

Information to inform Habitats Regulations Assessment

February 2024

Land North-east of Humber Doucy Lane
Ipswich

Prepared by
CSA Environmental

On behalf of
Hopkins Homes & Barratt David Wilson

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1.0 INTRODUCTION

- 1.1 This document has been prepared by CSA Environmental on behalf of Hopkins Homes and Barratt David Wilson, in relation to Land North-east of Humber Doucy Lane, Ipswich (hereafter referred to as 'the Site') where outline planning permission is sought for an allocated residential development (hereafter referred to as 'the proposed development'). The Site falls within two local authority areas: Ipswich Borough and East Suffolk Council areas. The Site location is shown in Appendix A.
- 1.2 This document provides information to assist Ipswich Borough Council (IBC) and East Suffolk Council (ESC) in their consideration of whether the proposed development will have likely significant effects on European sites, and in ascertaining any adverse effects on their integrity. This process is commonly termed Habitats Regulations Assessment (HRA).
- 1.3 As the decision-making authorities, IBC and ESC are the 'competent authority' in respect of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This document is intended to provide the necessary information to IBC and ESC with which to make their assessments (pursuant to Regulation 63(2) of the above Regulations).

Project Background

- 1.4 The Ipswich Local Plan 2018-2036 (adopted March 2022) and Suffolk Coastal Local Plan (adopted September 2020) set out the strategic development policies for the Ipswich Borough and East Suffolk Council areas respectively to 2036.
- 1.5 For Ipswich Borough, as part of the local plan, the Core Strategy and Policies DPD Review (2022) identifies a number of objectives to meet its development targets, with 'the Northern End of Humber Doucy Lane' allocated to support this. Policy ISPA4 states "...23.28ha of land at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, is allocated for 449 dwellings and associated infrastructure to come forward in conjunction with land allocated in Policy SCLP12.24 of the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site. 60% of the site within Ipswich Borough is allocated for housing and 40% is allocated for secondary uses, comprising open space and other green and community infrastructure."
- 1.6 For East Suffolk Council, to assist with development targets across the Ipswich Strategic Planning Area, Policy SCLP12.24 of the Suffolk Coastal Local Plan states "...9.9ha of land to the east of Humber Doucy Lane is identified to come forward for the development of approximately 150 dwellings in conjunction with land identified in the Ipswich Local Plan."

- 1.7 Both local plans have been subject to a HRA. The IBC Habitat Regulations Assessment Adoption Statement (Ipswich Borough Council, 2022^b) states *"The HRA concluded that, subject to the inclusion of recommendations for amended policy wording and site mitigations, (which have subsequently been included in the Plan) would not lead to likely significant effects on any national network site (formerly European site). Natural England, as the statutory consultee, agreed with this conclusion."*
- 1.8 The ESC Habitats Regulations Assessment of the Suffolk Coastal Local Plan (Hoskin and Liley, 2018) states that *"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."*
- 1.9 Policies ISPA4 and SCLP12.24 of the local plans both state that a project-level HRA is required for the proposed development. The purpose of this document is to provide the 'competent authorities' with the information required for them to complete the assessment.

Summary of Applicable Legislation and Policy

- 1.10 Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), termed 'European sites', collectively form part of a suite of sites known in the UK as the national site network. For ease of reference and consistent with their treatment under UK government policy, Ramsar sites are also referred to here as European sites.
- 1.11 All European sites in England and Wales are afforded strict protection through the Conservation of Habitats and Species Regulations 2017 (as amended). These Regulations, widely referred to as the 'Habitat Regulations', establish a framework for decision-making authorities to assess the potential for harmful effects on European sites to arise as a result of proposed plans or projects. This assessment process is commonly referred to as 'Habitats Regulations Assessment' (HRA).
- 1.12 Development management policies relevant to the proposed development and to the protection of European sites are set out within Policies ISPA3, ISPA4, CS16, CS17, CS20, DM6 and DM8 of the Ipswich Local Plan 2018-2036 and Policies SCLP10.1, SCLP10.2 and SCLP12.24 of the Suffolk Coastal Local Plan. Further guidance for developers is set out within the Recreational Disturbance Avoidance and Mitigation Strategy for (Hoskin, Liley and Panter, 2019) and Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy SPDs (East Suffolk Council, 2021; Ipswich Borough Council, 2020).
- 1.13 Further detail of the legislative and case law context, as well as national and local planning policies relevant to HRA, are provided within Appendix B.

2.0 EXEMPTION, EXCLUSION AND ELIMINATION

- 2.1 It is necessary in the first instance to undertake preliminary screening to determine whether the proposed development is exempt, excluded or eliminated from the Regulation 63 requirements, and to refine which European site designations warrant further consideration. If the proposed development 'passes' any of the preliminary screening tests shown below in Table 1, then no further screening for likely significant effects is required.

Table 1. Preliminary Screening

Preliminary Screening Test	Pass?
Is the scheme directly connected with or necessary to the management of a European site for nature conservation purposes?	No
Is the proposed scheme the continuation, without material change, of ongoing activities not subject to any form of authorisation?	No
In light of the nature, scale, duration and location of the scheme, is it obvious that it could not have any conceivable effect on any European site?	No

- 2.2 In view of the final preliminary screening test in Table 1, it is the professional opinion of the author that the following European sites could conceivably be affected by the scheme, in view of its nature, scale, duration and location. These designations will therefore be screened for likely significant effects in Section 3 of this document.

- Stour and Orwell Estuaries Ramsar (c. 4.8km south)
- Stour and Orwell Estuaries SPA (c. 4.8km south)
- Deben Estuary Ramsar (c. 6.7km east)
- Deben Estuary SPA (c. 6.7km east)
- Sandling SPA (c. 11km east)

- 2.3 Comprehensive details on the characteristics of the above European sites are presented in Appendix C. These characteristics form the basis of assessment and include their spatial relationship with the Site, component Sites of Special Scientific Interest (SSSIs), qualifying features, published conservation objectives and any known vulnerabilities or threats to their favourable conservation statuses.

3.0 SCREENING FOR LIKELY SIGNIFICANT EFFECTS

Potential Impact Pathways

- 3.1 In the context of the information on European site characteristics (Appendix C), potential impact pathways shared by the proposed development and the conservation objectives of the European sites identified in Section 2 of this report are screened below (Tables 2a-e).
- 3.2 Pathways are considered in Tables 2a-e on the basis of the development as proposed, i.e. including any facets which, in addition/secondary to their primary purpose, may act to mitigate effects that might otherwise occur on European sites. However, in accordance with the 'People Over Wind' ruling of the Court of Justice for the European Union (CJEU; Case C-323/17), screening for likely significant effects takes place in the absence of measures specifically adopted to avoid or reduce harmful effects on European sites.

Table 2.a. Screening for Likely Significant Effects

Stour and Orwell Estuaries Ramsar	
<i>Any potential changes to the site or its qualifying features arising as a result of the following impact pathways:</i>	
Land take by development within European site	None
Fragmentation of European site habitats	None
Increased mortality of key species	None
Disturbance to key species/deterioration of habitats within the European site	Possible
Disturbance to key species/deterioration of supporting habitats, beyond the European site	Possible
Atmospheric pollution/air quality	Possible
Hydrological regime change	Possible
Pollution of surface/ground water	Possible
<i>Those facets of the proposed development, or combination of facets, where the above pathways have the potential to give rise to significant effects, or where the scale or magnitude of potential effects is not known:</i>	
<p>The Site provides suitable arable habitat for wintering birds, including qualifying species of the European site.</p> <p>The Site lies within the 13km Zone of Influence (Zoi) which is currently being used to inform the impacts of recreation within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (Hoskin, Liley and Panter, 2019). The Site will lead to an increase in the local population which may contribute to increased recreational pressures, from walkers and water-based activities, which in turn may cause disturbance to birds.</p> <p>Air pollution, in the form of nitrogen deposition, is a known pressure on the European site. The proposed development may lead to an increase in vehicles using roads in and around the European site, and therefore cause an increase in air pollution.</p> <p>Changes to water flow of rivers can have impacts on aquatic habitats that support the qualifying bird species.</p>	

Water pollution, from surface run-off and discharge from treatment plans, can lead to eutrophication, which is a known threat to the supporting habitats of qualifying bird species within the European site.

Table 2.b. Screening for Likely Significant Effects

Stour and Orwell Estuaries SPA	
<i>Any potential changes to the site or its qualifying features arising as a result of the following impact pathways:</i>	
Land take by development within European site	None
Fragmentation of European site habitats	None
Increased mortality of key species	None
Disturbance to key species/deterioration of habitats within the European site	Possible
Disturbance to key species/deterioration of supporting habitats, beyond the European site	Possible
Atmospheric pollution/air quality	Possible
Hydrological regime change	Possible
Pollution of surface/ground water	Possible
<i>Those facets of the proposed development, or combination of facets, where the above pathways have the potential to give rise to significant effects, or where the scale or magnitude of potential effects is not known:</i>	
<p>The Site provides suitable arable habitat for wintering birds, including qualifying species of the European site.</p> <p>The Site lies within the 13km Zone of Influence (Zol) which is currently being used to inform the impacts of recreation within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (Hoskin, Liley and Panter, 2019). The Site will lead to an increase in the local population which may contribute to increased recreational pressures, from walkers and water-based activities, which in turn may cause disturbance to birds.</p> <p>Air pollution, in the form of nitrogen deposition, is a known pressure on the European site. The proposed development may lead to an increase in vehicles using roads in and around the European site, and therefore cause an increase in air pollution.</p> <p>Changes to water flow of rivers can have impacts on aquatic habitats that support the qualifying bird species.</p> <p>Water pollution, from surface run-off and discharge from treatment plans, can lead to eutrophication, which is a known threat to the supporting habitats of qualifying bird species within the European site.</p>	

Table 2.c. Screening for Likely Significant Effects

Deben Estuary Ramsar	
<i>Any potential changes to the site or its qualifying features arising as a result of the following impact pathways:</i>	
Land take by development within European site	None
Fragmentation of European site habitats	None
Increased mortality of key species	None
Disturbance to key species/deterioration of habitats within the European site	Possible
Disturbance to key species/deterioration of supporting habitats, beyond the European site	Possible
Atmospheric pollution/air quality	Possible
Hydrological regime change	Possible
Pollution of surface/ground water	Possible

<i>Those facets of the proposed development, or combination of facets, where the above pathways have the potential to give rise to significant effects, or where the scale or magnitude of potential effects is not known:</i>
<p>The Site provides suitable arable habitat for wintering birds, including qualifying species of the European site.</p> <p>The Site lies within the 13km Zone of Influence (Zoi) which is currently being used to inform the impacts of recreation within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (Hoskin, Liley and Panter, 2019). The Site will lead to an increase in the local population which may contribute to increased recreational pressures, from walkers, dog-walkers and water-based activities, which in turn may cause disturbance to birds.</p> <p>Air pollution, in the form of nitrogen deposition, is a known threat to the European site. The proposed development may lead to an increase in vehicles using roads in and around the European site, and therefore cause an increase in air pollution.</p> <p>Changes to water flow of rivers can have impacts on aquatic habitats that support the qualifying bird species.</p> <p>Water pollution, from surface run-off and discharge from treatment plans, can lead to eutrophication, which is a known threat to the supporting habitats of qualifying bird species within the European site.</p>

Table 2.d. Screening for Likely Significant Effects

Deben Estuary SPA	
<i>Any potential changes to the site or its qualifying features arising as a result of the following impact pathways:</i>	
Land take by development within European site	None
Fragmentation of European site habitats	None
Increased mortality of key species	None
Disturbance to key species/deterioration of habitats within the European site	Possible
Disturbance to key species/deterioration of supporting habitats, beyond the European site	Possible
Atmospheric pollution/air quality	Possible
Hydrological regime change	Possible
Pollution of surface/ground water	Possible
<i>Those facets of the proposed development, or combination of facets, where the above pathways have the potential to give rise to significant effects, or where the scale or magnitude of potential effects is not known:</i>	
<p>The Site provides suitable arable habitat for wintering birds, including qualifying species of the European site.</p> <p>The Site lies within the 13km Zone of Influence (Zoi) which is currently being used to inform the impacts of recreation within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (Hoskin, Liley and Panter, 2019). The Site will lead to an increase in the local population which may contribute to increased recreational pressures, from walkers, dog-walkers and water-based activities, which in turn may cause disturbance to birds.</p> <p>Air pollution, in the form of nitrogen deposition, is a known threat to the European site. The proposed development may lead to an increase in vehicles using roads in and around the European site, and therefore cause an increase in air pollution.</p> <p>Changes to water flow of rivers can have impacts on aquatic habitats that support the qualifying bird species.</p>	

Water pollution, from surface run-off and discharge from treatment plans, can lead to eutrophication, which is a known threat to the supporting habitats of qualifying bird species within the European site.

Table 2.e. Screening for Likely Significant Effects

Sandlings SPA	
<i>Any potential changes to the site or its qualifying features arising as a result of the following impact pathways:</i>	
Land take by development within European site	None
Fragmentation of European site habitats	None
Increased mortality of key species	None
Disturbance to key species/deterioration of habitats within the European site	Possible
Disturbance to key species/deterioration of supporting habitats, beyond the European site	None
Atmospheric pollution/air quality	Possible
Hydrological regime change	None
Pollution of surface/ground water	None
<i>Those facets of the proposed development, or combination of facets, where the above pathways have the potential to give rise to significant effects, or where the scale or magnitude of potential effects is not known:</i>	
<p>The Site lies within the 13km Zone of Influence (Zoi) which is currently being used to inform the impacts of recreation within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (Hoskin, Liley and Panter, 2019). The Site will lead to an increase in the local population which may contribute to increased recreational pressures, which in turn may cause disturbance to birds.</p> <p>Air pollution, in the form of nitrogen deposition, is a known pressure on the European site. The proposed development may lead to an increase in vehicles using roads in and around the European site, and therefore cause an increase in air pollution.</p>	

The Proposed Development Alone and In Combination

- 3.3 At the screening stage it is necessary to consider whether the proposed development will have likely significant effects on European sites (having regard to the meaning of these terms as established by applicable case law) either as a result of potential impacts of the development acting alone, or when considered in combination with other plans or projects.
- 3.4 The proposed development will consist of up to 660 dwellings, an increase from the combined 599 dwellings suggested by the local plans (the reasons for the increase are explained in the Planning Statement). This equates to c. 1,584 new residents based upon an average occupancy of 2.4 people per dwelling. The proposed development contributes to the total of 8,280 dwellings allocated within the Ipswich Local Plan and approximately 11,366 dwellings planned within the Suffolk Coast Local Plan.
- 3.5 The Ipswich Local Plan HRA identifies the proposed development (Policy ISPA4 of the Ipswich Local Plan) to have a full range of impact pathways including air and water pollution, water resources, recreation and

urbanisation. Within the Suffolk Coastal Local Plan HRA, recreational impacts are identified for site allocations between 1km and 13km of European sites.

Deterioration of Supporting Habitats Beyond the European Sites

- 3.6 A Preliminary Ecological Appraisal of the Site was undertaken by CSA in August 2023 (CSA, 2024^a). This identified arable habitat on site, consisting of broad bean and wheat crops at the time of survey. This habitat is potentially suitable for wintering birds, including dark-bellied brent goose *Branta bernicla bernicla*, lapwing *Vanellus vanellus* and golden plover *Pluvialis apricaria*. Dark-bellied brent goose is a qualifying species for Stour and Orwell Estuaries SPA/Ramsar and Deben Estuary SPA/Ramsar, while lapwing and golden plover are species that form part of the qualifying waterbird assemblage for Stour and Orwell Estuaries Ramsar.
- 3.7 Further wintering bird surveys, consisting of two visits, were undertaken in November and December 2023 as part of the Ecological Impact Assessment carried out by CSA (CSA, 2024^b). This survey work found the Site to be relatively poor for non-breeding waders and wildfowl, with none of the above species recorded. Furthermore, a review of the latest available 'Suffolk Birds' volumes from 2017-2021 (Mason, 2017-2021) accessed via the Suffolk Biodiversity Information Service (SBIS) website found no mention of records of these species near the Site, with the closest records from locations associated with the Orwell and Deben Estuaries.
- 3.8 Considering the results of the wintering bird surveys, the distance between the Site and the European sites (c. 4.8km and 6.7km) and the presence of other suitable habitat closer to the European sites, it can be concluded that there are likely no significant effects upon the integrity of the European site with regard to removal/deterioration of supporting habitats beyond the European sites.

Disturbance to Key Species within the European Site

- 3.9 The Site lies within the 13km Zone of Influence (Zoi) of the five aforementioned European sites, which is currently being used to inform the impacts of recreation within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (Hoskin, Liley and Panter, 2019). All residential developments within the 13km Zoi are anticipated to have a 'likely significant effect' upon the European sites through recreational pressure, when considered in combination with other developments as part of the local plans. Recreational pressure is a known threat to/pressure on all five European sites, in the form of disturbance to the qualifying bird species. Recreational impacts are mostly caused by disturbance from walkers, dogs and water-based activities (Hoskin, Liley and Caals, 2020).

Air Quality

- 3.10 Following the Ipswich Local Plan HRA, a Sustainability Appraisal Addendum document was produced in June 2020 (Arcadis, 2020) to assess the potential air quality and flood risk impacts of the local plan following an Air Quality Assessment (AQA) of the Ipswich Strategic Planning Area and Strategic Flood Risk Assessment (SFRA) of all site allocations.
- 3.11 With regard to air quality, the Sustainability Appraisal Addendum states *"The SA does not identify significant adverse air pollution effects on sensitive biodiversity designations as a result of a single policy or a single site allocation. This is considered to be accurate in light of the new AQA evidence and is consistent with the findings presented in the AQA."*
- 3.12 It goes on to say *"Cumulatively and synergistically, it is considered to be likely that the Plan would have an increase in air pollution at the European sites as a result of the plan, but as these effects are not considered significant, the overall effect is considered to be minor adverse impact on this SA Objective. This conclusion is based on a worst case scenario i.e. without mitigation being in place."*
- 3.13 The Suffolk Coastal Local Plan HRA also identifies in-combination air pollution effects from growth within East Suffolk and beyond.

Water Pollution

- 3.14 With regard to flood risk, the Sustainability Appraisal Addendum to the Ipswich Local Plan states *"The site is in Flood Zone 1 and is not at risk of surface water flooding. This assessment is accurate in light of the SFRA (March 2020)."* The allocation within East Suffolk also lies within Flood Risk Zone 1 and is c. 0.9km from the nearest Flood Risk Zone 2 or 3 areas along the River Fynn to the north-east. Considering the distance between the Site and the European sites, it can be concluded that there are no likely significant effects of flood risk.

Hydrological changes

- 3.15 A cross-boundary water cycle study was carried out by Wood (2019) for ESC and IBC to understand the impacts of development on the water environment. This found the whole of East Anglia to be in a high water stress area, with water companies able to account for the increase in growth in the long term but measures needed to account for water supply issues in the short term (up to 2025). This is being dealt with at a plan level and is not considered further here.

Urbanisation

- 3.16 The Site lies outside of the 1.5km Zol for urbanisation effects at Stour and Orwell Estuaries SPA/Ramsar as identified in the Ipswich Local Plan HRA (Hoskin, Liley and Caals, 2020) and is not considered further here.

- 3.17 In light of the foregoing it can be concluded that, in the absence of mitigation, the proposed development has the potential to result in likely significant effects on five European sites for recreation and air quality impacts. As such, further Appropriate Assessment is required, including consideration of proposed measures intended to avoid or reduce harmful effects, in order that it may be ascertained whether the scheme will have any adverse effect on the integrity of the above European sites. A summary of screening conclusions is presented in Table 3 below.

Table 3. Screening for Likely Significant Effects

Summary			
<i>Impact pathway</i>	<i>Affected European site(s)</i>	<i>Likely significant effect: development alone</i>	<i>Likely significant effect: in combination</i>
Recreation	All five sites	No	Yes
Air quality (vehicle emissions)	All five sites	No	Yes

4.0 APPROPRIATE ASSESSMENT

The Site

- 4.1 The Site occupies an area of c. 33.2ha and consists of four land parcels. The northern and central land parcels are comprised of arable fields with narrow field margins. Small areas of broadleaved woodland are present along the western boundary of the central land parcel, and two areas of neutral grassland are also present to the east and west of the northern parcel. The western-most land parcel is comprised entirely of dense mixed scrub. The southern-most land parcel is split in two, with modified grassland to the west and arable land to the east (Appendix D). The Site is located around central grid reference TM 1869 4672, to the north-east of Ipswich, Suffolk.

The Proposed Development

- 4.2 The proposed development occupies an area of c. 33.2ha and comprises up to 660 residential units. Based on 2.4 residents per dwelling, this equates to c. 1,584 new residents. The site allocation is split 60% for residential areas and 40% for secondary uses including open space and green infrastructure.
- 4.3 The Site includes recreational routes (c. 4.9km in length) and a 'Green Trail' along the northern boundary.
- 4.4 The open green space on site (c. 11.5ha) comprises planting of native trees and thicket alongside the retained vegetation along the northern boundary, a proposed central village green, a community orchard, Sustainable Drainage Systems (SuDS) and swales sown with native wildflower and grass mix, and a wildlife pond.
- 4.5 Three local equipped areas of play (LEAPs) and one multi-use games area (MUGA) are proposed across the Site.
- 4.6 The proposed development maintains the two public right of ways (PRoW) that cross the Site and link to a network of PRoWs in the wider landscape to the north and east.

Potential Adverse Effects

Recreation

- 4.7 The proposed development will result in an increase of c. 1,584 new residents, based upon an average occupancy of 2.4 people per dwelling. In combination with other residential developments allocated within Ipswich and Suffolk Coastal Local Plans¹, this has the potential to

¹ As with all residential developments, these allocations should include their own bespoke mitigation.

cause an increase in visitors to the European sites identified within the 13km Zol, which is being used to determine recreational impacts on the coastal and heathland European sites within Suffolk (Hoskin, Liley and Caals, 2020).

- 4.8 Recreation has a number of adverse impacts on European sites, including habitat damage, disturbance to protected and qualifying species, increased fire risk and nutrient enrichment from dog fouling (Hoskin, Liley and Caals, 2020).
- 4.9 Damage from vegetation wear, soil compaction and erosion can impact lowland heathland habitat at Sandlings SPA. The heathland at Sandlings SPA supports internationally important populations of nightjar *Caprimulgus europaeus* and woodlark *Lullula arborea* which form the qualifying species for the designation. An increase in visitor numbers may increase damage to the supporting heathland habitat. Furthermore, as both these species are ground-nesting birds, direct mortality from trampling is a threat.
- 4.10 All five European sites are designated for their internationally important populations of birds. Many studies have shown disturbance from humans and pet dogs to have detrimental impacts on birds by changing their behaviour and responses to perceived threats. This can impact their distribution, breeding success and health (Hoskin, Liley and Caals, 2020). An increase in visitors, particularly dog-walkers, will increase the perceived threat and lead to greater impacts.
- 4.11 Increased fire risk as a result of campfires, BBQs and arson can have impacts on heathland habitat at Sandlings SPA, as well as direct impacts on birds.
- 4.12 Dog defecation and urination lead to higher nutrient levels (nitrogen and phosphorus in particular). This favours plant species tolerant of high nutrient levels, reduces species diversity and can change the plant community. Increases in dog fouling has the potential to impact habitat for nightjar and woodlark, which could be exacerbated by increased habitat damage where more paths are created with higher levels of access.

Air Quality

- 4.13 Increased traffic flows resulting from the proposed development in combination with wider projected growth may cause increases nitrogen deposition, as well as that of sulphur and ammonia. Guidance from Natural England (2018) considers European sites within 200m of a major road to be potentially affected by nitrogen deposition. Of the European sites addressed here, the A14 and A137 roads cross over the Stour and Orwell Estuaries SPA and Ramsar sites, with the A1152 crossing over the Deben Estuary SPA and Ramsar sites. The B1084 road runs through the northern part of Sandlings SPA.

- 4.14 Whilst the B1084 is not a major road, there is the potential for increased volumes of traffic. Nitrogen deposition is known to impact heathland habitat and exceeds the site-relevant critical load at Sandlings SPA (Natural England, 2015^a).
- 4.15 At Deben Estuary SPA and Ramsar, nitrogen deposition may exceed the threshold limit (20-30kgN/ha/year) above which the diversity of saltmarsh vegetation begins to alter and become adversely impacted (Natural England, 2014). The impact on birds within the European sites is unclear.
- 4.16 The Stour and Orwell Estuaries Ramsar site is designated for its wetland plant assemblage and the nitrogen deposition exceeds the critical load for ecosystem protection (Natural England, 2015^b).

Mitigation Measures

Recreation

- 4.17 A Recreational Disturbance Avoidance Mitigation Strategy (RAMS) was jointly commissioned by East Suffolk, Ipswich Borough, Babergh District and Mid Suffolk Councils (Hoskin, Liley and Panter, 2019). The purpose of the RAMS is to set out mitigation measures to account for recreational impacts caused by the increase in local residents as part of the planned growth in the area. The RAMS helps to facilitate development within the identified 13km recreational Zol surrounding Suffolk Coast European sites without having an adverse effect on their integrity.
- 4.18 As part of the mitigation measures set out in the RAMS, a financial contribution will be sought from developers for projects within the Zol. This tariff will contribute towards the estimated cost of £3.7 million required to implement measures that protect the European sites. These include:
- Staff resources
 - Signage, interpretation and awareness raising
 - Car parking
 - Dog related measures
 - Site specific projects and longer-term measures
- 4.19 As stated in the RAMS, " *Two separate tariff zones are identified:*
- *Zone A - reflects the zone of influence to the Stour and Orwell Special Protection Area (SPA) and Ramsar and the Deben SPA and Ramsar; and*

- *Zone B - relates to all the relevant Habitat Sites apart from the Stour and Orwell."*

- 4.20 For development projects in Zone A, the current tariff is set at £121.89 per dwelling. For those in Zone B, the tariff is £321.22 per dwelling.
- 4.21 A map of the tariff zones is shown in Appendix 2 of the Ipswich Borough and the East Suffolk RAMS SPDs (Ipswich Borough Council, 2020; East Suffolk Council, 2021). This map suggests that the proposed development is located within both Zones A and B, with the units within Ipswich Borough subject to the Zone A tariff and the units within East Suffolk subject to the Zone B tariff. However, due to the map scale, the exact boundary between Zones A and B cannot be determined and should be clarified by the councils.
- 4.22 Policy ISPA4 of the Ipswich Local Plan directly relates to the proposed development within Ipswich Borough, with Criterion f)iii stating *"a project level Habitat Regulations Assessment will be required and Suitable Alternative Natural Greenspace (SANGs)".* It goes on to say *"...A concentration of housing in this location is likely to require a bespoke Suitable Alternative Natural Greenspace (SANG) in addition to contributions towards the Recreation Avoidance Mitigation Strategy, to function as an alternative to the coast. As proposals for the site progress, consideration should be given to how the nearby SANG being delivered as part of the Ipswich Garden Suburb and wider footpath network, may be linked to any new SANG provision".*
- 4.23 Policy SCLP12.24 of the Suffolk Coastal Local Plan directly relates to the proposed development within East Suffolk and makes no reference to SANG(S). Instead, Criterion d) states *"contribution to the creation of a 'Green Trail' around Ipswich and provision of on-site open space"* is expected. Policy SCLP10.1 states *"The Recreational Disturbance Avoidance and Mitigation Strategy has been prepared to provide a mechanism through which impacts from increased recreation can be avoided and mitigated via financial contributions towards the provision of strategic mitigation. Where mitigation is proposed to be provided through alternative mechanisms, applicants will need to provide evidence to demonstrate that all impacts are mitigated for, including in-combination effects. Depending on the size and location of the development, additional measures such as Suitable Alternative Natural Green Spaces (SANGS) may be required as part of development proposals".*
- 4.24 Ipswich Borough and East Suffolk RAMS SPDs allow for the option of good quality green infrastructure to contribute to mitigation measures, stating *"...some residential schemes, particularly those located close to a Habitat Site boundary or large scale developments, are likely to need to provide additional mitigation measures (in addition to the tariff) such as Suitable Alternative Natural Green Space (SANGS) or green*

infrastructure measures such as enhanced walking routes and connections to the Public Right of Way network. This would need to be assessed through a project level Habitats Regulations Assessment (HRA) (including Appropriate Assessment)."

4.25 Furthermore, a Suffolk Coast RAMS HRA Record document (East Suffolk Council, no date) provides guidance, agreed with Natural England, for the 'competent authority' to undertake its Appropriate Assessment of any relevant development. Under Natural England's recommendations, larger scale developments comprising 50 or more residential units *"...should include provision of well-designed open space/green infrastructure, proportionate to its scale. Such provisions can help minimise any predicted increase in recreational pressure to the European sites by containing the majority of recreation within and around the development site boundary away from European sites. We advise that the Suitable Accessible Natural Green Space (SANGS) guidance here can be helpful in designing this..."* Recommendations for SANGS in the Suffolk Coast RAMS HRA Record document is specific to the Thames Basin Heaths but is widely applicable to other areas, and includes:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km within the site and/or with links to surrounding Public Rights of Way
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

4.26 Considering that the proposed development exceeds the 50 residential unit threshold in both local plan allocations (up to 660 new residential units in total), measures additional to the tariff should be implemented to reduce the recreational impacts upon the European sites.

4.27 The proposed development includes the following site-specific mitigation measures to reduce recreational impacts:

1. The provision of c. 11.5ha of open space and green infrastructure on site. This accounts for c. 34.6% of the Site, above the 10% open space requirement as part of Policy DM6 of the Ipswich Local Plan. The proposed development includes the retention of natural and semi-natural areas along the northern boundary, with additional native tree and thicket planting along this boundary

as part of the 'Green Trail' on site. There will be a central village green and other amenity areas, along with a dedicated 'dogs-off-lead' area.

In addition, there will be a provision of on-site recreational routes totalling c. 4.9km, with the longest circular walking route c. 2.3km in length.

2. Recreational routes on site link to the extensive network of PRoWs to the north and east of the Site. Three potential off-site circular walking routes are provided (plus an extended option for Walking Route 1), ranging from 2.1km to 4.3km (Appendix E). These routes connect the Site to the wider countryside in the Fynn Valley, including the recognised Fynn Valley Walk and Three Circular Walks, and will provide a recreational destination when supported by signage and information leaflets delivered to local residents.

Quiet Lanes represent c. 1.3% and c. 7% of off-site Walking Routes 3 and 2 respectively, with these lanes already being used to connect PRoW walking routes. Walking Route 1 requires a Quiet Lane for c. 32% of the route, with the extended option requiring c. 22%.

3. The recreational routes on site will provide improved accessibility to PRoWs for existing local residents, particularly for those living on Humber Doucy Lane, Inverness Road, Sherborne Avenue and Sidegate Lane. There is currently no footway along the northern end of Humber Doucy Lane that enables safe access from these areas to the PRoW off Tuddenham Road (Appendix F). Residents from these areas will be able to use on-site recreational routes to safely access this PRoW.

- 4.28 Subject to payment of the tariff and implementation of the above mitigation measures, it can be concluded that the proposed development will have no adverse effect on the integrity of the five European sites as a result of impacts associated with recreation pressure.

Air Quality

- 4.29 In light of the Sustainability Appraisal Addendum SPD to the Ipswich Local Plan (Arcadis, 2020) and Suffolk Coastal Local Plan HRA (Hoskin and Liley, 2018), there will be an increase in air pollution at the European sites as a result of the in-combination planned growth across Ipswich Borough, but that these effects are not considered significant even without mitigation. This is due to predicted improvements in vehicular emissions standards and a shift towards use of low emissions vehicles.
- 4.30 An AQA was undertaken for the proposed development in February 2024 (Marshall, 2024). This assessment found the proposed development

to have a negligible increase in annual mean nitrogen dioxide concentrations during its operational phase without mitigation. The report states "...it can be concluded that emissions from road traffic will lead to negligible impacts, regardless of the existing air quality conditions, and there will be no significant air quality effects".

4.31 With no significant effects of air pollution, mitigation is not required. However, a number of good design and best practice measures have been incorporated into the proposed development, which conform with Policy CS20 of the Ipswich Local Plan, including:

- Provision of electric vehicle charging points
- Provision of on-site pedestrian and cycle routes to access local facilities
- On-site green infrastructure, including recreational routes and play areas
- Provision of a bus route on site
- Air source heat pumps proposed to heat all residential units, supplemented by solar photovoltaics
- A Travel Plan submitted along with the application to set out a range of measures to encourage and provide sustainable travel
- Superfast broadband provided to all residential units, allowing residents to work from home

4.32 The estimated cost of the above measures is in excess of £6.08 million, which far exceeds the calculated damage cost of c. £118,000 (Marshall, 2024). Therefore, no further mitigation measures are required.

4.33 Subject to the above measures, it is concluded that the proposed development will have no significant adverse effect on the integrity of the five European sites as a result of impacts associated with air pollution.

Residual Effects on Site Integrity

4.34 With implementation of the proposed measures intended to avoid or reduce adverse effects, it can be concluded that the proposed development will have no adverse effect on the integrity of the Stour and Orwell Estuaries SPA and Ramsar sites, Deben Estuaries SPA and Ramsar sites or Sandlings SPA. These measures can be summarised as follows:

- Payment of the tariff set out in the RAMS and provision of open space and walking routes on site, along with connection to and promotion of walking routes in the surrounding landscape.

- 4.35 These measures may readily be secured through appropriate legal mechanisms as part of an outline planning permission, therefore the proposed development may be permitted without conflict with the provisions of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

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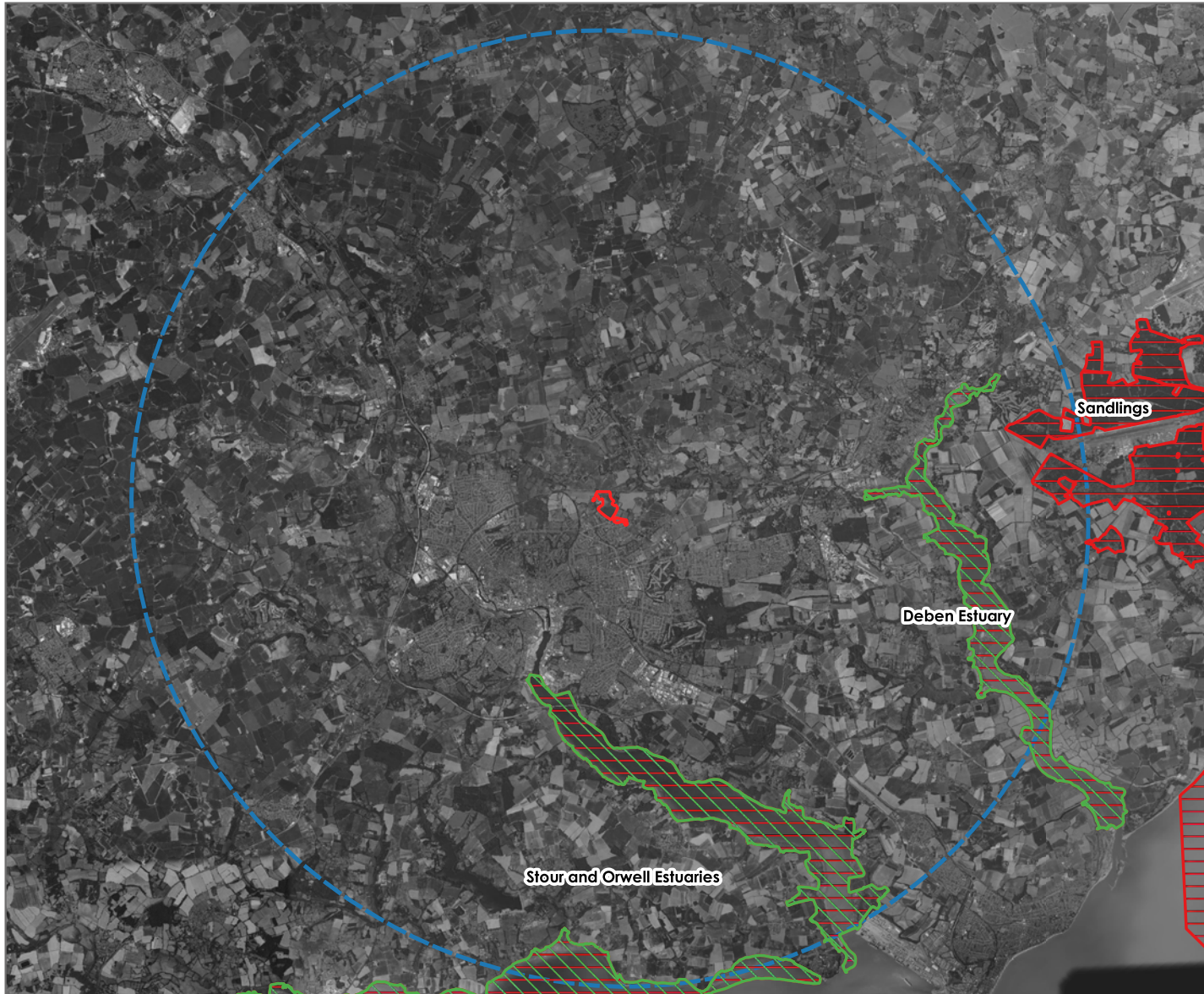
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Appendix A

Site Location



- Site boundary
- 13km zone of influence
- Special Protection Areas
- Ramsar sites



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Project	Land North-east of Humber Doucy Lane	Date	February 2024	Drawing No.	CSA/6675/120
Drawing Title	13km Recreational Zone of Influence	Scale	Refer to scale	Rev	-
Client	Hopkins Homes & Barratt David Wilson	Drawn	RG	Checked	JW

Appendix B

Legislation and Planning Context

European Sites

- 1.1. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), termed 'European sites', collectively form part of a suite of sites known in the UK as the national site network, and are afforded strict protection from the potentially damaging effects of human activities. For ease of reference here, and consistent with their treatment under UK government policy, sites designated by the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971), or 'Ramsar sites', are also referred to here as European sites.
- 1.2. All European sites in England and Wales are afforded protection through the Conservation of Habitats and Species Regulations 2017 (as amended). These Regulations are widely referred to as the 'Habitat Regulations'. Regulation 63 of these Regulations states that, "*A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which (a) is likely to have a significant effect on a European site... (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of that site, must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.*" This assessment process is commonly referred to as 'Habitats Regulations Assessment' (HRA).
- 1.3. The above Regulations formerly transposed Article 6(3) of Council Directive 92/43/EEC on the 'Conservation of Natural Habitats and of Wild Fauna and Flora', commonly referred to as the 'Habitats Directive'. This Directive is the means by which the European Union meets its obligations under the Bern Convention (1992) on the Conservation of European Wildlife and Natural Habitats. Following the UK's departure from the European Union, the provisions of the Regulations have been retained through enactment of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which came into force on 31 December 2020.

Notable Case Law

- 1.4. Many procedural facets of HRA have been established through case law. In light of Section 6(3) EU (Withdrawal) Act 2018 (as amended), UK courts will continue to be bound by HRA judgments handed down by the Court of Justice for the European Union CJEU prior to 31 December 2020 when interpreting the Conservation of Habitats and Species Regulations 2017 (as amended). A non-exhaustive summary of some of some key judgements is provided below:

In Relation to HRA Screening

Waddenzee (ECJ Case C-127/02; 07.09.04.)

- 1.5. This case considered when Appropriate Assessment might be triggered and concluded that it is required where there is a, *"probability or risk,"* of significant effects, and that, *"such a risk exists if it cannot be excluded on the basis of objective information that the plan or project will not have significant effects on the site concerned."* The ruling clarifies that, *"in case of doubt as to the absence of significant effects such an assessment must be carried out."*
- 1.6. The ruling further states that, *"in assessing the potential effects of a plan or project, their significance must be established in the light, inter alia, of the characteristics and species environmental conditions of the site concerned by that plan or project."* As such, when assessing potential effects, the current condition of the features for designation of a European site must be considered. Such information may be provided within, amongst other sources, published Condition Assessments of component Sites of Special Scientific Interest (SSSIs) and Site Improvement Plans (SIPs).

Boggis v Natural England (EWCA Civ 1061; 20.10.09.)

- 1.7. This case built upon guidance for the correct interpretation of what constitutes a 'likely' significant effect from that provided in Waddenzee. It was ruled that, *"Notwithstanding the word 'likely'...the precondition before there can be a requirement to carry out an appropriate assessment is not that significant effects are probable, a risk is sufficient..."* however this must be, *"real, rather than a hypothetical, risk..."*

People Over Wind (CJEU Case C-323/17, 12.04.2018)

- 1.8. The recent 'People Over Wind' ruling determined whether mitigation measures may be considered when determining if an effect is 'likely' and therefore whether it should be 'screened-in' for further assessment within the HRA process (i.e. be subject to Appropriate Assessment). Previously it has been established (R (Hart DC) v SSCLG; known as the 'Dilly Lane' decision) that any measures introduced to avoid or mitigate effects on a European site could be considered in the initial screening stage. However, in the People Over Wind case the CJEU ruled that such measures not be considered during HRA screening.
- 1.9. Paragraph 40: *"...in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site."*

In Relation to Appropriate Assessment

Waddenzee (ECJ Case C-127/02; 07.09.04)

- 1.10. Paragraph 59 of the ruling provides guidance on confidence thresholds in Appropriate Assessment, stating that, *"An appropriate assessment of the implications for the site concerned of the plan or project implies that prior to its approval, all the aspects of the plan or project which can...affect the site's conservation objectives must be identified in the light of the best scientific knowledge in the field. The competent national authorities, taking account of the conclusions of the appropriate assessment of the implications of [a project] for the site concerned, in light of the site's conservation objectives, are to authorise such activity only if they have made certain that it will not adversely affect the integrity of that site. That is the case where no reasonable scientific doubt remains as to the absence of such effects."*

National Policy

- 1.11. The term 'European site' used in reference to SACs and SPAs is derived from the above Regulations. The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2021) establishes that sites designated by the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971), or 'Ramsar sites', as well as 'potential SPAs' and 'possible SACs', should be given the same protection as European sites.
- 1.12. At paragraph 182, the Framework establishes that the presumption in favour of sustainable development (also known as the 'tilted balance' in planning) does not apply where the plan or project is likely to have a significant effect on a European site, unless an Appropriate Assessment has concluded that the plan or project will not adversely affect the integrity of the European site.

Local Policy

- 1.13. The Ipswich Local Plan (adopted March 2022) sets out development management policies relevant to HRA in the Ipswich Borough. The Suffolk Coastal Local Plan (adopted September 2020) sets out development management policies relevant to HRA in the East Suffolk District. These are shown in Table 1 below.

Table 1. Summary of relevant local planning policies

Policy	Provisions
Ipswich Local Plan (adopted March 2022)	
Policy ISPA3: Cross-boundary mitigation of effects on Protected Habitats and Species	The Council will continue to work with other authorities to address the requirements of the Recreational Disturbance Avoidance and Mitigation Strategy and implementation of mitigation measures for the benefit of the European protected sites across the Ipswich Strategic Planning Area.

	<p>The Council will continue to work with other authorities over the plan period to ensure that the strategy and mitigation measures are kept under review in partnership with Natural England and other stakeholders.</p>
<p>Policy ISPA4: Cross Boundary Working to Deliver Sites</p>	<p>Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner.</p> <p>23.28ha of land at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, is allocated for 449 dwellings and associated infrastructure to come forward in conjunction with land allocated in Policy SCLP12.24 of the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site. 60% of the site within Ipswich Borough is allocated for housing and 40% is allocated for secondary uses, comprising open space and other green and community infrastructure.</p> <p>Development will be planned and comprehensively delivered through master planning of the site, including the allocation of land in East Suffolk, to be undertaken jointly with East Suffolk Council and the landowner.</p> <p>Development will be expected to comply with the following criteria:</p> <ul style="list-style-type: none"> a) Delivery of a high-quality design in compliance with Policy DM12, including at least 30% affordable housing (unless viability assessment shows otherwise) in accordance with Policies CS8 and CS12. The mix and tenure types of housing will be determined through the master planning process; b) Development must respect the maintenance of separation between Ipswich and surrounding settlements which is important to the character of the area. This should be achieved by the effective use of green infrastructure to create a transition between the new development/Ipswich urban edge and the more rural landscape character of East Suffolk; c) The settings of the grade II Listed Westerfield House Hotel, Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse must be preserved or enhanced as part of any future development of the site. Development must also have regard to its impact on the significance of non-designated heritage assets identified in the Heritage Impact Assessment (HIA) (September 2020). An archaeological assessment is also required. Any future planning applications will require an HIA demonstrating how the effects on heritage assets are taken into account and mitigated;

	<p>d) A site specific Flood Risk Assessment will be required;</p> <p>e) Rows of trees covered by Tree Preservation Orders (TPOs) along the boundary with Westerfield House should be preserved unless there are overriding reasons for their removal;</p> <p>f) Current infrastructure requirements are as follows (subject to any additional infrastructure that may be identified as part of the planning application process):</p> <ul style="list-style-type: none"> i. Primary school places and an early years setting to meet the need created by the development; ii. Replacement sports facilities if required to comply with policy DM5, other open space in compliance with the Council's Open Space Standards set out in Appendix 3 of the Core Strategy DPD and links to the Ipswich 'green trail' walking and cycling route around the edge of Ipswich; iii. A project level Habitat Regulations Assessment will be required and Suitable Alternative Natural Greenspace (SANGs); iv. Landscaping and development proposals must take account of the Ipswich Wildlife Audit (2019) recommendations for the site, contribute positively to the enhancement of strategic green infrastructure both on and off the site in its vicinity as appropriate, include a 10% biodiversity net gain, and provide a soft edge to the urban area where it meets the countryside; v. Transport measures including: <ul style="list-style-type: none"> • highway and junction improvements on Humber Doucy Lane and Tuddenham Road; • walking and cycling infrastructure to link the site to key social and economic destinations including the town centre, and local services and facilities; • public transport enhancements; and • appropriate transport mitigation measures that arise from demand created by the development, in line with the ISPA Transport Mitigation Strategy; vi. Development will need to be phased and delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure sufficient primary school capacity is provided to meet demand generated
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	<p>from the strategic allocation at the northern end of Humber Doucy Lane;</p> <p>vii. The development will be triggered by the ability to provide the necessary primary school capacity on the Red House element of Ipswich Garden Suburb or an agreement between the landowner and Suffolk County Council, as the Education Authority, to provide a primary school on the Humber Doucy Lane development;</p> <p>viii. As part of the master planning work, the opportunity for the provision of convenience retail on site should be assessed in order to reduce travel demand, taking into account any effects on the viability of existing local retail facilities; and</p> <p>ix. A financial contribution to off-site healthcare facilities.</p>
Policy CS16: Green Infrastructure, Sport and Recreation	<p>The Council will safeguard, protect and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well-designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community. The Council will enhance and extend the ecological network and green corridors, blue corridors, open spaces and sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:</p> <ul style="list-style-type: none"> a) requiring all developments to contribute to the provision of open space necessary for that development in accordance with Policy DM6; b) requiring major new developments to include usable on-site public open spaces and wildlife habitat. On-site provision must create a network or corridor with existing green infrastructure where such an ecological network or green corridor exists beyond the site boundaries; c) supporting proposals or activities that protect, enhance or extend open spaces and sport and recreation facilities, including water and river-based activities; d) working with partners to prepare, implement and monitor the Recreational Disturbance Avoidance and Mitigation Strategy and other strategies and management plans for green spaces, including an Orwell Country Park management plan, that will result in a reduced impact upon birds in the Orwell Estuary; e) supporting the Greenways Project in working with communities and volunteers to manage green corridors in Ipswich; f) support the enhancement of canopy cover and ecological networks; g) working with partners to improve green infrastructure provision and link radial ecological networks and green corridors with a publicly accessible green trail around Ipswich;

	<ul style="list-style-type: none"> h) working with strategic partners and developers to ensure the provision of a new country park and visitor centre within the Ipswich Garden Suburb, and an extension to Orwell Country Park; i) promoting improved access to existing facilities where appropriate; j) reviewing the Town's estate of sports facilities to consider how they can best meet the needs of a growing population; and k) working with local police and community partners to ensure that appropriate opportunities to design out crime have been taken prior to the commencement of any project and as part of the on-going management of any open spaces, sport or recreational facilities. <p>Policies in this plan and the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review identify existing, new and proposed open spaces, sport and recreation facilities, green corridors and networks and allocate sites for new open spaces and facilities.</p>
Policy CS17: Delivering Infrastructure	<p>The Council will require all developments to meet the on and off-site infrastructure requirements needed to support the development and mitigate the impact of the development on the existing community and environment.</p> <p>Each development will be expected to meet site related infrastructure needs and in order to meet the requirements of Policy CS5 in relation to wider modal shift objectives, development proposals will include off-site works or financial contributions towards delivery of sustainable transport improvements. Where the provision of new, or the improvement or extension of existing, off- site infrastructure is needed to support a new development or mitigate its impacts, and it is not anticipated that the infrastructure will be provided through CIL, the development will be required to contribute proportionately through a Section 106 Agreement commuted sum, or other mechanism as agreed with the Council.</p> <p>Section 106 Agreements will apply to all major developments and some minor developments but may be varied according to:</p> <ul style="list-style-type: none"> a) the scale and nature of the development and its demonstrated viability; and b) whether or not a planning obligation meets all of the statutory reasons ('tests') for granting planning permission. <p>The broad categories of infrastructure to be secured or financed from new developments are as follows and detailed further in Appendix 2:</p> <ul style="list-style-type: none"> i. highways and transport, including measures to achieve modal shift; ii. childcare, early years and education;

	<ul style="list-style-type: none"> iii. health including acute care and emergency services; iv. environment and conservation; v. community and cultural facilities including heritage and archaeology; vi. sport and recreation; vii. economic development; and viii. utilities. <p>Key strategic infrastructure requirements needed to deliver the objectives of the Core Strategy include the following (not in priority order):</p> <ul style="list-style-type: none"> ix. Ipswich flood defences; x. sustainable transport measures and accessibility improvements between the Central Shopping Area, Waterfront and railway station; xi. measures to increase and maximise east-west capacity in the public transport system to ease congestion; xii. strategic education provision of new schools; xiii. strategic green infrastructure including a country park; xiv. sports and leisure facilities serving the whole Borough; xv. community facilities including GP surgeries, health centres and key acute inpatient and outpatient facilities; xvi. water management infrastructure; xvii. new primary electricity substation in Turret Lane; xviii. town centre environmental enhancements; and xix. ultrafast broadband and the opportunity for full fibre broadband to the premises (FTTP). <p>There are specific requirements linked to the Ipswich Garden Suburb that are identified in the Ipswich Garden Suburb supplementary planning document that has been adopted in advance of any development taking place there.</p> <p>The Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment and in the Recreational Disturbance Avoidance and Mitigation Strategy can be addressed and delivered, including for any measures not classified as infrastructure.</p>
Policy CS20: Key Transport Proposals	<p>The Council supports key transport proposals needed to mitigate the traffic impacts within Ipswich of planned growth within the Ipswich Strategic Planning Area. These may include:</p> <ul style="list-style-type: none"> a) Measures to increase bus usage such as a quality bus partnership or demand responsive transport; b) Promoting 'Smarter Choices' and requiring travel planning for larger new developments; c) The use of new and emerging technologies and the delivery of more electric vehicle charging points; d) Reviewing park and ride provision, with an ambition to re-establish the Bury Road Park and

	<p>Ride service and site and exploring the feasibility of a new park and ride facility at Nacton Road;</p> <ul style="list-style-type: none"> e) Adopting an Ipswich Town Centre parking plan; f) Enhancing cycling and walking infrastructure; g) Infrastructure improvements where necessary; and h) Exploring longer term legislative measures to help improve air quality. <p>The menu of potential measures is set out in the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (ISPA). A detailed action plan will be identified through the ISPA Board. Transport mitigation measures will be funded through developer contributions, Local Transport Plan funding, New Anglia Local Enterprise Partnership funding, the National Highways capital funding programme and bidding for other relevant funds.</p> <p>The Council will support further measures to facilitate cycling and walking in the Borough, including crossings of the river and railway lines to improve connectivity between residential communities and jobs, services or facilities and transport hubs, and to prioritise pedestrians and cyclists in Ipswich Town Centre. The Council will also support ongoing work to examine the feasibility of a Wet Dock Crossing, which may consist of Bridges B and C of the Upper Orwell Crossings project and, notwithstanding the results, measures to enable the redevelopment of the Island Site (site IP037).</p> <p>Land allocations or safeguarding for transport facilities are detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review and Policy CS10/ Table 8B for Ipswich Garden Suburb.</p>
Policy DM6: Provision of New Open Spaces, Sports and Recreation Facilities	<p>In all new residential developments of 10 dwellings or more (or on sites of 0.5ha or more), the Council will require provision of high-quality open spaces and sports and recreation facilities to meet the needs of their occupiers. The types and required standards of these spaces and facilities are identified in Appendix 3.</p> <p>There will be a preference for on-site provision where practicable, however off-site contributions may be appropriate depending on the size of the site and the level of existing provision within its walking catchment. If there are deficits of certain types of open spaces or facilities within the walking catchment of the development site, meeting these needs should be prioritised. Standards for children's and young people's facilities will be not be applied to elderly persons' accommodation and nursing homes.</p> <p>The design and layout of spaces and facilities should be delivered in accordance with the detailed design criteria set out in the Public Open Spaces Supplementary Planning Document (SPD) (2017) and the most up-to-date</p>

	<p>guidance in Secured By Design. The delivery of open space provision will not be a substitute for high-quality landscaping within new development. New open spaces and sport and recreation facilities should provide ecological enhancements as part of their design and implementation.</p> <p>There may be circumstances where development would more suitably accommodate greater provision of one typology at the expense of another. Such circumstances will be considered on their merits.</p> <p>The effect of on-site provision and/or off-site enhancements on development viability will also be a consideration, although the resultant provision to account for this must not be at a level that the development would not be deemed sustainable in either social or environmental terms.</p> <p>For non-residential developments of 1,000 sq. m floor space or more, contribution to public open spaces and outdoor sports facilities will be negotiated on a case by case basis. Open space over and above site landscaping should be provided where appropriate, for the health and wellbeing of employees.</p> <p>Public green spaces should be well overlooked by new properties, and the provision within large-scale developments should be meaningful, usable and distributed throughout the site.</p>
Policy DM8: The Natural Environment	<p>All development must incorporate measures to provide net gains for biodiversity.</p> <p>Proposals which would result in significant harm or net loss to biodiversity, having appropriate regard to the 'mitigation hierarchy', will not normally be permitted.</p> <p><u>Sites of International and National Importance</u></p> <p>Proposals which would have an adverse impact on European protected sites will not be permitted, either alone or in combination with other proposals, unless imperative reasons of overriding public interest exist in accordance with the provisions of the European Habitats Directive.</p> <p>Sites of Special Scientific Interest (SSSI) will be protected from development, which directly or indirectly would have an adverse effect on their natural value. An exception will only be made where a proposed development:</p> <ol style="list-style-type: none"> could not be located on an alternative site that would cause less harm; would deliver benefits that clearly outweigh the impacts on the site's special interest and on the national network of such sites; and would compensate for the loss of natural capital.

	<p>Any development with the potential to impact on a Special Protection Area, or Special Area for Conservation or Ramsar site within the Borough will need to be supported by information to inform a Habitats Regulations Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017, as amended (or subsequent revisions).</p> <p>Financial contributions will be secured in relation to the avoidance and mitigation of impacts of increased recreation, to contribute towards the provision of strategic mitigation as established through the Recreational Disturbance Avoidance and Mitigation Strategy.</p> <p>Where mitigation is proposed to be provided through alternative mechanisms, applicants will need to provide evidence to demonstrate that all impacts are mitigated, including incombination effects. Depending on the size and location of the development, additional measures such as Suitable Alternative Natural Greenspaces (SANGS) may be required as part of development proposals.</p> <p><u>Local Nature Reserves and County Wildlife Sites</u></p> <p>Planning permission will not be granted for development that would result in damage or loss in extent or otherwise have a significant adverse effect on: locally designated County Wildlife Sites and geological sites; Local Nature Reserves; or Local Wildlife Sites, if the harm cannot be avoided, adequately mitigated, or, as a last resort, compensated for.</p> <p>Enhancements for protected sites will be required from new development.</p> <p><u>Priority Habitats and Species</u></p> <p>Development which could harm, directly or indirectly, species, which are legally protected, or species and habitats that have been identified as Species or Habitats of Principal Importance in England (also known as Section 41 or 'Priority' species and habitats) will not be permitted unless the harm can be avoided or mitigated by appropriate measures.</p> <p>Development must include enhancements for protected and priority species as part of their design and implementation.</p> <p><u>Enhancing Ecological Networks</u></p> <p>The Council will enhance the ecological network across the Borough as identified on Plan 5. The designated sites are ranked 1 and 2 High Conservation Value. Within the remaining core areas of the ecological network and the corridors which link them, development proposals will be required to have regard to existing habitat features and the wildlife corridor function, through their design and</p>
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	<p>layout, and achieve net biodiversity gains commensurate with the scale of the proposal, through measures such as retaining existing habitat features, habitat restoration or re-creation and comprehensive landscaping, which is appropriate to local wildlife. Development which that would fragment the corridor function will not be permitted unless there is adequate mitigation.</p> <p>Within the buffer zones around core areas and corridors, development will be required to enhance the ecological network, through measures such as wildlife beneficial landscaping.</p>
Suffolk Coastal Local Plan (adopted September 2020)	
Policy SCLP10.1: Biodiversity and Geodiversity	<p>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 firstly to 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.</p> <p>Proposals that will have a direct or indirect adverse impact (alone or in-combination with other plans or projects) on locally 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 location, outweighs the biodiversity loss.</p> <p>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.</p> <p>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.</p> <p>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</p>

	<p>suitably qualified person. If present, the proposal must follow the mitigation hierarchy in order to be considered favourably. 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.</p> <p>Any development with the potential to impact on a Special Protection Area, Special Area for Conservation or Ramsar site within or outside of the plan area will need to be supported by information to inform a Habitat Regulations Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017, as amended (or subsequent revisions).</p> <p>The Recreational disturbance Avoidance and Mitigation Strategy has been prepared to provide a mechanism through which impacts from increased recreation can be avoided and mitigated via financial contributions towards the provision of strategic mitigation. Where mitigation is proposed to be provided through alternative mechanisms, applicants will need to provide evidence to demonstrate that all impacts are mitigated for, including in-combination effects. Depending on the size and location of the development, additional measures such as Suitable Alternative Natural Green Spaces (SANGS) may be required as part of development proposals.</p> <p>A Supplementary Planning Document will be prepared to assist with the implementation of the Recreational disturbance Avoidance and Mitigation Strategy. The Council will work with neighbouring authorities and Natural England to implement this strategy.</p>
Policy SCLP10.2: Visitor Management of European Sites	<p>The Council has a duty to ensure that development proposals will not result in an increase in activity likely to have a significant effect upon sites designated as being of international importance for their nature conservation interest.</p> <p>Applications for new car parking provision (public or privately owned which are available for wider public use) located within 1km boundary of a designated site or new access points direct into the estuary such as slipways or jetties will need to demonstrate that they will not result in an increase in activity likely to have a significant effect upon a European site whether on their own, or in combination with other uses. Such proposals need to be subject to a project level Habitats Regulation Assessment.</p>
Policy SCLP12.24: Land at Humber Doucy Lane	<p>9.9ha of land to the east of Humber Doucy Lane is identified to come forward for the development of approximately 150 dwellings in conjunction with land identified in the Ipswich Local Plan. Development will only come forward as part of a masterplanned approach with land in Ipswich Borough.</p> <p>Development will be expected to comply with the following criteria:</p>

	<ul style="list-style-type: none"> a) Delivery of a high quality design incorporating a mix of housing types, including affordable housing on-site; b) A site-specific Flood Risk Assessment will be required; c) Provision of 0.1ha of land for an early years setting if needed within the part of the site in East Suffolk; d) Contribution to the creation of a 'green trail' around Ipswich and provision of on-site open space; e) Provision for sufficient primary school spaces; f) Provision of a soft edge to the urban area through the provision of significant landscaping; g) Promotion of the use of sustainable modes of transport; h) An archaeological assessment will be required; i) Design, layout and landscaping of the development should be carefully designed to preserve the setting of the nearby listed buildings; and j) A project level Habitats Regulations Assessment will be required. <p>Development will be accessed via Humber Doucy Lane. A Transport Assessment will be required to identify any necessary improvements to highways and junctions on Humber Doucy Lane and Tuddenham Road.</p>
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Appendix C

European Site Characteristics

Table 1. Site Characteristics

Stour and Orwell Estuaries Ramsar	
Distance and direction from Site	c. 4.8km south
Size	3,324ha
Grid reference	TM 296 434
Component SSSIs	Stour Estuary SSSI and Orwell Estuary SSSI within 13km
Qualifying features	<p>The Ramsar designation is for qualifying Annex II species black-tailed godwit <i>Limosa limosa islandica</i> (wintering), dark-bellied brent goose <i>Branta bernicla bernicla</i> (wintering), dunlin <i>Calidris alpina alpina</i> (wintering), grey plover <i>Pluvialis squatarola</i> (wintering), knot <i>Calidris canutus</i> (wintering), pintail <i>Anas acuta</i> (wintering) and redshank <i>Tringa tetanus</i> (wintering and passage).</p> <p>Additionally, it is designated for its wintering waterbird assemblage, wetland invertebrate assemblage and wetland plant assemblage.</p> <p>The wetland invertebrate assemblage includes the muscid fly <i>Phaonia fusca</i>; the horsefly <i>Haematopota grandis</i>; two spiders, <i>Arctosa fulvolineata</i> and <i>Baryphema duffeyi</i>; and the endangered swollen spire snail <i>Mercuria confusa</i>.</p> <p>The wetland plant assemblage includes stiff saltmarsh-grass <i>Puccinellia rupestris</i>, small cord-grass <i>Spartina maritima</i>, perennial glasswort <i>Sarcocornia perennis</i>, lax-flowered sea lavender <i>Limonium humile</i> and the eelgrasses <i>Zostera angustifolia</i>, <i>Z. marina</i> and <i>Z. nolte</i>.</p>
Published Conservation Objectives	<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;</p> <ul style="list-style-type: none"> • 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.
Known vulnerabilities	<p>Erosion through natural coastal processes exacerbated by fixed sea defences, port development and maintenance dredging.</p> <p>Disturbance to birds, air pollution and new development.</p>

Table 2. Site Characteristics

Stour and Orwell Estuaries SPA	
Distance and direction from Site	c. 4.8km south
Size	3,667.37ha
Grid reference	TM 189 347
Component SSSIs	Stour Estuary SSSI and Orwell Estuary SSSI within 13km
Qualifying features	<p>The SPA designation is for qualifying Annex II species avocet, black-tailed godwit <i>Limosa limosa islandica</i>, dark-bellied brent goose, dunlin <i>Calidris alpina alpina</i>, grey plover <i>Pluvialis squatarola</i>, knot <i>Calidris canutus</i>, pintail <i>Anas acuta</i> and redshank <i>Tringa tetanus</i>.</p> <p>It is also designated for its waterbird assemblage.</p>

Published Conservation Objectives	<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;</p> <ul style="list-style-type: none"> • 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.
Known vulnerabilities	Threats, pressures and activities with impacts identified on the Natura 2000 Standard Data Form include other urbanisation, industrial and similar activities; fishing and harvesting aquatic resources; outdoor sports and leisure/recreational activities; changes in abiotic conditions; and changes in biotic conditions.

Table 3. Site Characteristics

Deben Estuary Ramsar	
Distance and direction from Site	c. 6.7km east
Size	978.93ha
Grid reference	TM 296 434
Component SSSIs	Deben Estuary SSSI, Ramsholt Cliff SSSI and Ferry Cliff, Sutton SSSI within 13km
Qualifying features	The Ramsar designation is for qualifying Annex II species dark-bellied brent goose (wintering) and the mollusc <i>Vertigo angustior</i> .
Published Conservation Objectives	<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;</p> <ul style="list-style-type: none"> • 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.
Known vulnerabilities	There is erosion from coastal squeeze within Deben Estuary, disturbance to birds, air and water pollution.

Table 4. Site Characteristics

Deben Estuary SPA	
Distance and direction from Site	c. 6.7km east
Size	981.08ha
Grid reference	TM 296 434
Component SSSIs	Deben Estuary SSSI, Ramsholt Cliff SSSI and Ferry Cliff, Sutton SSSI within 13km
Qualifying features	The SPA designation is for qualifying Annex II species dark-bellied brent goose and avocet <i>Recurvirostra avosetta</i> .

Published Conservation Objectives	<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;</p> <ul style="list-style-type: none"> • 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.
Known vulnerabilities	Threats, pressures and activities with impacts identified on the Natura 2000 Standard Data Form include outdoor sports and leisure/recreational activities, pollution to groundwater (point sources and diffuse sources), changes in abiotic conditions and changes in biotic conditions.

Table 4. Site Characteristics

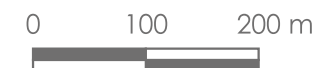
Sandlings SPA	
Distance and direction from Site	c. 11km east
Size	3,405.72ha
Grid reference	TM 368 516
Component SSSIs	Sandlings Forest SSSI and Sutton and Hollesley Heaths SSSI within 13km
Qualifying features	The SPA designation is for qualifying Annex II species nightjar <i>Caprimulgus europaeus</i> and woodlark <i>Lullula arborea</i> .
Published Conservation Objectives	<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;</p> <ul style="list-style-type: none"> • 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.
Known vulnerabilities	Threats, pressures and activities with impacts identified on the Natura 2000 Standard Data Form include outdoor sports and leisure/recreational activities, air pollution/air-borne pollutants, problematic native species, biocenotic evolution/succession and changes in biotic conditions.

Appendix D

Habitats Plan



- Site boundary
- Arable and horticulture (c1)
- Modified grassland (g4)
- Mixed scrub (h3h)
- Other woodland-broadleaved (w1g)
- Other neutral grassland (g3c)
- Hedgerows (Priority Habitat) (h2a)
- Mature Trees
- Fn Field reference

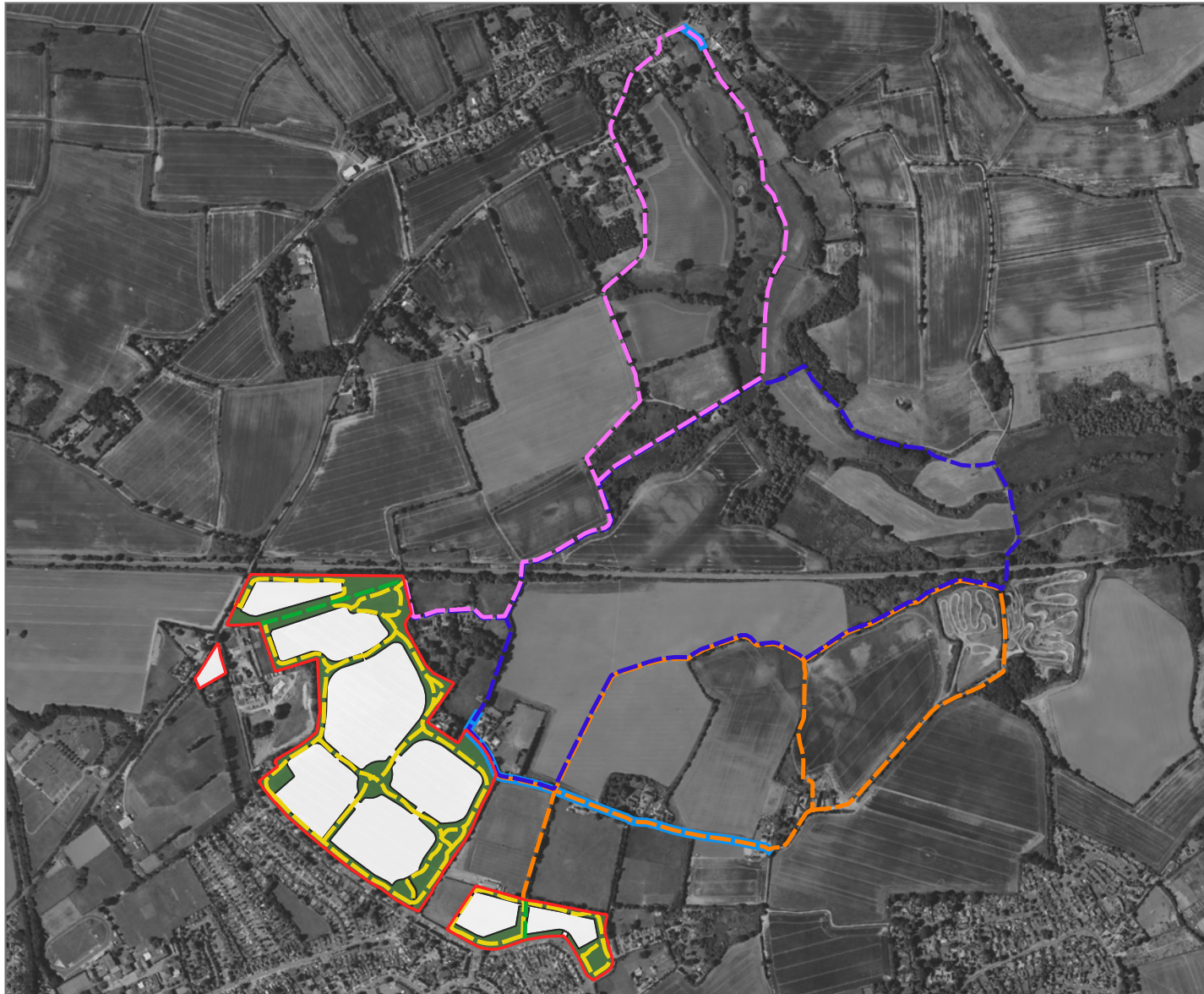


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Project	Land East of Humber Doucy Lane, Ipswich	Date	February 2024	Drawing No.	CSA/6675/111
Drawing Title	Habitats Plan	Scale	Refer to scale	Rev	-
Client	Barratt David Wilson & Hopkins Homes	Drawn	LF/MD	Checked	CH

Appendix E

Walking Routes Plan



- Site boundary
- Open space
- Development area
- Quiet Lanes
- On-site Public Right of Way
- On-site recreational routes
- Walking route 1 (2.1km, extended option 3km)
- Walking route 2 (4.3km)
- Walking route 3 (4.2km)



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Project	Land North-east of Humber Doucy Lane	Date	February 2024	Drawing No.	CSA/6675/119
Drawing Title	Walking Routes Plan	Scale	Refer to scale	Rev	-
Client	Hopkins Homes & Barratt David Wilson	Drawn	RG	Checked	JW

Appendix F

Site Recreational Routes



- Site boundary
- Open space
- Development area
- Dogs-off-lead area
- Quiet Lanes
- On-site Public Right of Way
- On-site recreational routes
- Off-site Walking Route 1 (including extended option)
- Off-site Walking Route 2
- Off-site Walking Route 3
- No footway along northern end of Humber Doucy Lane

0 200 400 m

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Project	Land North-east of Humber Doucy Lane	Date	February 2024	Drawing No.	CSA/6675/122
Drawing Title	Site Recreation Routes	Scale	Refer to scale	Rev	-
Client	Hopkins Homes & Barratt David Wilson	Drawn	RG	Checked	JW



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