



Habitats Regulations Assessment Screening Statement and Appropriate Assessment

Draft Ufford Neighbourhood Plan

April 2024

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1. Introduction

- 1.1 The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as 'European Sites'. The National Planning Policy Framework (NPPF) also states that Ramsar sites should be afforded the same level of protection and collectively refers to SACs, SPAs and Ramsar sites as 'Habitat 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 of Schedule 2 of the Neighbourhood Planning Regulations 2012 (as amended). In order to proceed to referendum a Neighbourhood Plan must meet a series of 'basic conditions', which include that it does not breach, and is otherwise compatible with, EU obligations.
- 1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) (as amended through EU Exit legislation) states:

'Where a land use plan:

- (a) is likely to have a significant effect on a European site 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 undertaken in stages and should conclude whether or not a proposal or policy in the Plan would adversely affect the integrity of any sites.

Stage 1 (Screening):	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 Union ¹ , which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.
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¹ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

- Stage 2
(Scoping): 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
(Assessment): 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 draft Ufford Neighbourhood Plan is being produced by Ufford Parish Council. This report considers whether there are likely to be significant effects on protected Habitat Sites and whether a full Appropriate Assessment may be required.
- 1.6 The Ufford Neighbourhood Plan will need to be in general conformity with the strategic policies of the adopted Local Plan. East Suffolk is covered by two Local Plans, the East Suffolk Council – Suffolk Coastal Local Plan (adopted September 2020) and the East Suffolk Council – Waveney Local Plan (adopted March 2019). The relevant Local Plan for Ufford is the East Suffolk Council - Suffolk Coastal Local Plan.
- 1.7 The East Suffolk Council – Suffolk Coastal Local Plan was 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 Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal District. The Local Plan Appropriate Assessment identified recreational disturbance particularly from dog walkers as the main significant effect. The Council has therefore produced a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) and requires payment towards mitigation from residential developments within 13km of the protected Habitat Sites (the ‘Zone of Influence’²).

2. Protected sites covered by this report

- 2.1 Sites included in this assessment are listed in **Table 1** below. This includes all sites that are within 20km of the Ufford Neighbourhood Plan area (for consistency with the distances applied within the HRA of the Suffolk Coastal Local Plan and adopting the precautionary approach).

² An interactive map showing the RAMS ‘Zone of Influence’, and the protected Habitats Sites is available at:
<https://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=ec07051688d9460e918d3cc69829f9be>

Table 1: Relevant Habitat Sites

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

- 2.2 The locations of the relevant Habitats 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 East Suffolk Council – Suffolk Coastal Local Plan.

3. Ufford Neighbourhood Plan

- 3.1 Ufford Parish Council is producing a Neighbourhood Plan for Ufford in order to set out the vision, objectives and policies for the development of the parish up to 2036, within the context of the Local Plan. This Habitats Regulations Assessment screening assessment reviews the 'Ufford NP Pre-submission 11 REDUCED SIZE' version of the draft Neighbourhood Plan, received December 2023.
- 3.2 The draft Ufford Neighbourhood Plan includes a range of policies covering the Ufford Neighbourhood Plan area, which covers the full parish of Ufford area. A number of policies relate to the full Neighbourhood Plan area whilst others are area/location specific. The draft Ufford Neighbourhood Plan allocates a site for housing development.
- 3.3 The policies in the Ufford Neighbourhood Plan are listed in **Table 2** below. An assessment of whether each policy is likely to have a significant effect on Habitat sites is included in section 5 of this report.

Table 2: List of Neighbourhood Plan policies³

Policy
Policy UFF1: Design
Policy UFF2: New housing
Policy UFF3: Housing mix
Policy UFF4: Rural exception sites
Policy UFF5: Local Green Spaces
Policy UFF6: Landscape Character and Area of Local Landscape Sensitivity (ALLS)
Policy UFF7: Important views
Policy UFF8: Biodiversity/nature conservation
Policy UFF9: Ecological corridors
Policy UFF10: Historic environment
Policy UFF11: Non-designated Heritage Assets
Policy UFF12: Dark skies
Policy UFF13: Connectivity and safety
Policy UFF15: Community facilities
Policy UFF16: New and existing business
Policy UFF17: Former Crown Nursery (site allocation for housing development)

4. Other Plans and Projects

- 4.1 Regulation 105 of the 2017 Regulations (as amended) requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plan is the Local Plan. The East Suffolk Council – Suffolk Coastal Local Plan was adopted in September 2020. The Local Plan sets out the broad scale and distribution of development across the area of East Suffolk formerly covered by Suffolk Coastal District. This was subject to an Appropriate Assessment as part of its production.
- 4.3 A screening process considered each policy in the Suffolk Coastal Local Plan and concluded whether significant effects were likely and if an Appropriate Assessment was needed. The Appropriate Assessment subsequently considered the following themes:
- recreation pressure from new residential development,
 - recreation pressure from tourism,
 - urbanisation effects in close proximity,
 - air quality from increased road traffic,
 - water quality and resources and
 - biodiversity net gain.

³ NB: there is currently no 'UFF14' due to a numbering error.

Mitigation measures were identified within the Appropriate Assessment and were incorporated within the final Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on Habitat Sites within and in the vicinity of the (then) Suffolk Coastal District.

- 4.4 The (now superseded) 2013 Core Strategy was also previously subject to strategic level Appropriate Assessment which concluded that without mitigation there would be a significant effect on Habitat Sites, alone and in combination with other plans. The Appropriate Assessment of that Plan identified recreational disturbance particularly from dog walkers as the main significant effect. The Council subsequently produced a Recreational Disturbance Avoidance and Mitigation Strategy and now requires payment towards mitigation of likely significant effects from residential developments within 13km of a Habitat Site. This approach continues to operate and was included within policies in the Local Plan, adopted in 2020.
- 4.5 Policy SCLP12.1 of the Suffolk Coastal Local Plan does not allocate a minimum housing figure to the Ufford Neighbourhood Plan area. This is because Ufford did not have a Neighbourhood Plan area designated at the time the Suffolk Coastal Local Plan was prepared. The Local Plan identifies Ufford as a 'Small Village' via Policy SCLP3.2 Settlement Hierarchy, which limits the location, scale and types of development that are appropriate for the settlement. Policy SCLP3.3 Settlement Boundaries delineates tight Settlement Boundaries around the main village area, thereby significantly limiting the potential for development outside of this area under the Local Plan policies.
- 4.6 The draft Ufford Neighbourhood Plan policies interpret the strategy and policies of the local plan at a local level. The policies contained in the draft Ufford Neighbourhood Plan are proposed to provide locally-specific policy for the determination of planning applications in compliance with the Local Plan's strategy. The draft Neighbourhood Plan includes one housing site allocation policy.

5. Assessment of likely significant effects of the Ufford Neighbourhood Plan on Habitat sites

- 5.1 **Table 3** below considers each policy of the draft Ufford Neighbourhood Plan in relation to whether there is potential for a likely significant effect on Habitat Sites. This constitutes Stage 1 (screening) 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 Ufford Neighbourhood Plan

Policy	Assessment of potential impact on Habitat sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
Policy UFF1: Design	<p>This policy sets out a number of design criteria for new development in the Neighbourhood Plan area in order to reflect local character, the historic environment and contribute to a high-quality, sustainable built environment. The policy also requires that native species are prioritized for planting in order to support wildlife.</p> <p>The policy builds on SCLP11.1 Design Quality of the Local Plan. The Habitats Regulation Assessment of Policy SCLP11.1 concluded no likely significant effects.</p> <p>The policy may have indirect positive effects by supporting native wildlife through native planting. This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>	None	None	No
Policy UFF2: New housing	<p>This policy sets out the framework for small scale housing to be delivered within and outside of Ufford's Settlement Boundary, and also refers to the new site allocation.</p> <p>The policy builds on the following policies of the Local Plan:</p> <ul style="list-style-type: none"> • Policy SCLP3.2 Settlement Hierarchy • Policy SCLP3.3 Settlement Boundaries • Policy SCLP5.2 Housing Development in Small Villages • Policy SCLP5.3 Housing Development in the Countryside • Policy SCLP5.4 Housing in Clusters in the Countryside 	All sites within Table 1.	Recreational impacts	Yes

	<ul style="list-style-type: none"> Policy SCLP5.5 Conversions of Buildings in the Countryside for Housing Policy SCLP5.7 Infill and Garden Development <p>Likely significant effects are identified as a result of this policy's positive framework for housing delivery and reference to the site allocation (see details under UFF17).</p>			
Policy UFF3: Housing mix	<p>This policy sets out the mix of dwelling sizes and tenures that will be supported for housing development in the Ufford Neighbourhood Plan Area.</p> <p>The policy builds on Policy SCLP5.8 Housing Mix and Policy SCLP5.10: Affordable Housing on Residential Developments in the Local Plan. The Habitats Regulation Assessment of these policies concluded no likely significant effects.</p> <p>This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>	None	None	No
Policy UFF4: Rural exception sites	<p>This policy sets out the types, scale and design of development that will be supported on exception sites in the Ufford Neighbourhood Plan area.</p> <p>The policy builds on SCLP5.11 Affordable housing on exceptions sites of the Local Plan, principally adding the need for the affordable dwellings to be offered to people with a demonstrable local connection in the first instance and evidence of need via the supporting Ufford Housing Needs Assessment. The Habitats Regulation Assessment of these policies concluded no likely significant effects.</p> <p>This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>	None	None	No

Policy UFF5: Local Green Spaces	<p>This policy identifies the 31 Local Green Spaces that the Ufford Neighbourhood Plan seeks to designate for protection. The supporting text highlights the value of these spaces to the community, as identified through the Household Survey. The list of proposed sites includes both those identified through the Household Survey and those identified by the Steering Group during the Character Area Appraisal Survey work, which supported the Ufford Design Code.</p> <p>This policy adds detail to Policy SCLP8.2 Open Space, which permits Neighbourhood Plans to identify areas of Local Green Space and to include policies relating to their protection.</p> <p>At local scale, the policy may have indirect positive effects by ensuring access to local green spaces, thereby reducing potential for increased pressure on Habitat Sites. Therefore no likely significant effects are identified.</p>	None	None	No
Policy UFF6: Landscape Character and Area of Local Landscape Sensitivity (ALLS)	<p>This policy identifies an 'Area of Local Landscape Sensitivity (ALLS)', where more weight should be given to Landscape Character in decision making on development proposals.</p> <p>The policy builds on SCLP10.4: Landscape Character of the Local Plan. The Habitats Regulation Assessment of the Local Plan identified no likely significant effects from policy SCLP10.4. This policy has no direct impacts on Habitat sites and therefore no likely significant effects have been identified.</p>	None	None	No
Policy UFF7: Important views	<p>This policy seeks to protect 15 important views within, into and out of the Neighbourhood Plan Area.</p> <p>The policy builds on SCLP10.4: Landscape Character of the Suffolk Coastal Local Plan. The Habitats Regulation Assessment of the Local Plan identified</p>	None	None	No

	no likely significant effects from policy SCLP10.4. This policy has no direct impacts on Habitat sites and therefore no likely significant effects have been identified.			
Policy UFF8: Biodiversity/nature conservation	<p>This policy seeks to avoid the loss of, or substantial harm to, important trees, ponds, hedgerows and other natural features. Where such losses or harm are unavoidable, the policy requires that adequate mitigation measures or, as a last resort, compensation measures, will be sought. If suitable mitigation or compensation measures cannot be provided, then planning permission should be refused.</p> <p>The policy builds on SCLP10.1: Biodiversity and Geodiversity of the Suffolk Coastal Local Plan. The Habitats Regulation Assessment of the Local Plan identified Likely Significant Effects through the HRA screening for policy SCLP10.1. Full Appropriate Assessment was undertaken and mitigation incorporated into the Local Plan.</p> <p>Policy UFF8 does not promote development and contributes towards the principles of the enhancement of the wider environment and therefore no likely significant effects are identified.</p>	None	No	No
Policy UFF9: Ecological corridors	<p>This policy seeks to avoid the loss of, or substantial harm to, important trees, ponds, hedgerows and other natural features within ecological corridor areas (green and blue) particularly where this would reduce continuity between corridors.</p> <p>The policy builds on SCLP10.1: Biodiversity and Geodiversity of the Suffolk Coastal Local Plan. The Habitats Regulation Assessment of the Local Plan identified Likely Significant Effects through the HRA screening for policy SCLP10.1. Full Appropriate Assessment was undertaken and mitigation incorporated into the Local Plan.</p>	None	No	No

	Policy UFF8 does not promote development and contributes towards the principles of the enhancement of the wider environment and therefore no likely significant effects are identified.			
Policy UFF10: Historic environment	<p>This policy seeks to protect the parish’s designated heritage assets, such as listed buildings, scheduled monuments and the Ufford Conservation Area, as well as the setting of these assets and the general historic environment of Ufford.</p> <p>The policy adds detail to the requirements of Policy SCLP11.3: Historic Environment, Policy SCLP11.4: Listed Buildings and Policy SCLP11.5: Conservation Areas of the Local Plan. The Habitats Regulation Assessment of Policy SCLP11.3, Policy 11.4 and Policy 11.5 and concluded no likely significant effects. This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>	None	None	No
Policy UFF11: Non-designated Heritage Assets	<p>The policy identifies 15 non-designated heritage assets and requires proposals for works to these to be assessed in accordance with the Local Plan.</p> <p>The policy builds on Policy SCLP11.6: Non-designated heritage assets of the 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 Habitat Sites and no likely significant effects are identified.</p>	None	None	No
Policy UFF12: Dark skies	<p>The policy promotes dark skies and sets number of criteria relating to the provision of artificial lighting within development schemes, including street lighting. The policy also encourages use of energy efficient lighting solutions.</p> <p>This policy builds on Policy SCLP10.3: Environmental Quality and Policy SCLP11.2: Residential Amenity of the Local Plan. The policy does not in</p>	None	None	No

	itself promote development. This policy has no direct impacts on Habitat Sites and therefore no likely significant effects have been identified.			
Policy UFF13: Connectivity and safety	<p>This policy supports the improvement and extension of the existing Public Rights of Way network in the Ufford Neighbourhood Plan area.</p> <p>The policy may have indirect positive effects on Habitat Sites by ensuring access to local recreation opportunities, thereby reducing potential for increased pressure on Habitat Sites. Therefore, no likely significant effects are identified.</p>	None	None	No
Policy UFF15: Community facilities	<p>This policy identifies 10 community facilities for protection. Proposals for the enhancement of these existing facilities are supported through the policy; the policy also sets terms for the development of replacement facilities, and a 'wish list' for new facilities.</p> <p>The policy builds on SCLP8.1: Community Facilities and Assets of the Local Plan. The Habitats Regulation Assessment of Policy SCLP8.1 concluded no likely significant effects. This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified.</p>	None	None	No
Policy UFF16: New and existing business	<p>This policy supports the expansion of existing employment uses within the Ufford Neighbourhood Plan Area subject to environmental criteria (including residential amenity).</p> <p>The policy also encourages the reuse and improvement of redundant buildings, consistent with the supporting text of chapter 9 Climate Change of the SCLP. This policy builds on Policy SCLP4.2: New Employment Development and Policy SCLP4.5: Economic Development in Rural Areas. The policy does not in itself promote development. This policy has no direct impacts on Habitat Sites and therefore no likely significant effects have been identified.</p>	None	None	No

Policy UFF17: Former Crown Nursery	<p>This policy allocates a site for the provision of 24 additional dwellings over the plan period and sets design criteria for its development, including the requirement for masterplanning of the whole site.</p> <p>As identified through the Habitats Regulation Assessment of the Local Plan and the Suffolk Coast RAMS work, new residential development within 13km Zone of Influence (ZOI) around Habitat Sites (as set out in the RAMS) could lead to likely significant effects on protected Habitat Sites as the result of increased recreational disturbance.</p> <p>The site identified in Policy UFF17 falls within the 13km RAMS ZOI but is not considered to be in close proximity to any protected Habitat Site (within 400m).</p>	All sites within Table 1.	Recreational impacts	Yes

6 Appropriate Assessment

- 6.1 The Ufford Neighbourhood Plan will provide policies which will be used for determining planning applications alongside the Local Plan. It includes policies with locally specific criteria to be used for the determination of planning applications within the Ufford Neighbourhood Plan area, and allocates one site for residential development of 24 dwellings (UFF17 Former Crown Nursery Site) and directs the location and scale of residential development on other sites within the Neighbourhood Plan Area (UFF2 New Housing).
- 6.2 The screening for Likely Significant Effects (**Table 3**) identified Policy UFF17 Former Crown Nursery Site and Policy UFF2: New Housing for more in-depth consideration within an appropriate assessment. Once likely significant effects have 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 Habitat Site integrity. Competent authorities should have enough evidence to satisfy themselves that there are feasible measures to prevent adverse effects.
- 6.3 Policy UFF17 Former Crown Nursery Site and Policy UFF2: New housing have been identified as having potential Likely Significant Effects on Habitat Sites as the result of increased recreational disturbance.
- 6.4 The impact of increased recreation arising from housing growth has already been recognised in Local Plan HRA work. This has led to collaborative working between the four Suffolk local planning authorities that lie within 13km of the coastal and heathland Habitat Sites. Taking a strategic approach to the Habitat Site mitigation has resulted in the development of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The Strategy sets out a tariff based approach to mitigating the additional recreation pressure risks associated with new residential development. The RAMS sets out an integrated suite of avoidance and mitigation measures that are supported by comprehensive evidence and experience gained from other Habitat Site mitigation strategies.
- 6.5 The whole Neighbourhood Plan Area (including Policy UFF17 Former Crown Nursery Site allocation) falls within the 13km RAMS Zone of Influence (as set out in the Recreational Disturbance Avoidance and Mitigation Strategy) but is not considered to be in close proximity to any protected Habitat Sites (within 400m).
- 6.6 As confirmed by the conclusions of the HRA of the Local Plan, the RAMS is considered capable of accommodating and mitigating the impact of the levels of residential growth promoted through the Local Plan. The draft Ufford Neighbourhood Plan has been prepared to be in general conformity with the relevant strategic policies in the East Suffolk Council – Suffolk Coastal Local Plan (adopted September 2020).

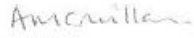
- 6.7 Natural England have been consulted on this Screening Statement and Appropriate Assessment as the statutory nature conservation body. Their views have been taken into account in finalising this HRA. Their response can be found in **Appendix 4**.

7. Summary and conclusions

- 7.1 The Ufford Neighbourhood Plan will provide policies which will be used for determining planning applications alongside the Local Plan. It includes policies with locally specific criteria to be used for the determination of planning applications within the Ufford Neighbourhood Plan area, and proposes to allocate one site for residential development of 24 dwellings (UFF17: Former Crown Nursery Site) and directs the location and scale of residential development on other sites within the Neighbourhood Plan Area (UFF2: New Housing).
- 7.2 The Neighbourhood Plan is being prepared to be in general conformity with the relevant policies in the East Suffolk Council – Suffolk Coastal Local Plan (adopted September 2020).
- 7.3 Policies UFF2: New Housing and UFF17: Former Crown Nursery Site were identified as having potential Likely Significant Effects on Habitat Sites as the result of increased recreational disturbance. As a result, both policies were subject to further consideration through appropriate assessment.
- 7.4 The impact of increased recreation arising from housing growth has already been recognised in Local Plan HRA work. This has led to collaborative working between the four Suffolk local planning authorities that lie within 13km of the coastal and heathland Habitat Sites. Taking a strategic approach to the Habitat Site mitigation has resulted in the development of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The Strategy sets out a tariff based approach to mitigating the additional recreation pressure risks associated with new residential development. The RAMS sets out an integrated suite of avoidance and mitigation measures that are supported by comprehensive evidence and experience gained from other Habitat Site mitigation strategies.
- 7.5 As confirmed by the conclusions of the Suffolk Coastal Local Plan HRA, The Suffolk Coast RAMS is considered to provide adequate measures to mitigate any impacts arising from planned housing growth.
- 7.6 Any residential development coming forward as the result of policies included in the Ufford Neighbourhood Plan will be subject to the RAMS tariff as per Policy SCLP10.1 Biodiversity and Geodiversity of the East Suffolk Council – Suffolk Coastal Local Plan (Adopted September 2020). It is therefore concluded that the draft Ufford

Neighbourhood Plan will not lead to any adverse effects on protected Habitat Sites

Signed:



Dated: 19th April 2024

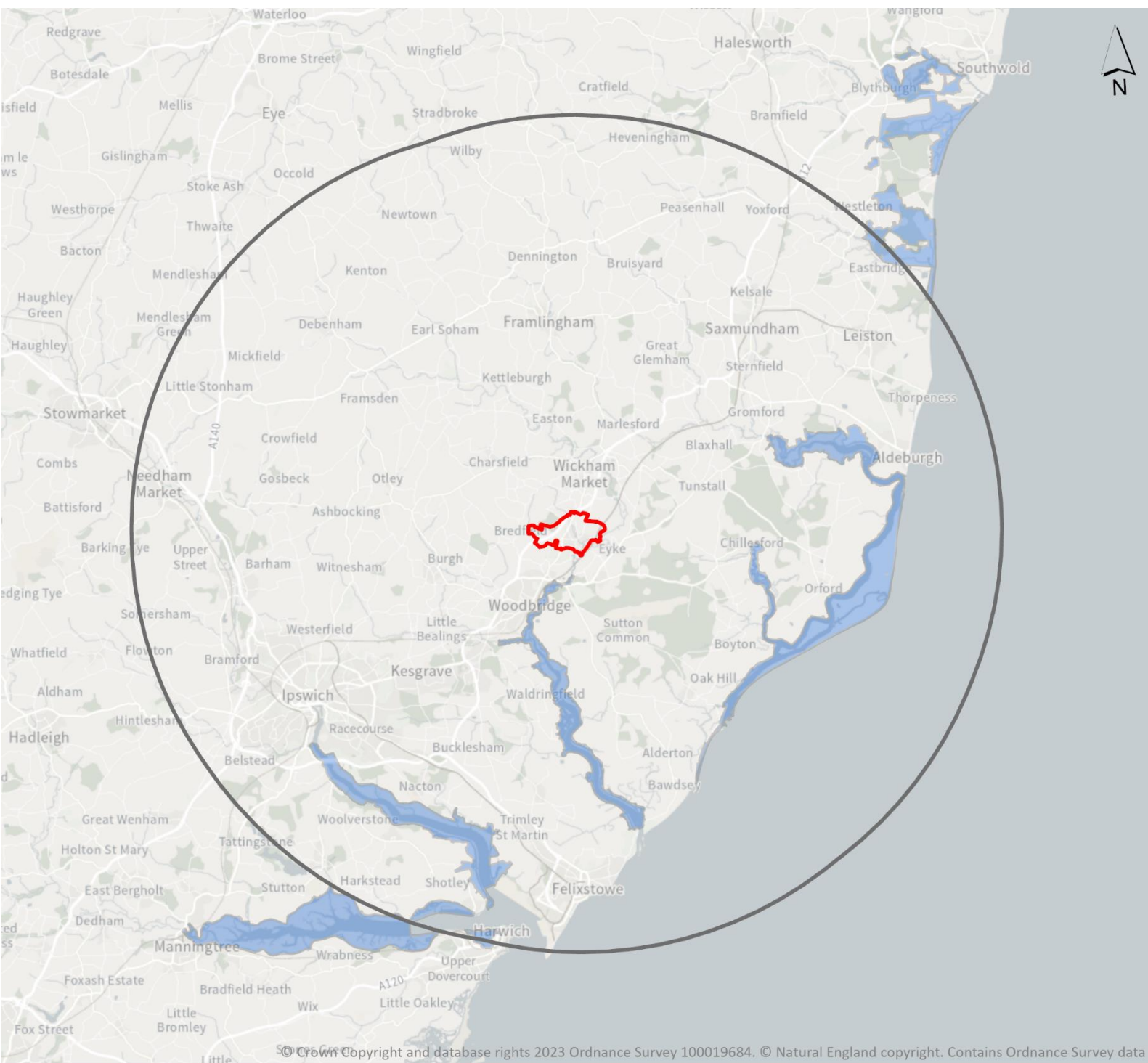
Andrea McMillan
Interim Joint Head of Planning
East Suffolk Council

Appendix 1: Sources of background information

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

Appendix 2: Locations of Habitat Sites

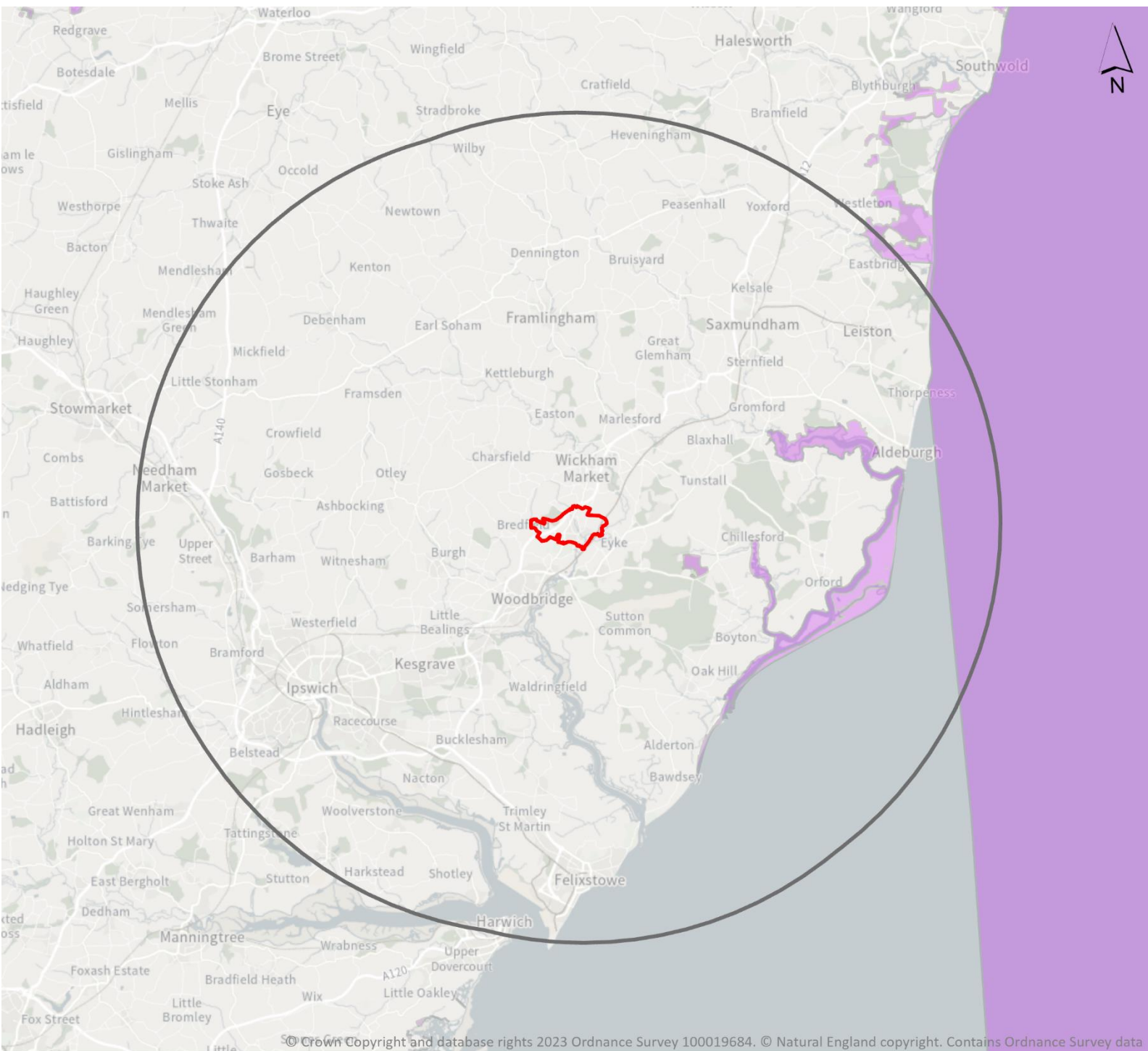
Ramsar Sites



-  Ufford Neighbourhood Area
-  20Km Buffer
-  Ramsar Sites

0 2 4 8 Km

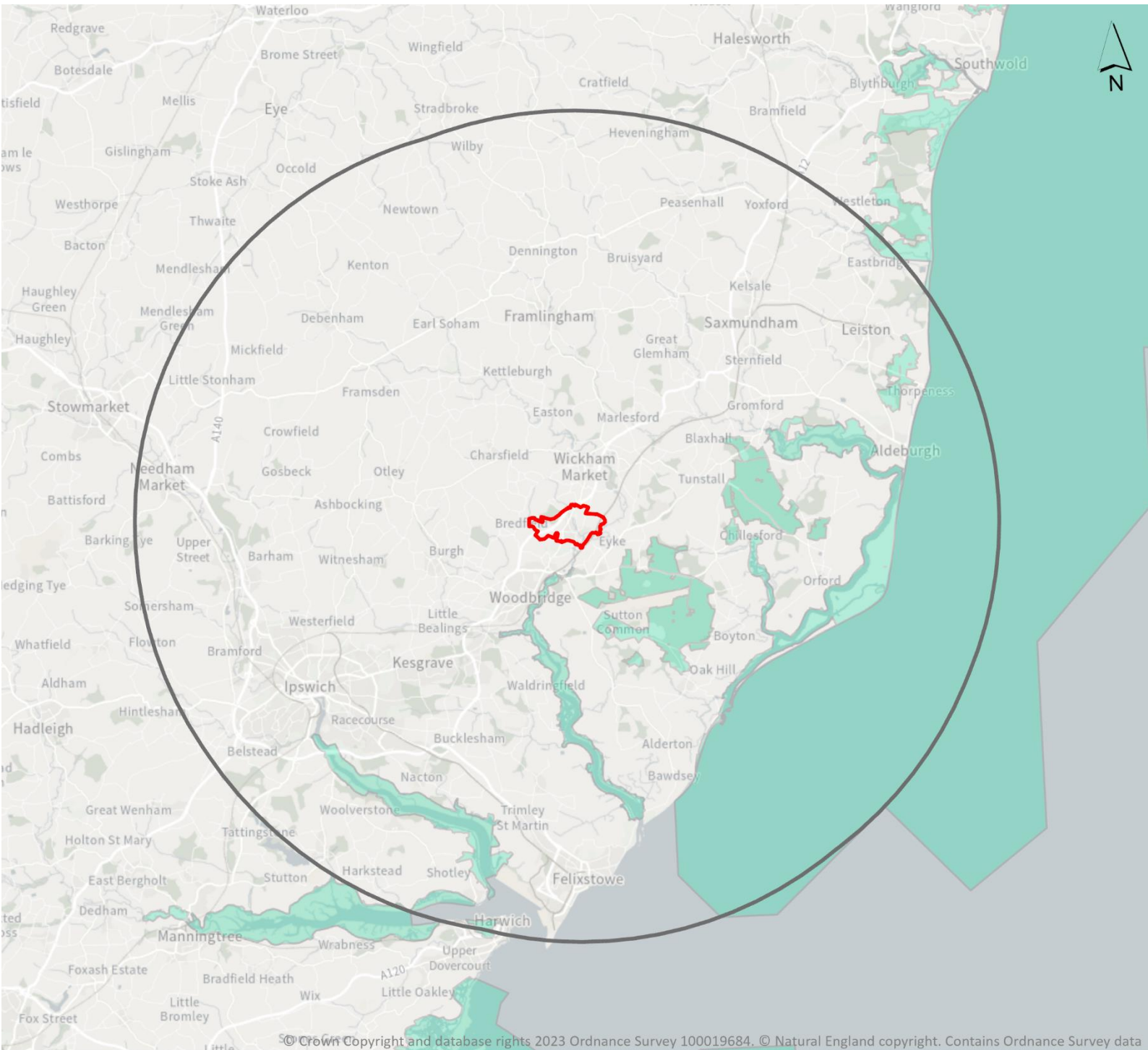
Special Areas of Conservation



- Ufford Neighbourhood Area
- 20Km Buffer
- Special Areas of Conservation

0 2 4 8 Km

Special Protection Areas



- Ufford Neighbourhood Area
- 20Km Buffer
- Special Protection Areas

0 2 4 8 Km

Appendix 3: Relevant Habitat sites

As identified in the Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils – Technical Report (2019), available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>.

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 (SACs)			
Alde-Ore and Butley Estuaries	H1130: Estuaries H1140: Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats H1330: Atlantic salt meadows	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; The supporting processes on which qualifying natural habitats rely.	Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine) (Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)
Dew's Pond	S1166 Triturus cristatus: Great crested newt	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring:	None identified.

		<p>The extent and distribution of qualifying natural habitats;</p> <p>The structure and function (including typical species) of qualifying natural habitats;</p> <p>The supporting processes on which qualifying natural habitats rely.</p>	
Orfordness – Shingle Street	<p>H1150: Coastal Lagoons</p> <p>H1210: Annual vegetation of drift lines</p> <p>H1220: Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring:</p> <p>The extent and distribution of qualifying natural habitats;</p> <p>The structure and function (including typical species) of qualifying natural habitats; and</p> <p>The supporting processes on which qualifying natural habitats rely.</p>	Not identified in Suffolk Coastal Final Draft Local Plan HRA.
Southern North Sea	1351: Phocoena phocoena	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring:</p> <p>The extent and distribution of qualifying natural habitats;</p>	Not identified in Suffolk Coastal Final Draft Local Plan HRA.

		<p>The structure and function (including typical species) of qualifying natural habitats; and</p> <p>The supporting processes on which qualifying natural habitats rely.</p>	
Staverton Park and The Thicks, Wantisden	H9190: Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains; Dry oak-dominated woodland.	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring:</p> <p>The extent and distribution of qualifying natural habitats;</p> <p>The structure and function (including typical species) of qualifying natural habitats; and</p> <p>The supporting processes on which qualifying natural habitats rely.</p>	Woodland management, disease, atmospheric pollution.
Minsmere to Walberswick Heaths and Marshes SAC (also SPA and Ramsar site)	<p>H4030 European dry heaths</p> <p>H1210 Annual vegetation of drift lines</p> <p>H1220 Perennial vegetation of stony banks</p> <p>A052(B) <i>Anas crecca</i>: Eurasian teal</p> <p>A021(B) <i>Botaurus stellaris</i>: Great bittern</p> <p>A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier</p> <p>A082(NB) <i>Circus cyaneus</i>: Hen harrier</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <p>The extent and distribution of qualifying natural habitats and habitats,</p> <p>The structure and function (including typical species) of qualifying natural habitats, and,</p>	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)

	<p>A224(B) <i>Caprimulgus europaeus</i>: European nightjar A056(B) <i>Anas clypeata</i>: Northern shoveler A056(NB) <i>Anas clypeata</i>: Northern shoveler A051(B) <i>Anas strepera</i>: Gadwall A051(NB) <i>Anas strepera</i>: Gadwall A132(B) <i>Recurvirostra avosetta</i>: Pied avocet A195(B) <i>Sterna albifrons</i>: Little tern A394(NB) <i>Anser albifrons</i>: Greater white-fronted goose</p>	The supporting processes on which qualifying natural habitats rely.	
Special Protection Areas (SPAs)			
Alde-Ore Estuary (also Ramsar site)	<p>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)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	<p>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)</p>
Deben Estuary	A046a: Dark bellied brent goose (non-breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and	Coastal squeeze, disturbance to birds, water and air pollution.

(also Ramsar site)	A132: Pied avocet (non-breeding)	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.	
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; The population of each of the qualifying features; and The distribution of the qualifying features within the site.	Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.

Sandlings	A224: European nightjar (breeding) A246: Woodlark (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.	Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.
Stour and Orwell Estuaries (also Ramsar site)	A046a: Dark bellied brent goose (non-breeding) A054: Northern pintail (non-breeding) A132: Pied avocet (non-breeding) A141: Grey plover (non-breeding) A143: Red knot (non-breeding) A149: Dunlin (non-breeding) A156: Black-tailed godwit (non-breeding) A162: Common redshank (non-breeding) Waterbird assemblage	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, air pollution and new development.

Appendix 4: Natural England Consultation Response

Date: 09 April 2024
Our ref: 464185
Your ref: N/A

Ms Machen
East Suffolk Council
planning@eastsuffolk.gov.uk

BY EMAIL ONLY



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 8GJ

T 0300 060 3900

Dear Ms Machen,

Ufford Neighbourhood Plan SEA & HRA Screening Consultation

Thank you for your consultation on the above dated 19 January 2023 which was received by Natural England on the same date.

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

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004 (as amended). Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the [Planning Practice Guidance](#).

Planning practice guidance also outlines that if an appropriate assessment is required for your Neighbourhood Plan this will also engage the need for a SEA. One of the basic conditions that will be tested by the independent examiner is whether the neighbourhood plan is compatible with European obligations, including those under the SEA Directive. Where a SEA is required it should be prepared in accordance with [Regulation 12](#) of the SEA Regulations.

Where a neighbourhood plan could potentially affect a '[Habitats Site](#)', it will be necessary to screen the plan in relation to the Conservation of Habitats and Species Regulations (2017), as amended (the 'Habitats Regulations'). Where likely significant effects are identified, it will be necessary to undertake an appropriate assessment of the neighbourhood plan and, if needed, identify and secure appropriate mitigation measures to ensure the plan does not result in an adverse effect on the integrity of the habitats site.

Natural England has reviewed the Screening Reports (dated January 2024) which assess the Ufford requirement for an SEA and Habitats Regulations Assessment (HRA) for the Neighbourhood Plan.

Natural England agrees with the conclusions of the reports that there is the potential for significant environmental effects arising from the policies in the plan, which have not already been accounted for within the adopted local plan. Therefore, the Ufford Neighbourhood Plan does require an SEA to be undertaken. Natural England also agrees that the Plan could potentially result in likely significant effects to European Sites, either alone or in combination, and therefore an appropriate assessment under the Habitats Regulations is required. It is noted that you have carried out an appropriate assessment in section 6 of the HRA screening report. Natural England agrees with the conclusion that the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy

(RAMS) will provide sufficient mitigation to ensure the plan does not result in an adverse effect on the integrity of the habitats sites.

Aside from this, Natural England have no specific comments at this stage. We would be happy to comment further should the need arise. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Joanna Parfitt
Norfolk & Suffolk Team