

Bungay Neighbourhood Development Plan

SEA/HRA Screening Assessment



Contents Page

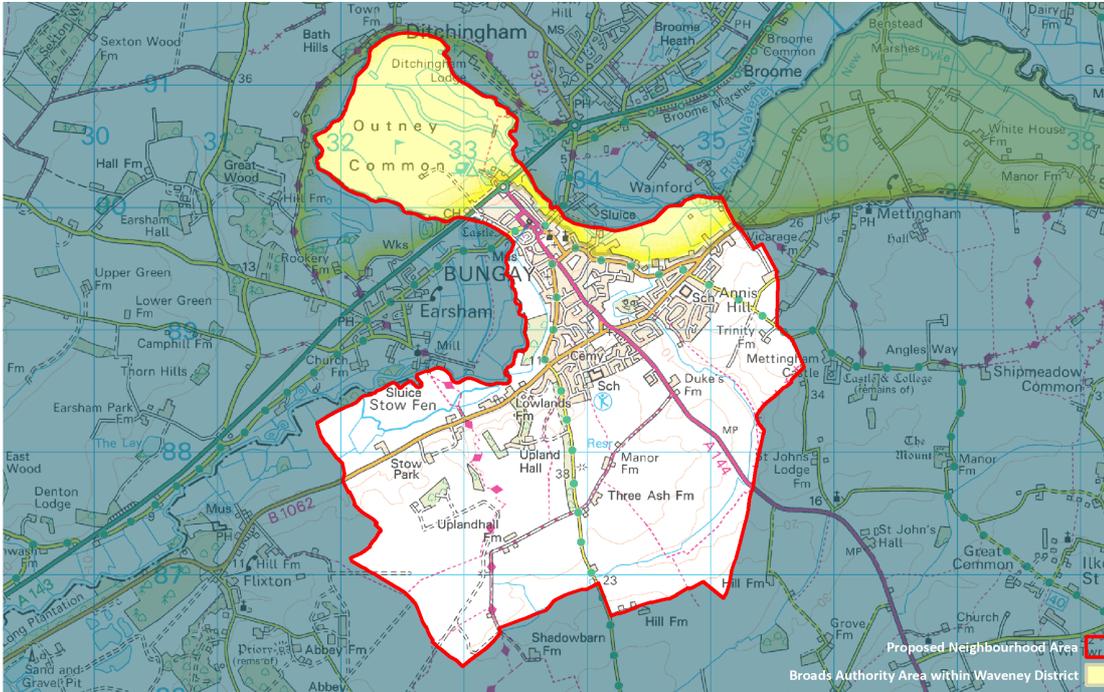
Section	Page
Introduction	2
Legislative Background	5
Screening Process	6
Assessment	7
Conclusions	18

1. Introduction

Neighbourhood Plan Area

The Bungay Neighbourhood Plan Area has been designated to cover the area identified in **Figure 1**.

Figure 1: Designated Area



Vision

Vision for Bungay

Bungay will be recognised as an historic and distinctive market town with a strong local identity and a vibrant town centre, and will be a place that people choose to visit. It will sit proudly within the surrounding fen and marshes that by virtue of their easy access and views from the town, and the abundant flora and fauna, are highly valued by residents and visitors alike. The town will host a good mix of housing and community facilities that meet the needs of its residents, as well as services, shops and facilities used by surrounding rural communities. Local people will be able to access local services, facilities and open spaces, as well as the surrounding countryside, by walking and cycling rather than being wholly dependent on the car.

Objectives

The objectives for Bungay are:

1. Meet the housing and community infrastructure needs of Bungay's residents
2. Support the vitality and regeneration of the town centre
3. Enable Bungay to realise its potential as a visitor attraction
4. Improve the attractiveness of walking and cycling
5. Ensure that the built character of Bungay is preserved and is reflected in new developments
6. Promote the quality and enjoyment of the natural environment, especially the surrounding fen and marshes
7. Ensure that new development manages flood risk in the most sustainable way possible

Draft Planning Policies

The neighbourhood plan for Bungay contains policies that seek to deliver the vision, this includes identifying and proposing sites to be allocated for development within the parish. Below is a summary of key points from the draft policies.

Housing:

- H1: New residential developments are required to be designed to a high quality, considering local character and enhancing local distinctiveness
- H2: New housing developments should provide a mix of housing to meet the needs of the community, with proportions to reflect the Bungay Housing Needs Assessment
- H3: Affordable housing to be delivered on-site, to reflect requirement locally and allocated based on local need.
- H4: Land to the east of St Margaret's Road allocated for approximately 300 dwellings.

Cultural Heritage

- CH1: Development is required to meet specific criteria so as to protect the integrity of the Bungay Conservation Area
- CH2: Support to regenerate the King's Head Grade II Listed Building within the town centre
- CH3: Requirement for a heritage statement to accompany any development proposals within or adjacent to designated heritage assets

Town Centre and Economy

- TC&E1: Support for development that enhances the vibrancy and vitality of the town centre
- TC&E2: Encouragement for tourism accommodation within the town centre
- TC&E3: Support for development that will lead to employment opportunities, subject to criteria, with emphasis on that within the town centre

Community Matters

- CM1: Support for proposals that will expand Bungay Medical Centre
- CM2, CM3 & CM4: Increased or expanded sports provision, educational opportunities and pre-school education welcomed

Environment

- ENV1: Creation of a green corridor linking the south-east with the town centre
- ENV2: Requirement for the provision of open green amenity space in line with the Open Space Needs Assessment

- ENV3 & ENV4: Protection of key areas of biological and geological significance
- ENV5: Requirement for a flood risk assessment and ecological assessment where development is proposed in areas immediately adjacent to areas of flood risk

Traffic and Transport

- TM1: Minimum standards for parking at new residential development
- TM2: Electric vehicle charging points required at all new homes with on-plot parking
- TM3: Support for additional off-street parking in or adjacent to the town centre
- TM4: HGVs required to avoid the town centre and Conservation Area in so far as possible for construction of new development
- TM5: New development should support safe and convenient pedestrian and cycle access and connections

2. Legislative Background

To be 'made' a Neighbourhood Plan must meet certain Basic Conditions. These include that making of the plan 'does not breach, and is otherwise compatible with EU obligations'. One of these obligations is Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'. This is often referred to as the Strategic Environmental Assessment (SEA) Directive. This seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing plans and programmes. The SEA Directive is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (the SEA Regulations) and it is these regulations that the plan will need to be compatible with. A key stage in the Neighbourhood Planning process is determining whether or not SEA is required.

As a general rule of thumb, SEA is more likely to be necessary if:

- A Neighbourhood Plan allocates sites for development;
- The Neighbourhood Plan area contains sensitive environmental assets that may be affected by the policies or proposals; or
- The Neighbourhood Plan is likely to have significant environmental effects not already addressed through the Sustainability Appraisal of the relevant Local Plan.

Another key obligation is Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, often referred to as the Habitats Directive. Under the Habitats Directive an assessment referred to as an Appropriate Assessment must be undertaken if the plan in question is likely to have a significant effect on a European protected wildlife site. The SEA Directive requires that if a plan or programme requires an Appropriate Assessment under the Habitats Directive, then that plan or programme will also require an SEA.

3. Screening Process

Three steps will be followed for this screening process:

1. Preparation of a screening report – this report
2. Request a screening opinion from the consultation bodies in light of the report – Waveney District Council responsibility
3. In light of their responses, determine whether the plan is likely to have significant effects on the environment (and therefore require an SEA) – Waveney District Council in discussion with Bungay Town Council.

4. Assessment

SEA Screening Assessment

Policies set out in the draft Neighbourhood Development Plan have been used to undertake this screening assessment. If the conclusion of the screening exercise is that SEA is not required, any major changes to existing policies or introduction of new ones will be subject to further screening to ensure significant effects are not likely.

Figure 2 identifies the environmental characteristics of the Bungay Neighbourhood Development Plan (BNDP) area, including key environmental designations whilst Figure 3 assesses for likely significant impact on the environment. Note that this assessment has been made based on criteria from Article 3.5 of the SEA Directive.

Figure 2: Environmental characteristics

Characteristic	Identification within the Neighbourhood Plan Area
National Nature Reserve	None
Natura 2000 sites – SPAs & SACs	None
Sites of Special Scientific Interest SSSI	None
National Parks	Norfolk and Suffolk Broads National Park
Areas of Outstanding Natural Beauty	None
World Heritage Sites	None
Scheduled Monuments	Bungay Castle
Locally designated nature conservation sites	Outney Common County Wildlife Site with wet meadows and acid grassland.
Biodiversity Action Plan Priority Habitat	None
Nationally listed buildings	Bungay has 189 Listed Buildings, the majority of which are Grade II and clustered in and around the Conservation Area in the town centre
Buildings at risk	Bungay Castle
Conservation area	A Conservation Area exists in the older part of the town, initially established in 1970.
Flood Zone 3	Bungay is constrained by flood risk, Zone 3, which is currently effectively managed through a Catchment Management Plan, Flood Risk Strategy and retention of the floodplain and automated sluices.
Areas with surface water flooding issues	There is medium and high risk from surface water flooding in several parts of the town, particularly the area between Beccles Road, Hillside Road East and St John's Hill.
Air Quality Management Area	None in the vicinity.
The best and most versatile agricultural land	Bungay is predominantly identified as land in urban use, though there is some poor to good agricultural land surrounding the town as identified by the Agricultural Land Classification map.

Characteristic	Identification within the Neighbourhood Plan Area
Source Protection Zones	Around a third of the NP area is within a Source Protection Zone, this includes Zones 1, 2 and 3. This includes a large area to the north west around the River Waveney.

Figure 3: Assessment of the likelihood of significant effects on the environment

Criteria for determining likely significance of effects	Is the BNDP likely to have a significant effect	Justification for decision
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.	Yes	<p>BNDP will set out policies against which development proposals in the NP area will be considered. The plan sets out general policies with a focus on preserving and enhancing the character of the area and promoting appropriate and sensitive growth. Policies seek to achieve good design, protect heritage and green spaces, enhance the environment, delivering net gains for biodiversity and improving sustainable transport infrastructure.</p> <p>The BNDP will allocate land for housing development (approximately 300 additional homes) and sets out positive planning policies seeking to encourage development to meet local need. It also requires associated infrastructure improvements to support the housing growth.</p>
The degree to which the plan or programme influences other plans and programmes including those in the hierarchy.	No	Once ‘made’ the BNDP will form part of the adopted Local Development Plan, setting non-strategic policies. Waveney Local Plan was adopted in March 2019. This allocates land for up to 485 new homes, of which 150 have planning permission already. Two strategic allocations are identified to accommodate those new homes without prior permission. BNDP is in general conformity of the Waveney Local Plan 2014-2036, with most recent adoption March 2019.
The relevance of the plan or programme for the integration of environmental considerations.	No	<p>BNDP seeks to promote sustainable development overall and does not seek any relaxations to the principles set out in higher-level plans. BNDP policies seek to ensure that environmental considerations are taken into account with any new development. It is in general conformity with the adopted Waveney Local Plan which has been subject to a thorough process of plan preparation and accompanying Sustainability Appraisal.</p> <p>The following policies exist within the BNDP relevant to environmental protection:</p> <ul style="list-style-type: none"> • Policy CH1: Conservation Area • Policy ENV1: Green Corridors

Criteria for determining likely significance of effects	Is the BNDP likely to have a significant effect	Justification for decision
		<ul style="list-style-type: none"> • Policy ENV2: Green Amenity Space • Policy ENV3: Landscape Character • Policy ENV4: Biodiversity • Policy ENV5: Flooding <p>In addition, the site allocation Policy H4 requires retention of natural features on site, a 10-metre wide landscape belt along the southern edge of the site and an ecological assessment to accompany the planning application that demonstrates a net ecological gain being delivered as part of development.</p> <p>BNDP’s policies, and those contained within the adopted Waveney Local Plan are considered to be sufficient to ensure that effects on the environment are minimised.</p>
Environmental problems relevant to the plan or programme.	No	Environmental concerns within the NP area include Flood Risk Zone 2 and 3 and surface water flooding issues. Policy ENV5 provides additional protection by requiring development proposed in areas immediately adjacent to areas at risk of flooding to produce a site-specific flood risk assessment and ecological assessment demonstrating no significant adverse effects on flood risk or biodiversity. This is more significant protection than that given within the Waveney Local Plan. Additionally, the site proposed for development does not fall within these flood risk zones.
The relevance of the plan or programme for the implementation of Community legislation on the environment.	No	The content of BNDP is not in conflict with those relevant planning documents of the wider district and county area and is in general conformity with the Waveney Local Plan.
The probability, duration, frequency and reversibility of the effects.	Yes	The following impacts have been identified within this Screening Assessment against the range of sustainability themes. Potential for significant impacts are identified against biodiversity, population and cultural heritage.

Sus	Biodiversity	LSE: Figure 2 identifies the wildlife designations within the BNDP area. This includes an area of the Norfolk and Suffolk Broads National Park. BNDP’s residential site allocation will not lead to loss of priority habitats, and they are of a sufficient distance from designated
-----	--------------	---

	areas (at least 800m), with other housing development between them. Additional recreational pressure on the Broads National Park cannot be ruled out at this stage however.
Population	LSE: BNDP allocates a site for residential development for up to 300 new homes, requires improvements to infrastructure alongside this, positively supports economic development and encourages tourism accommodation within the town centre. It is therefore expected to have positive impacts on the general population, providing housing and amenity required to meet local needs, including affordable housing.
Human Health	No LSE: BNDP does not allocate any land for development purposes that could have implications for human health, however it does positively support expansion of Bungay medical centre, which would have a positive impact.
Fauna	No LSE: The impacts of BNDP on fauna are not considered significant. Policy contained within the neighbourhood plan (including Policy H4 on land allocated for development purposes) requires any development to deliver a net ecological gain and retain existing natural features such as hedgerow that may support protected species. It is possible however that individual developments could have negative impacts, however these cannot be identified as strategically significant to warrant SEA at plan level. Such issues are more appropriate to be considered on a case-by-case basis at the development management / planning application stage.
Flora	No LSE: Although priority habitats of the Broads National Park exist in close proximity of site allocated for residential development within BNDP, Policy H4 ensures that impacts on biodiversity are minimized and that development delivers a net ecological gain. Policy ENV1 will deliver a new green corridor through development contributions, linking new development with the town centre on a traffic free route and promoting local wildlife areas. This will help reduce additional recreational pressure on the Broads. Further protection from flora exists in relevant policies contained within the Waveney Local Plan. There is not considered to be any likely effects on flora that would be of a significance that warrants application of the SEA directive.
Soil	No LSE: As identified in figure 2, the plan area has some good to poor farmland (Grade 3 & 4) according to the Agricultural Land Classification map. Residential development allocated for will result in loss of approximately 10.28ha of land that is currently in agricultural use – land identified as Grade 3. The planning application will be required to deliver a net ecological gain in accordance with Policy H4 on this site, therefore this screening concludes that the impact is not significant on soil.
Water	No LSE: There is risk around water quality and quantity as a result of the site allocation within the BNDP. However, these would need to be addressed as part of a project level HRA during planning application stage for the site allocation.
Air	No LSE: No AQMAs or other identified air quality issues exist within or in close proximity to the BNDP area. As such, no significant effects on air quality have been deemed likely.
Climatic factors	No LSE: A proportion of BNDP area is within Flood Zone 3, the area closest to the Broads. Policy ENV5 within the plan requires a site-specific flood risk assessment and ecological assessment to show that development will not have any significant adverse effects on flood risk or biodiversity where it is proposed in areas immediately adjacent to areas at risk of flooding, or where measures to mitigate flood risk could impact on biodiversity and ecological resources. The site allocation is not within or near to these Flood Risk Zones. As such, no significant effects have been identified.
Material assets	No LSE: Content of the BNDP is not considered to have any significant impacts on material assets due to the extent / size of the NP area. Such issues are more appropriate to be considered appropriate to be on a case by case basis at the development management /

	planning application stage and in accordance with relevant development management policies in the adopted Waveney Local Plan and Minerals and Waste Local Plan policies at county level. Policy H4 with the site allocation requires an assessment of sand and gravel resources on site to determine if it is practical to make use of these in development, in accordance with the Local Plan.
Cultural heritage	LSE: There are a significant number of designated heritage assets within the Bungay NP area, predominantly within the Conservation Area in the town centre. Due to this, it can be considered inevitable that schemes coming forward within the Plan area, including those related to the site allocations, would need to strongly consider the historic environment. Policy CH1 within BNDP requires schemes coming forward inside or impacting on the Conservation Area to preserve and enhance its special character, retaining views and other landscape features. This will be demonstrated through Policy CH3 which requires a heritage statement for any development proposals within or adjacent to designated and non-designated heritage assets. There is a Grade II listed building within close proximity of the south side of the allocated site. Policy H4 specifies that a landscape buffer of 10 metres is required, which will help preserve the setting of the Grade II listed Manor Farm. However, significant effects on cultural heritage cannot be ruled out as the site allocation policy is not informed by evidence of suitability of the allocation in relation to this.
Landscape	No LSE: Within the Waveney Landscape Character Assessment (2008) Bungay is characterised as ‘Urban’ or falls within the ‘Broads Authority Area’. The NP area is adjacent to Rural River Valleys and Tributary Valley Farmland. The allocated site within BNDP lacks distinctive landscape features and its landscape value and sensitivity is not too high. However, it does slope down, which means that development could impact upon views into the wider countryside. Policy H4 requires any planning application on the site to be accompanied by a landscape strategy which demonstrates how the development will be integrated into the landscape. This screening therefore concludes that the plan ensures potential landscape implications are suitably considered and significant effects minimised.

Criteria for determining likely significance of effects	Is the BNDP likely to have a significant effect	Justification for decision
The cumulative nature of effects.	Yes	BNDP allocates around 10ha greenfield land for development purposes, for up to 300 homes. This is in addition to 485 new homes proposed within the Waveney Local Plan. The cumulative effects of this have not been formally identified and assessed to date. It is possible that there will be cumulative impacts that warrant consideration of alternative approaches. It is proposed that this is identified through a full SEA and Environmental Report.
The transboundary nature of the effects.	Yes	There is potential for trans-boundary impacts arising from the site allocation, as identified within the HRA screening.
The risks to human health or the environment.	No	No risks to human health have been identified in the screening above.

Criteria for determining likely significance of effects	Is the BNDP likely to have a significant effect	Justification for decision
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	Yes	The magnitude of effects can be considered small in the wider Waveney District Council perspective. Bungay has a current population of 5,127 and 2,265 households. This Neighbourhood Plan proposed an increase in homes of 300, a 13% increase which is not considered significant. However, these are proposed over and above the additional 485 new homes allocated within the recently revised Waveney Local Plan and together, this could be considered significant for the population of Bungay and would be a 34% increase in the size of the town.
<p>The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> • Special natural characteristics or cultural heritage • Exceeded environmental quality standards or limit values of intensive land-use • The effects on areas or landscapes which have a recognized national, community or international protection status. 	Yes	As highlighted above in the screening by sustainability theme, BNDP has been assessed as having potential significant effects on the environment, which warrants further assessment through full SEA and Environmental Statement.

Habitats Regulations Assessment

The Habitats Regulations Assessment (HRA) refers to the assessment required for any plan or project to assess the potential implications for designated European wildlife sites. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar Sites, collectively known as internationally designated wildlife sites.

There are no designated European wildlife sites in the Bungay Neighbourhood Plan area. This screening assessment has also considered the impact on European sites within 20km of the neighbourhood plan area, as an in-combination assessment area. These include:

Figure 4: European Sites within 20km of BNDP area

Special Areas of Conservation	Special Protection Areas	Ramsar Sites
The Broads	Broadland	Broadland
Minsmere to Walberswick Heaths & Marshes	Minsmere-Walberswick	Breydon Water
Benacre to Easton Bavents Lagoons	Outer Thames Estuary	Minsmere-Walberswick
Dew's Ponds	Benacre to Easton Bavents	
	Breydon Water	

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. Each site also has a set of conservation objectives.

European sites are at risk if there are possible means by which any aspect of a plan 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'.

There are a range of impacts that Bungay Neighbourhood Development Plan could have on those designated European Sites identified in Figure 4. These can be summarised as:

- Increased disturbance, trampling and enrichment of European Sites from additional recreational pressure;
- Impact on protected species found within but that travel outside of the designated sites;
- Water issues relating to water quality and quantity; and
- Changes in atmospheric pollution levels due to increased traffic from development proposals.

In accordance with the Waveney Local Plan HRA Screening the following buffers have been considered – 400m for urban effects, 5km for recreational impacts and 13km which reflects the distance used to define a zone of influence in the wider Suffolk mitigation strategy. **Figure 5** reflects the housing numbers allocated within the BNDP which fall within those zones of influence of the European Sites identified in **Figure 4**. The Broads SAC and Broadland SPA/Ramsar are within 13km of potential new homes proposed – with the closest site around 6km from the allocated site.

Figure 5: Number of potential new dwellings within 400m, 5km and 13km of European Sites

Site	400m	5km	13km
The Broads SAC	0	0	300
Broadland SPA / Ramsar	0	0	300
Minsmere-Walberswick SPA / Ramsar	0	0	0
Benacre to Easton Bavents Lagoons SAC	0	0	0
Dew's Ponds	0	0	0
Outer Thames Estuary	0	0	0
Benacre to Easton Bavents SPA	0	0	0
Breydon Water SPA / Ramsar	0	0	0

Figure 6: Assessment of Potential Impacts of Policy contained within the BNDP

Policy	Description	Likely Significant Effects	Potential Risks	Recommendation
H1: Design Principles for New Development	Qualitative policy with criteria for high quality design, setting particular requirements for new development	No LSE – does not promote development	N/A	None
H2: Housing Mix	Policy stipulating required mix of new homes coming forward	No LSE – does not promote development	N/A	None
H3: Affordable Housing	Policy accords with NPPF, setting requirements for affordable housing, including delivery of onsite provision and criteria for exception sites	No LSE – does not promote development	N/A	None
H4: Land to the east of St Margaret's Road	Residential allocation for 300 new dwellings, with the site developed in accordance with site specific criteria	LSE – residential development could pose a risk in terms of increased recreational pressure on European Sites	In combination recreational pressure linked with allocations in the Waveney Local Plan	For consideration at appropriate assessment.
CH1: Conservation Area	Qualitative policy seeking to protect the integrity of Bungay Conservation Area	No LSE – does not promote development	N/A	None
CH2: The King's Head	Policy supporting proposals to restore the King's Head to	No LSE – promoting use of a derelict building within its current use class	N/A	None

Policy	Description	Likely Significant Effects	Potential Risks	Recommendation
	its former use as a hotel			
CH3: Heritage Statements	Policy seeking to protect the integrity of Bungay's historic environment	No LSE – does not promote development	N/A	None
TC&E1: Town Centre Vitality	Criteria for change of use development within the town centre	No LSE – does not promote development	N/A	None
TC&E2: Tourism Accommodation	Policy with criteria for new tourist accommodation aiming to influence location of such	No LSE – does not promote development	N/A	None
TC&E3: Employment Growth	Policy supporting proposals for economic growth meeting agreed criteria	No LSE – does not allocate land for development purposes	N/A	None
CM1: Bungay Medical Centre; CM2: Sports Facilities; CM3: Community Hub; CM4: Pre-School Education; CM5: Community Education	Policies that support delivery of infrastructure within the town	No LSE – although projects could have construction or operational impacts in relation to water and air quality, all designated sites are located outside of the zone of influence for this.	N/A	None
ENV1: Green Corridors	Policy seeking to establish a green corridor from growth areas to the town centre linking existing open green space	No LSE – mitigation policy for growth protecting European sites	N/A	None
ENV2: Green Amenity Space	Policy requiring contributions towards open green space in line with the Open Space Needs Assessment	No LSE – mitigation policy for growth protecting European sites	N/A	None
ENV3: Landscape Character	Policy protecting the integrity of areas of biological or geological significance	No LSE – protective policy not promoting development	N/A	None

Policy	Description	Likely Significant Effects	Potential Risks	Recommendation
ENV4: Biodiversity	Protective policy requiring green space connectivity and net ecological gain	No LSE - protective policy not promoting development	N/A	None
ENV5: Flooding	Protective policy requiring appropriate flood risk and ecological assessment	No LSE – protective policy including identification of risks to natural environment	N/A	None
TM1: Parking Standards for New Residential Development	Policy setting requirements for parking for new residential development	No LSE – does not promote development	N/A	None
TM2: Electric Vehicle Charging Points	Policy requiring provision of electric vehicle charging points	No LSE – does not promote development	N/A	None
TM3: Off Street Public Car Parking	Policy supporting additional public car parking provision subject to agreed criteria in or adjacent the town centre	No LSE – Policy designed to reduce the impact of current on-street car parking and contains protective criteria around the Conservation Area	N/A	None
TM4: HGVs in the Town Centre	Protective policy requiring HGVs associated with construction to avoid the Conservation Area and Town Centre	No LSE – does not promote development	N/A	None
TM5: Sustainable Transport and Highway Safety	Policy promoting sustainable transport as part of new development	No LSE – does not promote development, encourages walking and cycling in local environment	N/A	None

5. Conclusions

SEA Screening

Bungay Neighbourhood Development Plan has been prepared for planning purposes and sets a framework for future development consent. Planning Practice Guidance on SEA of Neighbourhood Plans indicates that an SEA may be required, for example, where neighbourhood plans allocate sites for development; the area contains sensitive natural or heritage assets that may be affected by proposals in the plan, or the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a Sustainability Appraisal on the Local Plan.

The Neighbourhood Plan allocates a site for development, for around 300 homes and required infrastructure improvements in relation to this. This is in addition to allocations within the Waveney Local Plan for up to 485 new homes. Overall, the degree to which this plan sets a framework for projects is high given the housing numbers it proposes which could give rise to significant effects on the environment, some of which could be transboundary. There could also be cumulative impacts in relation to the quantum of housing proposed in Bungay overall, and it could give rise to significant effects on the environment.

As such, the content of the Bungay Neighbourhood Development Plan has therefore been **screened in** for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.

HRA Screening

The screening assessment highlights that **Policy H4** has the potential to increase recreational pressure on European Sites in combination with other residential development. To ensure compliance with the Sweetman judgement it is not possible to take into account mitigation measures to screen out likely significant effects at this stage. Therefore, the requirement for the Bungay Neighbourhood Development Plan to undertake further assessment under the Habitats Regulations 2017 is **screened in**.