



Habitats Regulations Assessment of the Draft Saxmundham Neighbourhood Plan

May 2022

Contents

1. Introduction	1
2. Protected sites covered by this report	3
3. Saxmundham Neighbourhood Plan.....	4
4. Other Plans and Projects	5
5. Assessment of likely effects of the Saxmundham Neighbourhood Plan on Habitat Sites.....	7
6. Summary and conclusions	19
Appendix 1: Sources of background information	20
Appendix 2: Locations of Habitat Sites	21
Appendix 3: Relevant Habitat Sites.....	24
Appendix 4: Natural England Consultation Response	30

1. Introduction

1.1 The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) states that Ramsar sites should be afforded the same level of protection and refers to SACs, SPAs and Ramsar sites as 'Habitat Sites'.

1.2 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans is set out in the Conservation of Habitats and Species Regulations (2017) (as amended). It is also a requirement of Regulation 32 schedule 2 of the Neighbourhood Planning Regulations 2012 (as amended). In order to proceed to referendum a Neighbourhood Plan must meet a series of 'basic conditions', which include that it does not breach, and is otherwise compatible with, EU obligations.

1.3 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) states:

'Where a land use plan:

(a) Is likely to have a significant effect on a European sites or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) Is not directly connected with or necessary to the management of the site, The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.'

1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy in the Plan would adversely affect the integrity of any sites.

Stage 1: Determining whether a plan is likely to have a significant effect on a Habitat Site. This needs to take account of the likely impacts in combination with other relevant plans and projects.

This assessment should be made using the precautionary principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European Union¹, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a Habitat Site.

Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.

1.5 The Saxmundham Neighbourhood Plan is being produced by Saxmundham Town Council. This report considers whether there are likely to be significant effects on protected Habitat Sites and whether a full Appropriate Assessment may be required. This screening has been carried out against the Regulation 14 draft of the Neighbourhood Plan which was published for consultation November- December 2021².

1.6 The Saxmundham Neighbourhood Plan will need to be in general conformity with the strategic policies of the Local Plan. East Suffolk Council is covered by two Local Plans, the East Suffolk Council - Suffolk Coastal Local Plan adopted September 2020 and the East Suffolk Council - Waveney Local Plan adopted March 2019. The relevant local plan for the Saxmundham Neighbourhood Plan area is the East Suffolk Council - Suffolk Coastal Local Plan.

1.7 The Suffolk Coastal Local Plan was subject to Habitats Regulations Assessment as part of its production. Where screening identified a likely significant effect,

¹ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

² <http://www.saxplan.org/were-seeking-your-views-on-the-draft-neighbourhood-plan/>

an Appropriate Assessment was undertaken and mitigation measures identified were incorporated within the Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal District. The Local Plan Appropriate Assessment identified recreational disturbance particularly from dog walkers as the main significant effect. The Council has therefore produced a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) and requires payment towards mitigation from residential developments within 13km of the protected Habitat Sites.

2. Protected sites covered by this report

- 2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of the Saxmundham Neighbourhood Plan area (for consistency with the distances applied within the HRA of the Suffolk Coastal Local Plan and adopting the precautionary approach). The locations of the sites are shown on maps in Appendix 2 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 3, along with a summary of the pressures and threats as documented in the Appropriate Assessment for the Suffolk Coastal Local Plan.

Table 1: Relevant Habitat Sites

Name
Alde-Ore and Butley Estuaries SAC
Dew's Pond SAC
Orfordness – Shingle Street SAC
Minsmere to Walberswick Heaths and Marshes SAC
Staverton Park and The Thicks, Wantisden SAC
Southern North Sea SAC
Alde-Ore Estuary SPA
Deben Estuary SPA
Minsmere- Walberswick SPA
Outer Thames Estuary SPA
Sandlings SPA
Stour and Orwell Estuaries SPA
Alde-Ore Estuary Ramsar
Deben Estuary Ramsar

Minsmere- Walberswick Ramsar
Stour and Orwell Estuaries Ramsar

3. Saxmundham Neighbourhood Plan

- 3.1 Saxmundham Town Council is producing a Neighbourhood Plan for Saxmundham, in order to set out the vision, objectives and policies for the development of the parish up to 2037 within the context of the East Suffolk Council - Suffolk Coastal Local Plan. This screening has considered the Regulation 14 draft of the Neighbourhood Plan which was published for consultation November- December 2021³.
- 3.2 The Neighbourhood Plan includes a range of policies covering the Saxmundham Neighbourhood Plan area. A number of policies relate to the full Neighbourhood Plan area whilst others are area/location specific. The Plan does not allocate land for development, but there are two Local Plan allocations within the Neighbourhood Plan area for mixed use/ residential development amounting to approximately 840 dwellings (SCLP12.29⁴ and SCLP12.30).
- 3.3 The policies in the Saxmundham Neighbourhood Plan are listed in Table 2 below. An assessment of whether each policy is likely to have a significant effect on Habitat Site is included in section 5 of this report.

Table 2: List of Neighbourhood Plan policies (Reg 14 draft)

SAX1	General Design Principles
SAX2	Expansion of Existing Businesses
SAX3	New Businesses
SAX4	Protecting Valued Local Community Facilities and Amenities
SAX5	New Community Facilities
SAX6	Improving Connectivity
SAX7	Footpaths and Right of Way
SAX8	Parking Provision

³ <http://www.saxplan.org/were-seeking-your-views-on-the-draft-neighbourhood-plan/>

⁴ SCLP12.29 falls partly within the Neighbourhood Plan area and partly within the adjoining parish of Benhall.

SAX9	Windfall and Infill Development
SAX10	Housing Mix
SAX11	Historic Town Centre and Conservation Area
SAX12	Non-designated Heritage Assets
SAX13	Gateways, Views and Landscape Setting of Saxmundham
SAX14	Protection and Enhancement of Natural Assets
SAX15	Community Gardens and Allotments
SAX16	Protection of Existing Local Green Spaces
SAXGN1	Connecting the Garden Neighbourhood
SAXGN2	Green Infrastructure Links
SAXGN3	Community Facilities
SAXTC1	Town Centre Overarching Strategy
SAXSA1	Station Area
SAXSFR1	Redevelopment and environmental enhancement opportunities at Street Farm Road
SAXFS1	Fromus Square
SAXFC1	Former Fromus Centre site and Community Garden

4. Other Plans and Projects

- 4.1 Regulation 105 of the 2017 Regulations (as amended) requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plan is the Local Plan. The Local Plan sets out the broad scale and distribution of development across the area of East Suffolk formerly covered by Suffolk Coastal District. This was subject to an Appropriate Assessment as part of its production.
- 4.3 The Saxmundham Neighbourhood Plan policies interpret the strategy and policies of the Local Plan at a local level. The policies contained in the draft Saxmundham Neighbourhood Plan are proposed to provide locally specific, criteria based policy guidance for the determination of planning applications.
- 4.4 Policy SCLP12.1 of the Suffolk Coastal Local Plan does not allocate a specific minimum housing figure to the Neighbourhood Plan area, and the draft Neighbourhood Plan does not include any site allocation policies. The Local

Plan does however include two allocations within the Neighbourhood Plan area– policies SCLP12.29⁵ and SCLP12.30. Combined, these areas of land are allocated within the Suffolk Coastal Local Plan for approximately 840 dwellings.

- 4.5 A screening process considered each policy in the Suffolk Coastal Local Plan and concluded whether significant effects were likely and if an Appropriate Assessment was needed. The Appropriate Assessment subsequently considered the following themes - recreation pressure from new residential development, recreation pressure from tourism, urbanisation effects in close proximity, air quality from increased road traffic, water quality and resources and biodiversity net gain. Mitigation measures were identified within the Appropriate Assessment and were incorporated within the final Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on Habitat Sites within and in the vicinity of the (then) Suffolk Coastal District.
- 4.6 The Council has subsequently produced a Recreational Avoidance and Mitigation Strategy and requires payment towards mitigation of significant effects from residential developments within 13km of the protected European sites.

⁵ SCLP12.29 falls partly within the Neighbourhood Plan area and partly within the adjoining parish of Benhall.

5. Assessment of likely effects of the Saxmundham Neighbourhood Plan on Habitat Sites

- 5.1 Table 3 below considers each policy of the Saxmundham Neighbourhood Plan in relation to whether there is potential for a likely significant effect on protected Habitat Sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the Habitat Sites. The policies are considered within the context of the Local Plan policies which they must be in general conformity with, and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

Table 3: Likely significant effects of the draft Saxmundham Neighbourhood Plan

Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
SAX1 General Design Principles	<p>This policy sets out a number of design criteria for new development in the Neighbourhood Plan area in order to reflect local distinctiveness and character and contribute to a high quality, sustainable environment.</p> <p>The policy builds on SCLP11.1: Design Quality of the Local Plan. The Habitats Regulation Assessment of Policy SCLP11.1 concluded no likely significant effects.</p> <p>This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>	None.	None.	No.
SAX2 Expansion of Existing Businesses	<p>This policy sets out a number of criteria relating to the expansion or intensification of existing businesses within the Neighbourhood Plan area.</p> <p>Policy SAX2 is a qualitative policy which builds on SCLP4.3: Expansion and Intensification of Employment Sites of the Local Plan. The Habitats Regulation Assessment of Policy SCLP4.3 concluded no likely significant effects.</p> <p>This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>	None.	None.	No.
SAX3 New Businesses	<p>This policy sets out a number of employment and business uses that will be supported within the Neighbourhood Plan</p>	None.	None.	No.

Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>area. These uses are encouraged to locate within existing and proposed employment areas within the town.</p> <p>Policy SAX3 is a qualitative policy which builds on SCLP4.3: Expansion and Intensification of Employment Sites of the Local Plan. The Habitats Regulation Assessment of Policy SCLP4.3 concluded no likely significant effects.</p> <p>This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>			
SAX4 Protecting Valued Local Community Facilities and Amenities	<p>This policy resists the loss community facilities and amenities within the Neighbourhood Plan area.</p> <p>Policy SAX4 is a qualitative policy which builds on SCLP8.1: Community facilities and assets. The Habitats Regulation Assessment of Policy SCLP8.1 concluded no likely significant effects.</p> <p>This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>	None.	None.	No.
SAX5 New Community Facilities	<p>This policy supports the provision of new or improved community facilities within the Neighbourhood Plan area.</p> <p>Policy SAX5 is a qualitative policy which builds on SCLP8.1: Community facilities and assets. The Habitats Regulation</p>	None.	None.	No.

Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>Assessment of Policy SCLP8.1 concluded no likely significant effects.</p> <p>This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>			
SAX6 Improving Connectivity	<p>This policy supports proposals to improve cycling, walking and disabled access across the town. The policy requires development proposals to incorporate safe cycle and pedestrian access and links into the existing network and access to facilities within the wider Neighbourhood Plan area. The policy supports the creation of green corridors connecting with neighbouring villages.</p> <p>This policy has no direct impacts on Habitat Sites and therefore no likely significant effects have been identified.</p>	None.	None.	No.
SAX7 Footpaths and Right of Way	<p>This policy supports the protection and enhancement of the existing Public Rights of Way network in the Neighbourhood Plan area.</p> <p>This policy has no direct impacts on Habitat Sites and therefore no likely significant effects have been identified. The policy may have indirect positive effects on Habitat Sites by ensuring access to local recreation opportunities, thereby reducing potential for increased pressure on Habitat Sites.</p>	None.	None.	No.
SAX8 Parking Provision	<p>This policy seeks to ensure that sufficient off-road parking is provided on new development and requires all new residential</p>	None.	None.	No.

Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>development to meet the parking standards contained in the 2019 Suffolk County Council Parking Guidance. This policy includes a number of criteria relating to car parking design and layout.</p> <p>Policy SAX8 is a qualitative policy which builds on SCLP7.2: Parking proposals and standards of the Local Plan. The Habitats Regulation Assessment of Policy SCLP7.2 concluded no likely significant effects. This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>			
SAX9 Windfall and Infill Development	<p>This policy sets out a number of criteria relating to windfall and infill development within the Neighbourhood Plan area.</p> <p>Policy SAX9 is a qualitative policy which builds on SCLP5.7: Infill and garden development of the Local Plan. The Habitats Regulation Assessment of Policy SCLP5.7 concluded no likely significant effects. This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>	None.	None.	No.
SAX10 Housing Mix	<p>This policy sets out an approach to housing mix for new residential developments within the Neighbourhood Plan area. The policy gives particular support to smaller units, housing for older people, vulnerable people or those with special needs and affordable housing.</p>	None.	None.	No.

Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	Policy SAX10 does not promote residential development, beyond what is set out in the Local Plan. SAX10 is a qualitative policy which builds on SCLP5.8: Housing Mix of the Local Plan. The Habitats Regulation Assessment of Policy SCLP5.8 concluded no likely significant effects. This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.			
SAX11 Historic Town Centre and Conservation Area	<p>This policy sets out a number of criteria for protecting and enhancing the Saxmundham Conservation Area and the Town Centre including an approach to signage, shopfronts and street furniture.</p> <p>Policy SAX11 is a qualitative policy which does not in itself promote residential development beyond what is set out in the Local Plan. SAX11 builds on policies SCLP11.3: Historic Environment and SCLP11.5: Conservation Areas of the Local Plan. The Habitats Regulation Assessment of policies SCLP11.3 and SCLP11.5 concluded no likely significant effects. This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>	None.	None.	No.
SAX12 Non-designated Heritage Assets	<p>The policy identifies 13 non-designated heritage assets, and sets out an overall approach to protecting these assets.</p> <p>The policy builds on Policy SCLP11.6: Non-designated heritage assets of the Local Plan. The Habitats Regulation Assessment</p>	None.	None.	No.

Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	of Policy SCLP11.6 concluded no likely significant effects. This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.			
SAX13 Gateways, Views and Landscape Setting of Saxmundham	<p>This policy seeks to protect landscape setting and character of the Neighbourhood Plan area.</p> <p>The policy identifies 7 important local views which should be conserved and enhanced and four Green Gateways.</p> <p>This policy builds on SCLP10.4: Landscape Character of the Suffolk Coastal Local Plan. The Habitats Regulation Assessment of the Local Plan identified no likely significant effects from policy SCLP10.4. Therefore policy SAX13 will not result in any likely significant effects.</p>	None.	None.	No.
SAX14 Protection and Enhancement of Natural Assets	<p>This policy seeks to protect and enhance existing ecological assets, networks and wildlife corridors in the Neighbourhood Plan area. The policy also provides support for biodiversity net gain. The supporting text makes specific reference to the Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).</p> <p>Policy SAX14 does not in itself promote residential development beyond what is set out in the Local Plan. The policy builds on SCLP10.1: Biodiversity and Geodiversity and SCLP10.4: Landscape Character of the Suffolk Coastal Local Plan. Policy SAX14 contributes towards the principles of the</p>	None.	None.	No.

Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	enhancement of the wider environment and therefore no likely significant effects are identified.			
SAX15 Community Gardens and Allotments	<p>This policy identifies and protects the existing community garden at the former Fromus Centre and requires all new major residential development to make provision for a proportionate area of land for a community garden or allotments.</p> <p>This policy builds on SCLP8.3: Allotments of the Suffolk Coastal Local Plan. The Habitats Regulation Assessment of the Local Plan identified no likely significant effects from policy SCLP8.3. Therefore policy SAX15 will not result in any likely significant effects.</p>	None.	None.	No.
SAX16 Protection of Existing Local Green Spaces	<p>This policy identifies and protects 11 Local Green Spaces.</p> <p>The policy may have indirect positive effects on Habitat Sites by ensuring access to local green spaces, thereby reducing potential for increased pressure on Habitat Sites. Therefore no likely significant effects are identified.</p>	None.	None.	No.
SAXGN1 Connecting the Garden Neighbourhood	This policy builds on Local Plan allocation policy SCLP12.29: South Saxmundham Garden Neighbourhood. This site consists of approximately 67.8ha of land to the south of Saxmundham which includes land within the parish of Benhall. The site is allocated for an education led development, comprising primary school provision, community facilities, employment land and open space alongside a variety of residential	None.	None.	No.

Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>development of approximately 800 dwellings.</p> <p>Policy SAXGN1 adds detail to the Local Plan policy in relation to how any new development coming forward as part of the Local Plan allocation should ensure suitable connections (in particular cycle and pedestrian connections) into the existing settlement. The policy also addresses movement within the allocation and the promotion of sustainable transport.</p> <p>This policy does not in itself promote additional development, beyond what is already allocated in the Local Plan, and will not therefore result in any likely significant effects.</p>			
SAXGN2 Green Infrastructure Links	<p>This policy builds on Local Plan allocation policy SCLP12.29: South Saxmundham Garden Neighbourhood. This site consists of approximately 67.8ha of land to the south of Saxmundham which includes land within the parish of Benhall. The site is allocated for an education led development, comprising primary school provision, community facilities, employment land and open space alongside a variety of residential development of approximately 800 dwellings.</p> <p>Policy SAXGN2 adds detail to the Local Plan policy in relation to green infrastructure requirements, including connections to the wider surrounding countryside, the creation of a landscape buffer (green zone) to the north of the site, the provision of SANG on 'The Layers' (as required in the Local Plan), the</p>	None.	None.	No.

Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>retention of trees and hedgerows, wider landscape requirements and the provision of new allotments/ community gardens.</p> <p>This policy does not in itself promote additional development, beyond what is already allocated in the Local Plan, and will not therefore result in any likely significant effects.</p>			
<p>SAXGN3 Community Facilities</p>	<p>This policy builds on Local Plan allocation policy SCLP12.29: South Saxmundham Garden Neighbourhood. This site consists of approximately 67.8ha of land to the south of Saxmundham which includes land within the parish of Benhall. The site is allocated for an education led development, comprising primary school provision, community facilities, employment land and open space alongside a variety of residential development of approximately 800 dwellings.</p> <p>Policy SAXGN3 adds detail to the Local Plan policy in relation to community infrastructure requirements in accordance with the requirements set out in the Local Plan policy.</p> <p>This policy does not in itself promote additional development, beyond what is already allocated in the Local Plan, and will not therefore result in any likely significant effects.</p>	<p>None.</p>	<p>None.</p>	<p>No.</p>
<p>SAXTC1 Town Centre</p>	<p>The policy supports enhancing the vibrancy of Saxmundham town centre. The policy supports the continued use of the town centre, and proposals that reinforce the area’s character.</p>	<p>None.</p>	<p>None.</p>	<p>No.</p>

Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
Overarching Strategy	<p>The policy also includes criteria relating to traffic impacts, connectivity, and the role of key buildings as a focal point in the town.</p> <p>This policy does not in itself promote additional development which will impact on Habitat sites and therefore no likely significant effects have been identified.</p>			
SAXSA1 Station Area	<p>This policy highlights a number of regeneration opportunities in the area around the railway station. These include opportunities to improve connectivity to the town centre and deliver visual and environmental improvements.</p> <p>This policy supports the redevelopment and enhancement of part or all of the area, but does not in itself constitute a site allocation and therefore no likely significant effects have been identified.</p>	None.	None.	No.
SAXSFR1 Redevelopment and environmental enhancement opportunities at Street Farm Road	<p>This policy identifies opportunities in two areas for potential redevelopment and environmental enhancement. The policy highlights opportunities to deliver new car parking provision, commercial and employment development, and open space linked to existing walking opportunities.</p> <p>This policy supports the redevelopment and enhancement of the areas, but does not in itself constitute a site allocation and therefore no likely significant effects have been identified.</p>	None.	None.	No.

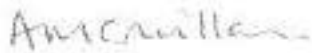
Policy	Assessment of potential impact on Habitat Sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
SAXFS1 Fromus Square	<p>This policy highlights opportunities for environmental and visual enhancements in the Fromus Square area. These include opportunities to enhance the retail, hospitality and leisure offer in the area and improve connectivity to the high street.</p> <p>This policy supports enhancements and improvements in the area but does not in itself constitute a site allocation and therefore no likely significant effects have been identified.</p>	None.	None.	No.
SAXFC1 Former Fromus Centre site and Community Garden	<p>This policy sets out support for the delivery of housing and open space on the site, in particular the provision of specialist housing. The policy seeks to protect the existing community garden as open space and supports improved connectivity and permeability both across the site and through to the town centre and the Garden Neighbourhood.</p> <p>This policy supports redevelopment of the site, but does not in itself constitute a site allocation and therefore no likely significant effects have been identified.</p>	None.	None.	No.

6. Summary and conclusions

- 6.1 The Saxmundham Neighbourhood Plan will provide policies which will be used for determining planning applications alongside the East Suffolk Council- Suffolk Coastal Local Plan, 2020. It includes locally specific criteria-based policies to be used for the determination of planning applications. The Plan does not allocate any sites for development.
- 6.2 The Neighbourhood Plan is being prepared to be in general conformity with the relevant policies in the East Suffolk Council- Suffolk Coastal Local Plan, September 2020.
- 6.3 Natural England were consulted on a draft of this Screening Statement as statutory nature conservation body. Their response is contained in Appendix 4.
- 6.4 The Saxmundham Neighbourhood plan includes adequate reference to the requirements of the Suffolk Coast RAMS and additional green infrastructure requirements and therefore it is concluded that the Saxmundham Neighbourhood Plan will not lead to any adverse effects on protected Habitat Sites.

Signed:

Dated: 25.05.2022



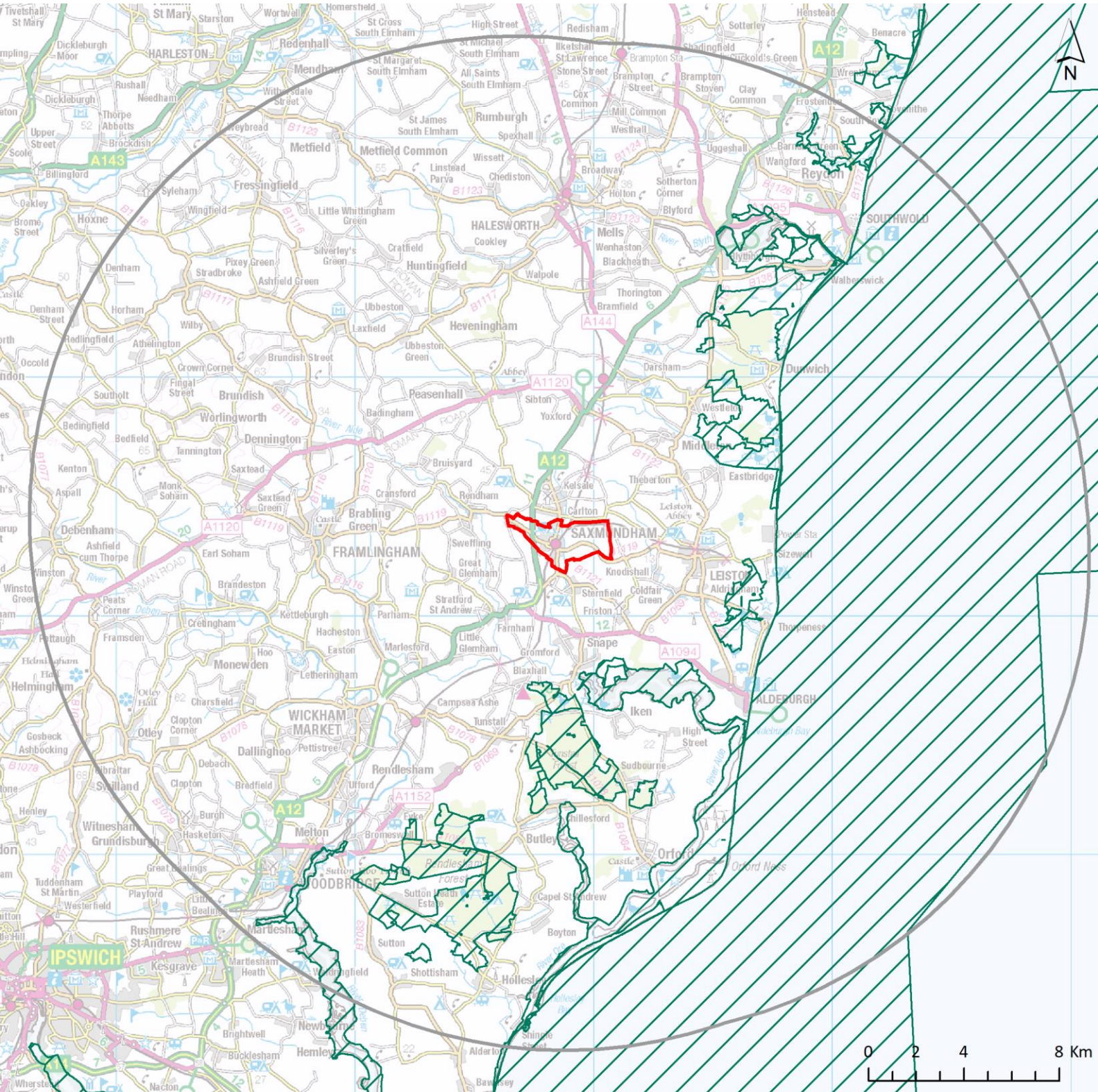
Andrea McMillan
Planning Manager (Policy, Delivery and Specialist Services)
East Suffolk Council

Appendix 1: Sources of background information

- Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan stage (December 2018)
- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019)
- East Suffolk Council- Suffolk Coastal Local Plan, September 2020

Appendix 2: Locations of Habitat Sites

Special Protection Areas



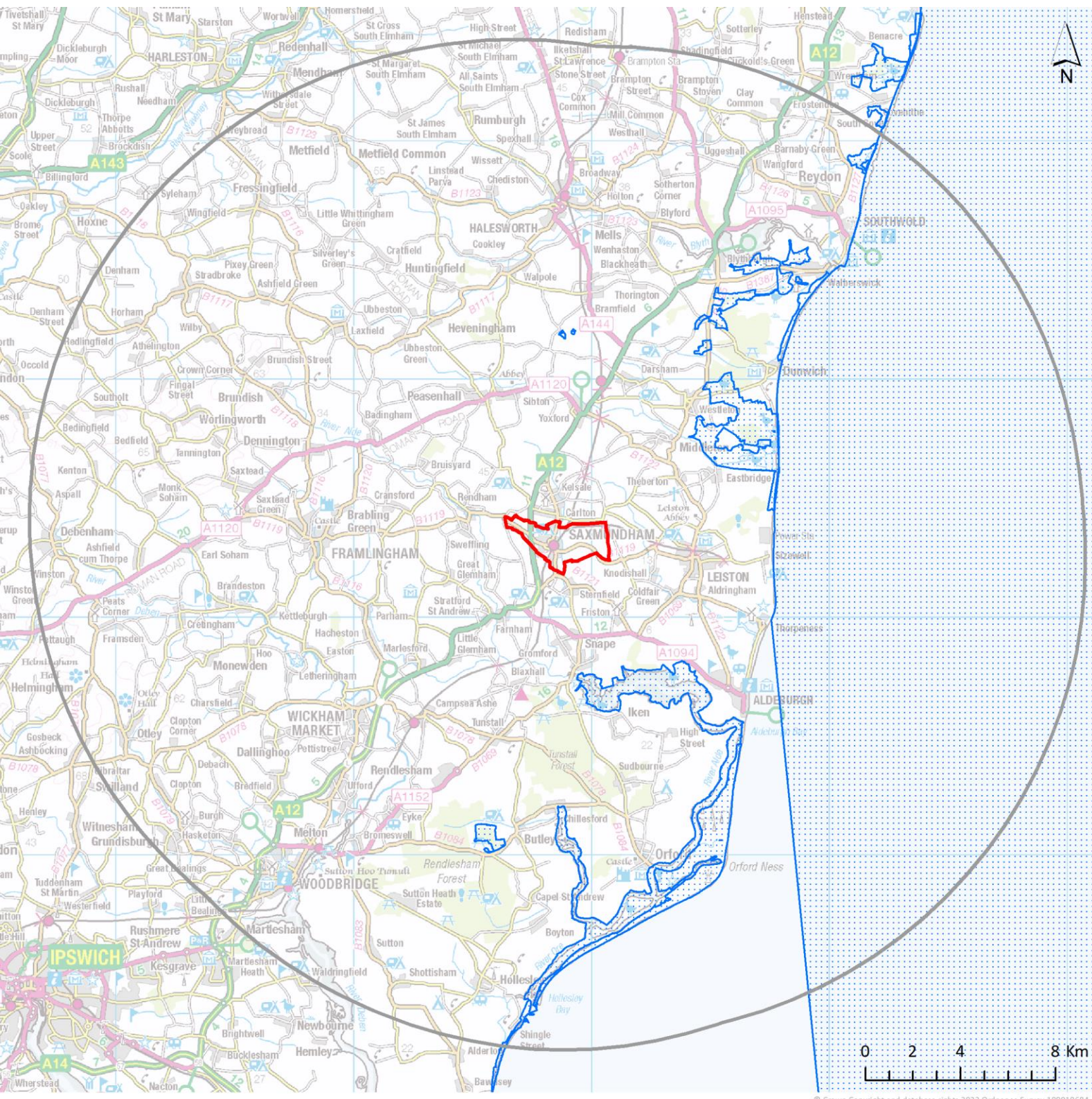
 Saxmundham Neighbourhood Area


 20km Buffer

 Special Protection Area

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Source: © Natural England copyright. Contains Ordnance Survey data

Special Areas of Conservation



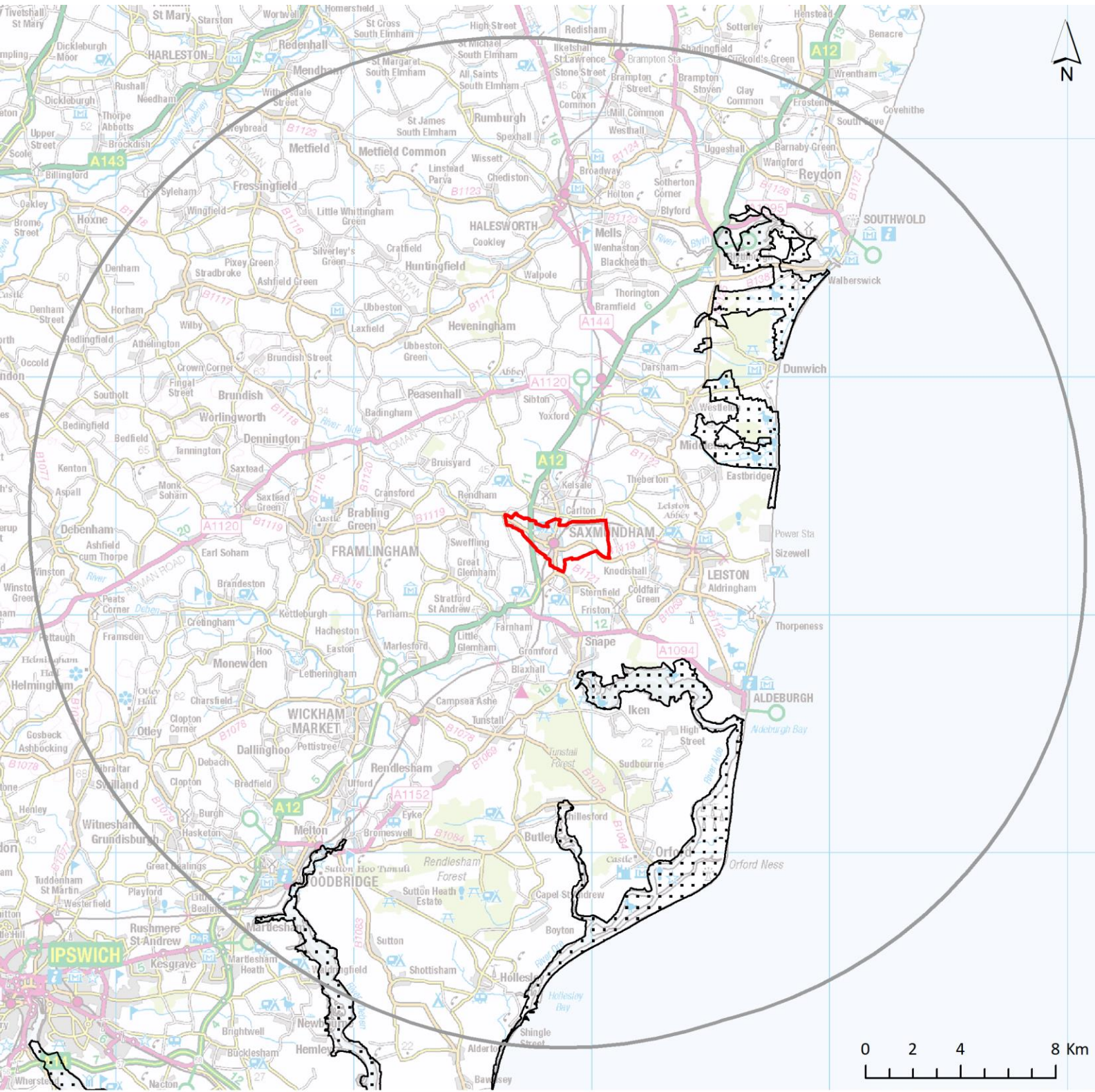
 Saxmundham Neighbourhood Area

 20km Buffer

 Special Areas of Conservation

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RAMSAR



- Saxmundham Neighbourhood Area
- 20km Buffer
- RAMSAR

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Appendix 3: Relevant Habitat Sites

Name	Qualifying features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan Stage (December 2018))
Special Areas of Conservation			
Alde-Ore and Butley Estuaries	H1130:Estuaries H1140: Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats H1330: Atlantic salt meadows	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; The supporting processes on which qualifying natural habitats rely.	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) (Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)
Dew's Pond	S1166 Triturus cristatus: Great crested newt	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats;	None identified.

		The supporting processes on which qualifying natural habitats rely.	
Orfordness – Shingle Street	H1150: Coastal Lagoons H1210: Annual vegetation of drift lines H1220: Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.	Not identified in Suffolk Coastal Final Draft Local Plan HRA.
Southern North Sea	1351: Phocoena phocoena	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.	Not identified in Suffolk Coastal Final Draft Local Plan HRA.
Staverton Park and The Thicks, Wantisden	H9190: Old acidophilous oak woods with Quercus robur on sandy plains; Dry oak-dominated woodland.	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its	Woodland management, disease, atmospheric pollution.

		<p>Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.</p>	
<p>Minsmere to Walberswick Heaths and Marshes SAC (also SPA and Ramsar site)</p>	<p>H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) <i>Anas crecca</i>: Eurasian teal A021(B) <i>Botaurus stellaris</i>: Great bittern A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier A082(NB) <i>Circus cyaneus</i>: Hen harrier A224(B) <i>Caprimulgus europaeus</i>: European nightjar A056(B) <i>Anas clypeata</i>: Northern shoveler A056(NB) <i>Anas clypeata</i>: Northern shoveler A051(B) <i>Anas strepera</i>: Gadwall A051(NB) <i>Anas strepera</i>: Gadwall A132(B) <i>Recurvirostra avosetta</i>: Pied avocet</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <p>The extent and distribution of qualifying natural habitats and habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.</p>	<p>Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)</p>

	A195(B) <i>Sterna albifrons</i> : Little tern A394(NB) <i>Anser albifrons</i> : Greater white-fronted goose		
Special Protection Areas			
Alde-Ore Estuary (also Ramsar site)	A081: Eurasian marsh harrier (breeding) A132: Pied avocet (non-breeding) A132: Pied avocet (breeding) A151: Ruff (non-breeding) A162: Common redshank (non-breeding) A183: Lesser black-backed gull (breeding) A191: Sandwich tern (breeding) A195: Little tern (breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or 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 population of each of the qualifying features; and The distribution of the qualifying features within the site.	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) (Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)
Deben Estuary (also Ramsar site)	A046a: Dark bellied brent goose (non-breeding) A132: Pied avocet (non-breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features;	Coastal squeeze, disturbance to birds, water and air pollution.

		<p>The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	
Outer Thames Estuary	<p>A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: Little Tern (Breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or 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 population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	<p>Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.</p>
Sandlings	<p>A224: European nightjar (breeding) A246: Woodlark (breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features;</p>	<p>Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.</p>

		<p>The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	
<p>Stour and Orwell Estuaries (also Ramsar site)</p>	<p>A046a: Dark bellied brent goose (non-breeding) A054: Northern pintail (non-breeding) A132: Pied avocet (non-breeding) A141: Grey plover (non-breeding) A143: Red knot (non-breeding) A149: Dunlin (non-breeding) A156: Black-tailed godwit (non-breeding) A162: Common redshank (non-breeding) Waterbird assemblage</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or 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 population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	<p>Coastal squeeze, disturbance to birds, air pollution and new development.</p>

Appendix 4: Natural England Consultation Response

Date: 18 May 2022
Our ref: 390055
Your ref: Saxmundham Neighbourhood Plan



Ms L Mundy
East Suffolk Council
Laura.Mundy@east.suffolk.gov.uk

BY EMAIL ONLY

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Electra Way
Crewe
Cheshire
CW1 8GJ

T 0300 060 3900

Dear Ms Mundy

Saxmundham Neighbourhood Plan

Thank you for your consultation on the above dated and received by Natural England on 13 April 2022

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Draft Strategic Environmental Assessment and HRA Screening Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

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

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an HRA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/HRA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Joanne Widgery
Consultations Team