HORSFORD NEIGHBOURHOOD PLAN REVIEW

HABITATS REGULATIONS ASSESSMENT

SUBMISSION ADDENDUM

OCTOBER 2026

Prepared by ONH on behalf of Horsford Parish Council to accompany the submission of the Horsford Neighbourhood Plan Review to Broadland District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

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1. INTRODUCTION

1.1 This Addendum has been prepared by ONH on behalf of Horsford Parish Council ("the Parish Council") to accompany the submission of the Horsford Neighbourhood Plan Review ("the Neighbourhood Plan") to Broadland District Council ("the District Council"). It supplements, and should be read alongside, the Habitats Regulations Assessment prepared for the Parish Council by AECOM (February 2025) ("the HRA").

1.2 The District Council's screening opinion identified the potential for in-combination effects of residential development on Habitats sites in the Greater Norwich area. Under the Conservation of Habitats and Species Regulations 2017 (as amended), the District Council is the competent authority for the Appropriate Assessment of the Neighbourhood Plan, and the Parish Council must provide the information it reasonably requires. The HRA, and this Addendum, provide that information.

1.3 The HRA was published alongside the Pre-Submission Plan for consultation under Regulation 14 in October and November 2025. It assessed the draft Neighbourhood Plan as it stood in February 2025. Since then, the Neighbourhood Plan has been amended in response to the Regulation 14 consultation, the publication of the National Planning Policy Framework in August 2026, and new technical evidence prepared for the Policy SS2A allocation.

1.4 The purpose of this Addendum is to:

- record Natural England's comments on the HRA at the Regulation 14 stage (Section 2);
- screen each change made to the Neighbourhood Plan since the HRA was prepared (Section 3);
- update the HRA, explaining how Policy 3 of the adopted Greater Norwich Local Plan (GNLP) secures the mitigation on which its conclusions rely (Section 4); and
- correct a number of errors in the HRA (Appendix A).

1.5 The Strategic Environmental Assessment of the Neighbourhood Plan is updated in a separate SEA Submission Addendum (October 2026).

2. REGULATION 14 CONSULTATION

2.1 Natural England responded to the Regulation 14 consultation on 7 November 2025. In summary, it:

- concurred with the findings of the HRA in respect of the Habitats sites and impact pathways screened into and out of the assessment;
- noted that the Appropriate Assessment concluded that the Neighbourhood Plan is unlikely to result in adverse effects on the integrity of any Habitats site;
- advised that a suitable contribution to the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) should be sought, with proportionate, well-designed on-site green infrastructure, including circular dog walking routes and dedicated 'dogs-off-lead' areas;

- advised that the site lies in the Bure, Broads and Marshes nutrient neutrality catchment, that the HRA's nutrient budget is indicative, and that it will need to be updated as the design advances;
- cited the GNLP requirement that "relevant developments will only be granted planning permission when there is certainty about the levels of nutrients which will be generated and mitigation so that the development will be nutrient neutral"; and
- concluded that, subject to the provision of a project-level HRA and if impacts relating to recreational disturbance and nutrient neutrality can be mitigated, it is likely there will be no significant impact to designated sites.

2.2 Natural England also welcomed Policy SS2B, including its 'Off the Lead' dog walking area. The Environment Agency noted that the Neighbourhood Area includes the catchment of Whitlingham Water Recycling Centre. These comments are taken into account in Section 4.

3. SCREENING OF CHANGES TO THE PLAN

3.1 Table 1 summarises the changes made to the Neighbourhood Plan since the HRA was prepared and screens each one for its implications for Habitats sites.

Table 1: HRA screening of changes to the Neighbourhood Plan

Policy	Change since the HRA	HRA screening
Plan period	Extended from 2038 to 2045.	No change.
SS1	Reworded to refer to national decision-making policy and to GNLP Policy 7.5 on self-build and custom build. Settlement boundary drawn to include the Policy SS2A residential area.	No change. Any windfall housing is subject to GNLP Policy 3.
SS2A – allocation	Former Policy SS2 split. Allocation areas now defined: 25 ha east of the village centre (about 300 homes and a community hub) and 11 ha south of Holt Road (Sports Hub). The Environmental Report appraised a smaller Sports Hub site of about 6 ha at the options stage.	Residential area larger than the 21.8 ha used in the HRA's indicative nutrient calculation. Calculation must be updated at the project stage under GNLP Policy 3. See Section 4.
SS2A – community hub	Now a mixed-use venue in the converted barn, retained by the landowner, including community space for hire.	No change.
SS2A – Sports Hub delivery	Land to be transferred freehold or on a lease of at least 100 years. Developer to provide, or fund, vehicular access, a shared footway/cycleway to the Brewery Lane roundabout with a Holt Road crossing, utility connections including foul drainage, and structural landscaping including a planted buffer to the A1270. Further drainage and ground conditions information required.	No overnight accommodation, so no residential nutrient pathway. Any non-residential effects are tested under GNLP Policy 3. No likely significant effect.
SS2A – Habitats sites clause	The requirement to address visitor pressure on the Broadland SPA and Ramsar and to offset nutrient impacts "in accordance with Policy 3 of the Greater Norwich Local Plan" is no longer repeated in the policy, as GNLP Policy 3 applies directly.	See Section 4. HRA conclusion unchanged.

Policy	Change since the HRA	HRA screening
SS2B	New separate policy supporting a Forest School at Diamond Jubilee Plantation, The Woodyard community space and an 'Off the Lead' dog walking area of about 2 ha. These sites formed part of the option appraised in the Environmental Report (Section 6), which noted potential recreational disturbance to priority woodland and heathland.	No residential use. The woodlands are not Habitats sites. Provision of alternative local greenspace is positive. No likely significant effect.
COM3, TRA2, INF2	Allotments, public parking and digital infrastructure policies deleted. Allotments are now required by Policy SS2A and existing allotments are listed in Policy COM1.	No change.
BUS1	Retitled 'New and Existing Business'. Identifies a need for a new or expanded supermarket or convenience store and maps existing business premises.	Screened in by the HRA, which concluded no adverse effect. Any proposal is tested under GNLP Policy 3. No change.
ENV1	Simplified to designate the Horsford Green Infrastructure Network for the application of national policy. Supporting text lists County Wildlife Sites and priority habitats.	No change.
ENV4	Reframed to define land north of the A1270 as a Local Green Gap to maintain separation from Norwich.	No change.
HBE4	Amended to support Passivhaus or equivalent buildings using forms that differ from the local character area, where no significant harm results.	No change.
Other policies	COM1, COM2, HBE1–HBE3, TRA1, ENV2, ENV3, ENV5 and INF1 reworded to align with the NPPF (August 2026), with minor updates to mapping.	No change.

3.2 Two changes require further consideration: the larger defined residential area in Policy SS2A, and the removal from that policy of the clause on Habitats sites mitigation. These are addressed in Section 4. None of the other changes alters the conclusions of the HRA.

4. HRA UPDATE

The HRA

4.1 The HRA considered the Broadland SPA and Ramsar site, The Broads SAC, the River Wensum SAC and Norfolk Valley Fens SAC. It screened out Norfolk Valley Fens SAC, and screened out water resources and air quality as impact pathways. Recreational pressure and nutrient enrichment were screened in, and Policies SS1, SS2 and BUS1 were taken forward to Appropriate Assessment. The HRA concluded that the Neighbourhood Plan would not adversely affect the integrity of any Habitats site, either alone or in combination with other plans and projects.

4.2 In reaching its conclusion, the HRA referred to the requirement in the draft Policy SS2 that the residential scheme should "address potential visitor pressure that would detrimentally impact the Broadlands SPA and Ramsar, and offset any nutrient neutrality impacts in accordance with Policy 3

of the Greater Norwich Local Plan, or any subsequent replacement". That requirement is no longer repeated in Policy SS2A. This section explains why the HRA conclusion remains valid.

Reliance on Greater Norwich Local Plan Policy 3

4.3 The Neighbourhood Plan forms part of the development plan, alongside the GNLP, and planning applications must be determined in accordance with the development plan as a whole. Policy SS2A does not repeat the requirements of the adopted development plan, which will continue to apply. The former clause in Policy SS2 required nothing more than GNLP Policy 3 already requires, and expressly deferred to it.

4.4 GNLP Policy 3 (Environmental Protection and Enhancement) requires that:

> *"All residential development will address the potential visitor pressure caused by residents of the development that would detrimentally impact on sites protected under the Habitats Regulations through: The payment of a contribution towards the cost of mitigation measures at the protected sites and The provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of the residents as an alternative to visiting the protected sites. This will equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England's Accessible Natural Greenspace Standard."*

4.5 It also requires that, within the catchments of the River Wensum SAC, The Broads SAC and the Broadland Ramsar site, residential development that results in an increase in overnight stays, and certain non-residential development:

> *"…must provide evidence to enable the local planning authority to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites in an unfavourable condition."*

4.6 The supporting text to Policy 3 confirms that it "ensures that relevant developments will only be granted planning permission when there is certainty about the levels of nutrients which will be generated and mitigation so that the development will be nutrient neutral" (paragraph 206). This is the passage cited by Natural England in its Regulation 14 response. Policy 3 was modified through the GNLP examination in the light of Natural England's advice on nutrient neutrality, and it applies to all relevant development in the Neighbourhood Area, including the Policy SS2A allocation.

4.7 The mitigation on which the HRA relies is therefore secured by an adopted strategic policy that applies directly to any planning application for the allocation. Repeating it in Policy SS2A would add nothing to its effect.

Recreational pressure

4.8 The GIRAMS provides the strategic mitigation sought by GNLP Policy 3. The Norfolk-wide tariff is £315.58 per net new dwelling from 1 April 2026, and is index-linked. Natural England has advised that the GIRAMS is sufficiently certain and effective to prevent adverse effects on the integrity of the Habitats sites within its zone of influence.

4.9 For on-site provision, approximately 300 homes would generate a population of around 700 people, requiring a minimum of about 1.4 hectares of green infrastructure under GNLP Policy 3. The 25 hectare allocation can readily accommodate this. Policy SS2A requires a green infrastructure strategy, the eastern section of the Green Circular Path, access to Diamond Jubilee Plantation from the site, and community gardens and allotments. Policy SS2B supports an 'Off the Lead' dog walking area nearby. Together, these provide the kind of local alternative greenspace that Natural England recommends to reduce visits to Habitats sites.

4.10 The HRA's conclusion of no adverse effect on integrity from recreational pressure, alone or in combination, therefore remains valid.

Nutrient enrichment

4.11 The HRA included an indicative nutrient budget for the residential scheme. It assumed a 21.8 hectare site draining to Reepham Water Recycling Centre. The residential area is now defined as 25 hectares. Consultees have also referred to different receiving catchments: Natural England places the site in the Bure, Broads and Marshes nutrient neutrality catchment, the land promoter's ecologist refers to the River Wensum SAC catchment, and the Environment Agency notes that the Neighbourhood Area includes the Whitlingham Water Recycling Centre catchment. The receiving water recycling centre has not yet been confirmed by Anglian Water.

4.12 These uncertainties do not affect the HRA conclusion at the plan level. GNLP Policy 3 requires a project-level HRA, informed by an updated nutrient budget based on the confirmed receiving works and the final layout, before planning permission can be granted. A range of mitigation is available to achieve nutrient neutrality, including:

- nutrient credits from Norfolk Environmental Credits, the joint venture of the Norfolk district councils, which supplies credits in both the Wensum and Bure catchments;
- on-site mitigation, as the land east of Holt Road is sufficient to accommodate land for nutrient offsetting alongside the housing, as noted in the Initial Heritage Assessment;
- the statutory requirement for Anglian Water to upgrade relevant water recycling centres to the technically achievable limits for nitrogen and phosphorus by 1 April 2030; and
- the draft Norfolk Environmental Delivery Plan for nutrient pollution, published by Natural England for consultation in September 2026 under the Planning and Infrastructure Act 2025. If made, this would provide a strategic levy-based route to mitigation for The Broads SAC, the Broadland Ramsar and the River Wensum SAC.

4.13 The Sports Hub, community hub and the uses supported by Policies SS2B and BUS1 would not provide overnight accommodation. Any non-residential proposal that falls within the scope of GNLP Policy 3 would be tested at the application stage.

4.14 Because the allocation cannot be implemented unless a project-level HRA concludes that it will be nutrient neutral, the HRA's conclusion of no adverse effect on integrity from nutrient enrichment, alone or in combination, remains valid.

Other pathways and in-combination effects

4.15 The changes to the Plan do not affect the screening of water resources or air quality, nor the screening out of Norfolk Valley Fens SAC. No new plans or projects have been identified that would alter the in-combination assessment. The review of the GNLP is at too early a stage to have identified sites, and will be subject to its own HRA.

5. CONCLUSIONS

5.1 The changes made to the Neighbourhood Plan since the HRA was prepared do not alter its conclusion. The Neighbourhood Plan would not adversely affect the integrity of any Habitats site, either alone or in combination with other plans and projects, because GNLP Policy 3 secures the necessary mitigation at the project level.

5.2 This Addendum is provided to the District Council, as the competent authority, to inform its Appropriate Assessment, which it will finalise in liaison with Natural England.

APPENDIX A: CORRECTIONS TO THE HRA

A.1 The following corrections should be read into the HRA. None affects its conclusions.

Reference	Error	Correction
Page headers	Headers refer to the "Pilning & Severn Beach Neighbourhood Plan".	Should read "Horsford Neighbourhood Plan".
Revision table	Shows the report as a draft (revision 0, 11 February 2025).	The report was issued for consultation at Regulation 14 in October 2025.
Table 1	Describes the Broadland SPA and Ramsar site and The Broads SAC as 9.2 km west of the Neighbourhood Area.	These sites lie to the east of the Neighbourhood Area, as stated elsewhere in the HRA.
River Wensum SAC distance	Gives the distance as 3.0 km.	The land promoter's ecology evidence measures the River Wensum SAC as approximately 3.1 km from the land east of Holt Road and 2.1 km from the Sports Hub land.
Nutrient budget	Assumes a 21.8 ha site draining to Reepham Water Recycling Centre.	The residential area is 25 ha. The receiving works is to be confirmed by Anglian Water. The budget is indicative and will be updated at the project stage (see Section 4).
Plan version assessed	Refers to the draft Plan and Policy SS2 as at February 2025, with a plan period to 2038.	The submitted Plan runs to 2045, and Policy SS2 is now Policies SS2A and SS2B (see Section 3).