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Habitats Regulations Assessment of the Suffolk Coastal District Local Plan at Final Draft Plan Stage

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Summary

This report is the Habitats Regulations Assessment (HRA) of the Suffolk Coastal District Local Plan at Final Draft Plan stage. A plan level HRA considers the implications of a plan or project for European wildlife sites, in terms of any possible harm to the habitats and species that form an interest feature of the European sites in close proximity to the proposed plan. This HRA report draws on a range of background evidence, understanding of the European sites, and a mitigation strategy currently being developed for the Suffolk coastal and heathland European sites.

All aspects of the emerging plan that influence sustainable development for the Suffolk Coastal District are checked through this assessment for risks to European sites. Risks need to be identified in order to inform the screening for likely significant effects, which is an initial stage of assessment to establish whether there is any possibility of the implementation of the plan causing significant effects on any European site. Where the potential for significant effects is identified, or there are uncertainties, a more detailed appropriate assessment is made. This report has regard for relevant case law, including a European Court of Justice Judgment that highlights the need for appropriate use of avoidance and mitigation measures at the correct stage of HRA. This HRA has recommended a number of wording amendments to the Suffolk Coastal District Local Plan. Explanatory text relating to these recommendations made at the screening stage has been added to the screening table where appropriate.

The screening table has identified key themes and a small number of site allocations for more detailed assessment at the appropriate assessment stage. The appropriate assessment has been undertaken at Final Draft plan stage for publication under Regulation 19 (of the Town and Country Planning (Local Plan) (England) Regulations 2012 (as amended)). The themes considered are; recreation pressure from new residential development and a check of the applicability of the Suffolk HRA Recreation Avoidance and Mitigation Strategy (RAMS) for the increased housing numbers, recreation pressure from tourism, urbanisation effects in close proximity (fire risk, lighting, noise etc), air quality from increased road traffic, water quality and resources and biodiversity net gains. The appropriate assessment also checks in more detail the potential risks arising from a small number of site allocations.

The recommendations from the appropriate assessment are precautionary, to ensure that the Local Plan identifies clear mitigation needs and protects the European sites from any project level impacts. The HRA conclusion at Final Draft Plan stage is no adverse effects on site integrity, subject to the recommended actions set out within the report being undertaken. Further checks are likely to be made on any main modifications that are proposed during the Examination.

Contents

Contents 4
Acknowledgements 6
1. Introduction and Background Information 7
Context 7
Habitats Regulations Assessment process 8
The emerging Suffolk Coastal District Local Plan 10
Relevant HRA work and other evidence and assessment 12
The adopted Local Plan HRAs 12
Suffolk Coast HRA Recreation Avoidance and Mitigation Strategy (RAMS) 13
Sustainability Appraisal for the emerging Local Plan 13
Water and flooding evidence documents 14
Transport Modelling 14
European sites 15
2. Consideration of Site Allocations 20
3. Screening for likely significant effects 23
What constitutes a likely significant effect? 23
4. Appropriate Assessment of Impact Pathways 47
Consultation responses of relevance to the HRA 48
Appropriate assessment topics 49
5. Recreation 50
Felixstowe garden neighbourhood 52
Saxmundam garden neighbourhood 53
Tourism 54
Summary of assessment of recreation risks 54
6. Urbanisation 56
Summary of assessment of urbanisation effects 65

7. Water resources, treatment and flooding 66
Water resources 66
Water treatment 68
Flood risk 69
Summary of assessment of water related risks 69
8. Traffic emissions 71
Summary of assessment of traffic emissions 74
9. Biodiversity net gains 76
Policy SCLP10.1 Biodiversity and Geodiversity – recommended amendments 76
10. Conclusions 79
11. References 80
12. Appendix 1 - The Habitats Regulations Assessment Process 82
13. Appendix 2 –Conservation Objectives 87
14. Appendix 3 – The Nature Conservation Interest of the European Sites 89

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1. Introduction and Background Information

Context

1.1 This report is the Habitats Regulations Assessment (HRA) of the Suffolk Coastal District Local Plan at Final Draft Plan stage. This HRA report has been prepared by Footprint Ecology, on behalf of Suffolk Coastal District Council. It has been written with the benefit of ongoing discussions with planning officers within the District Council, and forms part of the evidence base for the new Local Plan at 'Regulation 19' publication stage, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 This section provides the background context for this HRA. This report is a HRA of the emerging Suffolk Coastal District Local Plan, and is a report that has been updated as the preparation of the Local Plan has progressed, and a further update during the Examination of the Suffolk Coastal Local Plan may be necessary if any modifications are of relevance to this HRA.

1.3 A HRA considers the implications of a plan or project for European wildlife sites, in terms of any possible harm to the habitats and species that form an interest feature of the European sites in close proximity to the proposed plan or project, which could occur as a result of the plan or project being put in place. In this instance, the HRA is undertaken at plan level. HRA will also be required for development projects coming forward in the future in accordance with the Local Plan. An explanation of the HRA assessment process is summarised in this section below, and also described in greater detail in Appendix 1.

1.4 The Suffolk Coastal District covers much of the coastal part of the County of Suffolk, with a stretch of 48.8km of open coast, a significant proportion of which is designated as part of a suite of coastal and heathland European wildlife sites, as well as being within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). The Suffolk Coastal District adjoins the Waveney District to the north, which works collaboratively with Suffolk Coastal District on many Council functions, with a number of shared services. The two Councils are now working towards the creation of one single East Suffolk Council which will come into existence in April 2019, when the two individual authorities will be dissolved. At this point in time, both Waveney District and Suffolk Coastal District are preparing separate Local Plans, each taking account of up to date evidence, current local circumstances and needs, and current planning legislation and national policy, guidance and good practice.

1.5 The Suffolk Coastal District is part of the Ipswich Housing Market Area and the Ipswich Functional Economic Area, which means that spatial planning for the

District is closely aligned with that of the neighbouring authorities. A number of studies and strategies have been undertaken collectively to inform the Local Plan evidence base.

1.6 A summary of the key aspects of the emerging Suffolk Coastal District Local Plan in terms of growth objectives over the plan period is provided in this section below.

1.7 When embarking on new HRA work, it is important to take stock and consider how well the measures recommended or put in place to protect European site interest in previous plan iterations have progressed, and what evidence there is available to support the continuation of such measures, or to indicate that they may need modification. This HRA therefore looks at the measures that were recommended by the previous HRA for the current documents that form the existing Suffolk Coastal District Local Plan. In order to protect European sites, and any changes in circumstances, evidence, statutory advice or local understanding of the issues needs to be considered. A summary of previous and other relevant HRA work is also provided in this section below.

Habitats Regulations Assessment process

1.8 A 'Habitats Regulations Assessment,' normally abbreviated to HRA, is the step by step process of ensuring that a plan or project being undertaken by, or permitted by a public body, will not adversely affect the ecological integrity of a European wildlife site. Where it is deemed that adverse effects cannot be ruled out, a plan or project must not proceed, unless exception tests are met. This is because European legislation, which is transposed into domestic legislation and policy, affords European sites the highest levels of protection in the hierarchy of sites designated to protect important features of the natural environment.

1.9 The relevant European legislation is the Habitats Directive 1992[1] and the Wild Birds Directive 2009[2], which are transposed into domestic legislation through the Conservation of Habitats and Species Regulations 2017. These Regulations are normally referred to as the 'Habitats Regulations' and the most recent update consolidates previous versions and corrects some minor errors in transposition. The 2017 Regulations have not changed any of the requirements in relation to European sites.

1.10 The legislation sets out a clear step by step approach for decision makers considering any plan or project. In England, those duties are also supplemented by national planning policy through the National Planning Policy Framework

[1] Council Directive 92/43/EEC
[2] Council Directive 2009/147/EC

(NPPF). This national planning policy also refers to Ramsar sites, which are listed in accordance with the international Ramsar Convention. The NPPF requires decision makers to apply the same protection and process to Ramsar sites as that set out in legislation for European sites. Formally proposed sites, i.e. sites proposed for European designation and going through the designation process, and those providing formal compensation for losses to European sites, are also given the same protection. This report refers to all the above sites as 'European sites' for assessment purposes, as the legislation is applied to all such sites, either directly or as a result of policy.

1.11 It should be noted that the European Directives operate on the basis that sites are in place to serve as an ecologically functioning network, and ultimately it is the preservation of that network as a whole that is the overall aim of the European Directives. The network is often referred to as the Natura 2000 Network or 'N2K.'

1.12 The duties set out within the Habitats Regulations apply to any public body or individual holding public office with a statutory remit and function, referred to as 'competent authorities.' The requirements are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. A more detailed guide to the step by step process of HRA is provided in this report at Appendix 1.

1.13 In assessing the implications of any plan or project, in this case a local plan, for European sites in close proximity, it is essential to fully understand the sites in question, their interest features, current condition, sensitivities and any other on-going matters that are influencing each of the sites. Every 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 European site has a set of 'conservation objectives' that set out the objectives for the site interest, i.e. what the site should be achieving in terms of restoring or maintaining the special ecological interest of European importance. These objectives are set by Natural England and published for each European site in high level generic form and then with supplementary advice that relates to the interpretation of these at each individual site.

1.14 The site conservation objectives are relevant to any HRA, because they identify what should be achieved for the site, and HRA may therefore consider whether any plan or project may compromise the achievement of those objectives. A summary of relevant European sites is provided within this section below. Further information on European site interest and links to the conservation objectives can be found at Appendix 2 of this report. The European sites of relevance to this HRA are discussed below and in Appendix 3.

The emerging Suffolk Coastal District Local Plan

1.15 A Local Plan is produced by a local planning authority to set the quantum and direction of sustainable development for the forthcoming plan period. The National Planning Policy Framework (NPPF) 2018[3] states that sustainable development is the achievement of social, economic and environmental aspirations, and these three dimensions of sustainable development are mutually dependant. For the natural environment, the NPPF advises that sustainable development should include protecting, enhancing and improving biodiversity, and moving from a net loss of biodiversity to achieving net gains. The recently published Defra 25 year plan[4] sets out an ambitious programme for improving the natural environment, including the achievement of environmental net gains through development, of which biodiversity is an important part.

1.16 The Defra strategy follows on from the review of England's wildlife sites and ecological network, set out in the report to Defra in 2010 entitled 'Making Space for Nature,'[5] which was prepared by a group of national experts chaired by Professor Sir John Lawton. Within this report, it is identified that in order to make our ecological networks and wildlife sites capable of future resilience, there is a need for more wildlife sites, and that existing networks need to be bigger, better and more connected. The future health of designated sites is very much dependant on the future health of wider biodiversity and the ecological networks that sustain them. In planning for the long-term sustainability of designated sites, it is therefore necessary to protect and enhance wider biodiversity through the planning system as well as the designated sites. This HRA recognises this need within the appropriate assessment section in relation to biodiversity gains through planning.

1.17 Alongside an ambitious strategy for growth, the emerging Suffolk Coastal District Local Plan also has a significant focus on the natural environment, and its importance to the local economy, local communities and visiting tourists. Protective policies have been included within the Final Draft Local Plan, and these are discussed further in the screening and appropriate assessment sections of this report, with recommendations for strengthening policy wording and supporting text having been made at First Draft Local Plan stage.

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[3] https://www.gov.uk/government/publications/national-planning-policy-framework--2

[4] https://www.gov.uk/government/publications/25-year-environment-plan

[5] https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today

1.18 The Final Draft Plan for the Suffolk Coastal District has been prepared following the earlier Issues and Options Document, which was published in August 2017 for public consultation, and the First Draft Local Plan, which was published in July 2018 for public consultation. A call for sites was undertaken in late 2016 to identify potential development sites for inclusion within the Local Plan. The consultation responses and evidence produced to date has informed the development of the plan. At First Draft Local Plan stage, the plan consulted upon included draft policies and site allocations, responses to which have now informed the preparation of a Final Local Draft Plan, presenting the proposed plan to be submitted for Examination by the Planning Inspectorate. The Final Draft Local Plan publication will allow any representations on the soundness of the plan, which will then be considered by the appointed Examining Inspector during the Examination.

1.19 The Suffolk Coastal District Local Plan sets out the Council's intended framework for bringing forward sustainable development across the District between 2018 and 2036. The plan includes spatial policies, development management policies and site allocations. This HRA assesses all parts of the emerging plan at Final Draft stage.

1.20 The methodology for calculating housing growth requirements is explained within the plan as following the Government policy for assessing housing need as set out in the National Planning Policy Framework and the Planning Practice Guidance. At Final Draft Local Plan stage, the housing requirement for the Suffolk Coastal District is identified at 10,476 over the plan period, equating to 582 new dwellings annually. In addition, the plan seeks to deliver in excess of the baseline requirement for 13ha of employment land. A number of development management policies are also of relevance, for example the delivery of 15 new permanent gypsy and traveller pitches.

1.21 Tourism is an important part of the economy for the District. Suffolk Coastal District and Waveney District Councils have published an East Suffolk tourism Strategy 2017-2022.[6] This is a strategy for improving the visitor economy through a range of actions to improve the visitor experience, ensure the required visitor facilities are in place for the long term and effectively market the East Suffolk tourism offer. The strategy does not set any particular targets, but the monitoring of success is related to increased day and overnight visits, tourism spend and tourism related jobs.

1.22 There are also a number of Neighbourhood Plans that have already been 'made' by several Suffolk Coastal communities, including Rendlesham, Framlingham,

[6] http://www.eastsuffolk.gov.uk/assets/Visitors/East-Suffolk-Tourism-Strategy.pdf

Great Bealings, Leiston, Melton, Martlesham and Wenhaston with Mells. A number of others are currently in preparation.

1.23 The Final Draft Local Plan sets out the evidence to inform the housing and employment growth need for the District, and how that relates to the wider Ipswich Strategic Planning Area with neighbouring local planning authorities.

Relevant HRA work and other evidence and assessment

1.24 The following documents are of relevance to this HRA due to their consideration of the natural environment and resources, and also the historic HRA work for the documents that form the currently adopted Local Plan.

The adopted Local Plan HRAs

1.25 This HRA for the Local Plan for the Suffolk Coastal District follows a number of previous HRA documents for the currently adopted Local Plan, including HRAs for the Core Strategy and Development Management Policies DPD (2013), the Site Allocations and Area Specific Policies DPD (2017) and the Felixstowe Area Action Plan DPD (2017).

1.26 The HRA for the Core Strategy highlighted a number of potential risks to European sites arising from the quantum of growth proposed. This included a focus on the potential impact of increased recreation pressure, assessing visitor data from the Tourism Board and other visitor surveys relevant to the European sites, to identify this impact pathway as a key risk arising from the Core Strategy. The HRA concluded that measures would be required to mitigate for the recreational impact of the residential development coming forward. Recommended measures within the Core Strategy HRA are the provision of alternative natural greenspace for recreation and visitor management at the coastal and heathland European sites to include a visitor management plan and monitoring. These recommendations formed the basis of the Suffolk Coast HRA Recreation Avoidance and Mitigation Strategy (RAMS), which is outlined below.

1.27 The HRA for the Site Allocations DPD considers each site allocation in turn and assessed potential risks and distance from European sites. The HRA concludes no adverse effects on any European sites with reliance on the mitigation measures set out within the Core Strategy, along with some amendments to the policy wording within the Site Allocations DPD to give greater clarity on project level HRA requirements. The HRA for the Felixstowe Area Action Plan concludes that the mitigation set out within the Core Strategy and the Site Allocations DPD, with the addition of the Site Allocations DPD policy requiring project level HRA for any new car parking within 1km of a European site, allows a conclusion of no adverse effects on site integrity.

Suffolk Coast HRA Recreation Avoidance and Mitigation Strategy (RAMS)

1.28 The Suffolk Coast HRA RAMS is a means by which sustainable housing growth can be delivered in the Suffolk Coastal District and its neighbouring local planning authority areas of Ipswich Borough, Babergh District, Mid Suffolk District and Waveney District, whilst adequately protecting Suffolk's coastal, estuarine and heathland European wildlife sites. It is being developed as a strategy that provides a solution to the additional recreation pressure risks highlighted by each of the local plan HRAs for the authorities. The RAMS sets out an integrated suite of avoidance and mitigation measures that are supported by comprehensive evidence and experience gained from other European site mitigation strategies. The RAMS is being prepared by Footprint Ecology, under the guidance of a steering group with representatives from the local planning authorities and Natural England. The RAMS has evolved over time with detailed analysis of the best options for implementation being recently undertaken. It is now in the final stages of preparation.

1.29 The RAMS has been developed on the basis of housing numbers and spatial distribution in the existing local plans for each of the local planning authorities. An important aspect of this HRA of the Suffolk Coastal District Local Plan is to ensure that the RAMS remains a viable mitigation solution for the new local plan, having regard for the increased housing numbers and locations for growth identified within the emerging plan. This analysis forms part of the appropriate assessment within this HRA report.

Sustainability Appraisal for the emerging Local Plan

1.30 Suffolk Coastal District Council has prepared a sustainability appraisal to inform the Local Plan. A sustainability appraisal is undertaken by local planning authorities on local planning documents to assess whether the economic, environmental and social needs of the local area are being met. The appraisal runs alongside the preparation of a local plan, appraising the options being taken forward and whether alternatives might have a greater positive or lesser negative effect on economic, environmental and social objectives. Sustainability appraisal also incorporates the requirements of the European Strategic Environmental Assessment Directive (2001/42/EC).

1.31 The Scoping Report for the Suffolk Coastal Local Plan was consulted upon as part of the consultation on the Local Plan Issues and Options. As part of the scoping stage, relevant background documentation and evidence on economic, environmental and social factors for the local area is reviewed. Comments received were considered in finalising the Scoping Report. A sustainability appraisal has been undertaken on the First Draft Local Plan, and following consultation has been revisited to inform the Final Draft Local Plan.

1.32 There are some elements of cross over between HRA and the sustainability appraisal. The appraisal will consider environmental sustainability in terms of natural resources such as air and water, and how they may be affected by the plan. These are similarly important supporting aspects of European site ecological integrity. The sustainability appraisal scoping report has set a biodiversity objective 'to conserve and enhance biodiversity and geodiversity', with a number of indicators within that objective that relate to European sites, including any change in designated site condition and the recorded number of visitors using designated sites. The recommendations of this HRA have been identified in the sustainability appraisal.

Water and flooding evidence documents

1.33 The last water cycle study to be undertaken for the Suffolk Coastal District area was the Haven Gateway Water Cycle Study, with Stage 1 undertaken in 2008 and stage 2 in 2009. This work concluded that there is a sustainable water supply to meet the demand of the currently adopted Suffolk Coastal District Local Plan, but highlighted that in terms of water quality, there were a number of waste water treatment works and associated infrastructure improvements required over the plan period. As part of this HRA, progress in terms of water infrastructure upgrades and a continued water supply for the new plan period are checked with the appropriate assessment section of this report. A new water cycle study for Suffolk Coastal District and Ipswich Borough has been prepared to inform the new Local Plans and its findings are discussed in the appropriate assessment.

1.34 A Strategic Flood Risk Assessment (SFRA) has been undertaken to inform the Local Plan and was published alongside consultation on First Draft Local Plan. The appropriate assessment section of this report considered the content of the SFRA and any European site implications.

Transport Modelling

1.35 Transport modelling for the Suffolk local planning authorities has been undertaken by WSP to support the new local plans. The model provides a baseline for the situation at 2016, and the model was run for differing scenarios relating to the Local Plans at First Draft Local Plan stage. A further model has been run based upon the Final Draft Local Plan. The appropriate assessment section of this HRA report is informed by the most recent modelling undertaken by WSP to reflect the growth proposals within the Final Draft Local Plan, and the most up to date data available for the neighbouring local plans. The transport data indicates potential traffic changes as a result of proposed new growth, which could lead to increased vehicle emissions that in turn can lead to deposition of nitrogen on sensitive European site habitats. The consideration of

air quality impacts in light of the transport modelling is provided within the appropriate assessment.

European sites

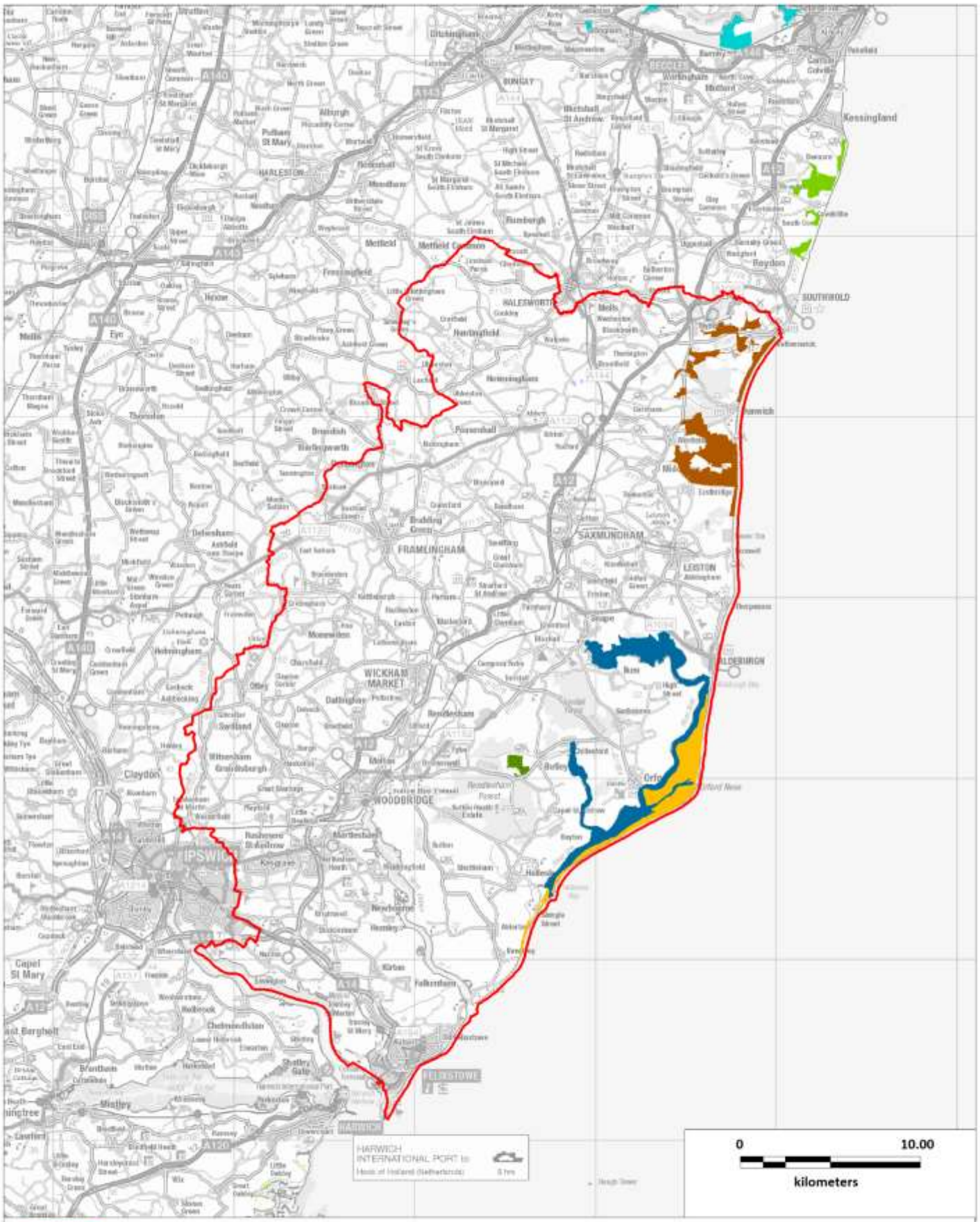
1.36 In undertaking HRA it is necessary to gather information on the European sites that could be potentially affected by the plan or project. A 20km buffer from the edge of the District was used to initially identify sites that may be potentially affected. This buffer is used by Footprint Ecology for local plan HRAs as it is deemed precautionary enough to capture most potential impact pathways (i.e. the means by which a European site may be affected) between plan implementation within a local planning authority's administrative area. The list of European sites within 20km was then evaluated in terms of relevant threats, vulnerabilities and current issues.

1.37 European sites within 20km are shown in Map 1 (SACs), Map 2 (SPAs) and Map 3 (Ramsar sites). Sites are listed in Table 1. Full details of the interest features and current pressures/threats for each site are summarised in Appendix 3.

Table 1: European Sites within a 20km radius

SAC	SPA	Ramsar
Alde-Ore & Butley Estuaries	Alde-Ore Estuary	Alde-Ore Estuary
Benacre to Easton Bavents Lagoons	Benacre to Easton Bavents	Broadland
Dew's Ponds	Breydon Water	Deben
Hamford Water	Broadland	Hamford Water
Minsmere to Walberswick Heaths & Marshes	Deben Estuary	Minsmere-Walberswick
Orfordness to Shingle Street	Hamford Water	Stour and Orwell Estuaries
	Minsmere to Walberswick	
Staverton Park and the Thicks	Outer Thames Estuary	
The Broads	Sandlings	
	Stour and Orwell Estuaries	

Map 1: SAC sites where boundary within 20km of Suffolk Coastal District



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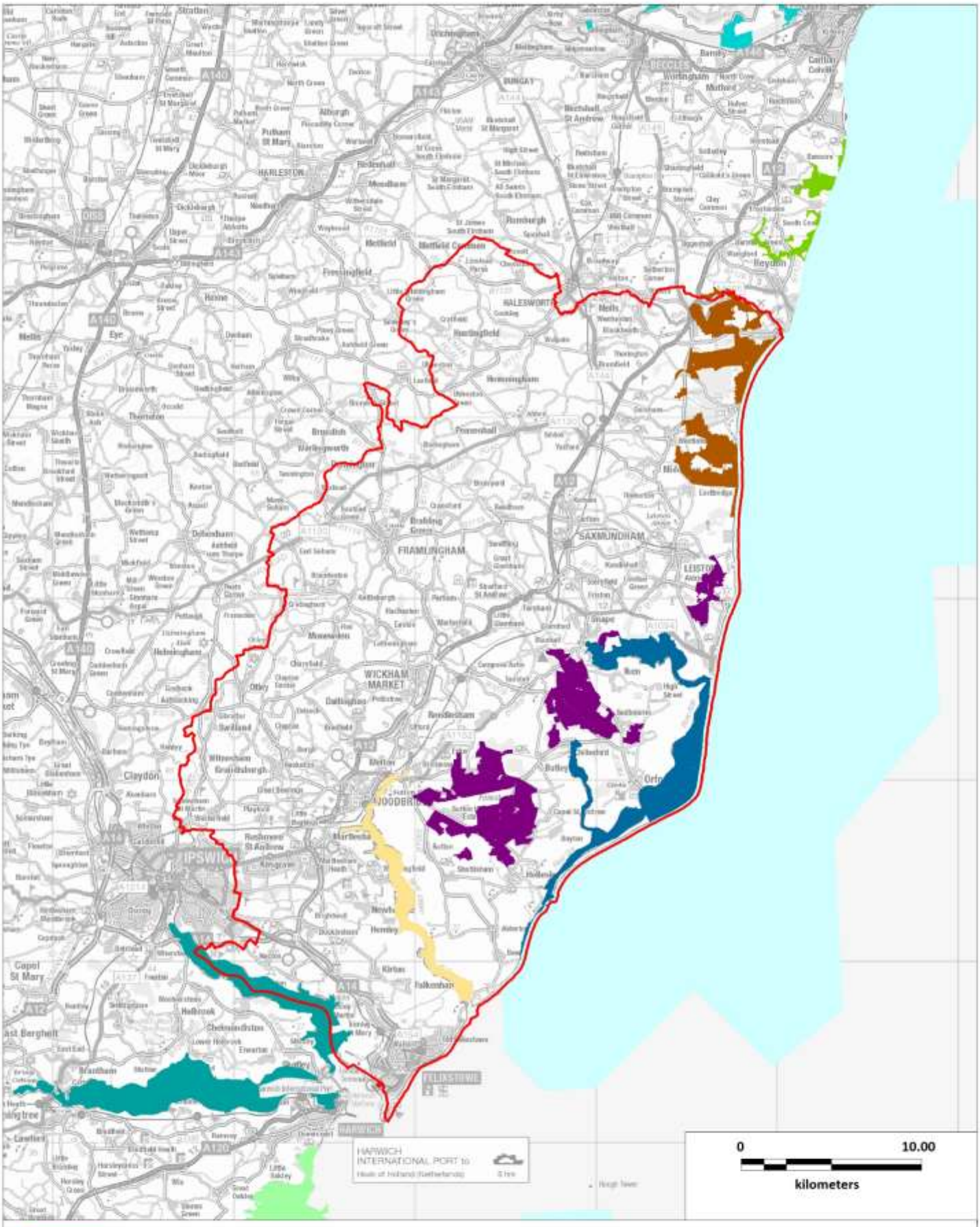
Map 2: SPA sites where boundary within 20km of Suffolk Coastal District



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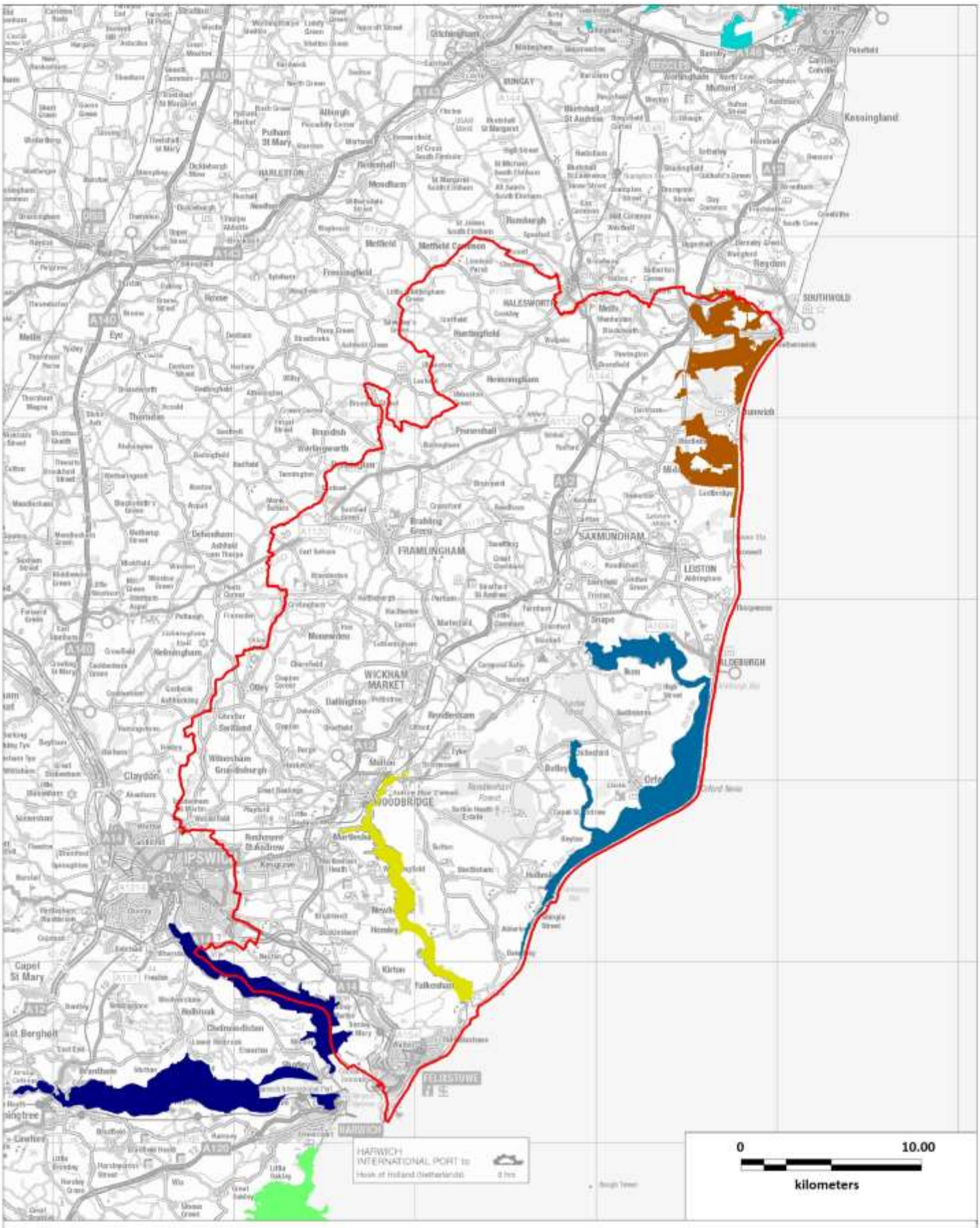
Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District



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1.38 In assessing the implications of any plan or project for European sites, it is essential to fully understand the ecology and sensitivity of the sites, in order to identify how they may be affected. This section and the accompanying detailed site information within Appendices 2 and 3 identifies those sites that could potentially be affected by the policies and proposals within the Suffolk Coastal District Local Plan. Every 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.

1.39 Each European site also has a set of 'conservation objectives' for the site interest, i.e. what the site should be achieving in terms of restoring or maintaining the special ecological interest of European importance. Also relevant to the HRA is the consideration of how a plan or project may affect the achievement of conservation objectives for each European site. The site conservation objectives are relevant to any HRA, because they identify what should be achieved for the site, and a HRA may therefore consider whether any plan or project may compromise the achievement of those objectives. The background to conservation objectives and key considerations are explained in Appendix 2. Appendix 3 sets out the site interest features for each European site.

1.40 The Habitats Directive requires competent authorities to 'maintain and restore' European sites. Where sites are meeting their conservation objectives, the requirement is to maintain this position and not allow deterioration. Where a site requires restoration, competent authorities should work to bring site interest features back to a status that enables conservation objectives to be met.

1.41 In addition to conservation objectives, Natural England produces Site Improvement Plans (SIPS) for each European site in England as part of a wider programme of work under the 'Improvement Programme for England's Natura 2000 sites.' Each plan includes a set of actions for alleviating issues that are impeding the delivery of conservation objectives, with lead delivery bodies identified and indicative timescales. The SIPs can provide an additional useful reference for HRA work, identifying where there are site sensitivities. These have been reviewed to inform the appropriate assessment set out within this report.

2. Consideration of Site Allocations

2.1 All aspects of the emerging plan that influence sustainable development for the Suffolk Coastal District are checked through this assessment for risks to European sites. Risks need to be identified in order to inform the screening for likely significant effects. 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' as it is an identifiable means by which the plan or project could potentially affect the European site.

2.2 All policies are checked as part of HRA, but of particular relevance is the quantum and location of proposed growth. GIS data showing proposed allocations for the Suffolk Coastal District Local Plan were provided to us by Suffolk Coastal District Council. These data showed locations for housing and employment growth being presented as site allocations within the Final Draft Local Plan. This enables a check for relevant potential pathways by looking at the growth that will come forward in close proximity to the European sites.

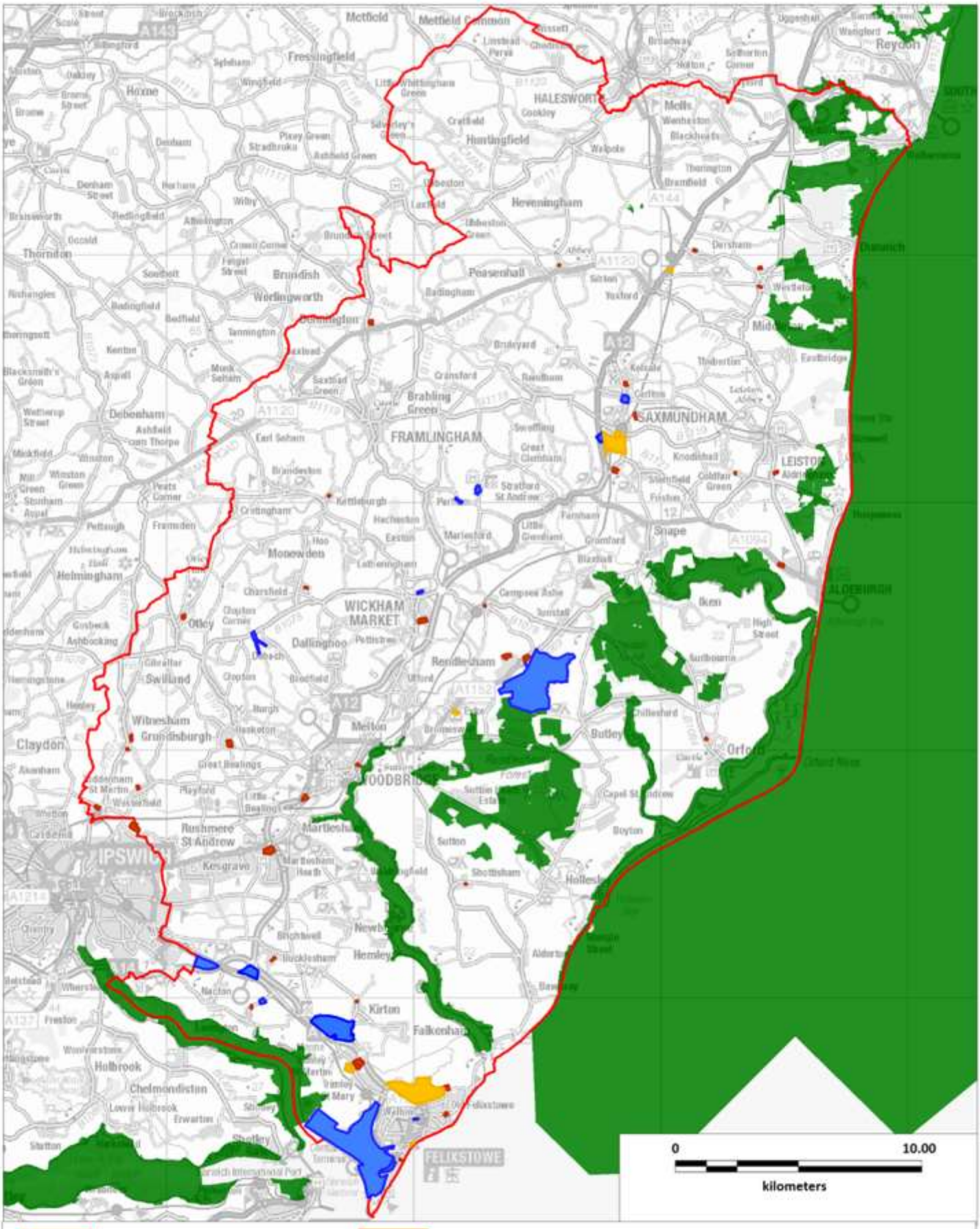
Map 4 shows the allocations and their proximity to the European sites. This then enables a consideration of any sites in very close proximity of 400m, within close proximity of 1km and also those that fall within the 13km zone of influence currently being used to inform the RAM Strategy. This then enables an initial consideration of the potential impact pathways that may be of relevance, serves to inform the initial screening of the plan for likely significant effects. These impact pathways are then considered in greater detail within the appropriate assessment. Table 2 provides an initial summary of all potentially relevant impact pathways, having regard for available information in relation to the sites. The Outer Thames Estuary marine site and Hamford Water are both not considered relevant to any of the various pathways discussed above and these can be ruled out for any likely significant effect.

2.3 It should be noted that the consideration of site allocations and Maps 4, 5 and 6 within this HRA report for the Final Draft Local Plan has been undertaken using available GIS data provided by Suffolk Coastal District Council during the preparation of the Final Draft Local Plan. For the exact boundaries of site allocations, the published Final Draft Local Plan should be referred to.

Table 2: Summary of potential impact pathways – i.e. potential mechanisms where by the different European sites could be impacted (? = possible)

Site	Recreation	Air quality	Water quality	Water abstraction	Urban effects
Alde-Ore & Butley Estuaries SAC, Alde-Ore Estuary SPA, Alde-Ore Ramsar	✓	✓	✓	✓	
Benacre to Easton Bavents Lagoons SAC, Benacre to Easton Bavents SPA	✓	✓	✓	✓	
Breydon Water SPA/Ramsar	✓		✓	?	
Dew's Ponds SAC			✓	✓	
Hamford Water SAC/SPA/Ramsar					
Minsmere to Walberswick Heaths & Marshes SAC, Minsmere-Walberswick SPA/Ramsar	✓	✓	✓	✓	✓
Orfordness to Shingle Street SAC	✓	✓	✓		✓
Staverton Park and the Thicks SAC	?	✓	✓	✓	✓
Outer Thames Estuary SPA					
Sandlings SPA	✓	✓			✓
The Broads SAC, Broadland SPA/Ramsar	✓		✓	✓	✓
Stour and Orwell Estuaries SPA/Ramsar	✓	✓	✓	✓	
Deben Estuary SPA/Ramsar	✓	✓	✓	✓	

Map 4: Relevant sites within the Local Plan



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3. Screening for likely significant effects

3.1 HRA is a step by step process, with the competent authority required to undertake screening for likely significant effects on European sites, after determining that the plan or project in question is not one that is entirely necessary for site management. Once relevant background information and potential impact pathways are understood, the HRA can progress to the screening for likely significant effects stage, fully informed by the background research undertaken. The screening for likely significant effects is undertaken on all policies within the plan. It is an initial check, made on a precautionary basis, to determine whether any part of the plan poses a risk to European sites in terms of its future implementation.

3.2 The Suffolk Coastal District Local Plan is being prepared to steer sustainable development in the Suffolk Coastal District, and whilst protection and enhancement of the natural environment is an integral part of sustainable development, the plan is not singularly focussed on European site management. The screening for likely significant effects is therefore undertaken.

3.3 When a HRA is being undertaken on a plan or project that is initiated by the competent authority themselves, there is greater opportunity to identify potential issues arising from the plan or project in the initial stages of design or preparation. Where a competent authority is approving a project being proposed by another party, the application for permission is usually made when the proposal has already been designed and all details finalised, thus the opportunity to identify issues early on is more limited unless an applicant chooses to hold early discussions with the competent authority.

3.4 For the Suffolk Coastal District Local Plan, Suffolk Coastal District Council is both the plan proposer and the competent authority, thus allowing the HRA to influence the plan in its earlier stages, at later refining stages and up to submission for Examination.

What constitutes a likely significant effect?

3.5 At the screening stage of HRA, there is the opportunity to identify changes to the plan that could be made to avoid risks to European sites. Any requirement for assessing the effectiveness of changes should be made at the appropriate assessment stage. The screening for likely significant effects is an initial check to identify risks or uncertainties in policy wording and recommend any obvious changes that can avoid those risks with clarifications, corrections or instructions for development project level HRA. Any recommendations that need to be justified in terms of effectiveness and applicability should be considered within

the appropriate assessment stage of HRA. As described in Appendix 1, screening for likely significant effects is an initial check to identify risks and uncertainties that could potentially be significant for the European sites, and to recommend any obvious changes that can avoid those risks. Where risks cannot be avoided with simple clarifications, corrections or instructions for project level HRA, a more detailed assessment is undertaken to gather more information about the likely significant effects and give the necessary scrutiny to potential mitigation measures. This is the appropriate assessment stage of HRA.

3.6 The screening check of each aspect of the plan is essentially looking for two things to enable a conclusion of no likely significant effect;

- Whether it is possible to say with certainty that there are no possible impacts on European sites, or
- Whether, in light of a potential risk, simple clarifications can be built into the policy and/or its supporting text, which serve to avoid any likely impacts.

3.7 If one of these can be met, it enables a competent authority to screen out from further stages of assessment. Where there is the potential for European sites to be affected, or mitigation measures need to be checked to ensure they are effective and appropriate, more detailed consideration is required and this then screens those aspects of the plan in to the appropriate assessment.

3.8 A likely significant effect could be concluded on the basis of clear evidence of risk to European site interest, or there could be a scientific and plausible justification for concluding that a risk is present, even in the absence of direct evidence. The latter is a precautionary approach, which is one of the foundations of the high-level of protection pursued by EU policy on the environment, in accordance with the EU Treaty.[7] The precautionary principle should be applied at all stages in the HRA process and follows the principles established in case law relating to the use of such a principle in applying the European Directives and domestic Habitats Regulations. In particular, the European Court in the 'Waddensee' case[8] refers to "*no reasonable scientific doubt*" and the 'Sweetman' case[9] the Advocate General identified that a positive conclusion on screening for likely significant effects relates to where there "*is a possibility of there being a significant effect*".

[7] Article 191 of the Treaty on the Functioning of the EU. Previously Article 174 of the Treaty of the EC.

[8] European Court of Justice case C - 127/02

[9] European Court of Justice case C - 258/11

3.9 An additional recent European Court of Justice Judgment in 2018 (Case C-323/17) clarified that the need to carefully explain actions taken at each HRA stage, particularly at the screening for likely significant effects stage. The Judgment is a timely reminder of the need for clear distinction between the stages of HRA, and good practice in recognising the function of each. The screening for likely significant effects stage should function as a screening or checking stage, to determine whether further assessment is required. Assessing the nature and extent of potential impacts on European site interest features, and the robustness of mitigation options, should be done at the appropriate assessment stage.

3.10 Table 3 below records the conclusions drawn and recommendations made on a policy by policy check for likely significant effects of the Suffolk Coastal District Local Plan at both First Draft and Final Draft Local Plan stages. Potential risks are highlighted. For a number of policies, particularly those related to site allocations, the screening at First Draft Local plan stage identified likely significant effects. These can be categorised as follows:

- For policies that do not set a quantum of development or specific locations, the potential for significant effects relates to the possibility of development coming forward in a particular location or with particular characteristics. In such instances, the risks may be simply avoided with straightforward clarifications, which remove any uncertainty. The recommendations add text to the policy to explain how the policy should be implemented to prevent adverse effects. This does not exclude the need for project level HRA but enables a conclusion of no likely significant effects at the plan level, because the identified risks to European sites have been removed. Project level HRA provides a means of checking for any further risks unforeseen at the plan level, and for developing project specific mitigation measures in greater detail within a project level appropriate assessment.

- For policies that do set a quantum of development or specific locations, the risks are primarily related to recreation pressure, but there are also potential impact pathways relating to urbanisation effects, water and air quality. The further detailed assessment of these impact pathways is discussed in more detail in the appropriate assessment chapter.

3.11 The screening table considers all policies individually, apart from site allocations, which are considered collectively on the basis of distance, apart from those where their close proximity or other concerns highlight a potential risk to European sites. Whilst each allocation has been checked individually, an individual line for each within the screening table is not considered necessary and would create an unwieldly table.

3.12 The screening table below provides a record of screening of the entire plan at First Draft stage, and the actions taken by Suffolk Coastal District council Planning Officers to incorporate recommendations into the plan. The initial screening was undertaken prior to the finalisation of the First Draft Local Plan for public consultation at Regulation 18 stage. This enabled the Council's planning officers to make the recommended amendments to remove likely significant effects. The recommendations column therefore also includes the action taken by Suffolk Coastal District Council in response to the recommendation. The public consultation version of the First Draft Local Plan therefore had the recommendations incorporated, and the outstanding matters from the screening table were then limited to those being taken to appropriate assessment stage.

3.13 A re-screen of the plan at Final Draft stage has then been made, and the findings are also recorded within the table. The publication version of the Local Plan at Final Draft also includes the appropriate assessment of all risks identified as requiring further assessment in the screening table.

3.14 The screening table therefore includes all screening up to and including Final Draft stage. There may also be a need to undertake further screening on any proposed modifications which arise during the Examination of the plan, prior to adoption. This ensures that the final adopted plan has an up to date HRA report.

Table 3: Screening for likely significant effects – at Draft Local Plan (Regulation 18) and re-screened at Final Draft Local Plan (Regulation 19)

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
Introduction	No LSE Context setting includes importance of European sites	N/A	N/A	N/A
SCLP2.1 Growth in the Ipswich strategic planning area	LSE Key policy setting out the proposed growth for Suffolk Coastal District.	Quantum and location of development could pose risks in terms of air and water pollution, water resources, recreation and urbanisation impacts	Location of growth the needs to be checked. Housing growth needs to be compared with current RAMS housing numbers	As per previous recommendations, consideration at appropriate assessment (recreation section) of overall quantum of growth and ability of RAMS to mitigate
SCLP2.2 Strategic infrastructure priorities	Clarification required to remove LSE Policy commits to collaborative working on large schemes that will need project level HRA	Depending on location of development, could pose risks in terms of air and water pollution, water resources, recreation and urbanisation impacts	Clarification to remove LSE - Add within supporting text a reference to joint working by public bodies for HRA purposes. Supporting text now added to SCLP2.3 "Strategic projects may require joint working by public bodies to ensure the requirements of the Habitats Directive are met." LPA action – Change made.	Following amendments at Regulation 18, no LSE
SCLP2.3 Cross-boundary mitigation of effects on protected habitats	LSE until HRA finalised A protective policy specifically for European sites, but may need revisiting.	Robustness of mitigation to protect new growth needs checking	This policy may be revisited after appropriate assessment to check it is fit for purpose in view of assessment findings	As per previous recommendations, consideration at appropriate assessment (recreation section) to ensure the policy meets the mitigation requirements
Vision	No LSE Includes importance of European sites	N/A	N/A	N/A

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
Strategic priorities and objectives	No LSE Provided for information to cross reference objectives with policies. Natural Environment adequately included.	N/A	N/A	N/A
SCLP3.1 (First Draft Local Plan policy) Presumption in favour of sustainable development	Clarification required to remove LSE.	Misinterpretation of legislative requirements	Clarification to remove LSE - Add to the end of supporting text relating to designated sites to highlight that the presumption in favour does not apply where there is a likely significant effect on a European site. Recommendation is not mitigation. LPA action – Changes made.	Policy removed from the plan, supporting text remains. No LSE
SCLP3.1 Strategy for growth in Suffolk Coastal District	LSE – employment and housing growth needs to be checked for potential risks	Air and water pollution, water resources, recreation and urbanisation impacts	(First Draft Local Plan policy ref SCLP3.2) Appropriate assessment - Level and location of growth needs to be checked. Housing growth needs to be compared with current RAMS housing numbers	As per previous recommendations, consideration at appropriate assessment (recreation section) of overall quantum of growth and ability of RAMS to mitigate (noting revised figures relating to housing need)
SCLP3.2 Settlement hierarchy	LSE – location of housing growth needs to be checked for potential risks	Air and water pollution, water resources, recreation and urbanisation impacts	(First Draft Local Plan policy ref SCLP3.3) Appropriate assessment - Level and location of growth needs to be checked. Housing growth needs to be compared with current RAMS housing numbers	As per previous recommendations, consideration at appropriate assessment (recreation section) of locations for growth
SCLP3.3 Settlement boundaries	No LSE. Defines settlements and does not promote development itself.	N/A	(First Draft Local Plan policy ref SCLP3.4)	N/A

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
	Development outside settlements governed by policy.		N/A	
SCLP3.4 Proposals for major energy infrastructure projects	Clarification required to remove LSE.	Misinterpretation of legislative requirements	(First Draft Local Plan policy ref SCLP3.5) Clarification to remove LSE - Add HRA to the 3rd bullet point in addition to EIA. Also suggest adding to supporting text to note the need to work with other competent authorities to prepare project wide HRAs when a project requires multiple permissions. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, no LSE
SCLP3.5 Infrastructure provision	Clarification required to remove LSE.	Misinterpretation of project level HRA requirements	(First Draft Local Plan policy ref SCLP3.6) Clarification to remove LSE – Add to supporting text to identify that the necessary infrastructure requirements for a project will need to form part of the HRA for a project, and that the applicant should therefore submit the necessary information to demonstrate that infrastructure provision will not pose a risk to European sites. Recommendation is not mitigation. Note that infrastructure funded by CIL will be approved	Following amendments at Regulation 18, no LSE

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
			separately, with its own HRA as required. LPA action – Changes made.	
SCLP4.1 Employment areas	LSE – employment growth needs to be checked for potential risks	Air and water pollution, water resources and urbanisation impacts	Appropriate assessment - Level and location of grow the needs to be checked	As per previous recommendations, consideration at appropriate assessment (traffic emissions, water and urbanisation sections). Specific sites are checked below
SCLP4.2 New employment areas	LSE – employment growth needs to be checked for potential risks	Air and water pollution, water resources and urbanisation impacts	Appropriate assessment - Level and location of grow the needs to be checked	As per previous recommendations, consideration at appropriate assessment (traffic emissions, water and urbanisation sections), but noting that new text is added to ensure designated sites are not adversely affected
SCLP4.3 Expansion and intensification of employment sites	No LSE. Qualitative, does not promote development and environmental impacts caveated.	N/A	N/A	N/A
SCLP4.4 Protection of employment sites	No LSE. Qualitative, does not promote development and environmental impacts caveated.	N/A	N/A	N/A
SCLP4.5 Economic development in rural areas	Clarification required to remove LSE.	Misinterpretation of project level HRA requirements	Clarification to remove LSE – Add 'natural environment' to 3rd bullet point. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, no LSE

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
SCLP4.6 Conversion and replacement of rural buildings for employment use	No LSE. Qualitative, does not promote development and environmental impacts caveated.	N/A	N/A	N/A
SCLP4.7 Farm diversification	No LSE. Qualitative, does not promote development. No impact pathways unless in close proximity to European sites.	Project level HRA may be required in some instances.	N/A	N/A
SCLP4.8 Retail hierarchy	No LSE. Qualitative, does not promote development. No impact pathways.	N/A	N/A	Policy removed and subsumed into town centre policy. No LSE
SCLP4.8 New retail and commercial leisure development	No LSE. Retail development in centres does not lead to any impact pathways.	N/A	(First Draft Local Plan policy ref SCLP4.9) N/A	N/A
SCLP4.9 Development in town centres	No LSE. Retail development in centres does not lead to any impact pathways.	N/A	(First Draft Local Plan policy ref SCLP4.10) N/A	N/A
SCLP4.10 Town centre environments	No LSE. Qualitative. Enhancement in centres does not lead to any impact pathways.	N/A	(First Draft Local Plan policy ref SCLP4.11) Biodiversity enhancement - Suggest adding reference to urban biodiversity, within policy and/or supporting text. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, no LSE
SCLP4.11 Retail and commercial leisure in Martlesham	No LSE. Retail development in centres does not lead to any impact pathways.	N/A	(First Draft Local Plan policy ref SCLP4.12) N/A	N/A

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
SCLP4.12 District and local centres and local shops	No LSE. Retail development in centres does not lead to any impact pathways.	N/A	(First Draft Local Plan policy ref SCLP4.13) N/A	N/A
SCLP5.1 Housing development in large villages	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.2 Housing development in small villages	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.3 Housing development in the countryside	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.4 Housing in clusters in the countryside	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.5 Conversion of buildings in the countryside for housing	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	Biodiversity enhancement - Suggest adding 'any impacts on the natural environment are adequately mitigated' to the end of 5th bullet point. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, no LSE
SCLP5.6 Rural workers dwellings	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
SCLP5.7 Infill and garden development	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.8 Housing mix	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.9 Self build and custom build housing	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.10 Affordable housing on residential developments	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.11 Affordable housing on exceptions sites	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.12 Houses in multiple occupation	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.13 Residential annexes	No LSE. Qualitative. Residential annexes are not counted as a net increase in dwellings for HRA purposes	N/A	N/A	N/A
SCLP5.14 Extensions to residential curtilages	No LSE. Qualitative. Residential extensions are not counted as a net increase in dwellings for HRA purposes	N/A	N/A	N/A

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
SCLP5.15 Residential moorings, jetties and slipways	No LSE. Jetties and slipways will need project level HRA. Qualitative policy and caveat already present in policy. Housing development location and scale will be considered within the appropriate assessment (which includes residential moorings).	Air and water pollution, water resources, recreation and urbanisation impacts re residential moorings. Project level HRA may be required in some instances for jetty's and slipways.	N/A	N/A
SCLP5.16 Residential caravans and mobile homes	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment (which includes residential caravans/mobile home pitches).	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP5.17 Gypsies, travellers and travelling showpeople	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment (which includes gypsy/traveller/showpeople pitches).	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A
SCLP6.1 Tourism	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	As per previous recommendations, consideration at appropriate assessment (recreation section)
SCLP6.2 Tourism destinations	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	As per previous recommendations, consideration at appropriate assessment (recreation section)
SCLP6.3 Tourism development	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	Amendments at Regulation 18 undertaken, noting that tourism will be covered by the

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
within the AONB and heritage coast			4th bullet point needs to be changed to 'avoids or mitigates for adverse impacts.' Incorrect terminology as a minimised adverse impact is still an adverse impact. LPA action – Changes made.	appropriate assessment (recreation section)
SCLP6.4 Tourism outside of the AONB	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	As per previous recommendations, consideration at appropriate assessment (recreation section)
SCLP6.5 New tourist accommodation	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	As per previous recommendations, consideration at appropriate assessment (recreation section)
SCLP6.6 Existing tourist accommodation	No LSE. Qualitative policy, does not add new development.	N/A	N/A	N/A
SCLP7.1 Sustainable transport	LSE. Potential risks to European sites from increased levels of car use.	Air quality implications from increased transport pressure on roads in close proximity to European sites	Appropriate assessment – risks from increased transport to be assessed	As per previous recommendations, consideration at appropriate assessment (traffic emissions)
SCLP7.2 Parking proposals and standards	No LSE. Qualitative, does not promote developments and includes provision for protecting water quality.	N/A	N/A	N/A
SCLP8.1 Community facilities and assets	No LSE. Qualitative.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	N/A
SCLP8.2 Open space	LSE.	Policy needs to include necessary mitigation	Appropriate assessment – the findings of the appropriate	New wording added in relation to supporting

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
	Policy will need strengthening to support mitigation requirements	requirements for recreation pressure	assessment of housing growth will inform mitigation requirements that need to be stated in policy. Possible wording additions re SANGs	biodiversity and delivering green infrastructure, which provides adequate links re SANGs. No LSE.
SCLP8.3 Allotments	No LSE. Does not promote a type of development with impact pathways.	N/A	N/A	N/A
SCLP8.4 Digital infrastructure	No LSE. Qualitative.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	N/A
SCLP9.1 Low carbon renewable energy	No LSE. Qualitative and includes protective caveats for the natural environment.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	N/A
SCLP9.2 Sustainable construction	No LSE. Qualitative, environmentally positive policy.	N/A	N/A	N/A
SCLP9.3 Coastal change management area	No LSE. Environmentally protective policy, with caveats re the environment.	N/A	N/A	N/A
SCLP9.4 Coastal change rollback or relocation	No LSE. Qualitative/protective.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	N/A
SCLP9.5 Flood risk	No LSE. Environmentally protective policy.	N/A	N/A	N/A
SCLP9.6 Sustainable drainage systems	No LSE. Environmentally protective policy, with enhancement provision for biodiversity.	N/A	N/A	References made to water quality and biodiversity. No LSE
SCLP9.7 Holistic water management	No LSE. Environmentally protective policy.	N/A	N/A	N/A

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
SCLP10.1 Biodiversity and geodiversity	LSE. Policy will need strengthening to support mitigation requirements	Policy needs to include necessary mitigation requirements for recreation pressure	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements that need to be stated in policy.	Supporting text and policy wording notably strengthened in relation to biodiversity and designated sites, and the RAMS, but text does not follow the mitigation hierarchy. Consideration at appropriate assessment (biodiversity)
SCLP10.2 Visitor management of European sites	LSE. Policy may need strengthening to support mitigation requirements	Policy is in accordance with previous HRA recommendations (site allocations), but now needs to include necessary mitigation requirements for recreation pressure	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements that need to be stated in policy.	As per previous recommendations, consideration at appropriate assessment (recreation section), where recreation pressure is the primary assessment topic.
SCLP10.3 Environmental quality	No LSE A strong environmentally positive policy securing adequate assessment of impacts on the environment,	N/A	New policy at Regulation 19 stage	No LSE
SCLP10.4 Landscape character	No LSE. Environmentally protective policy with green infrastructure enhancements.	N/A	(First Draft Local Plan policy ref SCLP10.3) N/A	N/A
SCLP10.5 Settlement coalescence	No LSE. Qualitative policy, does not add new development.	N/A	(First Draft Local Plan policy ref SCLP10.4) N/A	N/A
SCLP11.1 Design quality	No LSE. Qualitative policy, does not add new development, and requires natural features to be retained and enhanced.	N/A	N/A	N/A
SCLP11.2	No LSE.	N/A	N/A	N/A

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
Residential amenity	Qualitative policy, does not add new development.			
SCLP11.3 Historic environment	No LSE. Protective policy for heritage assets, does not add new development.	N/A	N/A	N/A
SCLP11.4 Listed buildings	No LSE Protective policy for heritage assets, does not add new development.	N/A	New policy at Regulation 19 stage	No LSE
SCLP11.5 Conservation areas	No LSE. Protective policy for heritage assets, does not add new development.	N/A	N/A	N/A
SCLP11.6 Non-designated heritage assets	No LSE. Protective policy for heritage assets, does not add new development.	N/A	(First Draft Local Plan policy ref SCLP11.4) N/A	N/A
SCLP11.7 Archaeology	No LSE. Protective policy for heritage assets, does not add new development.	N/A	(First Draft Local Plan policy ref SCLP11.6) N/A	N/A
SCLP11.9 Areas to be protected from development	No LSE. Environmentally protective policy.	N/A	(First Draft Local Plan policy ref SCLP11.8) N/A	Following amendments at Regulation 18, no LSE
SCLP11.10 Newbourne former land settlement association holdings	No LSE. Qualitative policy, does not add new development.	N/A	(First Draft Local Plan policy ref SCLP11.9) N/A	N/A
Area polices and site allocations requiring specific comment				

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
SCLP12.1 Neighbourhood plans	LSE. Neighbourhood plans will need to adhere to the findings and mitigation requirements for growth	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – consideration of housing growth and location to have regard for neighbourhood plans.	As per previous recommendations, consideration at appropriate assessment (all sections), noting changes to housing figures
SCLP12.2 Strategy for Felixstowe and Felixstowe policies SCLP 12.11 to SCLP 12.15	LSE The Felixstowe vision policy does not promote development, but it does not refer to European sites in close proximity. Other Felixstowe policies that are not specific site allocations have been checked and relate to safeguarding and small scale redevelopment of existing assets, or on a larger scale concentrated in existing built areas	Air and water pollution, water resources, recreation and urbanisation impacts. Reference is made in general terms in supporting text to European sites, but policy only refers to landscape.	Clarification to remove LSE – Add 'protected habitats' before 'landscapes' for 12.2 LPA action – Changes made.	Following amendments at Regulation 18, no LSE Note that there are a number of policies covering Felixstowe (SCLP12.11 to 12.15), that do not include specific new allocations. These have also been checked to ensure no LSE in this location, which is close to the Orwell and Deben Estuaries.
SCLP12.3 North Felixstowe Garden Neighbourhood	LSE 2,000 dwellings in one location	Potential for concentrated increased recreation pressure to European sites in close proximity due to large allocation	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements and for this very large allocation there is likely to be a need for on-site SANGs as well as contribution to RAMS.	Appropriate Assessment (recreation section) to assess SANGs requirements. The assessment of SANGs requirements for the Garden Neighbourhoods is set out within the appropriate assessment, and policy supporting text has been amended to provide the requirement for SANGs. Policy wording also strengthened.
SCLP12.17 Tourism accommodation (Felixstowe)	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	(First Draft Local Plan policy ref SCLP12.16)	As per previous recommendations, consideration at appropriate

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
			Appropriate assessment – risks from tourism related development to be assessed	assessment (recreation section)
SCLP12.18 Strategy for Communities surrounding Ipswich	No LSE Vision policy so does not promote development	N/A	(First Draft Local Plan policy ref SCLP12.17) N/A	N/A
SCLP12.19 Brightwell Lakes	No LSE Detailed discussions with the planning officer, NE and developer/consultants have provided for adequate mitigation	Recreation pressure risks have been fully mitigated for with a combination of a proportionate financial contribution to the RAMS and the provision of a SANG as part of the development. Project level HRA already undertaken.	(First Draft Local Plan policy ref SCLP12.18) N/A	N/A
SCLP12.23 Ipswich garden suburb country park	No LSE Detailed discussions with the planning officer, NE and developer/consultants have provided for adequate mitigation	Recreation pressure risks have been fully mitigated for. This policy provides for the SANG to mitigate for development. Project level HRA already undertaken.	(First Draft Local Plan policy ref SCLP12.22) N/A	N/A
SCLP12.26 Strategy for Aldeburgh	No LSE Vision policy so does not promote development. Sensitive environment referred to in policy	N/A	(First Draft Local Plan policy ref SCLP12.23) N/A	N/A
Strategy for Framlingham – text not policy	No LSE Vision text so does not promote development	N/A	N/A	N/A
Strategy for Leiston – text not policy	LSE Potential for impacts on Minsmere-Walberswick over and above RAMS	Impacts over and above those covered by RAMS will be Sizewell C and associated development	Clarification to remove LSE – Add to supporting text in 5th paragraph a reference to the	Following amendments at Regulation 18, no LSE

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
			wider natural environment as well as the Leiston community. LPA action – Changes made.	
SCLP12.28 Strategy for Saxmundham	No LSE Vision policy so does not promote development. Supporting text highlights natural environment issues.	N/A	N/A	N/A
SCLP12.29 South Saxmundham garden neighbourhood	LSE 800 dwellings in one location	Potential for concentrated increased recreation pressure to European sites in close proximity due to large allocation	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements and for this very large allocation there is likely to be a need for on-site SANGs as well as contribution to RAMS.	Appropriate Assessment (recreation section) to assess SANGs requirements. The assessment of SANGs requirements for the Garden Neighbourhoods is set out within the appropriate assessment, and policy supporting text has been amended to provide the requirement for SANGs. Policy wording also strengthened.
SCLP12.31 Strategy for Woodbridge	No LSE Vision policy so does not promote development. Supporting text highlights natural environment issues.	N/A	N/A	N/A
SCLP12.34 Strategy for Rural Areas	No LSE Vision policy with strong protective wording in relation to the natural environment and European sites	N/A	N/A	N/A
Site allocations within 400m of a European site boundary				
SCLP12.27	LSE 300m from River Alde SPA/SAC/Ramsar	Disturbance to estuary birds from recreation pressure.	Appropriate assessment – consideration of nature of	As per previous recommendations,

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
Land rear of Rose Hill, Saxmundham (Housing).		Note that the Site Allocations HRA highlighted risks, but did not assess in detail. Stated the need for project level HRA, also stated that there is the potential for the allocation to be undeliverable.	development and proximity to River Alde SPA/SAC/Ramsar. Policy refers to the need for project level HRA, but further assessment required, and text to inform HRA scope	consideration at appropriate assessment (urbanisation section)
SCLP12.7 Port of Felixstowe (Employment).	LSE Adjacent to Stour and Orwell SPA/Ramsar	Dredging, contamination, noise, lighting, disturbance risks, but within an area of existing high levels of activity. Policy is qualitative and does not identify new growth, therefore can be considered at project level.	Clarification to remove LSE – Add to supporting text to identify that project level HRA needs to consider nature of development and proximity to Stour and Orwell SPA/Ramsar. Policy refers to the need for project level HRA, but further clarification required in supporting text, re inclusion of issues such as dredging, contamination, noise, lighting, disturbance as part of project HRA scope. LPA action – Changes made.	Following amendments at Regulation 18, no LSE
SCLP12.32 Former Council Offices, Melton Hill (mixed use).	LSE 100 dwellings Abuts Deben Estuary	Risks relate to disturbance, noise, light and other urban effects	New allocation at Regulation 19 stage.	Appropriate assessment (urbanisation section) – consideration of nature of development and proximity to Deben Estuary. The site is just approximately 50m from the SPA boundary, however it is separated by a railway line which may help to reduce urban effects.

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
SCLP12.41 Bentwaters Park, Rendlesham. (Employment).	LSE Boundary abuts the Sandlings SPA and is within 400m of Staverton Park and the Thicks SPA	Risks relate to disturbance, noise, light and other urban effects, but the policy does not promote new development, rather it is qualitative setting out requirements for new development at this existing employment site. No further assessment required at the plan level. Policy identifies need to have regard for designations.	Clarification to remove LSE – Add to supporting text to identify that project level HRA may be required and projects will only be approved with effective measures to prevent impacts on European sites, and that project level HRA will need to consider a range of urbanisation effects such as noise and lighting. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, no LSE
SCLP12.69 Land West of B1125, Westleton. (Housing).	LSE 20 dwellings	400m from Minsmere-Walberswick SPA/Ramsar and Minsmere-Walberswick Heaths & Marshes SAC; easy access on foot to protected site and risks relate to recreation and urban effects (increased fire risk, cat predation, other predators etc.)	Appropriate assessment – consideration of nature of development and proximity to Minsmere-Walberswick.	As per previous recommendations, consideration at appropriate assessment (urbanisation section), due to proximity. Note reduction in housing numbers from 35 to 20
Site allocations within 400m to 1km of a European site boundary				
SCLP12.33 Land at Woodbridge Town Football Club	LSE 120 dwellings Site is around 760m from River Deben SPA, above Martlesham Creek.	Hydrological risks - checked on maps, none found. Project level HRA should make a more detailed check, but can be dealt with through project level mitigation.	New allocation at Regulation 19 stage.	Clarification to remove LSE – Policy to refer to need for project level HRA and add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
				checked and adequately mitigated for if required. Recommendation is not mitigation.
SCLP12.35 Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin. (Employment).	LSE (other than that being dealt with through RAMS) Over 900m from Stour & Orwell SPA/Ramsar	Hydrological risks - checked on maps, none found, and separated by main road and railway line. Recreation risks to be dealt with through the RAMS	Clarification to remove LSE – Add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checks and adequately mitigated for if required. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, no LSE
SCLP12.38 Levington Park (Employment).	LSE 900m from Stour & Orwell SPA	Hydrological risks - checked on maps, none found. Project level HRA should make a more detailed check, but can be dealt with through project level mitigation.	Clarification to remove LSE – Policy to refer to need for project level HRA and add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checked and adequately mitigated for if required. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, no LSE
SCLP12.43 Land to the east of Aldeburgh Road, Aldringham. (Housing).	LSE (other than that being dealt with through RAMS) 900m from Sandlings SPA	Hydrological risks - checked on maps, none found. Project level HRA should make a more detailed check, but can be dealt with through project level mitigation. Recreation risks to be dealt with through the RAMS	Clarification to remove LSE – Policy to refer to need for project level HRA and add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checked and adequately mitigated for if required.	Following amendments at Regulation 18, no LSE

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
			Recommendation is not mitigation. LPA action – Changes made.	
SCLP12.51 Land to the South of Eyke CoE Primary School and East of The Street, Eyke (Mixed use).	LSE Just over 400m from Sandlings SPA	Urbanisation impacts and possible concerns that impacts relating to recreation are over and above RAMS mitigation	Appropriate assessment – consideration of nature of development and proximity to Sandlings SPA	As per previous recommendations, consideration at appropriate assessment (urbanisation section), due to proximity. Note increase in housing numbers from 45 to 65
SCLP12.57 Land at Red house Farm, Bridge Road, Levington. (Housing).	LSE (other than that being dealt with through RAMS) Just over 700m from Stour & Orwell SPA/Ramsar	Hydrological risks - checked on maps, none found. Recreation risks to be dealt with through the RAMS	Clarification to remove LSE – Add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checked and adequately mitigated for if required. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, no LSE
SCLP12.70 Land at Cherry Tree, Darsham Road, Westleton (Housing).	LSE 15 dwellings	400m from Minsmere-Walberswick SPA/Ramsar and Minsmere-Walberswick Heaths & Marshes SAC; easy access on foot to protected site and risks relate to recreation and urban effects (increased fire risk, cat predation, other predators etc.)	New allocation at Regulation 19 stage.	Appropriate assessment (urbanisation section) – consideration of nature of development and proximity to Minsmere-Walberswick Sites is approx. 600m from Dunwich Heath with direct links by footpath.
All other employment site allocations over 1km from a European site boundary	No LSE Distance removes impact pathways. Introductory text makes reference to the potential need for project level HRA.	N/A	N/A	N/A

Policy (Final Draft Local Plan reference)	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan
Housing site allocations over 1km but within 13km from a European site boundary	LSE – level of housing growth within 13km RAMS zone of influence needs to be checked for potential risks	Recreation impacts	Appropriate assessment - Level of housing growth needs to be compared with current RAMS housing numbers	As per previous recommendations, consideration at appropriate assessment (recreation section)
All other housing site allocations over 13km from a European site boundary	No LSE Distance removes impact pathways	N/A	N/A	N/A

4. Appropriate Assessment of Impact Pathways

4.1 The screening for likely significant effects table has identified a number of recommended text changes that can strengthen policy or completely avoid risks with the removal of potentially harmful aspects. These are clarifications, corrections or instructions for the development project HRA, that do not require further scrutiny at the appropriate assessment stage. Most of these recommendations for text changes were highlighted at the screening for likely significant effects on the First Draft Local Plan and were made immediately prior to the Regulation 18 consultation. A small number of additional recommendations are made at Final Draft Local Plan stage and have been incorporated within the Plan.

4.2 Additionally, the screening table has flagged key topics and a small number of allocations for more in-depth consideration within an appropriate assessment. The appropriate assessment topics were highlighted in this HRA report at Regulation 18 stage to advise on the scope of the appropriate assessment. These impact pathways are now assessed in detail to form the appropriate assessment and to inform the Regulation 19 Final Draft Local Plan. There is now a strong body of evidence showing how increasing levels of development, even when well outside the boundary of protected wildlife sites, can have negative impacts on the sites and their wildlife interest. The research particularly includes work on heathlands (Mallord 2005; Underhill-Day 2005; Liley & Clarke 2006; Clarke, Sharp & Liley 2008; Sharp *et al.* 2008; Clarke & Liley 2013; Clarke *et al.* 2013) and coastal sites (Saunders *et al.* 2000; Randall 2004; Liley & Sutherland 2007; Clarke, Sharp & Liley 2008; Liley 2008; Stillman *et al.* 2009) where links between housing, development and nature conservation impacts are demonstrated.

4.3 Once a likely significant effect has been identified, the purpose of the appropriate assessment is to examine evidence and information in more detail to establish the nature and extent of the predicted impacts, in order to answer the question as to whether such impacts could lead to adverse effects on European site integrity.

4.4 An appropriate assessment should be based on evidence, and that can take different forms (direct evidence, comparable evidence, modelling, expert opinion, Natural England's advice etc). In reality however, appropriate assessments at the plan stage are often undertaken with enough evidence to give confidence in potential mitigation options, but that project level HRAs remain critical in determining the detail of such mitigation. The assessment at plan level is therefore often drawing on the knowledge and experience of the assessors, to make scientifically justified decisions about eliminating risk whilst recognising the need for further detailed considerations.

4.5 The 'precautionary principle' is described in the screening section. It is equally relevant for the appropriate assessment as it is for screening likely significant effects. It is an accepted principle that is embedded within the wording of the legislation, and latterly

within case decisions, both European and domestic. Essentially, the appropriate assessment stage is, in accordance with the Habitats Regulations, an assessment that enables a competent authority to only give effect to a plan or authorise/undertake a project after having ascertained that it will not adversely affect the integrity of the European site.

4.6 It is for the competent authority to gather the information and evidence necessary for the appropriate assessment to give them certainty that adverse effects will not occur. Fundamentally that therefore means that in the absence of certainty, the plan or project should not normally proceed (subject to the further exceptional tests explained in Appendix 1). Hence the precaution is in the competent authority's duty to only allow plans or projects to proceed whether there is certainty and to apply a precautionary approach where uncertainties remain. Competent authorities should have enough evidence to satisfy themselves that there are feasible measures to prevent adverse effects. These should be feasible in terms of cost, practical implementation, timeliness and attributing responsibility.

Consultation responses of relevance to the HRA

4.7 The HRA team has liaised with Natural England staff on numerous occasions during the preparation of this HRA report. In their formal response to the Regulation 18 consultation at First Draft Plan stage, Natural England advised that it supports and agrees with the recommendations and conclusions of the HRA. At that stage, the appropriate assessment had only been formulated in summary with impact pathways identified for further assessment. Natural England offered support for the appropriate assessment topics identified, and advised the Council that they would welcome the opportunity for further discussions, particularly in relation to recreational disturbance mitigation by means of RAMS, SANGS, biodiversity net gain, and the use of the green infrastructure network. Recommendations made under the appropriate assessment in relation to the biodiversity policy reflect the subsequent discussions held with Natural England and Council officers on these points.

4.8 The RSPB provided detailed comments on the plan at First Draft stage, including in relation to the HRA. The RSPB helpfully advised that the appropriate assessment should consider how the RAMS can accommodate additional housing to provide adequate mitigation for recreation, and this is now covered within the appropriate assessment section of this HRA report. The RSPB did suggest that each policy for a residential allocation should make reference to the RAMS. However, it is considered that this is not essential as there is a specific policy, SCLP 2.3, that clearly identifies the need for the RAMS, and SCLP 10.1 that requires residential growth to make a contribution. The latter policy has been further strengthened since the First Draft. As the RAMS applies to nearly all allocations, and the plan is to be applied as a whole, this is considered to be adequate protection. Where there are additional matters that are more site specific, such as where an allocation is in very close proximity, it is

appropriate to give further guidance in relation to the project level HRA requirements, as advised in the appropriate assessment sections of this report.

4.9 A number of consultees completed the consultation form indicating comments were in relation to the HRA. However, after checking all of these, it is apparent that the comments related to matters relevant to the policies and site allocations, generally raising concerns about increased growth in particular locations where it is considered detrimental to a village feel, traffic congestion, community facilities and the countryside in general. A check of all comments concluded that all related to matters of general concern that the Council should consider, not specifically the HRA.

Appropriate assessment topics

4.10 Using evidence and professional expertise, along with the consultation responses and discussions with Natural England, the following appropriate assessment chapters cover the following impact pathways identified by the screening for likely significant effects:

- Recreation – residential. Checking that the RAMS remains fit for purpose for the increased housing from the current Local Plan and reviewing its progress towards adoption
- Recreation from tourism – checking that the local plan does not give rise to additional recreation impacts as a result of its promotion of tourism growth
- Other urbanisation effects – checking development in close proximity for any urbanisation risks other than recreation.
- Water – a re-check of previous conclusions from earlier HRA work and review of any new information, including discussion with Anglian Water
- Air Quality – consideration of traffic increases in close proximity to European sites as a result of site allocations and growth
- Site allocations check – detailed consideration of all allocations that have been identified in the screening table as requiring further assessment. This is relevant within each of the above sections of the appropriate assessment
- Biodiversity net gain – ensuring that wider biodiversity is adequately protected and contribution are made through spatial planning to biodiversity restoration. This underpins European site protection and long term maintenance.

5. Recreation

5.1 The impact of recreation on the coastal and heathland European sites has already been recognised in previous HRA work and the identification of recreation pressure as a key concern for the Suffolk European wildlife sites has been echoed within neighbouring local planning authority plan level HRAs. This has led to the collaborative working between the five Suffolk local planning authorities that lie within 13km of the coastal and heathland European sites with the development of the Suffolk HRA RAMS. As discussed earlier in this report, the RAMS has initially been prepared using housing figures from the current local plans for the relevant local planning authorities. There are increased housing numbers in the emerging Suffolk Coastal District Local Plan and there are both existing allocations being reviewed and taken forward and new site allocations.

5.2 All but one (SCLP12.50, Land off Laxfield Road, Dennington) of the allocations within the Final Draft Local Plan falls within the 13 km zone of influence currently being proposed for the RAMS. The extent to which the RAMS is currently able, or can be expanded to accommodate, the new quantum of residential growth stated within the Final Draft Plan is a key consideration for this HRA.

5.3 There is also a need to have regard for the proximity of site allocations. Where allocations fall very close to European site boundaries, there may be recreation impacts that are over and above the capabilities for mitigation set out within the RAMS. As set out in the screening table, a number of individual site allocations are recommended for further consideration at appropriate assessment for this reason. This small number of site allocations is discussed in the subsequent appropriate assessment section below in relation to urbanisation effects.

5.4 The RAMS strategy has numerous opportunities for expansion. The strategy has been initially set up to cover the designated sites and mitigation has been based on residential growth within existing local plans. However, there is inherent flexibility within the approach and the following measures are ones which could be expanded or adjusted to accommodate different levels of growth:

- The warden team: staffing levels can be adjusted, and staff time focussed according to particular needs, changing patterns of access or different levels of growth;
- The dog project: numbers of events and staffing etc. can be adjusted as necessary;
- Site specific projects: these are targeted measures relating to changing access infrastructure, new paths, re-routing paths, watersports measures, changes to car-parks etc. and are instigated on or around the European sites.

5.5 The RAMS provides a mechanism for funding a range of measures to manage access at the European sites, but also highlights the potential need for greenspaces that serve to

provide an alternative to recreation on European sites. Large scale housing sites have provided such greenspace, referred to as Suitable Alternative Natural Greenspaces (SANGs) as part of the overall strategy. In accordance with the RAMs, SANGs are provided where there is a concentration of residential development at one location, with the additional risk to European sites being that the most local access points on the nearby European sites will receive a large influx of additional visitors as new residents seek local recreation space, particularly for daily walking/dog walking.

5.6 There are two large scale developments, including a large number of dwellings, within the Final Draft Local Plan, being promoted as 'garden neighbourhoods.' It is recommended that a similar SANGs requirement is applied to the two garden neighbourhood allocations, given the significant numbers of dwellings proposed for each.

5.7 The two garden neighbourhoods are proposed at Saxmundham and Felixstowe.

- SCLP12.3 North Felixstowe Garden Neighbourhood. 1440 dwellings (in addition to 560 granted outline planning permission).
- SCLP12.29 South Saxmundham Garden Neighbourhood. 800 dwellings.

5.8 The design of the SANGs in terms of their layout, size and facilities should be an early consideration for development sites, ideally at the strategic/master planning stage. It is recommended that Suffolk Coastal District Council works closely with the relevant developers to ensure that SANGS are an integral part of the project design, and adequately accounted for in terms of layout, development levels and resources to fund SANG delivery. As strategic mitigation schemes for European sites around the country progress, there is a growing body of information and good practice in relation to SANGs that those involved in SANGs design can draw from. Key principles and good practice are now widely recognised and include the following:

- Creating a rural and wilderness feel, in order to provide a similar experience to recreation being undertaken on European sites
- Avoiding visual and audible detractors such as busy roads, urbanised landscapes, industrial and manmade features
- Providing an experience that avoids a 'busy' feel. SANGs design elsewhere has quantified this with a measurement of no more than one person per hour per ha, but other means of quantifying a tranquil feel may also be appropriate
- Seeking to provide a minimum of 8ha per 1000 residents, but ensuring that the proposed size is justified in light of local circumstances (a greater size may be required in some instances). Resident numbers are usually calculated on the basis of 2.4 residents per dwelling, unless local information suggests otherwise.
- Ensuring that the SANG enables at least one circular walk of no less than 2.5km but ensure that the walking route provision is based on local evidence (there may be a reason why the average walk is greater in some circumstances).

5.9 These principles are based on the provision of a SANG by the creation of a new greenspace or enhancement of an existing space to increase its capacity as an alternative to European sites for recreation, in order to meet a specified number of new houses. It is important to note that the key principles, including SANG size, are established practice only and do not constitute a formal standard. Site specific evidence should also augment any adherence to good practice.

5.10 In some development cases elsewhere, developers have provided SANGs that significantly exceed these minimums, either because local circumstances require more mitigation to give certainty of success, or because the developer is providing some SANG capacity for other developments. Each of the garden neighbourhoods presents a differing SANGs need, which is established based on currently available evidence and the knowledge and expertise of Footprint Ecology drawn from working on similar strategies elsewhere. As discussed below, local evidence on European site use can indicate particular local requirements for SANGs to serve as a viable alternative to the European sites.

5.11 The following recommendations for each of the two sites should be used to expand policy and supporting text. The master plans and project level HRAs will also need to explain SANGs good practice and how they will be applied to adequately meet local needs.

Felixstowe garden neighbourhood

5.12 The proposed allocation for 1440 new dwellings, in addition to the 560 with outline consent already, is in close proximity to both the Deben and the Orwell Estuaries, as illustrated on Map 1 below, using GIS layers provided by Suffolk Coastal District Council. Visitor survey work undertaken in 2014 for the Deben was commissioned by the Deben Estuary Partnership. The European sites are within easy walking distance and site users tend to undertake walks along the estuary walls (Lake *et al.* 2014). The walls provide for a long walk and visitor survey work for the Deben, from the Felixstowe ferry survey point identifies that the median route length for walkers surveyed was 7km. The surveys revealed that walkers will walk from Felixstowe to the estuary by incorporating the wider footpath network through farmland to create a long circular walk. Dog walkers are a particularly important user group (Lake *et al.* 2014).

5.13 This information should be used to inform the detailed master planning for the site, but it is recommended that the detailed master planning is also informed by additional visitor survey work and an audit of the footpath network, which will need to play a role in providing long circular walks in conjunction with the SANG. This information suggests the following key design considerations for the SANG to be a viable avoidance/mitigation measure at Felixstowe garden neighbourhood development:

- Close proximity of European sites indicates that the SANG needs to be locationally convenient and easy to access
- Design needs to be dog walker focussed
- Provision of long walking routes within the SANG and incorporating the wider footpath network to create long walks that do not include or draw people close to the estuaries
- Walking routes need to feel like a long and exhilarating walk as an alternative to the estuaries.

5.14 SANG size should have regard for the general principles explained earlier but be particularly informed by the locally relevant information above.

Saxmundam garden neighbourhood

5.15 The proposed allocation for 800 new dwellings is to be accommodated on land to the south of Saxmundham as identified in the Final Draft Local Plan.

5.16 The nearest European sites are approximately 5 to 7km away, and therefore within easy driving distance rather than walking distance. The nearest sites are the Sandlings, the Alde Ore and Minsmere-Walberswick, and the nearest access points provide a range of popular and attractive destinations that have very scenic walks.

5.17 Visitor survey work for the Sandlings was commissioned by Suffolk wildlife Trust with the Forestry Commission (Cruickshanks, Liley & Hoskin 2010). The survey identifies that the median route length for walkers surveyed was 2.9km and this tends to be more focussed on within the European site than was found at Felixstowe.(Cruickshanks, Liley & Hoskin 2010).

5.18 This information should be used to inform the detailed master planning for the site, but it is recommended that the detailed master planning is also informed by additional visitor survey work and an audit of the footpath network and car parks. This information suggests the following key design considerations for the SANG to be a viable avoidance/mitigation measure at Saxmundham garden neighbourhood development:

- Close driving distance of a range of attractive of European site access points indicate that the SANG needs to be of high quality and design to deter visitors from honey pot locations
- The site needs to be large in order to provide a desirable alternative to getting in the car to visit the European sites
- Provision of walking routes within the SANG needs to be carefully designed to accommodate circular walks that provide a varied and high quality experience in terms of visual and other sensory factors as an alternative to the European sites.

5.19 SANG size should have regard for the general principles explained earlier but be particularly informed by the locally relevant information above.

Tourism

5.20 The Final Draft Local Plan states that tourism contributes 12% of the total employment within the District and has a major influence on the local economy. The tourism related policies within the Final Draft Local Plan are predominantly qualitative in nature, although some policies refer to particular towns or locations where tourism growth should be focussed.

5.21 Policies SCLP6.1 and SCLP6.2 are the overarching tourism policies, which both now give explicit reference to the need to undertake ecological/HRA assessments to ensure that any proposals for tourist related facilities do not conflict with environmental policies, and do not require further amendment. There is a specific policy within the Local Plan that promotes increased tourism development at Felixstowe. Policy SCLP 12.17 states that proposals for new tourist accommodation will be supported, with a list of caveats that include ensuring that there is no adverse effect on the environment. The proximity of Felixstowe to the Orwell and Deben Estuaries is such that a large scale tourism accommodation proposal such as a caravan park could lead to a significant increase in visits to the estuaries, with some parts of the Orwell potentially accessible on foot, depending on the location of the proposal.

5.22 It is recommended that Policy SCLP 12.17 includes a clearer requirement for consideration of recreation impacts from tourism development at Felixstowe within Policy SCLP 12.17. An additional sentence to advise that large scale tourism accommodation proposals will need to demonstrate that the development will not lead to additional recreation pressure at European sites should be added to the policy, or may be better placed within supporting text.

Summary of assessment of recreation risks

5.23 It is concluded that the RAMS, which is nearing finalisation and adoption, includes a comprehensive monitoring and review programme that allows for new growth in emerging local plans to be incorporated into the avoidance and mitigation measures programme. The strategy has numerous opportunities for expansion, particularly in relation to dedicated staff within the project team, which will initially be set up to cover the designated sites based on residential growth within existing local plans. Staff coverage of European sites could be notably increased with new growth, and there are also a range of opportunities for additional projects to be run or expanded upon at all of the European sites. Based on knowledge and experience of such strategies elsewhere, it is advised that the RAMS has significant potential for expansion into the long term. Policies relating to the delivery of RAMS are therefore considered to adequately enable appropriate mitigation for recreation.

5.24 For a small number of allocations in close proximity to European sites, it is advised that supporting text is added to flag the need for project level HRA to assess whether there are any additional recreation related mitigation measures required in addition to contributions to the strategic RAMS. These are set out in the urbanisation section below.

5.25 In particular, the policies and supporting text for the two garden neighbourhood sites will need to be expanded to include a summary of the recommendations set out above.

5.26 An additional sentence to advise that large scale tourism accommodation proposals will need to demonstrate that the development will not lead to additional recreation pressure at European sites should be added to the policy or supporting text for SCLP 12.17.

6. Urbanisation

6.1 Urban effects relate to issues where development is close to the European site boundary and is an umbrella term relating to impacts such as cat predation, fly tipping, increased fire risk and vandalism (see Underhill-Day 2005 for review).

6.2 A number heathland European sites[10] have a 400m zone around the boundary where there is a presumption of no further development (net increase in residential properties). This presumption reflects the issues with urbanisation and the lack of suitable mitigation and avoidance measures. For example, for development so close to the European sites the options to divert access or provide suitable alternatives are very limited.

6.3 The choice of 400m is based on the literature (summarised in Underhill-Day 2005) and to some extent is a pragmatic choice. Studies of cat roaming behaviour have shown 400m to be an appropriate buffer width to limit cats in very urban environments (Thomas, Baker & Fellowes 2014), however in more rural areas cats can roam considerably further and some studies have suggested ranges over 2km for more rural situations (Metsers, Seddon & van Heezik 2010; Hall *et al.* 2016).

6.4 Studies of fire incidence have shown that heathland sites with high levels of housing within 500m of the site boundary have a higher fire incidence (Kirby & Tantram 1999). Fires can start in a range of ways, including deliberate arson, children playing, campfires, barbeques, sparks from vehicles, discarded cigarettes etc.

6.5 Where housing is directly adjacent to sites, access can occur directly from gardens and informal access points. Parking areas can be used as residential parking and access can include short-cuts and a range of other uses that are not necessarily compatible with nature conservation. Fly-tipping and dumping of garden waste can be more common. As such managing and looking after such sites can be more challenging.

6.6 Urban issues are perhaps most relevant to heathland sites, which are vulnerable to fire, nutrient enrichment and have sensitive ground-nesting birds. Urban effects are however relevant to other habitats.

6.7 In Table 4 below, site allocations have been included from in the screening for likely significant effects due to their proximity to European sites. Where a policy has been identified as having urbanisation risks in the screening table that isn't

[10] E.g. the Thames Basin Heaths, the Dorset Heaths, the East Devon Pebblebed Heaths

an allocation, the policy has been flagged because of growth in close proximity. Only the site allocations policies are therefore included in Table 4. The table below includes a final column that considers the measures required in relation to the additional risks presented by proximity. As noted in the recreation section of this appropriate assessment, these considerations also include whether there are additional risks relating to recreation pressure that may need to be considered over and above the measures provided by the RAMS.

Table 4 – Site allocations in close proximity to European sites

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan	Appropriate assessment recommendations
SCLP12.27 Land rear of Rose Hill, Saxmundham Road, Aldeburgh (Housing).	LSE 300m from River Alde SPA/SAC/Ramsar 10 dwellings plus a care home	Disturbance to estuary birds from recreation pressure. Note that the Site Allocations HRA highlighted risks, but did not assess in detail. Stated the need for project level HRA, also stated that there is the potential for the allocation to be undeliverable.	Appropriate assessment – consideration of nature of development and proximity to River Alde SPA/SAC/Ramsar. Policy refers to the need for project level HRA, but further assessment required, and text to inform HRA scope	As per previous recommendations, consideration at appropriate assessment	As noted in the HRA for the site allocations, this site may not be deliverable if project level HRA cannot demonstrate no adverse effects. If this allocation is included the policy and supporting text needs to make clear that the allocation will only be deliverable if project level HRA can demonstrate no adverse effects. The following text is suggested: *The allocation is approximately 300m from the River Alde. Project level HRA will need to assess disturbance risks through the consideration of up to date ecological and visitor survey data. Development can only be taken forward if project level HRA is able to demonstrate that adverse effects can be prevented with*

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan	Appropriate assessment recommendations
					long term mitigation measures. The allocation is for a small number of dwellings, and it is likely that adequate additional mitigation can be provided. if the care home is specifically a nursing home rather than a residential or retirement home it is unlikely to require mitigation.
SCLP12.32 Former Council Offices, Melton Hill (mixed use).	LSE 100 dwellings Abuts Deben Estuary	Risks relate to disturbance, noise, light and other urban effects	New allocation at Regulation 19 stage.	Appropriate assessment – consideration of nature of development and proximity to Deben Estuary (around 50m at closest point).	This site is very close to the estuary and will only be deliverable if project level HRA can demonstrate no adverse effects. If this allocation is included the policy and supporting text needs to make this point clear. The following text is suggested: *The allocation is adjacent to the Deben Estuary. Project level HRA will need to assess disturbance risks (to include recreation, light, noise etc) through the consideration of*

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan	Appropriate assessment recommendations
					up to date ecological and visitor survey data. Development can only be taken forward if project level HRA is able to demonstrate that adverse effects can be prevented with long term mitigation measures. Whilst light and noise disturbance could be mitigated for, the allocation is for 100 dwellings, which could post a significant recreation disturbance risk. However, the railway line provides a potential barrier to access. There is a gate and crossing close to the development site, however at the moment this is private and does not provide a public right of way to the estuary.
SCLP12.69 Land West of B1125, Westleton. (Housing).	LSE 20 dwellings	400m from Minsmere-Walberswick SPA/Ramsar and Minsmere-Walberswick Heaths & Marshes SAC; easy access on foot to protected site and risks	Appropriate assessment – consideration of nature of development and proximity to	As per previous recommendations, consideration at appropriate assessment, due to proximity. Note	This site is very close to Minsmere-Walberswick and will only be deliverable if project level HRA can demonstrate no adverse effects. If this allocation is

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan	Appropriate assessment recommendations
		relate to recreation and urban effects (increased fire risk, cat predation, other predators etc.)	Minsmere-Walberswick.	reduction in housing numbers from 35 to 20	included the policy and supporting text needs to make this point clear. The following text is suggested: *The allocation is in close proximity to Minsmere-Walberswick SPA/Ramsar and Minsmere-Walberswick Heaths & Marshes SAC. Project level HRA will need to assess disturbance risks (to include recreation, light, noise etc) through the consideration of up to date ecological and visitor survey data. Development can only be taken forward if project level HRA is able to demonstrate that adverse effects can be prevented with long term mitigation measures.* The allocation is for a small number of dwellings, and given the nature of the site and its recreation use there is likely to be an opportunity to enhance or add to the measures within

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan	Appropriate assessment recommendations
					the RAMS for this specific location
SCLP12.70 Land at Cherry Tree, Darsham Road, Westleton (Housing).	LSE 15 dwellings	400m from Minsmere-Walberswick SPA/Ramsar and Minsmere-Walberswick Heaths & Marshes SAC; easy access on foot to protected site and risks relate to recreation and urban effects (increased fire risk, cat predation, other predators etc.)	New allocation at Regulation 19 stage.	Appropriate assessment – consideration of nature of development and proximity to Minsmere-Walberswick Site is approximately 600m from Dunwich Heath with direct foot access along public rights of way.	This site is very close to Minsmere-Walberswick and will only be deliverable if project level HRA can demonstrate no adverse effects. If this allocation is included the policy and supporting text needs to make this point clear. The following text is suggested: *The allocation is in close proximity to Minsmere-Walberswick SPA/Ramsar and Minsmere-Walberswick Heaths & Marshes SAC. Project level HRA will need to assess disturbance risks (to include recreation, light, noise etc) through the consideration of up to date ecological and visitor survey data. Development can only be taken forward if project level HRA is able to demonstrate that adverse effects can be prevented with*

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan	Appropriate assessment recommendations
					long term mitigation measures. The allocation is for a small number of dwellings, and given the nature of the site and its recreation use there is likely to be an opportunity to enhance or add to the measures within the RAMS for this specific location
SCLP12.51 Land to the South of Eyke CoE Primary School and East of The Street, Eyke (Mixed use).	LSE Just over 400m from Sandlings SPA	Urbanisation impacts and possible concerns that impacts relating to recreation are over and above RAMS mitigation	Appropriate assessment – consideration of nature of development and proximity to Sandlings SPA	As per previous recommendations, consideration at appropriate assessment, due to proximity. Note increase in housing numbers from 45 to 65	This site is very close to the Sandlings SPA and will only be deliverable if project level HRA can demonstrate no adverse effects. If this allocation is included the policy and supporting text needs to make this point clear. The following text is suggested: *The allocation is in close proximity to the Sandlings SPA. Project level HRA will need to assess disturbance risks (to include recreation, light, noise etc) through the consideration of up to date ecological and visitor survey*

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 Final Draft Local Plan	Appropriate assessment recommendations
					data. Development can only be taken forward if project level HRA is able to demonstrate that adverse effects can be prevented with long term mitigation measures. The allocation is for a relatively large number of dwellings, and careful consideration of mitigation needs over and above RAMS is required. There is likely to be an opportunity to enhance or add to the measures within the RAMS for this specific location

Summary of assessment of urbanisation effects

6.8 For a small number of allocations in close proximity to European sites, it is advised within Table 4 above that supporting text is added to flag the need for project level HRA to assess whether there are any additional recreation impacts that require additional mitigation over and above a RAMS contribution, and whether there are any non- recreation related mitigation measures that are required to prevent urbanisation impacts.

6.9 Each allocation has been considered in detail in relation to its proximity to European sites boundaries, the nature of the European site at the closed point, and the size and nature of the development. It is concluded at this plan level that each should be capable of mitigation, and therefore can remain as part of the suite of site allocations, but that additional impacts must be assessed in detail at the project level, with further data gathering if necessary. For these sites it will be imperative that there is early engagement between the Council and developers, to ensure that appropriate information to inform the project level HRA is gathered prior to making a planning application.

7. Water resources, treatment and flooding

7.1 Water issues include water quality and water quantity (i.e. water availability), and flood management. Run-off, outflow from sewage treatments and overflow from septic tanks can result in increased nutrient loads and contamination of water courses. Abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. Such impacts particularly relate to aquatic and wetland habitats.

7.2 The currently adopted Suffolk Coastal District Local Plan documents are supported by a Water Cycle Study, prepared in 2009. This concluded that the proposed development within the current Local Plan documents are capable of being supported by the current network in terms of water quality and water availability, although there is a need for some water infrastructure upgrades within the current plan period to fully accommodate growth. A new Cross Boundary Water Cycle Study has been prepared in 2018 by Wood, which covers both the Suffolk Coastal District and Ipswich Borough.

7.3 For flood risk a Strategic Flood Risk Assessment has been prepared by AECOM to inform the preparation of the Local Plan, which is a cross boundary assessment for both Suffolk Coastal and Waveney Districts.

7.4 The Cross Boundary Water Cycle Study advises that the whole of East Anglia is a high water stress area, and identifies the Suffolk Coastal District as being particularly sensitive, partly due to the European wildlife site designations that include rivers that receive treated waste water from Waste Water Treatment Works. In the Environment Agency's 2015 classification assessment for the Water Framework Directive, some water bodies in the Suffolk Coastal catchment did not achieve good status. The findings of the study that are relevant to European sites are discussed here.

Water resources

7.5 The Cross Boundary Water Cycle Study considers the available evidence such as water company plans to determine whether the growth proposed in both the Suffolk Coastal and Ipswich Local Plans can be adequately catered for in terms of water supply and water treatment, without placing stress on the water network or contributing to environmental issues. For water resources, it is apparent from the study that much of the area is under water supply stress and this is impacting on the Water Framework Directive status for surface and ground water bodies in the Suffolk Coastal area.

7.6 The Environment Agency is working with water companies to find solutions that are either voluntary, or where necessary mandatory changes to abstraction

licenses. In response, Anglian Water and Essex and Suffolk Water both supply water in the Suffolk Coastal District. Essex and Suffolk Water is voluntarily limiting groundwater abstractions to recent actual rates (rather than licenced capacity, which will be higher), and will make formal licence changes in the AMP8 period 2025-2030. Anglian Water is also making reductions that are being brought forward from their initial longer term programme. Both companies have committed to a number of programmes to reduce water demand. These include further metering across the network, targeting leakages and requirements for greater water efficiencies in new build. The latter however can only be advisory to developers from the water companies. The study emphasises the need for water efficiency planning policies to support water efficiency requirements in new build.

7.7 The Cross Boundary Water Cycle Study considers the growth proposed in the Local Plan. The Water Resources Management Plans are refreshed every five years by the water companies, and at the time of preparing the study, both companies had not yet finalised their most up to date plans,

7.8 The Cross Boundary Water Cycle Study highlights the necessity for the abstractions caps and continued programme of abstraction reductions in order to support the ecological status of waterbodies, some of which are European wildlife sites. Continued close working between the local planning authority and water companies is essential as the Local Plan is reviewed and the Water Resources Management Plans refreshed.

7.9 Some water supply infrastructure is likely to be required over the Local Plan period, potentially to bring water in from other catchments, and Anglian Water have raised particular concerns in relation to the Felixstowe Garden Neighbourhood allocation, where major upgrades to infrastructure may be required. It is understood that the Council has held discussions with Anglian Water in relation to this issue and have been advised that it can be adequately addressed. It is therefore recommended that the solutions form part of the detailed master planning stage, so that there is certainty in what is required and timely delivery, prior to any planning application being made. This should be stated within the supporting text for the Felixstowe Garden Neighbourhood allocation.

7.10 The Cross Boundary Water Cycle Study gives confidence that whilst the network faces challenges, the water companies are sufficiently accounting for new growth and are proactive in securing a range of solutions to meet demand. Policy SCLP 9.7 supports the recommendation within the study for stringent policy wording in relation to new build and water efficiencies.

Water treatment

7.11 Sewerage treatment within Suffolk Coastal District is managed by Anglian Water Services. The Environment Agency uses a range of data sources to understand potential future water quality issues on rivers subject to treated water discharges from treatment works, including complex modelling data known as SIMCAT modelling for key pollutants, including phosphate and ammonia. The analysis explained within the Cross Boundary Water Cycle Study undertaken by the Environment Agency highlights that some works will require upgrades to enable additional capacity for the predicted growth. The study raises concerns in relation to both phosphate and ammonia related deterioration in water quality, which may be overcome by upgrades to treatment works, but noting that some of these are small and rural. Nitrogen deposition is also flagged within the study as a potential concern for European sites. The study recommends a discussion between Anglian Water Services, Natural England and the Environment Agency in relation to the implications of these predictions for nitrogen.

7.12 A full list of water treatment plan improvements are listed in the Infrastructure Delivery Plan that forms Appendix B of the Local Plan. It is understood that the infrastructure requirements listed will be continually checked and reviewed and are viewed as necessary for the delivery of the plan. The study recommends early discussions with Anglian Water Services on these matters. With the advice within the study in mind, this HRA recommends that an annual review of the current situation and planned works is timed annually to enable meeting outputs to inform the annual monitoring report for the Local Plan. Attendees of this water review group should include both utilities companies, the Environment Agency, Natural England and the District Council.

7.13 It is important to note that where growth is committed to via planning permissions, water utility companies must honour the connection requirements to the water network. These matters cannot therefore be left to the project level for solutions to be sought and must be continually reviewed as part of the Local Plan monitoring. It is therefore recommended that clear wording in relation to assuring timely delivery of required infrastructure and treatment capabilities for phosphate, ammonia and nitrogen is required within the Local Plan.

Flood risk

7.14 The NPPF sets out a sequential test to ensure that new development is only undertaken in the lowest areas of flood risk wherever possible. In order to support the emerging Local Plan, Suffolk Coastal District Council and Waveney District Council jointly commissioned a Strategic Flood Risk Assessment, undertaken by AECOM and published in April 2018. The objective of the assessment is to identify where development may be at risk of flooding or may exacerbate an existing flood risk situation.

7.15 The assessment makes general recommendations for planning policy and development management. It promotes more sustainable flood risk management, particularly by appropriately managing and making greater use of natural floodplains and moving existing development from the floodplain wherever possible. The assessment recommends safeguarding the remaining unbuilt spaces along river corridors and using open spaces within development to make space for water rather than hard infrastructure management of water. Similar development site focussed recommendations are also made in the Cross Boundary Water Cycle Study, which also includes a section on sustainable drainage. The study highlights that a number of allocations lie within Flood Risk Zones 2 and 3. For these sites, a flood risk assessment and drainage strategy will be required.

7.16 Relevant flood risk policies within the Local Plan at Final Draft stage are SCLP 9.5, 9.6 and 9.7. Additionally, supporting text sets out the requirements to address flood risk within the District, including the requirements for development project level flood risk assessments. It is recommended that supporting text makes specific reference to the need for such assessments to consider impacts on designated sites from flooding.

Summary of assessment of water related risks

7.17 In relation to potential impacts on European sites from increasing water resource demand and water treatment, it is advised that there should be a continued awareness of the risks to European sites as part of the recommended continued review of water resource availability stated within the Cross Boundary Water Cycle Study. It is apparent that there are a number of initiatives in progress to seek solutions that protect the natural environment and reduce abstractions, and Suffolk Coastal District Council should continue to work closely with the Environment Agency and water companies to keep the risks to European sites at the forefront of this work.

7.18 Given the level of water treatment infrastructure upgrades required to support growth in the Suffolk Coastal District, and the potential risk to European sites if

this is not progressed in time for growth coming forward, it is advised that it is necessary to establish an annual review of the current situation and planned works. Attendees of this water review group should include both utilities companies, the Environment Agency, Natural England and the District Council. It is recommended that this is timed annually to enable meeting outputs to inform the annual monitoring report for the Local Plan. The following recommendations are made in relation to text additions within the plan, which will give confidence that matters are continually reviewed and resolved ahead of growth needs:

7.19 The plan should include a specific commitment to establishing and running an annual water review group, to include both utilities companies, the Environment Agency, Natural England and the District Council. The stated purpose should be to ensure that water related matters (both supply and treatment) and required infrastructure upgrades are continually reviewed and resolved ahead of growth needs.

7.20 It is recommended that clear wording in relation to assuring timely delivery of required infrastructure and treatment capabilities for phosphate, ammonia and nitrogen is required within the Local Plan, which may be best placed alongside the infrastructure needs table.

7.21 It is recommended that within the supporting text for the Felixstowe Garden Neighbourhood allocation there is reference to the water infrastructure upgrades necessary to enable this development to proceed, and assurances that solutions will form part of the detailed master planning stage so that there is certainty in what is required and timely delivery, prior to any planning application being made.

7.22 In relation to flood risk, it is concluded that there are suitable policies in place to protect from flood risk, but that in addition to these there should be specific reference for project level flood risk assessments to cover the risks of flooding to designated sites, which may be most appropriate at paragraph 9.52.

8. Traffic emissions

8.1 Reductions in air quality associated with increased traffic are primarily as a result of increased nitrogen deposition, but are also related to increases in both sulphur and ammonia. Traffic generated air quality reductions can impact on vegetation communities (Bobbink, Hornung & Roelofs 1998; Stevens *et al.* 2011). The Design Manual for Roads and Bridges (DMRB) currently advises that the effect of traffic emissions is focussed on the first 200m to the side of a road. There is a declining effect out to 200m and beyond this it is currently agreed that the effects are *de minimis*, i.e. of no consequence against background levels. Following a recent case decision from Ashdown Forest (Wealden v SSCLG 2017) it is essential that air quality considerations have appropriate regard for any impacts that may act in-combination in HRA work. An appropriate assessment of air quality should be undertaken with regard for the principles of this recent case.

8.2 The length of roads within 200m of the European sites and visual checks of how those road sections relate to allocations within the Suffolk Coastal District would suggest that there is a relevant pathway with air quality issues and transport that requires further consideration. Map 5 illustrates where roads are within 200m of European sites. Each of the road stretches that lies within 200m has been labelled within the map.

8.3 The DMRB highlights the need for further assessment where changes to the road network or traffic volumes might increase daily traffic flows by 1,000 Average Annual Daily Traffic (AADT) or more where the road stretch has sensitive habitats within 200m of the road. This is a simple measurement of change, using the total volume of traffic on a road and dividing it by 365 days to give a daily average.

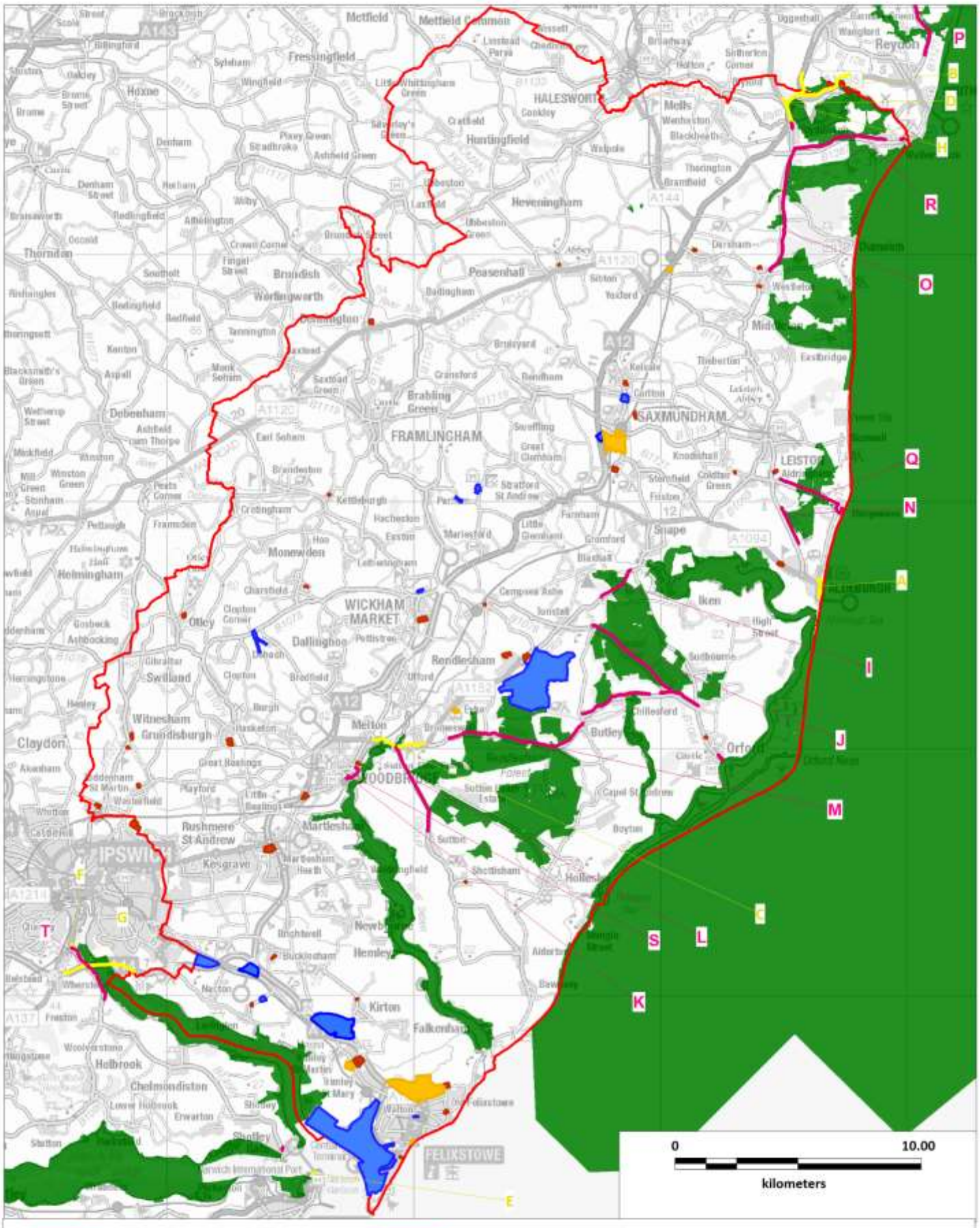
8.4 The transport modelling undertaken to support the emerging Local Plan by WSP covers the Suffolk Coastal District and the neighbouring local planning authorities of Ipswich Borough, Babergh and Mid Suffolk Districts. The modelling also takes into account the growth planned through the emerging Waveney Local Plan. The modelling has been undertaken at a point in time when each authority was at a slightly different stage in the development of their Local Plan, and re-run as available date has come forward for growth. It can therefore offer a good indication of traffic changes, but as a tool for assessing the impacts of growth at a strategic level should not be viewed as a precise model.

8.5 The modelling does provide traffic changes on an in-combination basis with neighbouring local planning authorities, and is therefore in conformity with the Wealden case referred to above. The outputs of the modelling have been

checked to establish whether the predicted road traffic increases likely to occur as a result of the proposed growth and site allocations are such that they equate to an increase close to the 1,000 AADT. This has involved a calculation undertaken by the Council using the AM and PM peak figures to establish an average to calculate the AADT. The modelling has regard for the Suffolk Coastal District and neighbouring local planning authorities, thus providing a check that is for Suffolk Coastal District's growth in combination with its neighbouring authorities.

8.6 The road stretches labelled within Map 5, showing roads stretches within 200m of European sites have been provided to the Council to enable comparison of these stretches with the traffic modelling. Stretches that have a combined (i.e. Suffolk Coastal plus neighbouring authorities) traffic increase of near to or greater than 1000 AADT. The modelling has inherent variations due to the growth scenarios used for each district at differing stages of plan progression. An initial calculation of AADT has identified that the following road stretches from Map 5 as potentially having an AADT increase of near to or over 1,000 AADT as a result of new growth in Suffolk Coastal District and neighbouring authorities. The road stretches where the change in AADT is near to or greater than 1,000 are listed in Table 5 below.

Map 5: Roads within 200m of European Sites



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8.7 For the road stretches in Table 5, which predominantly relate to the A12 and 14, the habitats present are predominantly of a type that are not highly susceptible to air pollution (mainly estuarine habitats). However, in the absence of detailed assessment of habitat types in each location, along with air quality modelling to predict deposition rates, it is impossible to accurately describe potential impacts or their magnitude.

Table 5 traffic modelling close to or exceeding 1000 AADT

Map 5 Label	Road Class	Road Number	Road Name
D	A Road	A12	London Road
D	A Road	A12	London Road
D	A Road	A12	London Road
E	A Road	A120	The Quay
G	A Road	A14	
G	A Road	A14	
G	A Road	A14	
S	B Road	B1438	Station Road

8.8 It is clear that there are potential risks in relation to traffic emissions, but that these predominantly relate to an ever-increasing volume of traffic on the A12 and A14, rather than being able to pinpoint particular site allocations of concern. This growth in traffic will also relate to growth beyond Suffolk Coastal District.

8.9 The traffic modelling results for the road stretches within 200m as identified on Map 5 have been discussed with Natural England, highlighting a potential risk from increased traffic, but that this is primarily on the main A12 and A14 routes, and that there is an absence of information to more accurately define potential impacts, if any. Air quality modelling would be able to factor in the national predictions in relation to vehicle emissions improvements. Experience from such modelling in other areas has shown that this can significantly decrease any predicted risk to European sites.

8.10 It is recommended that the Suffolk authorities should be mindful of this potential issue and plan for more detailed analysis of risks across the county, to inform the next plan reviews. This should include air quality modelling that incorporates a specific consideration of potential deposition rates within 200m of European sites.

Summary of assessment of traffic emissions

8.11 For the emerging Local Plan, discussions with Natural England have enabled a conclusion that there are potential risks that warrant a co-ordinated approach to more comprehensive evidence gathering, but that this should be planned for in

time for the next plan review. It is advised that the plan includes text at an appropriate point to highlight the potential risk of traffic emissions to designated sites with features sensitive to air pollution, and that the Council commits to working with neighbouring authorities to gather more data to inform future plan reviews.

9. Biodiversity net gains

9.1 As noted in the introductory sections of this HRA, the future health of designated sites is very much dependant on the future health of wider biodiversity and the ecological networks that sustain them. In planning for the long-term sustainability of designated sites, it is therefore necessary to protect and enhance wider biodiversity through the planning system as well as the designated sites. The National Planning Policy Framework sets out comprehensive requirements for the protection, restoration, enhancement and expansion of biodiversity. A Local Plan should include protecting, enhancing and improving biodiversity, and moving from a net loss of biodiversity to achieving net gains. The Government is currently promoting a number of initiatives in relation to biodiversity net gain, including a comprehensive update to the metric that can be used to account for biodiversity losses and gains, due to be published in early 2019.

9.2 It is strongly advised that the biodiversity and geodiversity policy SCLP 10.1 is strengthened to be more reflective of the current focus on biodiversity net gain, which in turn provides a more holistic approach to biodiversity protection and enhancement, recognising the intrinsic links between designated sites and wider biodiversity, and the role that development can play in reversing declines.

9.3 It is important for the policy to stress the importance of local biodiversity assets such as county wildlife sites and priority habitats and species, and only allow harm to these where the benefit of the development can be demonstrated. The mitigation hierarchy of avoid, mitigate and as a last resort compensate. In order to prevent an assumption that compensation can be the first option, it should be made clear that compensation should only be allowed for residual harm that cannot be avoided or mitigated for, and only where the benefit of the development, in a specific location is demonstrably such that it outweighs the harm.

9.4 It is recommended that the requirement for biodiversity net gain should be for all development, proportionate to the potential impacts. It is therefore advised that Policy SCLP 10.1 should be revised, and the following provides the suggested full policy text:

Policy SCLP10.1 Biodiversity and Geodiversity – recommended amendments

9.5 *Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to linkages between habitats,*

such as wildlife corridors and habitat 'stepping stones'. All development should follow a hierarchy of seeking to firstly avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated.

9.6 *Proposals that will have a direct or indirect adverse impact (alone or combined in-combination with other plans or projects) on locally recognised designated sites of biodiversity or geodiversity importance, including County Wildlife Sites, priority habitats and species, will not be supported unless it can be demonstrated with comprehensive evidence that the benefits of the proposal, in its particular proposed location, outweigh the biodiversity loss.*

9.7 *New development should provide environmental net gains in terms of both green infrastructure and biodiversity. Proposals should demonstrate how the development would contribute towards new green infrastructure opportunities or enhance the existing green infrastructure network as part of the development. New development must also secure ecological enhancements as part of its design and implementation and should provide a biodiversity net gain that is proportionate to the scale and nature of the proposal.*

9.8 *Where compensatory habitat is created, it should be of equal or greater size and ecological value than the area lost as a result of the development, be well located to positively contribute towards the green infrastructure network, and biodiversity and/or geodiversity and be supported with a management plan.*

9.9 *Where there is reason to suspect the presence of protected, UK or Suffolk Priority species or habitat, applications should be supported by an ecological survey and assessment of appropriate scope undertaken by a suitably qualified person. If present, the proposal must follow the mitigation hierarchy in order to be considered favourably.*

9.10 *Any proposal that adversely affects a European site or causes significant harm to a Site of Special Scientific Interest, will not normally be granted permission.*

9.11 *Any development with the potential to impact on a Special Protection Area or Special Area for Conservation within or outside of the District will need to be supported by information to inform a Habitat Regulations Assessment.*

9.12 *A Supplementary Planning Document will be prepared to implement a strategic Recreational Avoidance and Mitigation Strategy in order to mitigate for any potential adverse effects arising from new growth on Special Protection Areas, Ramsar Sites and Special Areas of Conservation. The Council will work with neighbouring authorities and Natural England to develop and implement this strategy. The strategy*

will include a requirement for developers to make financial contributions towards the provision of strategic mitigation within defined zones.

10. Conclusions

10.1 This HRA, undertaken at Final Draft Local Plan stage has recommendations from the screening assessment for policy wording changes, and also identifies key topic areas for consideration at appropriate assessment.

10.2 As noted within the screening table, all recommendations for wording changes have been undertaken within the Regulation 18 consultation version of the First Draft Local Plan. A small number of additional recommendations are made for the Final Draft Local Plan, following the updated screening and the appropriate assessment. The appropriate assessment themes have been assessed within this iteration of the HRA and provides a number of recommendations at the end of each themed section. These recommendations were made before the finalisation of the Final Draft Local Plan by Suffolk Coastal District Council. All recommendations have been taken forward in the Final Draft Local Plan, with policies and supporting text amended accordingly. This now enables a conclusion that the plan will not lead to any adverse effects on European wildlife sites within and in the vicinity of the Suffolk Coastal District.

10.3 Any modifications to the Suffolk Coastal District Local Plan that are proposed as a result of the Examination are likely to require a final check for HRA compliance and this HRA report will be updated accordingly to give a final HRA record before adoption of the Suffolk Coastal District Local Plan.

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12. Appendix 1 - The Habitats Regulations Assessment Process

12.1 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, which are commonly referred to as the 'Habitats Regulations.' The most recent version of the Habitats Regulations does not affect the principles of European site assessment as defined by the previous Regulations, and which forms the focus of this report. Regulation numbers have changed from the 2010 Regulations.

12.2 The Habitats Regulations are in place to transpose European legislation set out within the Habitats Directive (Council Directive 92/43/EEC), which affords protection to plants, animals and habitats that are rare or vulnerable in a European context, and the Birds Directive (Council Directive 2009/147/EC), which originally came into force in 1979, and which protects rare and vulnerable birds and their habitats. These key pieces of European legislation seek to protect, conserve and restore habitats and species that are of utmost conservation importance and concern across Europe. Although the Habitats Regulations transpose the European legislation into domestic legislation, the European legislation still directly applies, and in some instances, it is better to look to the parent Directives to clarify particular duties and re-affirm the overarching purpose of the legislation.

12.3 European sites include Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) classified under the Birds Directive. The suite of European sites includes those in the marine environment as well as terrestrial, freshwater and coastal sites. European sites have the benefit of the highest level of legislative protection for biodiversity. Member states have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted, with a precautionary approach embedded in the legislation, i.e. it is necessary to demonstrate that impacts will not occur, rather than they will. The overarching objective is to maintain sites and their interest features in an ecologically robust and viable state, able to sustain and thrive into the long term, with adequate resilience against natural influences. Where sites are not achieving their potential, the focus should be on restoration.

12.4 The UK is also a contracting party to the Ramsar Convention, which is a global convention to protect wetlands of international importance, especially those wetlands utilised as waterfowl habitat. In order to ensure compliance with the requirements of the Convention, the UK Government expects all competent

authorities to treat listed Ramsar sites as if they are part of the suite of designated European sites, as a matter of government policy, as set out in Section 118 of the National Planning Policy Framework. Most Ramsar sites are also a SPA or SAC, but the Ramsar features and boundary lines may vary from those for which the site is designated as a SPA or SAC.

12.5 It should be noted that in addition to Ramsar sites, the National Planning Policy Framework also requires the legislation to be applied to potential SPAs and possible SACs, and areas identified or required for compensatory measures where previous plans or projects have not been able to rule out adverse effects on site integrity, yet their implementation needs meet the exceptional tests of Regulation 64 of the Habitats Regulations, as described below.

12.6 The step by step process of HRA is summarised in the diagram below. Within the Habitats Regulations, local planning authorities, as public bodies, are given specific duties as 'competent authorities' with regard to the protection of sites designated or classified for their species and habitats of European importance. Competent authorities are any public body individual holding public office with a statutory remit and function, and the requirements of the legislation apply where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. Regulation 63 of the Habitats Regulations sets out the HRA process for plans and projects, which includes development proposals for which planning permission is sought. Additionally, Regulation 105 specifically sets out the process for assessing emerging land use plans.

12.7 The step by step approach to HRA is the process by which a competent authority considers any potential impacts on European sites that may arise from a plan or project that they are either undertaking themselves, or permitting an applicant to undertake. The step by step process of assessment can be broken down into the following stages, which should be undertaken in sequence:

- Check that the plan or project is not directly connected with or necessary for the management of the European site
- Check whether the plan or project is likely to have a significant effect on any European site, from the plan or project alone
- Check whether the plan or project is likely to have a significant effect on any European site, from the plan or project in-combination with other plans or projects
- Carry out an Appropriate Assessment
- Ascertain whether an adverse effect on site integrity can be ruled out

12.8 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential impacts. A competent authority may consider that there is a need to undertake further levels of evidence gathering and assessment in order to have certainty, and this is the Appropriate

Assessment stage. At this point the competent authority may identify the need to add to or modify the project in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.

12.9 For plans, the stages of HRA are often quite fluid, with the plan normally being prepared by the competent authority itself. This gives the competent authority the opportunity to repeatedly explore options to prevent impacts, refine the plan and rescreen it to demonstrate that all potential risks to European sites have been successfully dealt with.

12.10 When preparing a plan, a competent authority may therefore go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect European site interest features.

12.11 After completing an assessment, a competent authority should only approve a project or give effect to a plan where it can be ascertained that there will not be an adverse effect on the integrity of the European site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or modified the project with restrictions or conditions, in light of their Appropriate Assessment findings.

12.12 Where adverse effects cannot be ruled out, there are further exceptional tests set out in Regulation 64 for plans and projects and in Regulation 107 specifically for land use plans. Exceptionally, a plan or project could be taken forward for imperative reasons of overriding public interest where adverse effects cannot be ruled out and there are no alternative solutions. It should be noted that meeting these tests is a rare occurrence and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.

12.13 In such circumstances where a competent authority considers that a plan or project should proceed under Regulations 64 or 107, they must notify the relevant Secretary of State. Normally, planning decisions and competent authority duties are then transferred, becoming the responsibility of the Secretary of State, unless on considering the information, the planning authority is directed by the Secretary of State to make their own decision on the plan or project at the local level. The decision maker, whether the Secretary of State or the planning authority, should give full consideration to any proposed 'overriding reasons' for which a plan or project should proceed despite being unable to rule out adverse effects on European site interest features, and ensure that those reasons are in the public interest and are such that they override the

potential harm. The decision maker will also need to secure any necessary compensatory measures, to ensure the continued overall coherence of the European site network if such a plan or project is allowed to proceed.

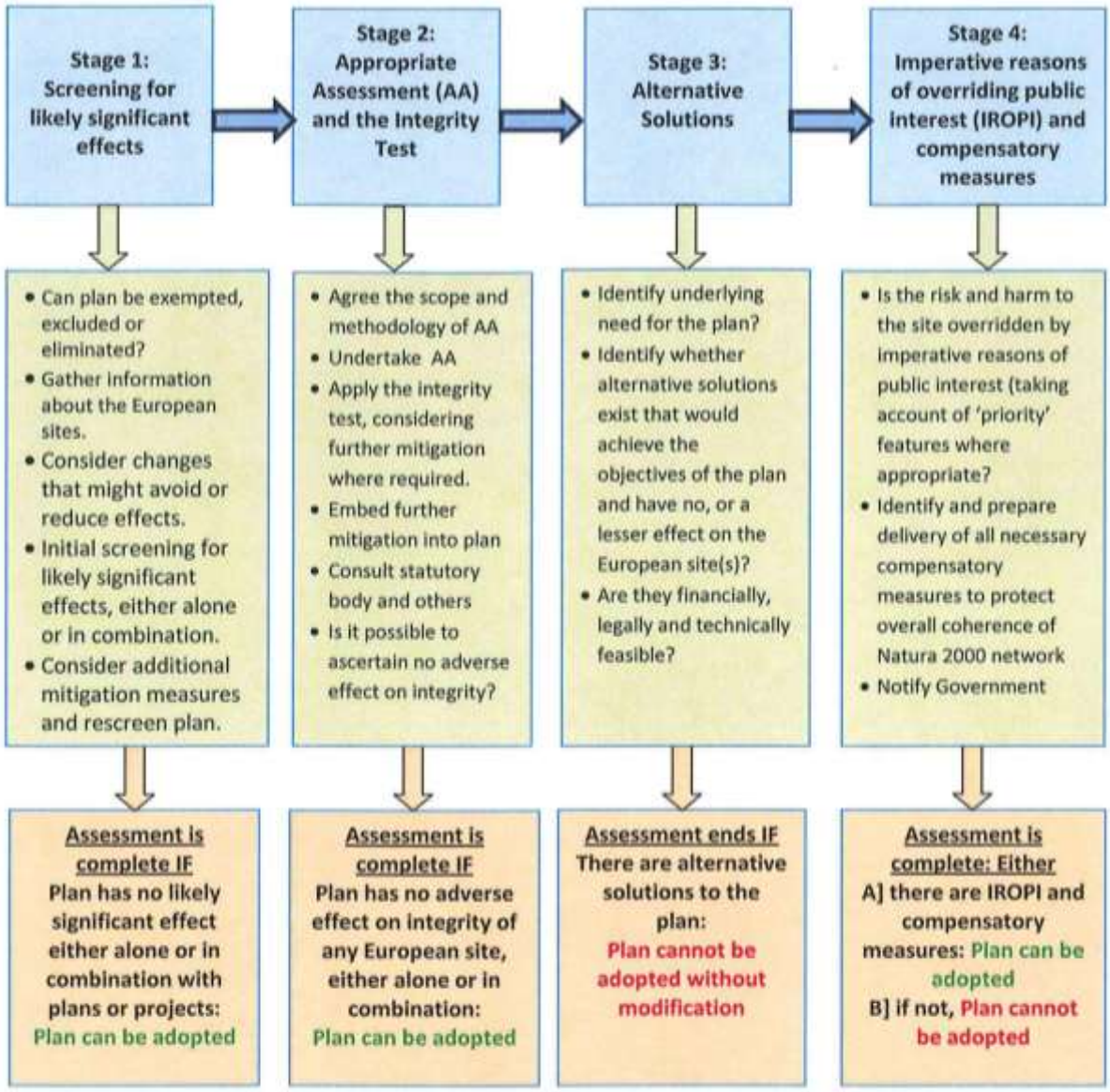

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Figure 1: Outline of the assessment of plans under the Habitat Regulations

13. Appendix 2 –Conservation Objectives

13.1 As required by the Directives, 'Conservation Objectives' have been established by Natural England, which should define the required ecologically robust state for each European site interest feature. All sites should be meeting their conservation objectives. When being fully met, each site will be adequately contributing to the overall favourable conservation status of the species or habitat interest feature across its natural range. Where conservation objectives are not being met at a site level, and the interest feature is therefore not contributing to overall favourable conservation status of the species or habitat, plans should be in place for adequate restoration.

13.2 Natural England has embarked on a project to renew all European site Conservation Objectives, in order to ensure that they are up to date, comprehensive and easier for developers and consultants to use to inform project level HRA s in a consistent way. In 2012, Natural England issued now a set of generic European site Conservation Objectives, which should be applied to each interest feature of each European site. These generic objectives are the first stage in the project to renew conservation objectives, and the second stage, which is to provide more detailed and site-specific information for each site to support the generic objectives, is now underway.

13.3 The new list of generic Conservation Objectives for each European site includes an overarching objective, followed by a list of attributes that are essential for the achievement of the overarching objective. Whilst the generic objectives currently issued are standardised, they are to be applied to each interest feature of each European site, and the application and achievement of those objectives will therefore be site specific and dependant on the nature and characteristics of the site. The second stage, provision of the more supplementary information to underpin these generic objectives, will provide much more site-specific information, and this detail will play a fundamental role in informing HRAs, and importantly will give greater clarity to what might constitute an adverse effect on a site interest feature.

13.4 In the interim, Natural England advises that HRAs should use the generic objectives and apply them to the site-specific situation. This should be supported by comprehensive and up to date background information relating to the site.

13.5 For SPAs, the overarching objective is to:

13.6 'Avoid the deterioration of the habitats of qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is

maintained and the site makes a full contribution to achieving the aims of the Birds Directive.'

13.7 This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the habitats of the qualifying features.
- The structure and function of the habitats of the qualifying features.
- The supporting processes on which the habitats of the qualifying features rely.
- The populations of the qualifying features.
- The distribution of the qualifying features within the site.

13.8 For SACs, the overarching objective is to:

'Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.'

13.9 This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the qualifying natural habitats and habitats of qualifying species.
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species.
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely.
- The populations of qualifying species.
- The distribution of qualifying species within the site.

13.10 Conservation objectives inform any HRA of a plan or project, by identifying what the interest features for the site should be achieving, and what impacts may be significant for the site in terms of undermining the site's ability to meet its conservation objectives.

14. Appendix 3 – The Nature Conservation Interest of the European Sites

14.1 The Suffolk Coastal District lies in an area of considerable importance for nature conservation with a number of European sites located within and just outside the District, some of which are offshore. The range of sites, habitats and designations is complex with some areas having more than one designation.

14.2 The relevant European sites are summarised in Table 6 below, where the interest features, threats and pressures and links to the relevant conservation objectives are listed.

Table 6: Summary of relevant European sites, their interest features and relevant pressures/threats. Pressures/threats are taken from the site improvement plans (SIP) and are listed in priority order. Hyperlinks in the first column link to the relevant site page on the Natural England website, providing details of the site's conservation objectives, citation etc. Pale blue shading indicates marine sites.

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
Alde-Ore & Butley Estuaries SAC, Alde-Ore Estuary SPA Also a Ramsar site	H1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae) H1130 Estuaries H1140 Mudflats and sandflats not covered by seawater at low tide A151(NB) Philomachus pugnax: Ruff A132(NB) Recurvirostra avosetta: Pied avocet A081(B) Circus aeruginosus: Eurasian marsh harrier A162(NB) Tringa totanus: Common redshank A132(B) Recurvirostra avosetta: Pied avocet A183(B) Larus fuscus: Lesser black-backed gull A191(B) Sterna sandvicensis: Sandwich tern A195(B) Sterna albifrons: Little tern	Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine)
The Broads SAC, Broadlands SPA Also a Ramsar site	H7210# Calcareous fens with Cladium mariscus and species of the Caricion davallianae S1016 Vertigo moulinsiana: Desmoulin`s whorl snail H7230 Alkaline fens H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) H91E0# Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) H7140 Transition mires and quaking bogs H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid S4056 Anisus vorticulus: Little ramshorn whirlpool snail A021(B) Botaurus stellaris: Bittern A038(B) Cygnus cygnus Cygnus: Whooper Swan	Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
	A151(NB) *Philomachus pugnax*: Ruff A081(B) *Circus aeruginosus*: Eurasian marsh harrier A082(NB) *Circus cyaneus*: Hen harrier A037(NB) *Cygnus columbianus bewickii*: Bewick swan A050(NB) *Anas penelope*: Eurasian wigeon A051(NB) *Anas strepera*: Gadwall A056(NB) *Anas clypeata*: Northern shoveler	
Benacre to Easton Bavents Lagoon SAC, Benacre to Easton Bavents SPA	H1150# Coastal lagoons, A195(B) Sterna albifrons: Little tern A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).
Breydon Water SPA	Waterbird assemblage A037(NB) Cygnus columbianus bewickii: Bewick swan A132(NB) Recurvirostra avosetta: Pied avocet A140(NB) Pluvialis apricaria : European golden plover A142(NB) Vanellus vanellus: Northern lapwing A151(NB) Philomachus pugnax: Ruff A193(B) Sterna hirundo: Common tern	Shooting/scaring, change in land management, public access/disturbance, hydrological changes, fisheries (marine and estuarine).
Dew's Ponds SAC	S1166 Triturus cristatus: Great crested newt	None identified
Minsmere to Walberswick Heaths & Marshes SAC, Minsmere-Walberswick SPA Also a Ramsar site	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) Anas crecca: Eurasian teal A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier A082(NB) Circus cyaneus: Hen harrier A224(B) Caprimulgus europaeus: European nightjar A056(B) Anas clypeata: Northern shoveler A056(NB) Anas clypeata: Northern shoveler A051(B) Anas strepera: Gadwall A051(NB) Anas strepera: Gadwall A132(B) Recurvirostra avosetta: Pied avocet	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
	A195(B) Sterna albifrons: Little tern A394(NB) Anser albifrons albifrons: Greater white-fronted goose	
Outer Thames Estuary SPA	A001 (W) Gavia stellate: Red-throated Diver A195 (B) Sterna hirundo: Common Tern A193 (B) Sternula albifrons: Little Tern	
Sandlings SPA	A224(B) Caprimulgus europaeus: European nightjar A246(B) Lullula arborea: Woodlark	Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance,
Hamford Water SAC Hamford Water SPA Also a Ramsar site	A132(NB) *Recurvirostra avosetta*: Pied avocet A156(NB) *Limosa limosa islandica*: Black-tailed godwit A048(NB) *Tadorna tadorna*: Common shelduck Waterbird assemblage A137(NB) *Charadrius hiaticula*: Ringed plover A046a(NB) *Branta bernicla bernicla*: Dark-bellied brent goose A162(NB) *Tringa totanus*: Common redshank A141(NB) *Pluvialis squatarola*: Grey plover A195(B) *Sterna albifrons*: Little tern A052(NB) *Anas crecca*: Eurasian teal 4035 Gortyna borelii lunata: Fisher's estuarine moth	Coastal squeeze, site management (scrub control), disturbance to breeding and overwintering birds, possible atmospheric air pollution issues
Deben Estuary SPA Also a Ramsar site	A675(NB) Branta bernicla bernicla: Dark-bellied brent goose A132(NB) Recurvirostra avosetta: Avocet	Coastal squeeze, disturbance to birds, water and air pollution
Orfordness to Shingle Street SAC	H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks H1150# Coastal lagoons	
Stour and Orwell Estuaries SPA Also a Ramsar site	A156(NB) *Limosa limosa islandica*: Black-tailed godwit A143(NB) *Calidris canutus*: Red knot A149(NB) *Calidris alpina alpina*: Dunlin Waterbird assemblage A162(NB) *Tringa totanus*: Common redshank A141(NB) *Pluvialis squatarola*: Grey plover A046a(NB) *Branta bernicla bernicla*: Dark-bellied brent goose	Coastal squeeze, disturbance to birds, air pollution and new development

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
	A054(NB) *Anas acuta*: Northern pintail A132(B) *Recurvirostra avosetta*: Pied avocet	
Staverton Park and the Thick, Wantisden SAC	9190 Old acidophilous oak woods with Quercus robur on sandy plains	Woodland management, disease, atmospheric pollution