



Mrs Hanslip  
Suffolk Coastal District Council  
East Suffolk House  
Station Road  
Melton  
Woodbridge  
IP12 1RT

1st March 2017

Dear Mrs Hanslip

**Re: Melton Neighbourhood Plan**

**Background**

We understand that Melton Neighbourhood Plan has been prepared by Melton Parish Council and is currently subject to public consultation prior to independent examination and referendum. The RSPB objects at present to the proposed allocation of land off Wilford Bridge Road (Policy MEL21) for housing, commercial use and open space as we consider that insufficient provision has been made for the mitigation of potential impacts on the Deben Estuary SPA and Ramsar site from increases in recreational pressure.

**Nature conservation interests**

The proposed allocation (Policy MEL21) is situated within 500m of the Deben Estuary SSSI, SPA and Ramsar site. The Deben Estuary SPA supports nationally important numbers of avocet over winter and internationally important populations of wintering brent geese. The Deben Estuary Ramsar site is also designated for wintering populations of brent geese and important populations of the snail *Vertigo angustior*, with noteworthy fauna also including redshank and avocet.

**Comments on the Plan**

*Habitats Regulations Assessment*

We are concerned that there is potential for Policy MEL21 to give rise to increased recreational pressure on the Deben Estuary SPA and Ramsar site. Whilst the Woodbridge/Melton area contains a reasonably high density of housing, the in-combination effects of recently approved projects and proposed site allocations in close proximity to the estuary are likely to increase recreational pressures on the SPA and Ramsar site. Whilst we recognise that the development provides greenspace for residents' use and that access to the estuary via the most direct footpath will be restricted, we consider that use of the estuary by residents is still likely, due to its proximity, the attractiveness of the 'wild' estuarine landscape, and the

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availability of longer routes for dog walkers. We therefore consider that additional mitigation is likely to be required.

The Habitats Regulations Assessment (HRA) makes reference to the strategic mitigation scheme for impacts on international sites resulting from increased recreational pressure which is under development for Suffolk Coastal District Council, Babergh District Council and Ipswich Borough Council. We agree that this could be an appropriate mechanism by which to provide mitigation, however, the Plan should also state that developer contributions towards the strategic mitigation scheme will be required in order to ensure that the mitigation provided at the strategic level incorporates that required for Policy MEL21. It should also be noted that these would need to be secured through appropriate planning agreements. Without these provisions, it cannot reliably be concluded that any impacts from this proposal would be mitigated through the strategic mitigation scheme, and therefore adverse effects on the integrity (AEOI) of the Deben Estuary European sites cannot be ruled out.

The Plan should also state that any application coming forward on this allocation site should be subject to HRA at the project level (as well as the strategic level). This is because a much greater level of detail will be available regarding the proposals at this stage, including the number of dwellings, the site layout and public access provisions. The proponent will need to “*provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable them to determine whether an appropriate assessment is required*” (Reg. 61 of the Habitats Regulations 2010 (as amended)). We recommend that such information should include:

- the number of residents (including specifically the number with dogs) that the development is likely to support
- access points (both for people on foot and by car) to the estuary likely to be used by residents
- the sensitivity of the parts of the estuary likely to be accessed (species and number of birds present, whether these parts are used for foraging and/or roosting, current levels of recreational use and any disturbance issues)

## **Conclusion**

The RSPB object to the proposed allocation of land off Wilford Bridge Road (Policy MEL21) at present due to the lack of evidence that this (alone or in-combination with other housing developments in the area) will not result in AEOI of the Deben Estuary SPA and Ramsar site through increases in recreational pressure. Provisions are required to ascertain that any mitigation requirement is incorporated into the strategic mitigation scheme for recreational impacts on European sites currently under development by local Councils.

I trust that these comments are helpful. If you have any queries about the comments above, please do not hesitate to contact me.

Yours sincerely

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