



Habitats Regulations Assessment of the Draft Wickham Market Neighbourhood Plan

October 2021

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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) states that Ramsar sites should be afforded the same level of protection and refers to SACs, SPAs and Ramsar sites as 'Habitat Sites'.

1.2 The requirement to undertake Habitats 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 (as amended) states:

'Where a land use plan:

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

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

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

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

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

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

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

1.5 The Wickham Market Neighbourhood Plan is being produced by Wickham Market Parish Council. This report considers whether there are likely to be significant effects on protected Habitat 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 Wickham Market Neighbourhood Plan will need to be in general conformity with the strategic policies of the Local Plan. East Suffolk Council is covered by two Local Plans, the East Suffolk Council - Suffolk Coastal Local Plan adopted September 2020 and the Waveney Local Plan adopted March 2019. The relevant local plan for the Wickham Market Neighbourhood Plan area is the East Suffolk Council - Suffolk Coastal Local Plan.

1.7 The Suffolk Coastal Local Plan was subject to Habitats Regulations Assessment as part of its production. Where screening identified a likely significant effect, an Appropriate Assessment was undertaken and mitigation measures identified were incorporated within the Local Plan, resulting in a conclusion

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

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

2. Protected sites covered by this report

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

Table 1: Relevant Habitat Site

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

3. Wickham Market Neighbourhood Plan

- 3.1 Wickham Market Parish Council is producing a Neighbourhood Plan for Wickham Market, in order to set out the vision, objectives and policies for the development of the parish up to 2036, within the context of the East Suffolk Council- Suffolk Coastal Local Plan.
- 3.2 The Neighbourhood Plan includes a range of policies covering the Wickham Market Neighbourhood Plan area. A number of policies relate to the full Neighbourhood Plan area whilst others are area/location specific. The Plan allocates two sites for new housing development (Policy WICK12 and WICK13).
- 3.3 The policies in the Wickham Market Neighbourhood Plan are listed in Table 2 below. An assessment of whether each policy is likely to have a significant effect on Habitat Site is included in section 5 of this report.

Table 2: List of Neighbourhood Plan policies

WICK1	DEVELOPMENT STRATEGY AND PRINCIPLES
WICK2	LOCAL LANDSCAPE CHARACTER
WICK3	KEY LOCAL VIEWS
WICK4	PROVISION FOR WILDLIFE IN NEW DEVELOPMENT
WICK5	DESIGNING FOR RENEWABLE ENERGY AND CARBON REDUCTION
WICK6	LOCAL GREEN SPACES
WICK7	PRESERVING AND ENHANCING OPEN, GREEN AND TREED SPACES IN THE WICKHAM MARKET CONSERVATION AREA
WICK8	NON-DESIGNATED HERITAGE ASSETS
WICK9	CAR PARKING
WICK10	PEDESTRIAN SAFETY
WICK11	CYCLING, WALKING AND DISABILITY ACCESS ROUTES
WICK12	LAND AT OLD SCHOOL FARM
WICK13	LAND AT SIMON'S CROSS

- 3.4 HRA is an iterative process. HRA and Appropriate Assessment were initially carried out on a pre-submission version of the plan, dated March 2021.

Through that Appropriate Assessment, policy changes were identified and incorporated into a new draft of the Neighbourhood Plan (pre-submission version 3.28, June 2021). That version of Neighbourhood Plan was subject the Habitats Regulations Assessment and the views of Natural England were sought in June/July 2021 (see appendix 4 for response). As part of their response, Natural England raised some concerns around the wording in paragraph 8.8 (policy WICK12) of the Plan in relation to additional green infrastructure requirements. In response to this, the Neighbourhood Plan has been further amended. This screening report reviews the updated version of the Wickham Market Neighbourhood Plan (pre-submission version 3.29, August 2021).

4. Other Plans and Projects

- 4.1 Regulation 105 of the 2017 Regulations (as amended) requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plan is the Local Plan. The Local Plan sets out the broad scale and distribution of development across the area of East Suffolk formerly covered by Suffolk Coastal District. This was subject to an Appropriate Assessment as part of its production.
- 4.5 The Wickham Market Neighbourhood Plan policies interpret the strategy and policies of the Local Plan at a local level. The policies contained in the Draft Wickham Market 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 Suffolk Coastal Local Plan provides an indicative minimum housing figure of 70 to the Wickham Market Neighbourhood Plan area for the period 2018 – 2036. The Wickham Market Neighbourhood Plan identifies two sites to deliver this housing requirement. The allocated sites have potential to deliver up to 110 new homes.
- 4.7 A screening process considered each policy in the Suffolk Coastal Local Plan and concluded whether significant effects were likely and if an Appropriate Assessment was needed. The Appropriate Assessment subsequently considered the following themes - recreation pressure from new residential

development, recreation pressure from tourism, urbanisation effects in close proximity, air quality from increased road traffic, water quality and resources and biodiversity net gain. Mitigation measures were identified within the Appropriate Assessment and were incorporated within the final Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on Habitat Sites within and in the vicinity of the (then) Suffolk Coastal District.

- 4.8 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.

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

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

Table 3: Likely significant effects of the Wickham Market Neighbourhood Plan

Policy	Assessment of potential impact on Natura 2000 sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
<p>POLICY WICK1: DEVELOPMENT STRATEGY AND PRINCIPLES</p>	<p>This policy sets out the overall development strategy for the Neighbourhood Plan area. It directs development to within the settlement boundary and makes provision for up to 110 dwellings on two site allocations.</p> <p>In accordance with the relevant Local Plan policies, WICK1 requires a mix of dwellings, including at least 50% to meet the requirements for accessible and adaptable dwellings under Partn M4 (2) of the Building Regulations. The policy also sets out a number of other criteria that new development will be expected to address, including: delivery against evidence-based needs, as set out in the Wickham Market Housing Needs Assessment; the provision of key infrastructure; and, high quality design including natural landscaping.</p> <p>Policy SCLP12.1 of the Suffolk Coastal Local Plan set a minimum housing requirement of 70 dwellings for the Wickham Market Neighbourhood Plan area. The Habitats Regulation Assessment of the Local Plan identified likely significant effects from policy SCLP12.1 as the result of housing growth coming forward through Neighbourhood Plans. Therefore, potential likely significant effects on protected Habitat Sites have been identified from increased recreational disturbance as the result of development proposals outlined in Policy WICK1.</p>	<p>All sites within table 1.</p>	<p>Recreational impacts</p>	<p>Yes</p>

Policy	Assessment of potential impact on Natura 2000 sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
POLICY WICK2: LOCAL LANDSCAPE CHARACTER	<p>This policy seeks to maintain and enhance the landscape character of the Wickham Market Neighbourhood Plan area.</p> <p>The policy requires development coming forward within the area to demonstrate consideration of the Wickham Market Landscape Character Assessment. The policy identifies specific landscape character considerations that must be taken into account.</p> <p>This policy builds on SCLP10.4: Landscape Character of the Suffolk Coastal Local Plan. The Habitats Regulation Assessment of the Local Plan identified no likely significant effects from policy SCLP10.4. Therefore policy WICK2 will not result in any likely significant effects.</p>	None.	None.	No.
POLICY WICK3: KEY LOCAL VIEWS	<p>This policy seeks to maintain and, where possible enhance key local views. The accompanying map, identifies the 16 key views into and out of Wickham Market to be afforded particular protection.</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 no likely significant effects from policy SCLP10.4. Therefore policy WICK3 will not result in any likely significant effects.</p>	None.	None.	No.
POLICY WICK4: PROVISION FOR	<p>This policy seeks to deliver wildlife enhancements as part of new developments. The policy requires wildlife impacts to be</p>	None.	None.	No.

Policy	Assessment of potential impact on Natura 2000 sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
WILDLIFE IN NEW DEVELOPMENT	<p>minimised and biodiversity net gains. The policy also requires construction management processes which ensure that there is no harm to wildlife and biodiversity.</p> <p>The policy requires new housing to deliver on-site Sustainable Drainage Systems (SuDS), designed to enhance green infrastructure, wildlife and biodiversity.</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 WICK4 contributes towards the principles of the enhancement of the wider environment and therefore no likely significant effects are identified.</p>			
POLICY WICK5: DESIGNING FOR RENEWABLE ENERGY AND CARBON REDUCTION	<p>This policy requires all new housing development to be designed so that it results in at least a 20% reduction in CO2 emissions below the Target CO2 Emission Rate (TER) and to achieve the optional technical standard for water efficiency. The policy requires layout design to utilise and benefit from natural sunlight and solar gain including enabling the provision of solar energy generation measures on all houses. The Policy also requires the provision of electric car charging facilities.</p>	None.	None.	No.

Policy	Assessment of potential impact on Natura 2000 sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>Policy WICK5 builds on, but is more stringent than, Policy SCLP9.2 of the Local Plan which only applies to developments of over 10 dwellings. The Habitats Regulation Assessment of the Local Plan identified no likely significant effects from policy SCLP9.2.</p> <p>This policy will not have a direct effect on any Habitat Sites and no likely significant effects are identified</p>			
POLICY WICK6: LOCAL GREEN SPACES	<p>This policy identifies and protects ten Local Green Spaces.</p> <p>The policy may have indirect positive effects on Habitat Sites by ensuring access to local green spaces, thereby reducing potential for increased pressure on Habitat Sites. Therefore no likely significant effects are identified.</p>	None.	None.	No.
POLICY WICK7: PRESERVING AND ENHANCING OPEN, GREEN AND TREED SPACES IN THE WICKHAM MARKET CONSERVATION AREA	<p>This policy highlights the importance of open spaces in the Neighbourhood Plan area and the role they play enhancing the character of the Wickham Market Conservation Area. The policy resists development in these areas, and requires proposals adjacent to these spaces to demonstrate how the character of the Conservation Area will be preserved or enhanced.</p> <p>The policy builds on Policy SCLP11.5 of the local plan. The Habitats Regulation Assessment of Policy SCLP11.5 concluded no likely significant effects.</p>	None.	None.	No.

Policy	Assessment of potential impact on Natura 2000 sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	The policy may have indirect positive effects on Habitat Sites sites by ensuring access to local green spaces, thereby reducing potential for increased pressure on Habitat Sites. Therefore no likely significant effects are identified.			
POLICY WICK8: NON- DESIGNATED HERITAGE ASSETS	<p>The policy identifies 18 non-designated heritage assets, and sets out an overall approach to protecting these assets, including criteria against which proposals for re-use, alteration, or loss of a non-designated heritage asset will be assessed.</p> <p>The policy builds on Policy SCLP11.6 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 WICK9: CAR PARKING	This policy seeks to ensure that sufficient off-road parking is provided on new development and requires all new residential development to meet the parking standards contained in the 2019 Suffolk County Council Parking Guidance. This policy has no direct impacts on Habitat Sites and therefore no likely significant effects have been identified.	None.	None.	No.
POLICY WICK10: PEDESTRIAN SAFETY	This policy requires major development proposals to be accompanied by information that demonstrates that development will not lead to unacceptable impacts on	None.	None.	No.

Policy	Assessment of potential impact on Natura 2000 sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>pedestrian safety in 5 specific locations (identified in the policy).</p> <p>This policy has no direct impacts on Habitat Sites and therefore no likely significant effects have been identified.</p>			
POLICY WICK11: CYCLING, WALKING AND DISABILITY ACCESS ROUTES	<p>This policy supports proposals to improve cycling, walking and disabled access. The policy requires development proposals to ensure safe pedestrian and disabled access that link into the existing network and existing facilities within the Neighbourhood Plan area.</p> <p>This policy has no direct impacts on Habitat Sites and therefore no likely significant effects have been identified.</p>	None.	None.	No.
POLICY WICK12: LAND AT OLD SCHOOL FARM	<p>This policy allocates land at Old School Farm for residential development of up to 85 dwellings. The policy includes a number of criteria and requirements to guide development on the site including dwelling and tenure mix requirements, access arrangements, open space provision, and design considerations.</p> <p>Supporting text to the policy, explains that the site falls within the remit of the Suffolk Coast RAMS and that a financial contribution towards mitigation measures will be required. The supporting text also sets out the additional green infrastructure that will be required as any part of any scheme on the site. This includes the provision of open space</p>	All sites within table 1.	Recreational impacts	Yes

Policy	Assessment of potential impact on Natura 2000 sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>incorporating high quality semi natural areas and links to surrounding public rights of way creating circular dog walking routes, signage/information leaflets to householders to promote these areas for recreation, and the provision of dog waste bins. The supporting text also clarifies that a commitment to the long-term maintenance and management of these provisions will be expected.</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 WICK12 falls within the 13km RAMS ZOI but is not considered to be in close proximity to any protect Habitat Site (within 400m).</p>			
POLICY WICK13: LAND AT SIMON’S CROSS	This policy allocates land Simon’s Cross for residential development of up to 25 dwellings. The policy includes a number of criteria and requirements to guide development on the site including dwelling and tenure mix requirements, access arrangements, play space provision, and drainage improvements.	All sites within table 1.	Recreational impacts.	Yes

Policy	Assessment of potential impact on Natura 2000 sites	Habitat Sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>Supporting text to the policy, clarifies that the site falls within the remit of the Suffolk Coast RAMS and explains that a financial contribution towards mitigation measures will be required.</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 WICK12 falls within the 13km RAMS ZOI but is not considered to be in close proximity to any protect Habitat Site (within 400m).</p>			

6. Appropriate Assessment

- 6.1 The screening for likely significant effects (table 3) has identified three policies (WICK1, WICK12 and WICK13) 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 Habitat site integrity. Competent authorities should have enough evidence to satisfy themselves that there are feasible measures to prevent adverse effects.
- 6.2 Policies WICK1, WICK12 and WICK13 of the Wickham Market Neighbourhood Plan have been identified as having potential likely significant effects on Habitat Sites as the result of increased recreational disturbance.
- 6.3 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.
- 6.4 As confirmed by the conclusions of the HRA of the Local Plan, the RAM Strategy is considered capable of accommodating and mitigating the impact of the levels of residential growth promoted through the Local Plan (which the Wickham Market Neighbourhood Plan is considered to be in general conformity with).
- 6.5 Policy SCLP12.1 of the Suffolk Coastal Local Plan provides an indicative minimum housing figure of 70 to the Wickham Market Neighbourhood Plan area for the period 2018 – 2036. Policy WICK1 of the Neighbourhood Plan sets out the overall development strategy for the Neighbourhood Plan area and

makes provision for up to 110 dwellings (through WICK12 and WICK13). Policy WICK12 allocates land at Old School Farm for residential development of up to 85 dwellings and WICK13 allocates land Simon’s Cross for up to 25 dwellings. Both site allocations (WICK12 and WICK13) fall within the 13km Zone of Influence (as set out in the Recreational Disturbance Avoidance and Mitigation Strategy) but are not considered to be in close proximity to any protected Habitat Sites (within 400m).

- 6.6 As a site allocation of over 50 dwellings, policy WICK12 includes reference to the need to ensure that additional green infrastructure is provided as part of any future scheme. This includes the provision of open space incorporating high quality semi natural areas and links to surrounding public rights of way creating circular dog walking routes, signage/information leaflets to householders to promote these areas for recreation, and the provision of dog waste bins. The provision of these additional green infrastructure measures ensures mitigation of any likely significant effects arising as the result of the development alone, by containing the majority of recreation within and around the development site boundary away from habitat sites. This approach accords with the guidance set out in the Suffolk Coast RAMS Habitat Regulation Assessment (HRA) Record² which provides further guidance, agreed with Natural England.
- 6.7 The initial HRA Screening and Appropriate Assessment of the Wickham Market Neighbourhood Plan (carried out in April 2021) identified some suggested amendments to the supporting text of Policy WICK12 and WICK13 in order to ensure that the necessary mitigation would be secured as part of any development coming forward on these sites. This additional wording has now been incorporated into the latest version of the Wickham Market Neighbourhood Plan at paragraphs 8.7, 8.8 and 8.13. The additional wording in the supporting text to WICK12 and WICK13 is also considered to adequately address the Likely Significant Effect identified through the screening of policy WICK1.

² <https://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/>

7. Summary and conclusions

- 7.1 The Wickham Market Neighbourhood Plan will provide policies which will be used for determining planning applications alongside the East Suffolk Council- Suffolk Coastal Local Plan, 2020. It includes locally specific criteria based policies to be used for the determination of planning applications. The Plan also includes two allocations for new residential development (up to 110 dwellings).
- 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, September 2020.
- 7.3 Policies WICK1, WICK12 and WICK13 of the Wickham Market Neighbourhood Plan were identified through the HRA screening process as having a potential likely significant effect on protected Habitat Sites as the result of increased recreational disturbance. However, 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. In addition, policy WICK12 includes sufficient references to the need to secure additional green infrastructure to ensure the mitigation of any likely significant effects arising as the result of that development alone.
- 7.4 The Wickham Market Neighbourhood plan includes adequate reference to the requirements of the Suffolk Coast RAMS and additional green infrastructure requirements and therefore it is concluded that the Wickham Market Neighbourhood Plan will not lead to any adverse effects on protected Habitat Sites.

Signed:

Dated: 6th October 2021



Desi Reed

Planning Policy and Delivery Manager
East Suffolk Council

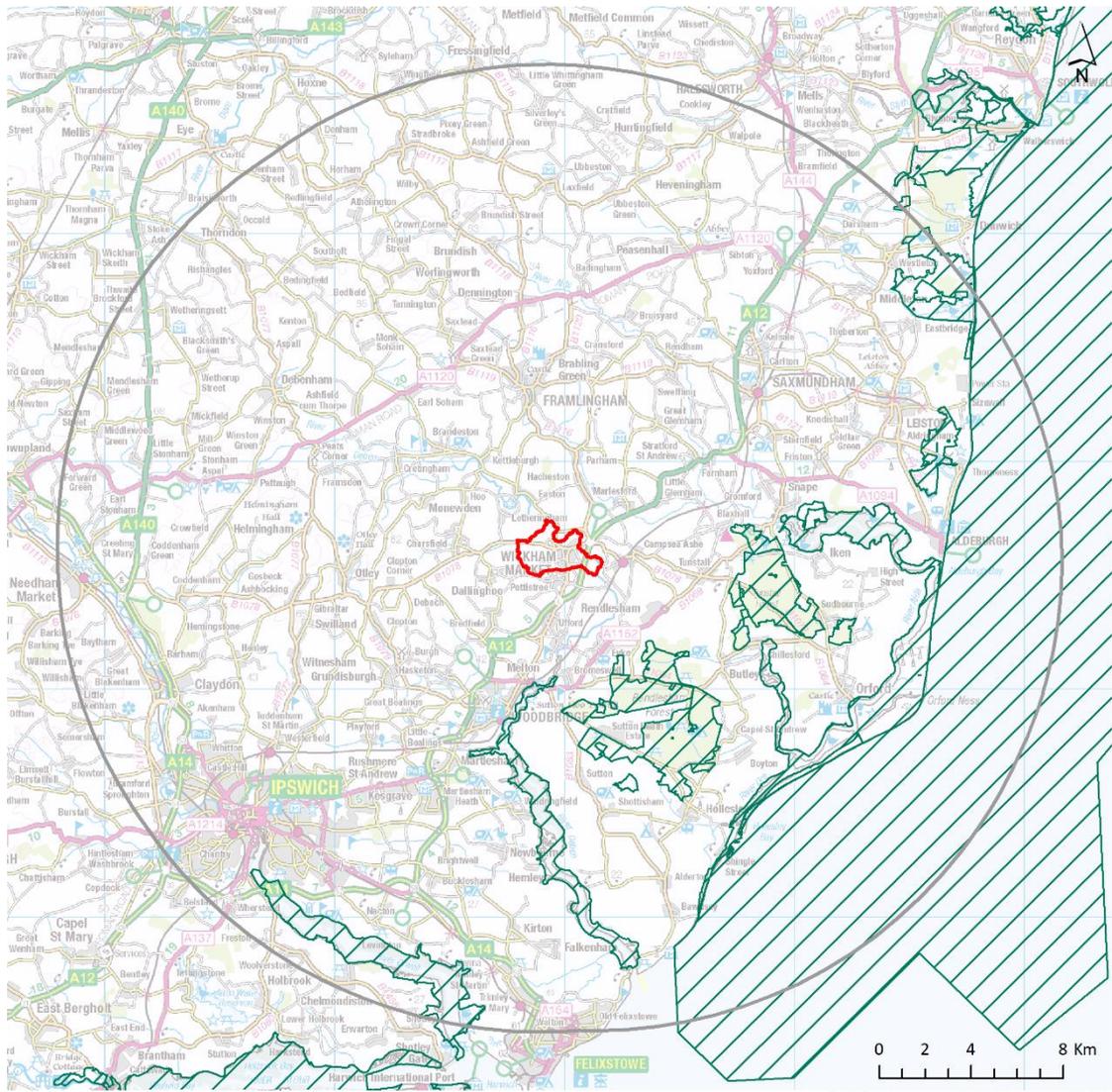
Appendix 1: Sources of background information

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

Appendix 2: Locations of Habitat Sites



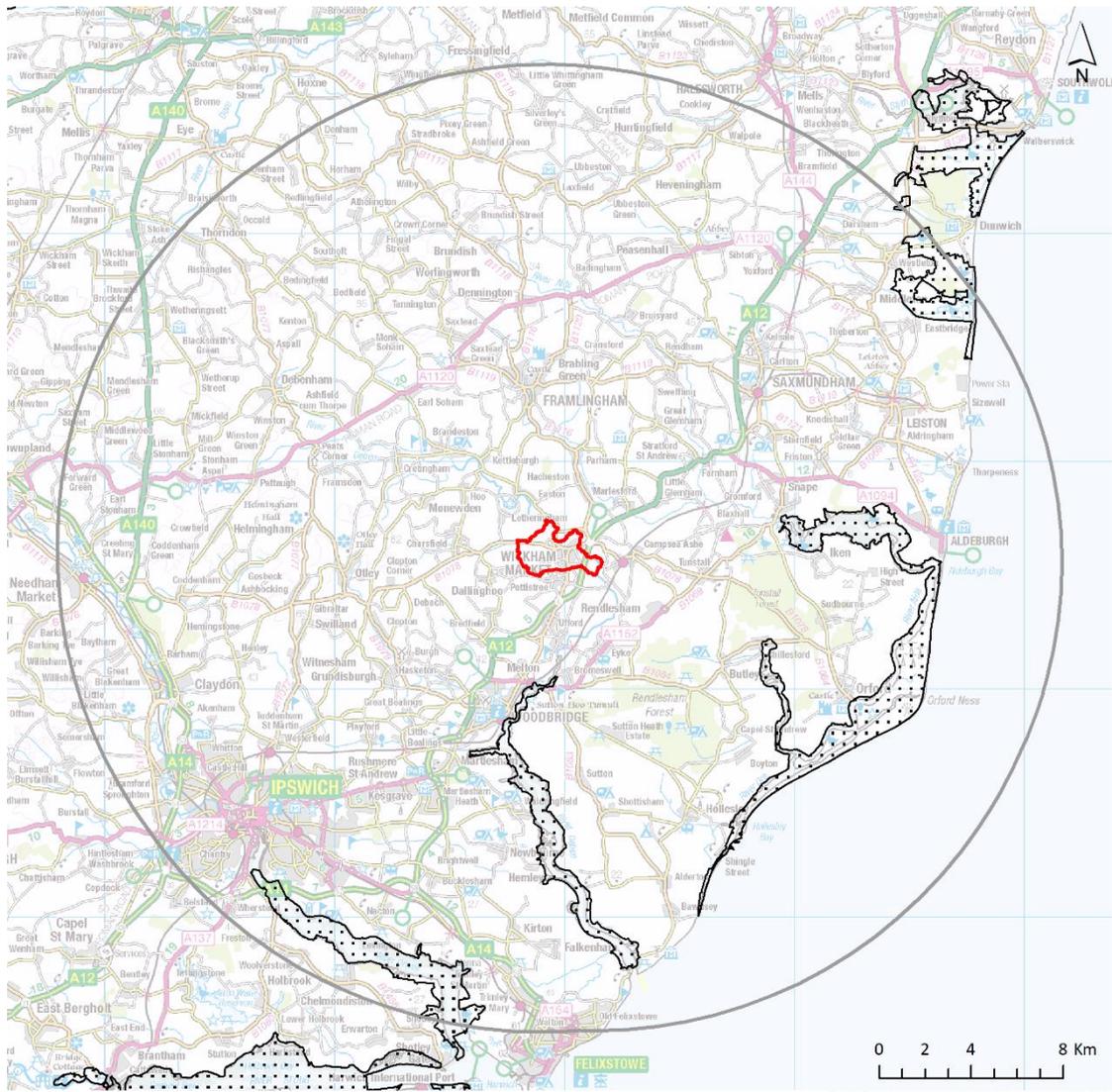
Wickham Market Neighbourhood Plan
 Habitats Regulations Assessment– October 2021



- Wickham Market Neighbourhood Area
- 20km Buffer
- Special Protection Area

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 Source: © Natural England copyright. Contains Ordnance Survey data

Wickham Market Neighbourhood Plan
 Habitats Regulations Assessment – October 2021



Wickham Market Neighbourhood Area
 20km Buffer
 RAMSAR

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Appendix 3: Relevant Habitat Sites

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

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

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

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

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

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

Appendix 4: Natural England Consultation Responses

Natural England Response to June 2021 Habitats Regulations Assessment of the Draft Wickham Market Neighbourhood Plan

Date: 13 July 2021
Our ref: 355972
Your ref:



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Andrea McMillan,

Planning Consultation: Draft Habitats Regulations Assessment of the Draft Wickham Market Neighbourhood Plan

Thank you for your consultation on the above dated 08 June 2021 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.

Draft Habitats Regulations Assessment

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that it is **not possible** to ascertain that the proposal will not result in adverse effects on the integrity of the sites in question.

Natural England advises that the assessment does not currently provide enough information and/or certainty to justify the assessment conclusion and that your authority should not grant planning permission at this stage.

Further assessment and consideration of mitigation options is required, and Natural England provides the following advice on the additional assessment work required;

The draft HRA (paragraph 6.6) identifies a need for mitigation measures to be applied for Policy WICK12 and WICK13. Whilst the measures identified broadly align with Natural England's view on the necessary mitigation measures required to ensure that these policies do not have an adverse effect on the integrity (AEOI) of any European Sites identified, either alone or in combination, we advise that the mitigation measure identified in paragraph 8.8 for Policy WICK12 of the Neighbourhood Plan (Reg 15 pre-submission version 3.28) does not currently provide enough certainty to ascertain that the proposal will not result in AEOI of the sites in question. 8.8 states, "provision of open space should reflect the local needs and be provided in accordance with the national recommended standard of 2.4ha per 1,000 population." We note that whilst applying this standard is a positive step and the neighbourhood plan appropriately identifies the importance of on-site public open space in retaining recreational pressure on site, we advise that the national recommended standard is not in line with expectations

for developments within the 13 km Suffolk Coast RAMS zone of influence (50 units +, or equivalent, as a guide). Please note that whilst we generally do not generally advise a required standard for open space, we ask developers to consider benchmark standards for accessible natural greenspace, the TCPA have published [Guides and Principles for Garden Communities](#), and Guide 7, Principal 9, references 40% Green Infrastructure (GI) as a target quantum. The [Suitable Accessible Natural Green Space \(SANGS\)](#) guidance can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. We have previously agreed with East Suffolk Council for other residential development sites that 8 ha of SANG should be provided per 1000 head of population (Thames Basin Heaths SPA Delivery Framework, 2009), however, we acknowledge that this is a high standard and may not be met by every development. In instances where 8ha of SANGS per 1000 head of population cannot be met, the quality of GI is considered particularly important. For further information, please refer to Annex I which details the minimum provisions required, guidance on creating high quality open space/GI, and provides information explaining the importance of retaining recreation on-site.

Should open space requirements for Policy WICK12 align closely with Natural England's requirements for 50 unit + residential development sites within the 13 km Suffolk Coast RAMS zone of influence (Annex I), we consider that the 'likely significant effect' identified within the HRA would be fully mitigated and Policy WICK12 (and by extension the plan) would not result in an AEOI on any European sites.

Please re-consult Natural England once this advice has been suitably applied.

Sites of Special Scientific Interest

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Further general advice on neighbourhood planning and the natural environment, including natural environment information sources is provided in Annex II.

Yours faithfully

Sam Kench
Norfolk and Suffolk Team

Annex I – Natural England’s recommendations for larger scale residential developments within the 13 km Suffolk Coast RAMS zone of influence (50 units +, or equivalent, as a guide)

Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale.

Whilst recreational disturbance has a number of impacts on designated sites (i.e. trampling, litter), one of the most significant impacts is the visual and noise disturbance of birds for which the SPAs are designated (although other site features are also affected). These birds are sensitive to disturbance from recreational walkers, cyclists etc. and in particular dogs off leads. With this site in close proximity to the European designated sites, it is considered that residents are likely to use these designated sites for undertaking regular recreational activities such as dog walking. Dog owners require space to walk their dogs off lead close to home and away from traffic, once or twice per day. If the onsite green space does not give adequate dog walking provision, most owners will travel elsewhere. Well-designed GI should positively accommodate off-lead exercising of dogs, in areas where this causes the least conflict with other resident’s interests such as cycling, children’s play equipment, sports activities and people seeking to minimise contact with dogs. We recommend that the developer consults relevant guidance and best practice documents such as [Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value](#) and incorporates these principles within proposed application designs.

The applicant may wish to consider to benchmark standards for accessible natural greenspace, the TCPA have published [Guides and Principles for Garden Communities](#), and Guide 7, Principal 9, references 40% GI as a target quantum. The [Suitable Accessible Natural Green Space \(SANGS\)](#) guidance can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. GI design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in [Nature Nearby](#), including the minimum standard of 2ha informal open space within 300m of everyone’s home.

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; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding public rights of way (PRoW)
- 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

Natural England would be happy to advise developers and/or their consultants on the detail of this at the pre-application stage through our charged Discretionary Advice Service (DAS), further information on which is available here.

- However, the unique draw of the above European sites means that, even when well-designed, ‘on-site’ provisions are unlikely to fully mitigate impacts when all residential development within reach of the coast is considered together ‘in combination’. We therefore advise that

¹ Taken from *Jenkinson, S., (2013), Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*

consideration of 'off-site' measures (i.e. in and around the relevant European designated site(s)) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases. Such measures are to be delivered strategically through the Suffolk Coast RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from these developments in line with the Suffolk Coast RAMS.

Natural England Response to August 2021 Habitats Regulations Assessment of the
Draft Wickham Market Neighbourhood Plan

Date: 29 September 2021
Our ref: 365740
Your ref:



Hornbeam House
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CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

laura.mundy@eastsuffolk.gov.uk
andrea.mcmillan@eastsuffolk.gov.uk

Dear Andrea McMillan,

**Planning Consultation: Draft Habitats Regulations Assessment of the Draft Wickham Market
Neighbourhood Plan**

Thank you for your consultation on the above dated 25 August 2021 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.

Draft Habitats Regulations Assessment

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the plan will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the plan, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any associated planning permissions given.

Further general advice on neighbourhood planning and the natural environment, including natural environment information sources is provided in Annex I.

Yours faithfully

Sam Kench
Norfolk and Suffolk Team

Annex I - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic¹](http://magic.defra.gov.uk/) website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here²](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here³](#). Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here⁴](#).

There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the [Magic⁵](http://magic.defra.gov.uk/) website and also from the [LandIS website⁶](http://www.landis.org.uk/), which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework⁷](#) sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance⁸](#) sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).