



# **Habitats Regulations Assessment Screening Statement**

**Draft Affordable Housing  
Supplementary Planning Document**

October 2021

## Contents

1. Introduction .....	1
2. Protected sites covered by this report .....	1
3. Affordable Housing Supplementary Planning Document .....	1
4. Other Plans and Projects .....	1
5. Assessment of likely significant effects of the Draft Affordable Housing Supplementary Planning Document (SPD) on Habitat sites .....	2
6. Summary and conclusions .....	7
Appendix 1: Sources of background information .....	8
Appendix 2: Locations of Habitat sites .....	9
Habitat sites within 20km of the East Suffolk Council- Waveney Local Plan Area .....	9
Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area .....	13
Appendix 3: Relevant Habitat sites .....	17
Appendix 4: Natural England Consultation Response .....	27

# 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 plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).

1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states:

'Where a land use plan:

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

Stage 1: Determining whether a plan is likely to have a significant effect on a European site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European

Union<sup>1</sup>, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

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

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

1.5 The draft Affordable Housing Supplementary Planning Document (SPD) is being produced by East Suffolk Council. The SPD will apply to the whole of the East Suffolk Council area, outside of the Broads. This report considers whether there are likely to be significant effects on protected Habitat sites and where a full Appropriate Assessment may be required.

1.6 East Suffolk (outside of the Broads) 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.

1.7 Both Local Plans were subject to Habitats Regulations Assessment as part of their production. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plans, resulting in conclusions that the plans will not lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts. Both Appropriate Assessments identified recreational disturbance particularly from dog walkers as a significant effect. The Council has subsequently produced a Recreational Avoidance and Mitigation Strategy and requires payment towards mitigation from residential developments within 13km of the protected Habitat sites.

---

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

## 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 East Suffolk Council. 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 Assessments for the Local Plans.

**Table 1: Relevant Habitat sites**

Name
Alde-Ore and Butley Estuaries SAC,
Alde-Ore Estuary SPA, Ramsar
Benacre to Easton Bavents SPA
Benacre to Easton Bavents Lagoons SAC
Breydon Water SPA, Ramsar
Broadland SPA, Ramsar
Deben Estuary SPA, Ramsar
Dew's Ponds SAC
Great Yarmouth North Denes SPA
Haisborough, Hammond and Winterton SAC
Minsmere to Walberswick Heaths & Marshes SAC
Minsmere – Walberswick SPA, Ramsar
Norfolk Valley Fens SAC
Outer Thames Estuary SPA
Orfordness – Shingle Street SAC
Sandlings SPA
Southern North Sea SAC
Staverton Park and The Thicks, Wantisden SAC
Stour and Orwell Estuaries SPA, Ramsar
The Broads SAC
Winterton-Horsey Dunes SAC

### 3. Affordable Housing Supplementary Planning Document

- 3.1 This HRA report reviews an early draft of the Affordable Housing Supplementary Planning Document (SPD).
- 3.2 The draft Affordable Housing SPD provides information and advice concerning the delivery of affordable housing. The overarching aim of the SPD is to facilitate the delivery of policy compliant affordable housing. The guidance contained in the draft SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for East Suffolk relating to the delivery of affordable housing. The SPD, when adopted, will be a material consideration in determination of applications for planning permission. The SPD does not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority.
- 3.3 Chapter 1 of the SPD is descriptive, setting out the policy context and purpose of the SPD and describing some key elements of affordable housing that are covered in the document. This chapter has therefore not been included in the screening table in section 5 of this report.
- 3.4 The other chapters provide guidance to support the preparation and determination of any planning applications which involve affordable housing, or for which the Local Plan policies concerning affordable housing are relevant. These chapters have all been included in the screening table in section 5.
- 3.5 The SPD also includes 3 appendices. These provide additional detail to support the main body of the SPD but do not in themselves introduce any new requirements and have therefore not been included in the screening table in section 5 of this report.

## 4. Other Plans and Projects

- 4.1 Regulation 105 of the Habitats Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plans are the Local Plans. The Local Plans set out the broad scale and distribution of development across the area of East Suffolk formerly covered by Suffolk Coastal District and Waveney District.
- 4.3 The draft Affordable Housing Supplementary Planning Document (SPD) adds detail to policies within both the Suffolk Coastal Local Plan and the Waveney Local Plan, specifically policies SCLP5.10 and 5.11 of the Suffolk Coastal Local Plan and policies WLP8.2 and 8.6 of the Waveney Local Plan.
- 4.4 A screening process considered each policy in the Suffolk Coastal and Waveney Local Plans and concluded whether significant effects were likely and if Appropriate Assessment was therefore needed. The Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans considered the following themes:
- Recreation pressure,
  - Air quality and traffic emissions,
  - Biodiversity net gain,
  - Urbanisation,
  - Water quality, resources and treatment, and
  - Flood risk and coastal erosion.
- 4.5 Mitigation measures were identified within the Appropriate Assessments and incorporated within both Local Plans, resulting in a conclusion that neither plan would lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts.

## 5. Assessment of likely significant effects of the Draft Affordable Housing Supplementary Planning Document (SPD) on Habitat sites

- 5.1 Table 3 below considers each relevant section of the draft Affordable Housing Supplementary Planning Document (SPD) 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 protected sites. The relevant sections are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

**Table 3: Likely significant effects of the Draft Affordable Housing Supplementary Planning Document**

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
2. Types of affordable housing	This chapter is mostly descriptive, setting out the different types of housing that constitute affordable housing. It includes sections on affordable housing tenures, community led housing, affordable self-build and custom build housing. This chapter does not in itself promote development and will not lead to likely significant effects on Habitat Sites.	None	None	No
3. Identifying an appropriate mix of affordable housing	This chapter explains the Council’s approach to affordable housing tenure mix. Information regarding the sections of the relevant Strategic Housing Market Assessments is provided. This chapter also sets out Council’s approach to First Homes, affordable specialist housing provision, build to rent, and provides further guidance on the use of Council’s housing register to evidence local housing need. This section simply clarifies the approach to affordable housing mix and does not in itself promote development. This chapter will therefore	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	not lead to likely significant effects on Habitat Sites.			
4. Section 106 agreements	This section explains the legal mechanisms that the Council will use to secure affordable housing. This section does not in itself promote development and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
5. Financial contributions	This chapter explains the Council’s approach to the provision of financial contributions in lieu of on-site affordable housing provision. This section does not in itself promote development and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
6. Exception Sites	This chapter sets out the Council’s approach to the consideration of exception sites/ affordable housing in countryside i.e affordable housing schemes outside settlement boundaries. This chapter expands on the guidance set out in policies SCLP5.11 Affordable Housing on Exception Sites and WLP8.6 Affordable Housing in the	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	Countryside. Both these policies were considered as part of the Local Plan HRA reports and no Likely Significant Effects were identified. This chapter will not lead to likely significant effects on Habitat Sites.			
7. Design	This chapter provides guidance on the key design policies that the Council will apply when considering mixed-tenure or solely affordable housing developments. This section does not in itself promote development and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
8. Local Housing Needs Assessments	The chapter provides guidance on the production and assessment of local housing needs assessments. This section does not in itself promote development and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
9. Viability assessments	The explains the Council’s approach to viability assessments submitted in support of schemes where a reduced amount of affordable housing in being proposed. This section does not in itself promote	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	development and will therefore not lead to likely significant effects on Habitat Sites.			
10. Vacant buildings credit	This section explains the Council’s approach to applying vacant building credit. This incentivises the development of brownfield land but does not in itself promote development and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
11. Community Infrastructure Levy	Sets out the Council’s approach to CIL relief on schemes for affordable housing. This section simply clarifies the policy and does not in itself promote development. This chapter will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
12. Making an Application	This section explains the process for applying for planning permission for schemes including an element of affordable housing. It explains the evidence and supporting documents that will need to be submitted alongside such applications. This chapter is descriptive, does not in itself promote development, and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No

## 6. Summary and conclusions

- 6.1 The draft Affordable Housing Supplementary Planning Document (SPD) provides additional guidance to inform the determination of planning applications alongside the Waveney and Suffolk Coastal Local Plans. The draft Affordable Housing SPD provides information and advice concerning the delivery of affordable housing, with an overarching aim of facilitating the delivery of policy compliant affordable housing. The guidance contained in the draft SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for East Suffolk relating to affordable housing. The SPD, when adopted, be a material consideration in the determining of applications for planning permission.
- 6.2 Natural England were consulted on a draft of this Screening Statement as statutory nature conservation body. Their response is contained in Appendix 4.
- 6.3 Implementation of the Affordable Housing Supplementary Planning Document will not lead to likely significant effects on protected Habitat sites.

Signed: 

Dated: 27/10/2021

Desi Reed  
Planning Policy and Delivery Manager  
East Suffolk Council

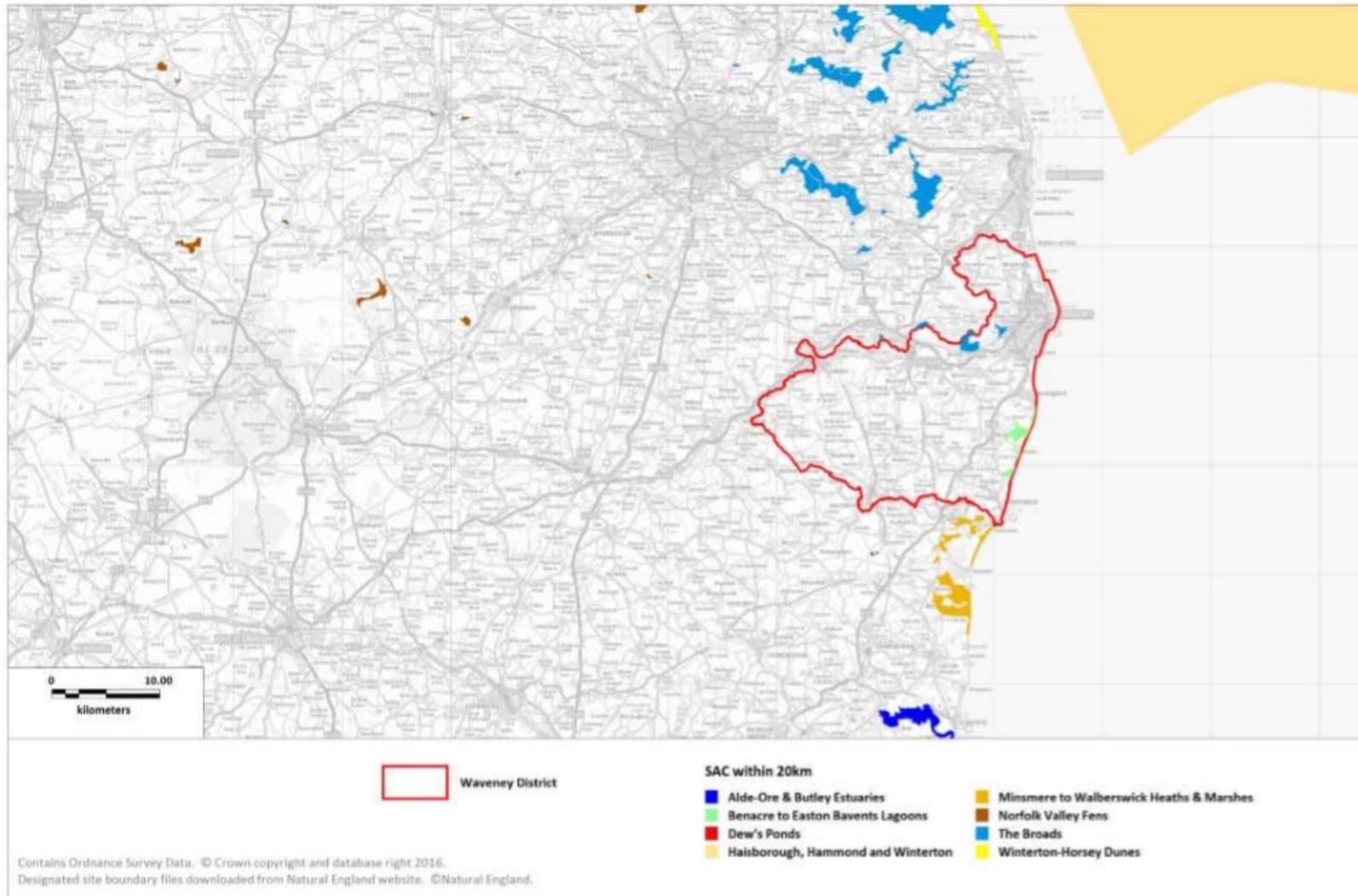
## Appendix 1: Sources of background information

- East Suffolk Council – Suffolk Coastal Local Plan (September 2020)
- East Suffolk Council – Waveney Local Plan (March 2019)
- Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan stage (incorporating Main Modifications) (May 2020)
- The Habitats Regulations Assessment of the Waveney Local Plan (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)

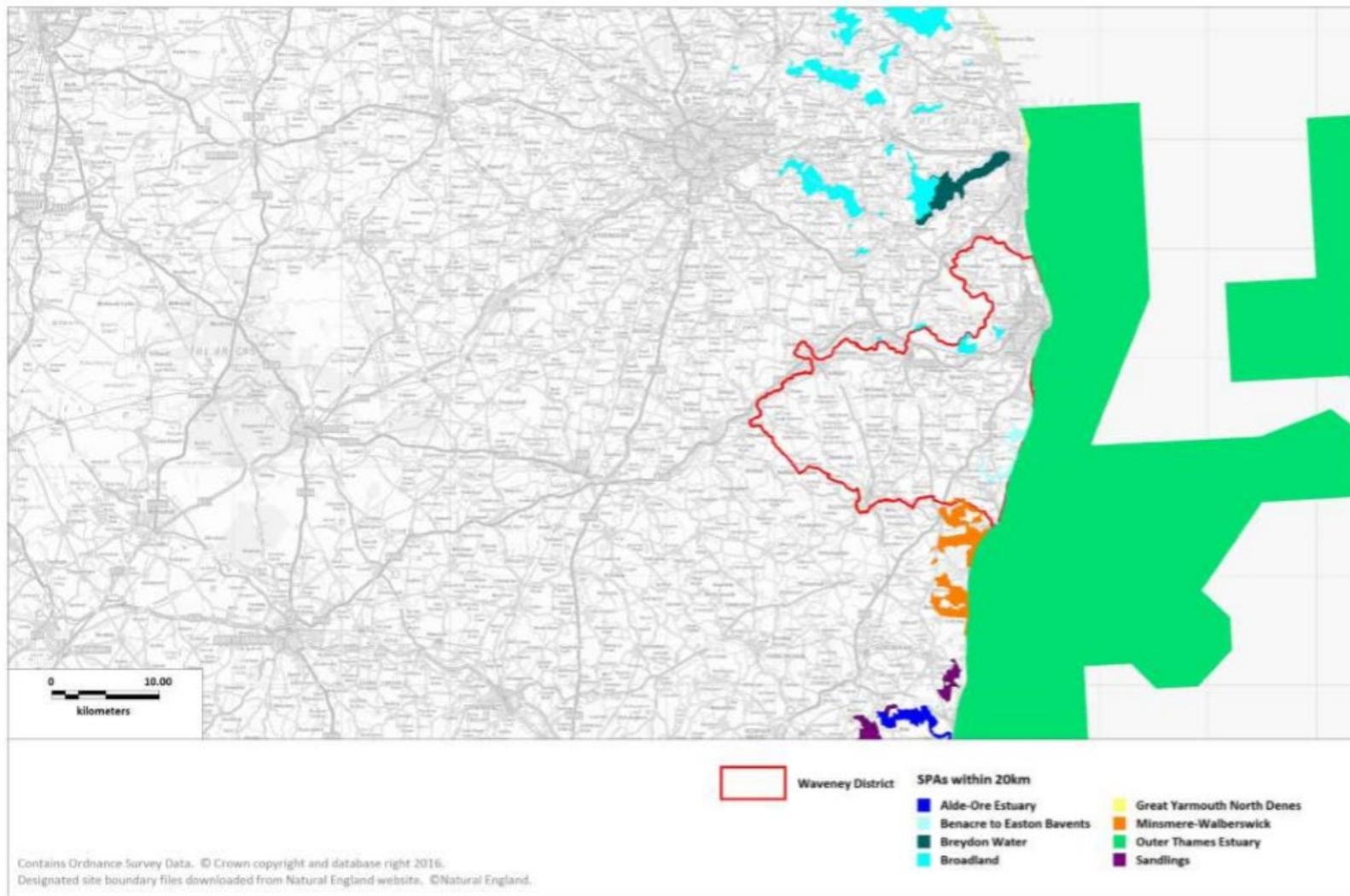
## Appendix 2: Locations of Habitat sites

Habitat sites within 20km of the East Suffolk Council-  
Waveney Local Plan Area

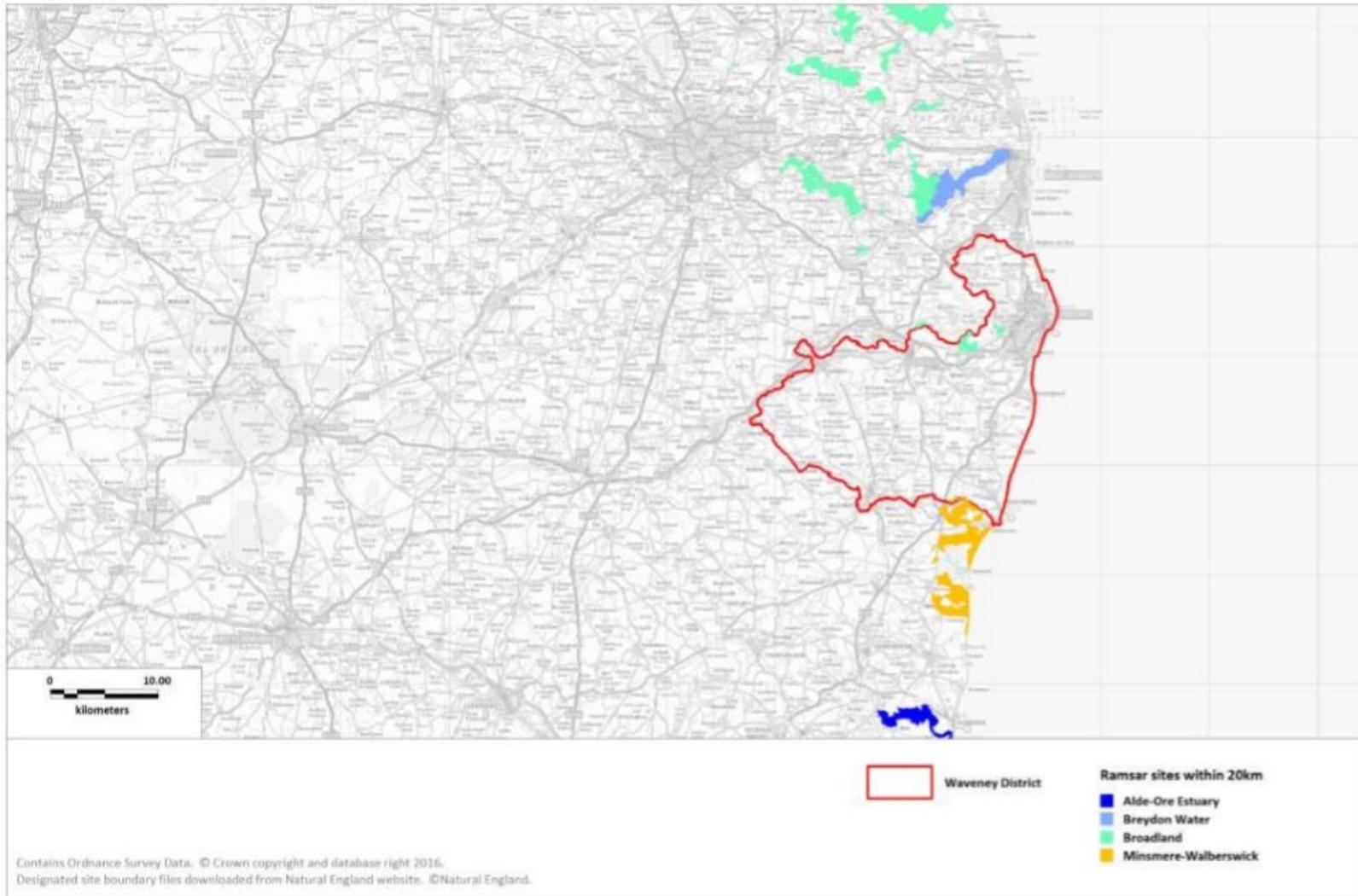
Map 1: SACs



Map 2: SPAs

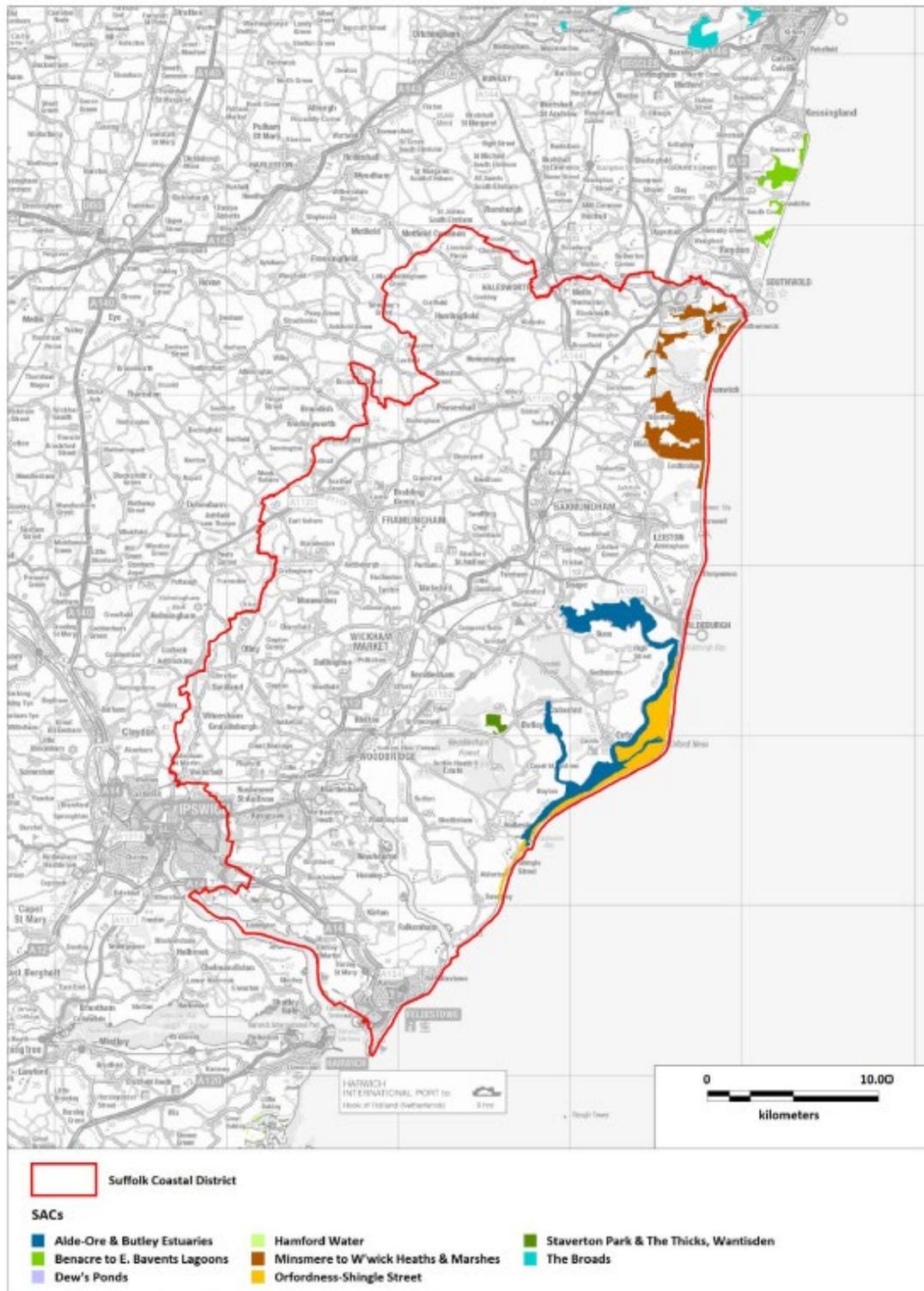


Map 3: Ramsar Sites



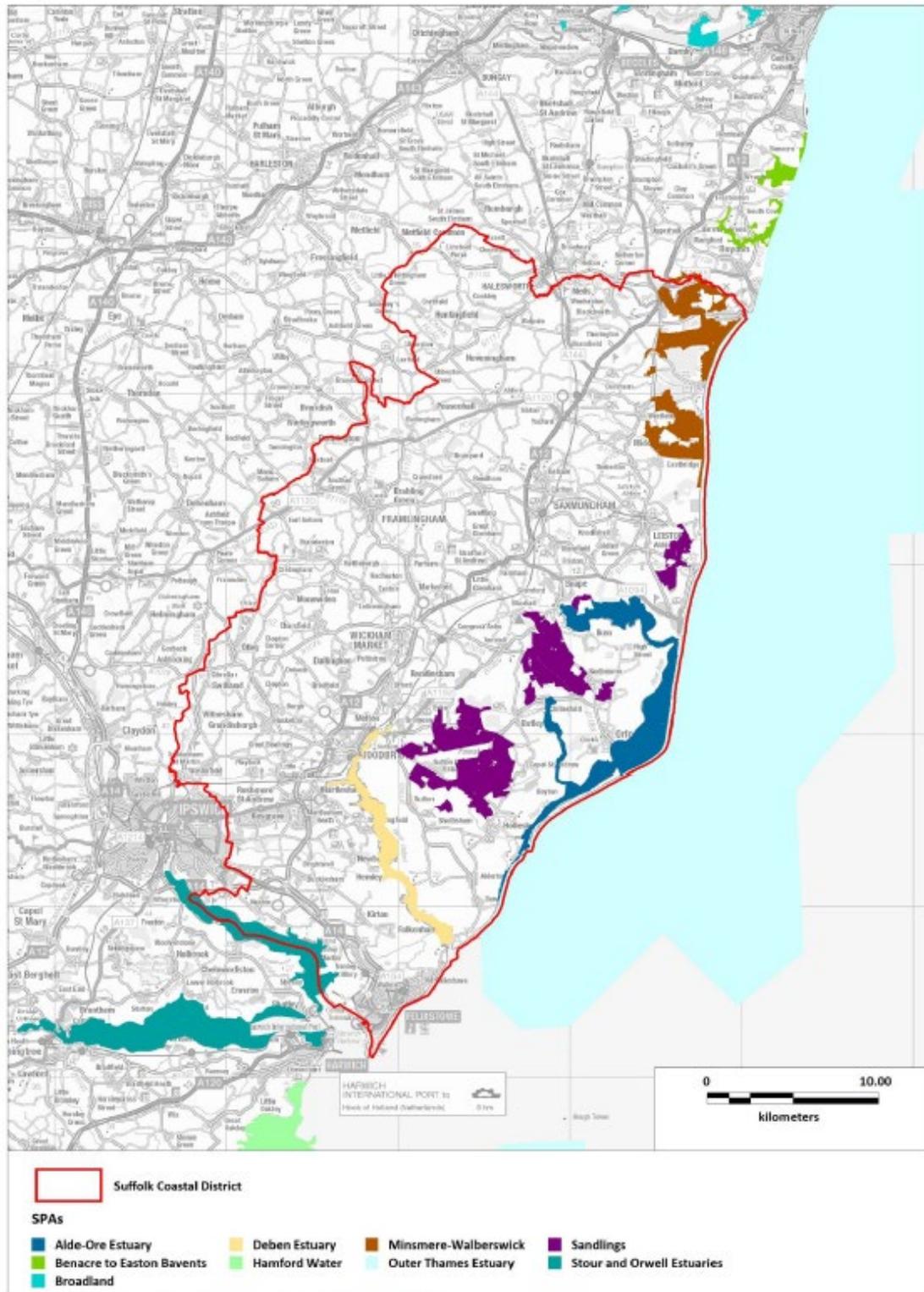
## Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

Map 1: SAC sites where boundary within 20km of Suffolk Coastal District



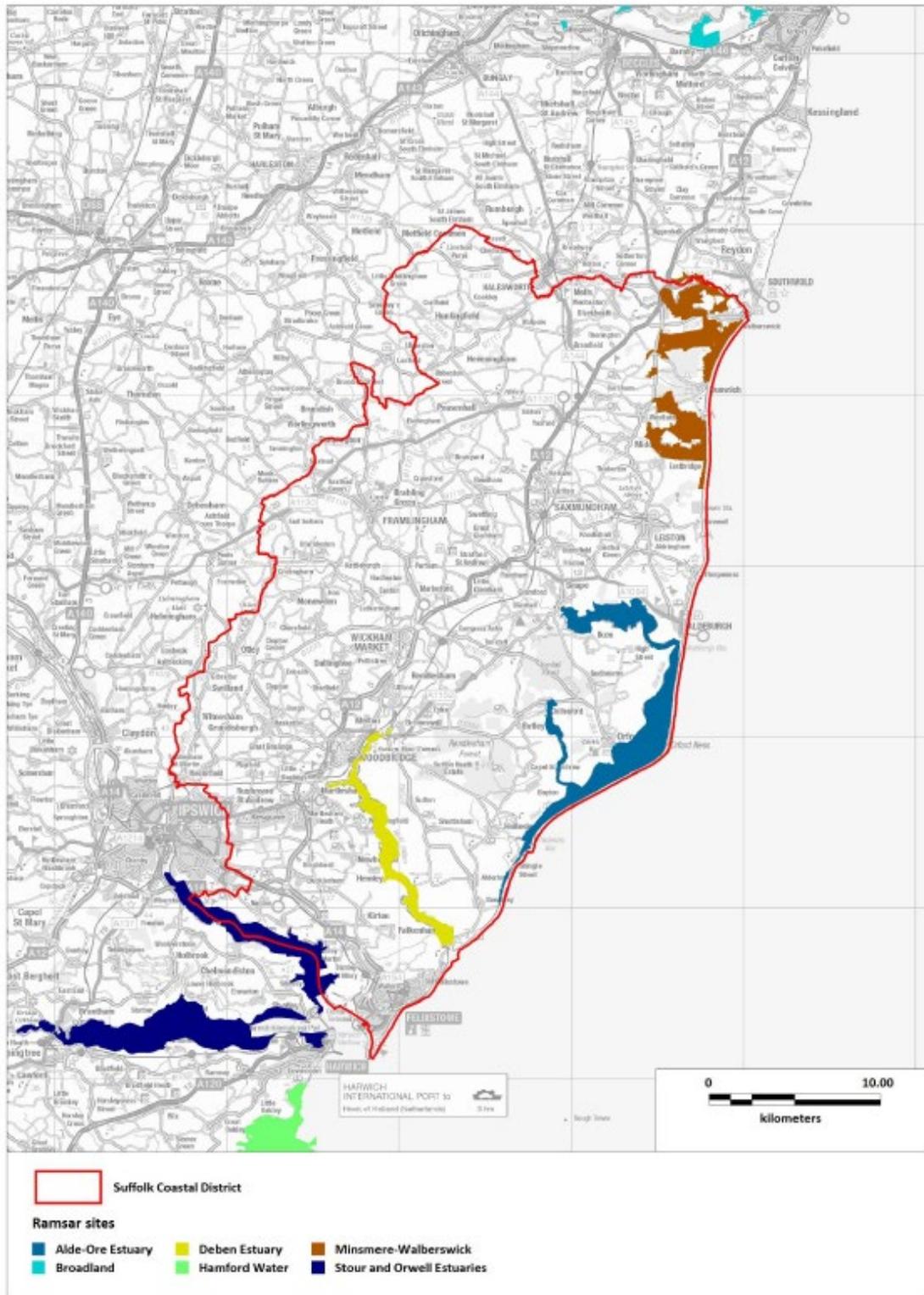
Contains Ordnance Survey Data. © Crown copyright and database right 2017.  
 Contains Natural England information © Natural England and Database Right. All rights Reserved.

**Map 2: SPA sites where boundary within 20km of Suffolk Coastal District**



Contains Ordnance Survey Data. © Crown copyright and database right 2017.  
 Contains Natural England Information © Natural England and Database Right. All rights Reserved.

**Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District**



Contains Ordnance Survey Data. © Crown copyright and database right 2017.  
 Contains Natural England Information © Natural England and Database Right. All rights Reserved.

### 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))
<b>Special Areas of Conservation</b>			
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)
Benacre to Easton Barents Lagoons	H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i> : Little tern A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	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,	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).

		The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.	
Dew's Ponds	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 the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.	None identified
Minsmere to Walberswick Heaths and Marshes	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) Anas crecca: Eurasian teal A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier	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 and habitats,	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>A082(NB) Circus cyaneus: Hen harrier  A224(B) Caprimulgus europaeus: European nightjar  A056(B) Anas clypeata: Northern shoveler  A056(NB) Anas clypeata: Northern shoveler  A051(B) Anas strepera: Gadwall  A051(NB) Anas strepera: Gadwall  A132(B) Recurvirostra avosetta: Pied avocet  A195(B) Sterna albifrons: Little tern  A394(NB) Anser albifrons albifrons: Greater white-fronted goose</p>	<p>The structure and function (including typical species) of qualifying natural habitats, and,  The supporting processes on which qualifying natural habitats rely.</p>	
<p>Orfordness – Shingle Street</p>	<p>H1150: Coastal Lagoons  H1210: Annual vegetation of drift lines  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:  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>Not identified in Suffolk Coastal Final Draft Local Plan HRA.</p>

<p>Staverton Park and The Thicks, Wantisden</p>	<p>H9190: Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains; Dry oak-dominated woodland.</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: 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>Woodland management, disease, atmospheric pollution.</p>
<p>The Broads</p>	<p>H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i>: Desmoulin's whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) H7140 Transition mires and quaking bogs</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; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,</p>	<p>Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party</p>

	<p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp</p> <p>H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation</p> <p>S1355 Lutra lutra: Otter</p> <p>S1903 Liparis loeselii: Fen orchid</p> <p>S4056 Anisus vorticulus: Little ramshorn whirlpool snail</p>	<p>The populations of qualifying species, and, The distribution of qualifying species within the site.</p>	
<b>Special Protection Areas</b>			
<p>Alde-Ore Estuary (also Ramsar site)</p>	<p>A081: Eurasian marsh harrier (breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A132: Pied avocet (breeding)</p> <p>A151: Ruff (non-breeding)</p> <p>A162: Common redshank (non-breeding)</p> <p>A183: Lesser black-backed gull (breeding)</p> <p>A191: Sandwich tern (breeding)</p> <p>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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	<p>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)</p> <p>(Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)</p>
<p>Benacre to Easton Bvents</p>	<p>H1150# Coastal lagoons, A195(B) Sterna albifrons: Little tern</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to</p>	<p>Public access/disturbance, water pollution, physical modification, changes</p>

	<p>A021(B) <i>Botaurus stellaris</i>: Great bittern  A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier</p>	<p>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>in species distributions, fisheries (marine and estuarine).</p>
<p>Broadlands (also Ramsar site)</p>	<p>H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>  S1016 <i>Vertigo moulinsiana</i>: Desmoulin's whorl snail  H7230 Alkaline fens  H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)  H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>)  H7140 Transition mires and quaking bogs  H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp</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;  The extent and distribution of qualifying natural habitats and habitats of qualifying species,  The structure and function (including typical species) of qualifying natural habitats,  The structure and function of the habitats of qualifying species,  The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,  The populations of qualifying species, and,</p>	<p>Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party</p>

	H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid S4056 Anisus vorticulus: Little ramshorn whirlpool snail	The distribution of qualifying species within the site.	
Deben Estuary (also Ramsar site)	A046a: Dark bellied brent goose (non-breeding) A132: Pied avocet (non-breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.	Coastal squeeze, disturbance to birds, water and air pollution.
Outer Thames Estuary	A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: Little Tern (Breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features;	Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.

		<p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	
<p>Minsmere to Walberswick (also Ramsar site)</p>	<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>A224(B) <i>Caprimulgus europaeus</i>: European nightjar</p> <p>A056(B) <i>Anas clypeata</i>: Northern shoveler</p> <p>A056(NB) <i>Anas clypeata</i>: Northern shoveler</p> <p>A051(B) <i>Anas strepera</i>: Gadwall</p> <p>A051(NB) <i>Anas strepera</i>: Gadwall</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of the qualifying features,</p> <p>The structure and function of the habitats of the qualifying features,</p> <p>The supporting processes on which the habitats of the qualifying features rely,</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p>	<p>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>

	<p>A132(B) <i>Recurvirostra avosetta</i>: Pied avocet  A195(B) <i>Sterna albifrons</i>: Little tern  A394(NB) <i>Anser albifrons albifrons</i>: Greater white-fronted goose</p>		
Outer Thames Estuary	<p>A001 (W) <i>Gavia stellata</i> Red-throated Diver  A195 (B) <i>Sterna hirundo</i> Common Tern  A193 (B) <i>Sternula albifrons</i> Little Tern</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;</p>	<p>Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.</p>

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

## Appendix 4: Natural England Consultation Response

Date: 26 October 2021  
Our ref: 368549  
Your ref:



Andrea.McMillan@eastsoffolk.gov.uk  
**BY EMAIL ONLY**

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

T 0300 060 3900

Dear Andrea McMillan,

**Planning Consultation: Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) screening opinion for the draft Affordable Housing Supplementary Planning Document (SPD)**

Thank you for your consultation on the above dated 21 September 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.

**Screening Opinion Request: Strategic Environmental Assessment and Habitats Regulation Assessment**

**Habitats Regulations Assessment**

Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has screened the proposal to check for the likelihood of significant effects.

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of the information provided, Natural England concurs with this view.

**Strategic Environmental Assessment**

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects on the environment as a result of the proposal are unlikely to occur. On the basis of the information provided, Natural England concurs with this view.

If you have any queries relating to the advice in this letter please contact me on [REDACTED].

Yours faithfully

Sam Kench  
Norfolk and Suffolk Team