



Habitats Regulations Assessment of the Draft Bredfield Neighbourhood Plan

June 2019

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1. Introduction

1.1 The European Habitats Directive¹ and Wild Birds Directive² 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) also states that Ramsar sites should be afforded the same level of protection as the European sites.

1.2 The requirement to undertake Habitats Regulation 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) 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.

¹ 92/43/EEC

² 2009/147/EEC

- Stage 1: Determining whether a plan is likely to have a significant effect on a European 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 Union³, 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 European 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 Bredfield Neighbourhood Plan is being produced by Bredfield Parish Council. This report considers whether there are likely to be significant effects on protected European sites and where a full Appropriate Assessment may be required. Where Appropriate Assessment is identified as necessary, this has been carried out.
- 1.6 The Bredfield Neighbourhood Plan will need to be in general conformity with the strategic policies of the Local Plan. The adopted Local Plan is currently the Core Strategy and Development Management Policies (2013), the Site Allocations and Area Specific Policies DPD (2017) and saved policies contained in the Local Plan (2001), however a new Local Plan for the Suffolk Coastal area of East Suffolk is currently being prepared and is well advanced. The Bredfield Neighbourhood Plan is therefore being developed within the

³ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

context of the relevant policies contained in the emerging Suffolk Coastal Local Plan (the Suffolk Coastal Final Draft Local Plan, January 2019).

- 1.7 The emerging Suffolk Coastal Local Plan has been subject to Habitats Regulations Assessment as part of its production. Where screening identified a likely significant effect, an Appropriate Assessment was undertaken and mitigation measures identified were incorporated within the Final Draft Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on European wildlife sites within and in the vicinity of the (then) Suffolk Coastal District. The 2013 Core Strategy was also previously subject to strategic level Appropriate Assessment which concluded that without mitigation there would be a significant effect on Natura 2000 sites, alone and in combination with other plans. The Appropriate Assessment identified recreational disturbance particularly from dog walkers as the main significant effect. The Council has subsequently undertaken to produce a Recreational Avoidance and Mitigation Strategy and requires payment towards mitigation from residential developments within 13km of the protected European 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 Bredfield Neighbourhood Plan area (for consistency with the distances applied within the HRA of the emerging 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 Final Draft Local Plan.

Table 1: Relevant European protected sites

Name
Alde-Ore and Butley Estuaries SAC
Orfordness – Shingle Street SAC
Staverton Park and The Thicks, Wantisden SAC
Alde-Ore Estuary SPA
Deben Estuary SPA
Outer Thames Estuary SPA

Sandlings SPA
Stour and Orwell Estuaries SPA
Alde-Ore Estuary Ramsar
Deben Estuary Ramsar
Stour and Orwell Estuaries Ramsar

3. Bredfield Neighbourhood Plan

- 3.1 Bredfield Parish Council is producing a Neighbourhood Plan for Bredfield, in order to set out the vision, objectives and policies for the development of the parish up to 2036, within the context of the emerging Suffolk Coastal Local Plan. This HRA report reviews the Bredfield Neighbourhood Plan (Submission version).
- 3.2 The Neighbourhood Plan includes a range of policies covering the Bredfield Neighbourhood Plan area. A number of policies relate to the full Neighbourhood Plan area whilst others are area/location specific. The Plan allocates three specific sites for new housing development (Policy BDP 15 Sites for Development).
- 3.3 The policies in the Bredfield Neighbourhood Plan are listed in Table 2 below. An assessment of whether each policy is likely to have a significant effect on European protected sites is included in section 5 of this report.

Table 2: List of Neighbourhood Plan policies

BDP 1	Maintaining Distinctive Views
BDP 2	Maintaining the Landscape
BDP 3	Maintaining Priority Habitats
BDP 4	Green Spaces
BDP 5	Locally Valued Heritage Assets
BDP 6	Protecting Sites of Archaeological Interest
BDP 7	Farming and Agriculture
BDP 8	Small Scale Business and Tourism
BDP 9	Expansion of Business Premises
BDP 10	Vehicle Parking
BDP 11	Transport Considerations in New Development
BDP 12	Future Housing

BDP 13	Location of Development
BDP 14	Scale of Development
BDP 15	Sites for Development
BDP 16	Preserving Character
BDP 17	Conversion of Redundant Buildings

4. Other Plans and Projects

- 4.1 Regulation 105 of the 2017 Regulations 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 emerging Local Plan is well advanced, and was submitted for Examination in March 2019. Until the adoption of the new Local Plan, the adopted Core Strategy and Development Management Policies (2013) and Site Allocations and Area Specific Policies DPD (2017) also contain relevant policies. The emerging Local Plan sets out the broad scale and distribution of development across the area of East Suffolk formerly covered by Suffolk Coastal District. This has been subject to an Appropriate Assessment as part of its production. The current adopted plan is the Core Strategy and Development Management Policies 2013 which was adopted in July 2013 and was subject to a strategic level appropriate assessment. The currently adopted Site Allocations and Area Specific Strategies DPD (2017) implements the policies and development strategy set out in the Core Strategy.
- 4.5 The Bredfield Neighbourhood Plan policies interpret the strategy and policies of the emerging Local Plan at a local level. The policies contained in the Draft Bredfield Neighbourhood Plan are proposed to provide locally specific, criteria based policy guidance for the determination of planning applications.
- 4.6 Policy SCLP12.1 of the emerging Local Plan provides an indicative minimum housing figure of 20 to the Bredfield Neighbourhood Plan area for the period 2018 – 2036. The Bredfield Neighbourhood Plan identified three sites to deliver this housing requirement. The allocated sites have potential to deliver up to 30 new homes. On the allocations (for 10 units) has outline planning permission.

- 4.7 A screening process has considered each policy in the emerging Suffolk Coastal Local Plan and concluded whether significant effects are likely and that an Appropriate Assessment is needed. The Appropriate Assessment of has 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 Draft Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on European wildlife sites within and in the vicinity of the (then) Suffolk Coastal District.
- 4.8 The 2013 Core Strategy was also previously subject to strategic level Appropriate Assessment which concluded that without mitigation there would be a significant effect on Natura 2000 sites, alone and in combination with other plans. The Appropriate Assessment identified recreational disturbance particularly from dog walkers as the main significant effect. The Council has subsequently undertaken to produce 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. Assessment of likely effects of the Bredfield Neighbourhood Plan on European protected sites

- 5.1 Table 3 below considers each policy of the Bredfield Neighbourhood Plan in relation to whether there is potential for a likely significant effect on protected European sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected 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 Bredfield Neighbourhood Plan

Policy	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
BDP 1- Maintaining Distinctive Views	This policy seeks to maintain locally significant views. The policy identifies four specific views to be afforded particular protection. The policy builds on SCLP10.4: Landscape Character of the emerging Local Plan. The Habitats Regulation Assessment of the emerging Local Plan identified no likely significant effects from policy SCLP10.4. Therefore policy BDP 1 will not result in any likely significant effects.	None	None	No
BDP 2- Maintaining the Landscape	This policy seeks to maintain the landscape character of Bredfield and identifies specific landscape features that should, where practicable, be maintained. The policy builds on SCLP10.4: Landscape Character of the emerging Local Plan. The Habitats Regulation Assessment of the emerging Local Plan identified no likely significant effects from policy SCLP10.4. Therefore policy BDP 2 will not result in any likely significant effects.	None	None	No

Policy	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
BDP 3- Maintaining Priority Habitats	<p>The policy seeks to protect and enhance the key features of the landscape including the priority habitats, as defined in the UK Biodiversity Action Plan: Priority Habitat Descriptions.</p> <p>The policy builds on SCLP10.1: Biodiversity and Geodiversity and SCLP10.4: Landscape Character of the emerging Local Plan. The Habitats Regulation Assessment of the emerging Local Plan identified no likely significant effects from policy SCLP10.4. Likely Significant Effects were identified through the HRA screening for policy SCLP10.1: Biodiversity and Geodiversity. Therefore full Appropriate Assessment was undertaken and mitigation incorporated into the Local Plan.</p> <p>This policy will contribute towards the principles of the of the enhancement of the wider environment and therefore no likely significant effects are identified.</p>			

Policy	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
BDP4- Green Spaces	This policy identifies and protects five Local Green Spaces. This policy also encourages opportunities to improve the quality, quantity of and access to green space. The policy may have indirect positive effects on European protected sites by ensuring access to local green spaces, thereby reducing potential for increased pressure on European protected sites. Therefore no likely significant effects are identified.	None	None	No
BDP 5- Locally Valued Heritage Assets	The policy identifies a number of locally valued heritage assets, and sets out an overall approach to protecting these assets. The policy builds on policy SCLP11.6: non designated Heritage Assets of the emerging local plan. The Habitats Regulation Assessment of policy SCLP11.6 concluded no likely significant effects. This policy will not have a direct effect on any European protected sites and no likely significant effects are identified.	None	None	No

Policy	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
BDP 6- Protecting Sites of Archaeological Interest	This policy identifies several sites of archaeological interest and sets out an overall approach to considering the impact of development of archaeological deposits. The policy builds on policy SCLP11.7: Archaeology of the emerging local plan. The Habitats Regulation Assessment of policy SCLP11.7 concluded no likely significant effects. This policy will not have a direct effect on any European protected sites and no likely significant effects are identified.	None	None	No
BDP 7- Farming and Agriculture	The policy supports proposals for the development of facilities of farming, arboricultural enterprises or small holdings. The policy includes criteria for the consideration of such proposals. This policy has no direct impacts on European sites and therefore no likely significant effects have been identified.	None	None	No

Policy	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
BDP 8- Small Scale Business and Tourism	This policy encourages and supports small-scale business and tourism uses which provide community benefits. The policy includes criteria for the consideration of such proposals. This policy has no direct impacts on European sites and therefore no likely significant effects have been identified.	None	None	No
BDP 9- Expansion of Business Premises	This policy supports the limited expansion of an existing employment site within the neighbourhood plan area . The policy includes criteria for the consideration of such proposals. This policy has no direct impacts on European sites and therefore no likely significant effects have been identified.	None	None	No
BDP 10- Vehicle Parking	This policy seeks to ensure that sufficient off-road parking is provided on new development. This policy has no direct impacts on European sites and therefore no likely significant effects have been identified.	None	None	No

Policy	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
BDP 11- Transport Considerations in New Development	This policy requires development proposals to be accompanied by information demonstrating how development proposals support the provision of walking and cycling routes and improved links to public transport. This policy has no direct impacts on European sites and therefore no likely significant effects have been identified.	None	None	No
BDP 12- Future Housing	This policy sets out a local approach to housing mix, prioritising the provision of one/two bed and two/three bed homes to attract younger people and those downsizing. This policy builds on policy SCLP5.8: Housing Mix of the emerging 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 European protected sites and no likely significant effects are identified.	None	None	No

Policy	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
BDP 13- Location of Development	This policy sets out minor amendments to the settlement boundary for Bredfield. This policy builds on policy SCLP3.3: Settlement Boundaries of the emerging Local Plan. The Habitats Regulation Assessment of policy SCLP3.3 concluded no likely significant effects. This policy will not have a direct effect on any European protected sites and no likely significant effects are identified.	None	None	No
BDP 14- Scale of Development	The policy limits the scale of new development within the Neighbourhood Plan area to no more than 10 houses. This policy will not have a direct effect on any European protected sites and no likely significant effects are identified.	None	None	No

Policy	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
BDP 15- Sites for Development	<p>This policy identifies three sites for new residential development and sets out a number of criteria to guide development on those sites. All three sites are identified for a maximum of 10 dwellings, one of the allocation already has outline planning permission.</p> <p>All three sites fall within the 13km Zone of Influence (as set out in the Recreational Avoidance and Mitigation Strategy) but are not considered to be in close proximity to any protect European Site (within 400m).</p> <p>Potential likely significant effect on protected European Sites from increased recreational disturbance as the result of population growth arising from increased residential development.</p>	All sites within table 1.	Recreational impacts	Yes

Policy	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
BDP 16- Preserving Character	This policy seeks to ensure that new development is sympathetic to the existing rural character of Bredfield. The policy sets out a number of criteria to be considered in this respect. This policy will not have a direct effect on any European protected sites and no likely significant effects are identified.	None	None	No
BDP 17- Conversion of Redundant Buildings	This policy contains criteria to determine when the conversion of redundant buildings will be permitted. Alternatives used include residential, employment, tourism, recreation, and community uses. This policy will not have a direct effect on any European protected sites and no likely significant effects are identified.	None	None	No

6. Appropriate Assessment

- 6.1 The screening for likely significant effects (table 3) has identified one policy (policy BDP 15) for more in-depth consideration within an appropriate assessment. Once a likely significant effect has been identified, the purpose of the appropriate assessment is to examine evidence and information in more detail to establish the nature and extent of the predicted impacts, in order to answer the question as to whether such impacts could lead to adverse effects on European site integrity. Competent authorities should have enough evidence to satisfy themselves that there are feasible measures to prevent adverse effects.
- 6.2 As set out in table 3 above, Policy BDP 15 of the Bredfield Neighbourhood Plan has been identified as having a potential likely significant effect on protected European Sites from increased recreational disturbance as the result of population growth arising from increased residential development.
- 6.3 Policy BDP 15 identifies three sites for new residential development and sets out a number of criteria to guide development on those sites. All three sites are identified for a maximum of 10 dwellings, with one of the allocated sites already granted planning permission.
- 6.4 All three sites fall within the 13km Zone of Influence (as set out in the Recreational Avoidance and Mitigation Strategy- see below for further information) but are not considered to be in close proximity to any protected European wildlife sites (within 400m).
- 6.5 The impact of increased recreation on the coastal and heathland European wildlife sites has already been recognised in Local Plan HRA work. This has led to collaborative working between the five Suffolk local planning authorities that lie within 13km of the coastal and heathland European sites. Taking a strategic approach to the European site mitigation has resulted in the development of the Suffolk Coast HRA Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).
- 6.6 The RAM Strategy is a means by which sustainable housing growth can be delivered, whilst adequately protecting Suffolk's coastal, estuarine and heathland European wildlife sites. It is being developed as a strategy that

provides a tariff based solution to mitigating the additional recreation pressure risks associated with new development. The RAMS sets out an integrated suite of avoidance and mitigation measures that are supported by comprehensive evidence and experience gained from other European site mitigation strategies.

- 6.7 The RAM Strategy has initially been developed on the basis of the housing numbers and spatial distribution set out in the existing local plans for each of the local planning authorities. However, as confirmed by the conclusions of the HRA of the emerging Local Plan, the RAM Strategy is considered capable of accommodating and mitigating the impact of the levels of residential growth being promoted through the emerging Local Plan (which the Bredfield Neighbourhood Plan is considered to be in general conformity with).
- 6.8 Policies within the Local Plan relating to the delivery of the RAM Strategy are considered to adequately enable appropriate mitigation for the recreation impacts arising from new residential development.

7. Summary and conclusions

- 7.1 The Bredfield Neighbourhood Plan will provide policies which will be used for determining planning applications alongside the Suffolk Coastal Local Plan. It includes locally specific criteria based policies to be used for the determination of planning applications, including the identification of important local views to be protected, locally significant heritage assets, and an amended settlement boundary. The Plan also includes three allocations for new residential development (one of which already has planning permission).
- 7.2 The Neighbourhood Plan is being prepared to be in general conformity with the relevant policies in the emerging Suffolk Coastal Local Plan, and also considers the relevant policies of the currently adopted Core Strategy and Development Management Policies Document (2013) and the Site Allocations and Area Specific Policies DPD (2017).
- 7.3 Policy BD15 of the Bredfield Neighbourhood Plan has been identified through the HRA screening process as having a potential likely significant effect on protected European wildlife sites as the result of increased recreational disturbance. However, as confirmed through the HRA of the emerging Local Plan, the Suffolk Coast HRA Recreational Disturbance Avoidance and Mitigation Strategy provides adequate measures to mitigate this impact and therefore enable a conclusion that the Bredfield Neighbourhood Plan will not lead to any adverse effects on protected European sites.



Signed:

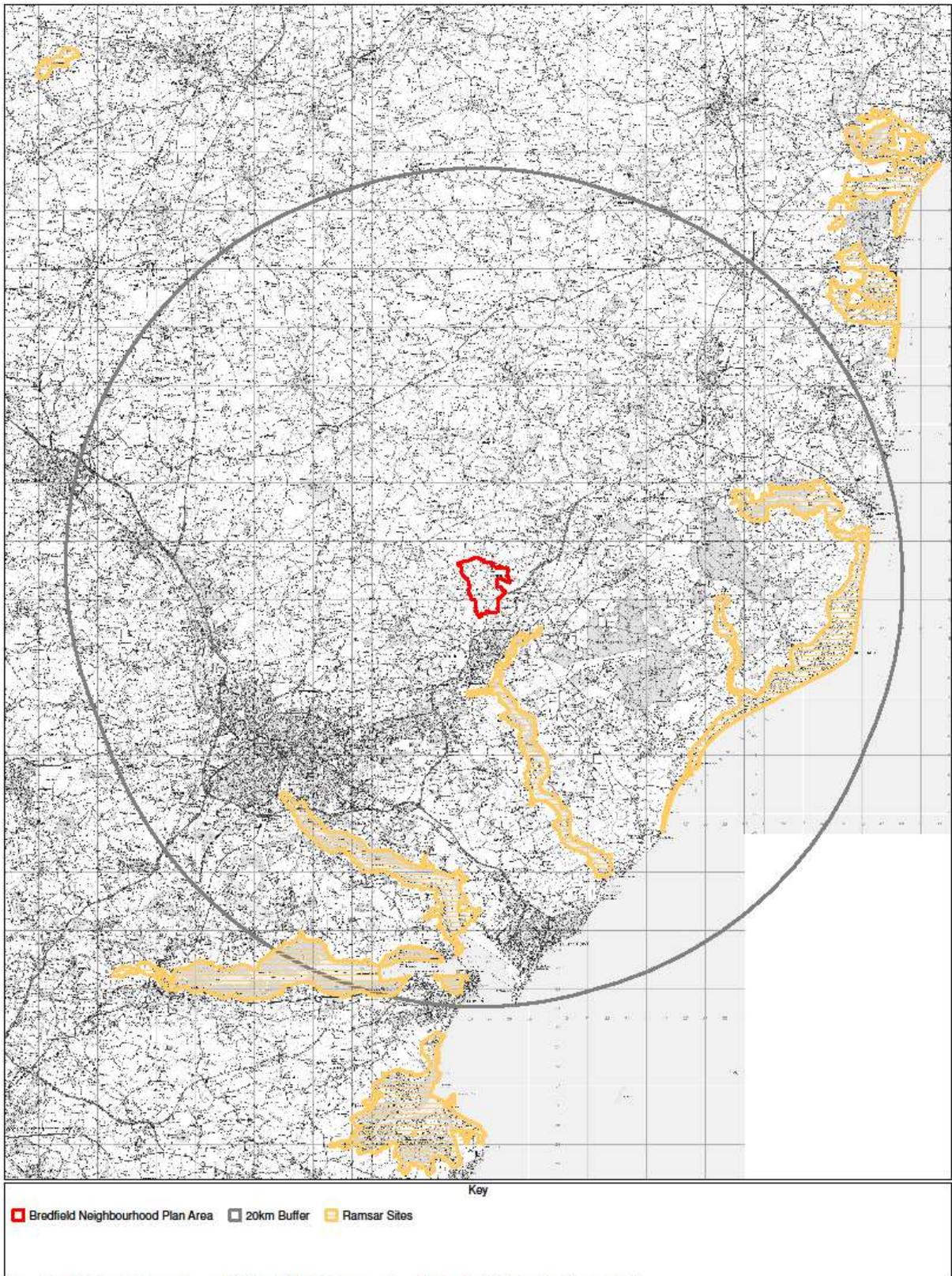
Dated: 20/06/2019

Desi Reed
Planning Policy and Delivery Manager
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 for Suffolk Coastal District Council Proposed Submission Site Allocations and Area Specific Policies (February & March 2016)
- Appropriate Assessment for Modifications to Suffolk Coastal District Council Core Strategy and Development Management Policies June 2013 (Addendum to Appropriate Assessment November 2011)

Appendix 2: Locations of European protected sites



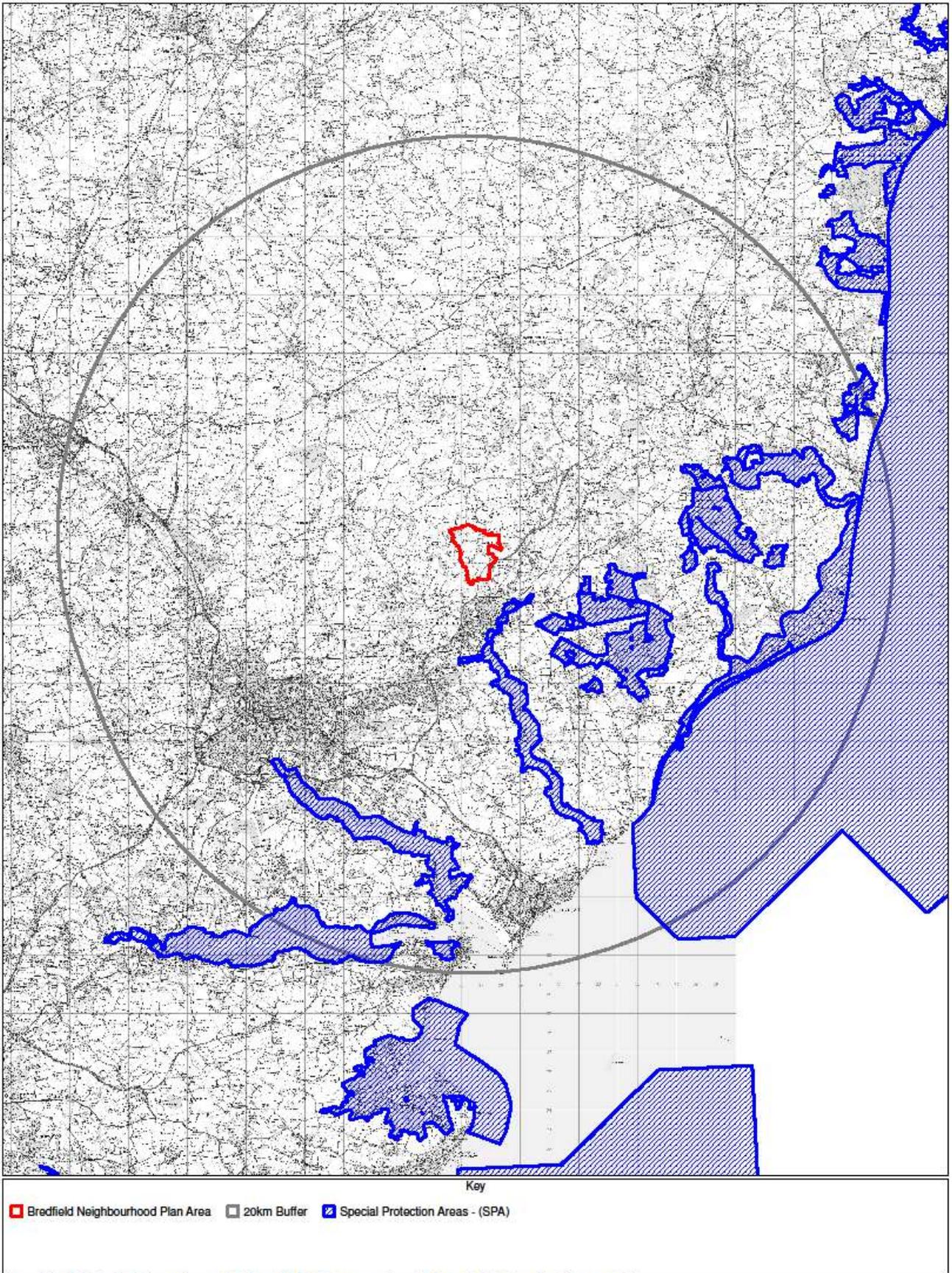
Bredfield Neighbourhood Plan HRA Screening Map 1 (20km buffer only)

East Suffolk Council

Scale 1:170000

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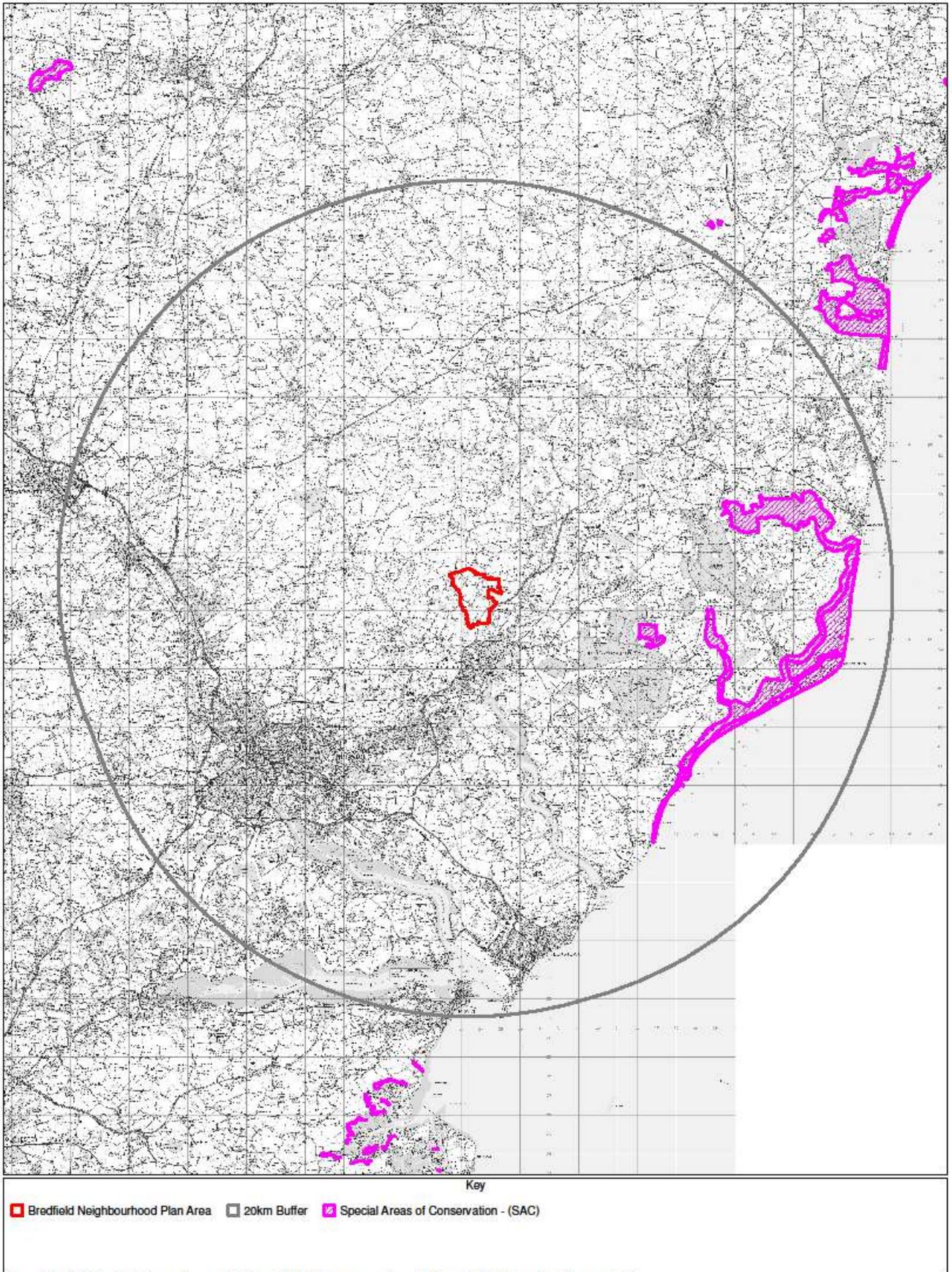
Bredfield Neighbourhood Plan HRA Screening Map 2 (20km buffer only)

East Suffolk Council

Scale 1:170000

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Bredfield Neighbourhood Plan HRA Screening Map 3 (20km buffer only)

East Suffolk Council

Scale 1:170000

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Appendix 3: Relevant European protected 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)
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	Not identified in Suffolk Coastal Final Draft Local Plan HRA.

		typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.	
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 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.	Woodland management, disease, atmospheric pollution.
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	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)

		features; and The distribution of the qualifying features within the site.	
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; 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.	Coastal squeeze, disturbance to birds, water and air pollution.
Outer Thames Estuary	A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: 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;	Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.

		<p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	
Sandlings	<p>A224: European nightjar (breeding)</p> <p>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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	<p>Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.</p>
Stour and Orwell Estuaries (also Ramsar site)	<p>A046a: Dark bellied brent goose (non-breeding)</p> <p>A054: Northern pintail (non-breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A141: Grey plover (non-breeding)</p> <p>A143: Red knot (non-breeding)</p> <p>A149: Dunlin (non-breeding)</p> <p>A156: Black-tailed godwit (non-breeding)</p> <p>A162: Common redshank (non-</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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p>	<p>Coastal squeeze, disturbance to birds, air pollution and new development.</p>

	breeding) Waterbird assemblage	The population of each of the qualifying features; and The distribution of the qualifying features within the site.	
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Appendix 4: Natural England Consultation Response

Subject: RE: Habitats Regulations Assessment - Bredfield Neighbourhood Plan and Mutford Neighbourhood Plan

From: Jackson, John [mailto: [REDACTED]@naturalengland.org.uk]
Sent: 20 June 2019 11:03
To: PlanningPolicy
Subject: RE: Habitats Regulations Assessment - Bredfield Neighbourhood Plan and Mutford Neighbourhood Plan

Dear Andrea,
I am writing to confirm that Natural England agrees with the conclusion of the Bredfield NP HRA that with mitigation in line with RAMS, the small amount of additional development is not likely to have an adverse effect, alone or in combination with plan allocations.
We also agree that the Mutford NP is not likely to have a significant effect.

Best Regards

John

From: PlanningPolicy [mailto:PlanningPolicy@eastsoffolk.gov.uk]
Sent: 14 June 2019 14:07
To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Cc: Jackson, John < [REDACTED]@naturalengland.org.uk >
Subject: Habitats Regulations Assessment - Bredfield Neighbourhood Plan and Mutford Neighbourhood Plan

Dear Sir / Madam

Please find attached documentation relating to Habitats Regulations Assessment of two Neighbourhood Plans in East Suffolk:

- Habitats Regulations Assessment screening opinion and appropriate assessment relating to the Bredfield Neighbourhood Plan, along with the draft Bredfield Neighbourhood Plan against which the assessment has been undertaken. Please note that this version of the Neighbourhood Plan is confidential;
- Habitats Regulations Assessment screening opinion relating to the Mutford Neighbourhood plan. This concludes that no appropriate assessment will be required. The Submission version of the Neighbourhood Plan against which the assessment has been undertaken, can be viewed on our website at <https://www.eastsoffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/mutford-neighbourhood-plan/>.

As these plans are both at a relatively advanced stage, I would be grateful of a response as soon as possible in relation to whether you can confirm that you are in agreement with the conclusions in the attached.

Should you have any queries please do not hesitate to contact me.

Regards
Andrea McMillan



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East Suffolk Council is a new district authority which, from April 2019, delivers services for the residents, businesses and communities previously served by Suffolk Coastal and Waveney District Councils