APPENDIX 9.10B

INFORMATION TO SUPPORT HRA

BROADLAND DISTRICT COUNCIL
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PLANNING CONTROL
Appendix 9.10b: Information to Inform a Habitats Regulations Assessment

Introduction

Background

9.1.1 This document, prepared by Bioscan UK Limited, sets out information to inform the screening and (where relevant) full ‘appropriate assessment’ stages of a Habitats Regulations Assessment (HRA) in respect of potentially significant indirect effects on European Sites which may result from the Development of the Site. The EIA scoping for the adjoining site (extending to 15km for international designations) identified that there was potential for significant effects from increases in recreational use on the Broadland SPA and The Broads SAC (also SSSI and Ramsar Site; see Appendix 9.10a). This document seeks to provide sufficient baseline information for the relevant competent authorities to assess the likelihood of significant effects arising.

9.1.2 This report refers throughout to, and draws upon, the information within a very similar Habitats Regulations Assessment carried out by Aspect Ecology in March 2016 for the adjoining site (also referred to as ‘Land South of Salhouse Road, Norwich) which forms the remainder of the GT7 allocation site. That report is included within this Appendix, and referred to as Appendix 9.10a.

Proposals

9.1.3 The Development will comprise up to 380 dwellings, with access roads and associated infrastructure and open space provision.

9.1.4 Aspect Ecology used an average occupancy estimator to predict the increase in population for the adjoining site (see Appendix 9.10a). The latest CLG household projection data states that there is an average occupancy of 2.21 residents per dwelling. Applying this multiplier to the Site, it is predicted that the proposals will result in an increase in population of 840 people. It should however be noted that such simplistic calculations are very much biased towards the worst-case end of the spectrum, for the simple reason that residential developments do not of themselves generate new people. A significant proportion, and quite probably the majority of occupants of any new development will be people who have relocated from the immediate local area (e.g. families seeking to upscale their accommodation and/or first time buyers moving out of rented ‘houses in multiple occupancy’ (HMOs)). In a large proportion or majority of cases, new occupants will therefore be relocating from existing accommodation elsewhere within the same recreational catchment, thus resulting in no net increase in recreational burden on sites falling within range. Put another way, the proportion of occupants taking up the new residential capacity that are entirely new to the area, and thereby represent a net increase in population within the recreational visitor catchment of sensitive sites, is likely to be low, and simple multipliers of the sort applied by Aspect should be seen in this context. For consistency however, the same approach to assessing recreational uplift is used in this assessment.
Potential Effects

9.1.5 The sites with international ecological designations within a 15km radius of the Site are described in detail in the Baseline Conditions section of Chapter 9 (Ecology & Nature Conservation) of this ES, and summarised below:

- The Broads Special Area of Conservation (SAC), Broadland Special Protection Area (SPA) and Broadland Ramsar Site (approximately 4.4km south-east of the Site and approximately 5.8km north-east of the Site at the two closest points);
- River Wensum SAC (approximately 6.9km west of the Site); and
- Norfolk Valley Fens SAC (approximately 13.5km north-west of the Site).

9.1.6 Aspect Ecology’s HRA report (Appendix 9.10a) identified that no potential effects were identified for either River Wensum SAC or Norfolk Valley Fens SAC during the EIA scoping for the adjacent site. Both sites were assessed as being sufficiently far from the Site that no significant direct impacts would be anticipated. Recreational pressure has not been identified as a potential threat to either site on the JNCC data forms. For the same reasons, there is assessed to be no requirement for further assessment of these sites in respect of the current Site, and they are scoped out at this stage.

9.1.7 As such, this assessment just focuses on potential effects from the proposals on The Broads SAC and Broadland SPA (and by extension the Broadland Ramsar Site and relevant SSSI, although these fall outside the HRA regime). These cumulative designations are hereafter collectively referred to as ‘The Broads designations’.

Legislation and Assessment Methodology

9.1.8 The applicable legislation and assessment methodology for competent authorities is as described by Aspect Ecology within their HRA report. Further details are included within Appendix 9.10a (section 2) and are not repeated here.

Consultation

9.1.9 The comments made at paragraphs 2.2.10 and 2.2.11 of Appendix 9.10a about consultation and scoping and its relevance to the HRA process also remains valid for this assessment, as the EIA scoping process covered the entire GT7 allocation site, of which the current Site forms a part.

Planning Context and Policy HRAs

9.1.10 The planning context and policy HRAs are also as per section 3 of the Appendix 9.10a and are not repeated here.
Characteristics of The Broads Designations

9.1.11 The characteristics of The Broads designations are as per section 4 of Appendix 9.10a, so are not repeated here.

Assessment of Potential Effects

9.1.12 As identified during the EIA scoping process for the adjoining development and wider GT7 allocation area that includes the Site, the potential impact requiring consideration in terms of the HRA Stage 2 and (if relevant) Stage 3 processes is the potential for effects resulting from increased recreational pressure. Information to assess the potential for likely significant effects to arise from this is provided below, using the same headings as at Appendix 9.10a:

Recreation Effects and Delivery of Green Space

9.1.13 Potential effects on The Broads designations arising from a worst-case increase in recreational catchment population of 840 people could include increased:

- Dog fouling;
- Fly tipping;
- Littering;
- Path erosion / trampling;
- Damage to bankside vegetation; and
- Disturbance to bird populations.

Quantum of Green Space

9.1.14 The strategic HRA carried out in connection with the Greater Norwich Joint Core Strategy, Emerging North-East Growth Triangle (NEGT) Area Action Plan\(^1\) and the Beeston Park development state that there is an evidence base to confirm that significant effects on The Broads designations can be mitigated with provision of Green Infrastructure (GI). To provide effective mitigation, the GI must be of an adequate size and attractiveness and in an appropriate location to draw residents away from the designated sites for everyday recreational activities, in particular dog walking.

9.1.15 Policy RL1 of the Broadland DPD states that at least 1.68ha of formal space and 0.34ha of children’s play space should be provided per 1,000 population. Policy EN3 of the Broadland DPD states that residential development of five dwellings or more will be expected to provide at least 4ha of informal space and 0.16ha of allotments per 1,000 head of population. The North East Growth Triangle Area Action Plan (NEGT AAP) notes that GI provision can be either onsite or offsite.

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\(^1\) North-East Growth Triangle Area Action Plan, adopted July 2016, Broadland District Council.
Analysis of Proposed Provision of Green Space

9.1.16 While it is unlikely that provision of children’s play space and allotments would contribute towards attracting residents away from The Broads designations for everyday recreation, figures for such provision were included at Appendix 9.10a to demonstrate what would be required to be compliant with local Policy.

9.1.17 Based on the above, in order to provide adequate GI to be pursuant with Policies EN3 and RL1 of the Broadland DPD, and therefore provide sufficient GI to ensure no likely significant effect, there would be a requirement to provide the following:

- 1.41ha formal recreation space (840/1000 x 1.68; with the 1.68ha of formal open space including 0.34ha of children’s play space)
- 3.36ha informal recreation space (840/1000 x 4; with the 4ha of informal open space including 0.16ha of allotments)

9.1.18 This equates to a total requirement of 4.77 ha of formal and informal recreation space.

9.1.19 Based on the current outline masterplan for the Site, 1.4ha of formal open space and 3.76ha of informal open space are proposed, for a total of 5.16ha of formal and informal recreation space.

9.1.20 The proposals are therefore fully policy compliant, with a slight over provision amounting to 0.39ha of informal open space.

Functionality of Proposed Green Space

9.1.21 The habitats present within The Broads have an inherent draw and will undoubtedly attract residents of the new development. However, as noted above, provision of high quality onsite GI will encourage residents to use this for more regular recreation requirements, thus reducing the potential frequency of visits to The Broads.

9.1.22 The following features have been incorporated within the masterplan to encourage the use of onsite GI, and in particular to encourage use by dog walkers. These include:

- Provision of a network of open spaces extending through the Site, linked by foot and cycle paths;
- Retention of the majority of existing woodland and plantation, offering the potential for sheltered walking areas; and
- Creation of a range of habitat types to create an interesting landscape for walkers, such as water features associated with the Sustainable Drainage System, wildflower grassland and a new native hedgerow along part of the eastern and southern sides of the Site;

9.1.23 Additional measures to encourage residents to use onsite GI, for example the provision of dog waste bins, litter bins, seating and information boards, will be specified at the detailed design stage. This will be secured by the production of a landscape masterplan, in accordance with Policy GT7 of the NEGT AAP.
In the scoping response for the Site (see Appendix 9.3), the Norfolk County Council Natural Environment Team stated under the topic of mitigation that it was essential that there should be ‘clear connectivity between the two associated developments within allocation GT7’. As such, it is considered appropriate that the onsite GI provision should link up with the onsite and offsite GI provision for the adjoining site.

**Provision of Offsite GI**

9.1.24 Given that the onsite recreation space is fully policy compliant, no offsite recreation space is proposed. There is also a strong case that it provides ample over provision in the context of the comments made at 9.1.4 above about how simplistic multipliers exaggerate the magnitude of uplift in recreational pressure that is possible in reality. It is also noted that offsite GI provision is proposed for the wider GT7 development and for the same reasons this may adequately absorb any potential rise in off-site effects from both developments.

**Cumulative Effects**

9.1.29 The Site forms part of an allocation within the NEGT and as such in-combination effects have already been considered as part of SEA and HRA procedures connected with emerging policies for that area.

**Overall Appraisal**

9.1.30 A considerable number of studies provide a documented evidence base informing local policy on how visitor pressures on The Broads resulting from growth in the Norwich area can be adequately mitigated. While the inherent draw of The Broads is acknowledged, provision of high quality formal and informal GI to a quantum of 1.68ha formal and 4ha informal recreation space per 1,000 population has been adopted in relevant local policies and strategies as an adequate level of provision to avoid likely significant effects, by drawing visitors to alternative sites for everyday recreation. If possible, this quantum should be met on-site, but offsite provision can also be considered, in line with the NEGT AAP.

9.1.31 In respect of the Site under specific consideration here, the onsite GI is fully policy compliant, with a minor over provision of 0.39ha of recreation space in simple land area terms. This is also based on the assumption that all new occupants of the completed development represent a net increase in population within the local visitor catchment of The Broads designations. As has been discussed, that is an assumption that further consideration reveals to be beyond worst case, and on that basis there is a strong case that the existing on-site GI provision is adequate to prevent likely significant effects on The Broads occurring without any need for any off-site provision.