However, since FNDP is not allocating any sites in the NDP it is considered a full HRA should be ruled out at this stage.</p>
<b>Changes to hydrology, including water quantity and quality</b>	<p>An increase in demand for water abstraction and treatment resulting from any growth proposed in the FNDP area could result in changes in hydrology at European sites. Depending on the qualifying features and particular vulnerabilities of the European sites, this could result in likely significant effects, for example, due to changes in environmental or biotic conditions, water chemistry and the extent and distribution of preferred habitat conditions.</p> <p>The FNDP does not allocate any development and does not have influence over any development outside of the FNDP designated area. Therefore, no likely significant effects will occur from FNDP as a result of changes to hydrology either alone or in-combination with other plans and policies.</p>

Figure 19-Summary of Impact Pathways

Policy	Description	Likely Significant Effects (LSE)	Recommendation at Screening Stage
<b>Policy H1: Housing Type and Mix</b>	This policy addresses housing mix including requirements that ensure future housing development meets the needs of local people.	No LSE – does not promote development but relates to qualitative criteria for development	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken
<b>Policy H2: Design</b>	Requiring high quality design complementing the local character.	No LSE – policy is qualitative and does not promote development	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken.
<b>Policy E1: Biodiversity and Wildlife Corridors</b>	<p>Policy sets out that Filby's wildlife rich habitats must be safeguarded and enhanced through proactive actions part of development. Proposals will be supported where they can demonstrate a list of actions.</p> <p>Wildlife corridors have been mapped out with local natural features in mind which proposed developments within or adjacent to the corridors should have regard to enhance or restore habitat connectivity.</p>	No LSE – mitigation policy for growth	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken
<b>Policy E2: Trees and Hedgerows</b>	Policy setting out detail/criteria on protecting existing trees and hedgerows in the parish, as well as replacement trees.	No LSE – protective policy	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken

Policy	Description	Likely Significant Effects (LSE)	Recommendation at Screening Stage
<b>Policy E3: Local Green Space</b>	Protection of green spaces of local importance from future development.	No LSE – supports retention of green open spaces, conserving the natural environment	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken
<b>Policy E4: Dark Skies</b>	Policy to protect unnecessary light pollution from new developments	No LSE – protective policy	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken
<b>Policy E5: Landscape Character</b>	<p>Development must conserve and enhance the local character.</p> <p>Protection of important local views means proposals must demonstrate that development is sited and designed to be of a form and scale which avoids harm to the views.</p> <p>Proposals sited on Grade 1 agricultural land that is currently in farming use will not be supported, unless the community benefits of such development significantly and demonstrably outweigh the harm of losing the land.</p>	No LSE – protective policy	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken

Policy	Description	Likely Significant Effects (LSE)	Recommendation at Screening Stage
<b>Policy E6: Managing Surface Water</b>	Policy is promoting sustainable development to help address vulnerability to the effects of climate change. All developments should incorporate SuDS appropriate to their scale and nature. SuDS should link with Filby's wildlife corridors.	No LSE – protective policy	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken.
<b>Policy BE1: Heritage Assets</b>	Policy protects heritage assets in the parish including a number of buildings and structures of local importance that are valued for their historic significance, architectural distinctiveness and social / cultural value.	No LSE – policy is qualitative and does not promote development	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken.
<b>Policy BE2: Filby Village Gap</b>	Policy sets out two distinct parts of the village for separation. Development proposals within the defined area should respect the individual and distinct identities of the different parts of the village.	No LSE – policy is qualitative and does not promote development	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken.

Policy	Description	Likely Significant Effects (LSE)	Recommendation at Screening Stage
<b>Policy AT1: Sustainable Transport</b>	<p>Policy focuses on encouraging sustainable travel choices including safe walking links and improving/extending footpaths and footways.</p> <p>Enhancements to existing Public Rights of Ways will need to focus on those that have the potential to take recreational walking pressure off those parts of The Broads SSSI and SAC where habitat deterioration and disturbance are a concern.</p>	No LSE – policy is qualitative and does not promote development	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken.
<b>Policy AT2: Traffic and Speed</b>	Development should not be detrimental to highway safety and will be required to mitigate its own impacts.	No LSE – policy is qualitative and does not promote development	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken.
<b>Policy CFI1: Community Facilities</b>	Policy protects 12 community facilities. As well as this proposal will be supported where they assist with the delivery of new/enhanced facilities to the benefit of the community.	No LSE – does not promote development	None. This policy does not trigger the need for an appropriate assessment (HRA Stage 2) to be undertaken

Figure 20- HRA Screening Assessment

#### HRA Screening Conclusion

56. The HRA Screening Assessment concludes that no significant effects are likely to occur with regards to the integrity of European Wildlife Sites within 20km. As such a

full HRA and Appropriate Assessment is not required at this point and is **screened out**.