# Habitats Regulations Assessment Screening Statement

# Coastal Adaptation Supplementary Planning Document

October 2022











### Contents

1.	Introduction	1
2.	Protected sites covered by this report	1
3.	Coastal Adaptation Supplementary Planning Document	1
4.	Other Plans and Projects	2
5.	Assessment of likely significant effects of the Draft Coastal Adaptation	
Sup	plementary Planning Document (SPD) on Habitat sites	4
6.	Summary and conclusions	9
Арр	endix 1: Sources of background information	. 11
Арр	endix 2: Locations of Habitat sites	. 12
Hab	itat sites within 20km of the East Suffolk Council- Waveney Local Plan Area	. 12
Hab	itat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Ard	ea
	16	
Hab	itat sites within 20km of the Great Yarmouth Local Plan Area	. 20
Hab	itat sites within 20km of the North Norfolk Local Plan Area	. 24
Hab	itat sites within 20km of The Broads Authority Local Plan Area	. 28
Арр	endix 3: Relevant Habitat sites	. 32
Арр	endix 4: Natural England Consultation Response	. 48

#### 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 Coastal Adaptation Supplementary Planning Document (SPD) is being prepared by a partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team. The purpose of the SPD is to provide guidance on aligned policy approaches along the coast. The SPD follows on from the Statement of Common Ground on Coastal Zone Planning agreed between the partnership authorities in September 2018. The SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice. This report considers whether there are likely to be significant effects on protected Habitat sites as the result of the guidance in the SPD. The geographical extent of the SPD partnership area is illustrated by figure 1 below:

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

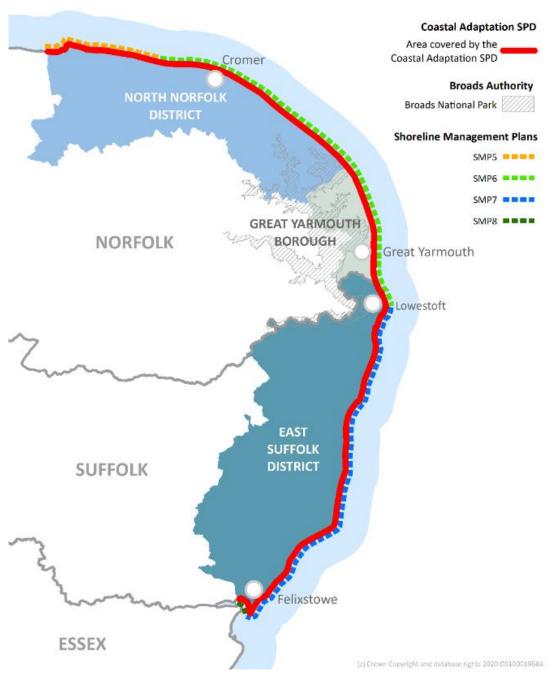


Figure 1: Extent of Coastal Adaptation Partnership Area

- 1.6 Within the partnership area there are a number of Local Plans, which are summarised below:
  - 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.
  - The Local Plan for Great Yarmouth (outside of the Broads) is made up of two parts, the Core Strategy (Local Plan Part 1) adopted December 2015, and the

Local Plan Part 2 adopted December 2021. The Borough Council is currently progressing a review of the Local Plan. The new Local Plan will eventually replace the Core Strategy and the Local Plan Part 2. It is intended the new Local Plan will be a single document, rather than being separate Local Plans covering strategy, allocation and detailed policies. The first stage in the review process was a 'call for sites' and consultation on a new Sustainability Appraisal Scoping Report which was held between 27 May 2022 and 08 July 2022.

- The Local Plan for North Norfolk (outside of the Broads) comprises the Core Strategy and Development Management Policies adopted September 2008, and the Site Allocations Development Plan Document adopted February 2011.
   The District Council is currently at an advanced stage in the production of a new Local Plan and consultation on a Proposed Submission Version (Regulation 19 Publication Stage) was held during January and February 2022.
- The Broads Authority adopted the Local Plan for the Broads on 17 May 2019.
  The Broads Authority have recently commenced a review the Local Plan for the
  Broads. The first stage in the review process was a consultation on a new
  Sustainability Appraisal Scoping Report which was published for technical
  consultation in June 2021. Issues and Options consultation commenced in
  October 2022.

2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of the SPD Partnership Area. 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.

**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
Breckland SAC, SPA
Breydon Water SPA, Ramsar
Broadland SPA, Ramsar
Deben Estuary SPA, Ramsar
Dew's Ponds SAC
Great Yarmouth North Denes SPA
Greater Wash SPA
Haisborough, Hammond and Winterton SAC
Inner Dowsing, Race Bank and North Ridge SAC
Minsmere to Walberswick Heaths & Marshes SAC
Minsmere – Walberswick SPA, Ramsar
Norfolk Valley Fens SAC
North Norfolk Coast SAC, SPA, Ramsar
Outer Thames Estuary SPA
Orfordness – Shingle Street SAC
Overstrand Cliffs SAC
River Wensum SAC
Roydon Common and Dersingham Bog SAC, Ramsar
Sandlings SPA
Southern North Sea SAC
Staverton Park and The Thicks, Wantisden SAC

Stour and Orwell Estuaries SPA, Ramsar
The Broads SAC
The Paston Great Barn SAC
The Wash and North Norfolk Coast SAC
The Wash SPA, Ramsar
Winterton-Horsey Dunes SAC

## 3. Coastal Adaptation Supplementary Planning Document

- 3.1 This HRA report reviewed an early draft of the Coastal Adaptation SPD, dated August 2022 which was produced prior to the finalisation of the consultation draft.
- 3.2 The overall purpose of the SPD is to provide guidance on how to interpret and implement planning policy in relation to coastal matters. The guidance contained in the SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for the authorities that make up the SPD partnership area (East Suffolk, Great Yarmouth, North Norfolk and The Broads Authority Area). The SPD, when adopted, will be a material consideration in determination of applications for planning permission.
- 3.3 Chapter 1, 2 and 3 of the SPD set out the introduction, the purpose of the SPD, the policy context and an explanation the roles and remits of different organisations involved in coastal matters throughout the SPD partnership area. These chapters are descriptive statements of fact and have therefore not been included in the screening table in section 5 of this report.
- 3.4 The other chapters provide guidance on specific coastal matters to support the interpretation and implementation of planning policies. They cover:
  - Development in the Coastal Change Management Area;
  - Rollback and Relocation, and
  - Delivery and Enabling Development.

These chapters have all been included in the screening table in section 5 along with a brief summary of each chapter.

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 four authorities which make up the SPD Partnership Area.
- 4.3 Specifically, the SPD adds detail to the following policies contained within the Local Plans:
  - East Suffolk Council- policies SCLP9.3 (Coastal Change Management Area) and SCLP9.4 (Coastal Change Rollback or Relocation) of the Suffolk Coastal Local Plan and policies WLP8.25 (Coastal Change Management Area), WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion) of the Waveney Local Plan.
  - Great Yarmouth Borough Council- Local Plan Part 1 policy CS13 (Protecting Areas at Risk of Flooding or Coastal Change), Local Plan Part 2 policy GSP4 (New Development in Coastal Change Management Areas), Local Plan Part 2 policy E2 (Relocation from Coastal Change Management Areas).
  - North Norfolk District Council- Core Strategy policy EN11 (Coastal Erosion), policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk), emerging Local Plan policy CC5 (Coastal Change Management), and emerging Local Plan policy CC6 (Coastal Change Adaptation).
  - The Broads Authority- Broads Local Plan policy SSCOAST (The Coast).
- 4.4 Screening has been carried out on all the relevant local plans across the partnership area and concluded whether significant effects were likely and if Appropriate Assessment was therefore needed. 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.

- 4.5 Recreational Disturbance from new residential development has been identified as a significant effect across the SPD partnership area. As a result of which, two strategic mitigation schemes have been developed and implemented, and the relevant Councils require payment towards mitigation within the relevant Zone of Influence:
  - Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019) (this also applies to part of the Broads Authority area)
  - Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (March 2021).

- Assessment of likely significant effects of the Draft Coastal Adaptation Supplementary Planning Document (SPD) on Habitat sites
- 5.1 Table 3 below considers each relevant section of the 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 Coastal Adaptation Supplementary Planning Document

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that	Likely	AA
		could possibly be	significant	needed?
		affected	effect identified	
Chapter 4: Development in the Coastal Change Management Area	This chapter provides detailed guidance regarding the types of development that may be appropriate within identified Coastal Change Management Areas (CCMAs) and set out the planning considerations for development within the CCMAs.  The guidance in this chapter builds on the relevant local plan policies, namely:  East Suffolk Council: SCLP9.3 Coastal Change Management Area and WLP8.25 Coastal Change Management Areas.  Great Yarmouth Borough Council: GSP4 New Development in Coastal Change Management Areas.  North Norfolk District Council: EN11 Coastal Erosion.  The Broads Authority: SSCOAST The Coast The above policies have been subject to separate HRA as part of the their production and any necessary mitigation incorporated into the relevant Local Plans.	None	None	No
	The guidance in this chapter supports the Government's objective to ensure that development will only be appropriate in a CCMA if it requires a coastal location and provides substantial economic and social benefits to communities. The guidance is clear that new permanent residential will not be			

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that	Likely	AA
		could possibly be	significant	needed?
		affected	effect identified	
	permitted in CCMAs and that new non-residential development that is not associated with an existing building or use, is unlikely to be appropriate within the CCMA, whatever its proposed use.			
	This chapter also provides specific guidance on use Coastal Erosion Vulnerability Assessment (CEVA).			
	This chapter provides guidance for land and property owners and those wishing to apply for planning permission or carry out development within the CCMA. The guidance expands on existing policy and clarifies the approach to the consideration of development within the CCMAs; it does not, in itself promote additional development. This chapter will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other plans or projects.			
Chapter 5: Rollback and Relocation	This chapter explains the requirement for LPAs to make provision for development & infrastructure that needs to be relocated away from CCMAs and links to the relevant guidance in the NPPF and NPPG. This chapter also provides an explanation on what is meant by 'rollback' and 'relocation' and explains that compensation is not included as part of this and	None	None	No

Assessment of potential impact on Habitat sites	Habitat sites that	Likely	AA
	could possibly be	significant	needed?
	affected	effect identified	
is beyond the remit of the SPD. The chapter provides guidance on both residential and commercial, business and leisure uses.			
The guidance in this chapter builds on the relevant local plan policies, namely:  East Suffolk Council: Policy SCLP9.4 (Coastal Change Rollback or Relocation) and Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion).  Great Yarmouth Borough Council: Policy E2 (Relocation from Coastal Change Management Areas).  North Norfolk District Council Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk)  This chapter provides further detail guidance on the interpretation of the relevant local plan policies particularly around issues such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated from, should be managed or utilised in the future to the point at which it eventually becomes lost to the sea. The guidance in this chapter does not, in itself promote additional development and will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other			
	is beyond the remit of the SPD. The chapter provides guidance on both residential and commercial, business and leisure uses.  The guidance in this chapter builds on the relevant local plan policies, namely:  East Suffolk Council: Policy SCLP9.4 (Coastal Change Rollback or Relocation) and Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion).  Great Yarmouth Borough Council: Policy E2 (Relocation from Coastal Change Management Areas).  North Norfolk District Council Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk)  This chapter provides further detail guidance on the interpretation of the relevant local plan policies particularly around issues such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated from, should be managed or utilised in the future to the point at which it eventually becomes lost to the sea. The guidance in this chapter does not, in itself promote additional development and will therefore not lead to likely significant	is beyond the remit of the SPD. The chapter provides guidance on both residential and commercial, business and leisure uses.  The guidance in this chapter builds on the relevant local plan policies, namely:  East Suffolk Council: Policy SCLP9.4 (Coastal Change Rollback or Relocation) and Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion).  Great Yarmouth Borough Council: Policy E2 (Relocation from Coastal Change Management Areas).  North Norfolk District Council Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk)  This chapter provides further detail guidance on the interpretation of the relevant local plan policies particularly around issues such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated from, should be managed or utilised in the future to the point at which it eventually becomes lost to the sea. The guidance in this chapter does not, in itself promote additional development and will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other	is beyond the remit of the SPD. The chapter provides guidance on both residential and commercial, business and leisure uses.  The guidance in this chapter builds on the relevant local plan policies, namely:  East Suffolk Council: Policy SCLP9.4 (Coastal Change Rollback or Relocation) and Policy WLP8.26 (Relocation and Replacement of Development Affected by Coastal Erosion).  Great Yarmouth Borough Council: Policy E2 (Relocation from Coastal Change Management Areas).  North Norfolk District Council Policy EN12 (Relocation and Replacement of Development Affected by Coastal Erosion Risk)  This chapter provides further detail guidance on the interpretation of the relevant local plan policies particularly around issues such as how land or sites may be identified for rollback or relocation purposes; how such land may be acquired or identified; and how land, which has been vacated from, should be managed or utilised in the future to the point at which it eventually becomes lost to the sea. The guidance in this chapter does not, in itself promote additional development and will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Chapter 6: Delivery and Enabling Development	This chapter provides guidance on the circumstances whereby enabling development may be considered necessary to help support coastal adaptation/rollback measures. Example scenarios are provided.  This chapter includes reference to opportunities for the rollback or creation of natural habitats through development elsewhere.  This chapter provides further detail guidance on the interpretation of the relevant local plan policies and does not, in itself, promote additional development and will therefore not lead to likely significant effects on Habitat Sites alone or in combination with other plans or projects.	None	None	No

#### 6. Summary and conclusions

6.1 The Coastal Adaptation Supplementary Planning Document (SPD) provides additional guidance to inform the determination of planning applications across the SPD Partnership Area (East Suffolk, Great Yarmouth, North Norfolk and The Broads Authority Area). The SPD provides information and advice for residents, businesses and other relevant organisations concerning coastal management measures and policies, development in the Coastal Change Management Area (CCMA); rollback and relocation; and delivery and enabling Development.

- 6.2 The guidance contained in the SPD will assist in the implementation of Local Plans and Neighbourhood Plans across the SPD Partnership Area (East Suffolk, Great Yarmouth, North Norfolk and The Broads Authority Area). The SPD, when adopted, will be a material consideration in the determining of applications for planning permission.
- 6.3 Following screening for likely significant effects it is concluded that implementation of the SPD will not lead to likely significant effects on protected Habitat sites alone or in combination with other plans or projects.
- 6.4 Natural England were consulted on a draft of this Screening Statement as statutory nature conservation body and they agreed with the conclusions set out above. Their response can be found in Appendix 4.

Signed: Dated: 26 October 2022

Iain Withington
Planning Policy Team Leader
North Norfolk District Council

#### Signed:

Ancrilla

Dated: 21 October 2022

Andrea McMillan Planning Manager - Policy, Delivery and Specialist Services East Suffolk Council

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Signed: Dated: 31 October 2022

Kim Balls Principal Strategic Planner Great Yarmouth Borough Council

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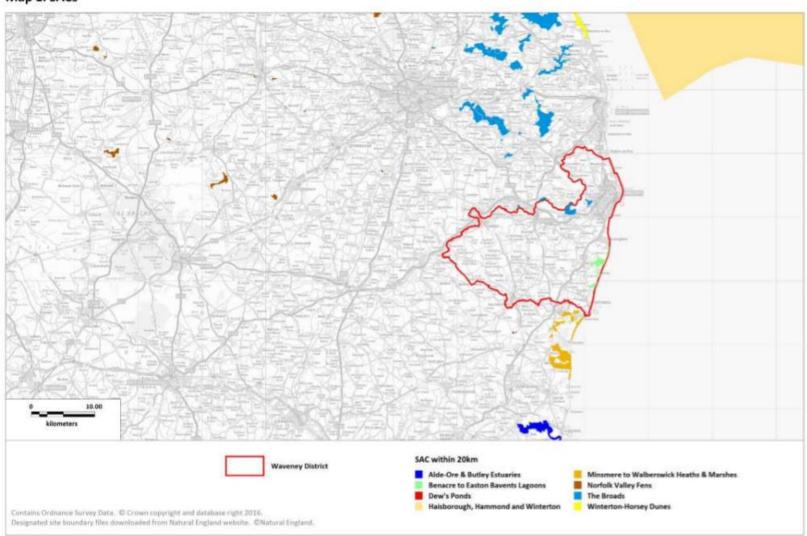
#### Appendix 1: Sources of background information

- 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)
- Great Yarmouth Core Strategy (Local Plan Part 1) (December 2015)
- Great Yarmouth Local Plan Part 2 (December 2021)
- Habitats Regulation Assessment of the Great Yarmouth Local Plan Core Strategy (February 2015)
- Habitats Regulations Assessment of the Great Yarmouth Local Plan Part 2 (December 2019)
- Habitats Regulations Assessment of the Great Yarmouth Local Plan Part 2: Addendum at Main Modifications (June 2021)
- North Norfolk Core Strategy Appropriate Assessment (June 2007)
- North Norfolk Local Plan HRA Submission Version (December 2021)
- Local Plan for the Broads Plan 2015 2036 (May 2019)
- Habitats Regulations Assessment of the Local Plan for the Broads (January 2019)
- Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (March 2021)

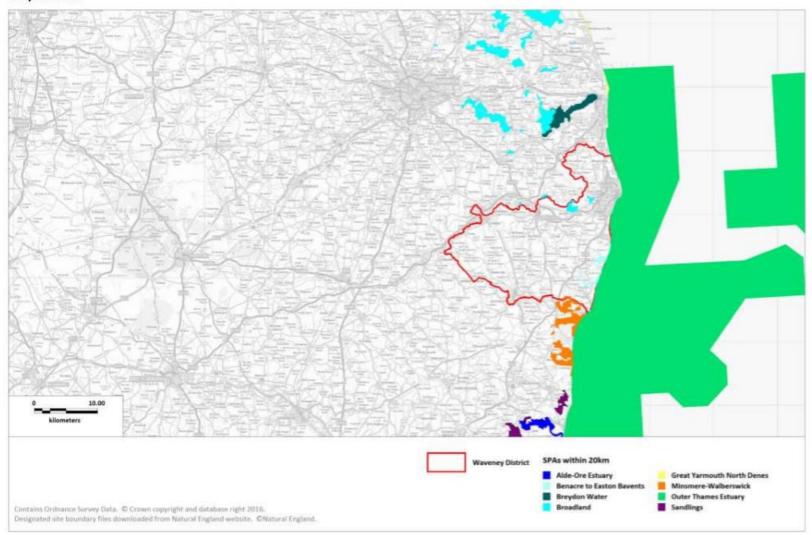
### Appendix 2: Locations of Habitat sites

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

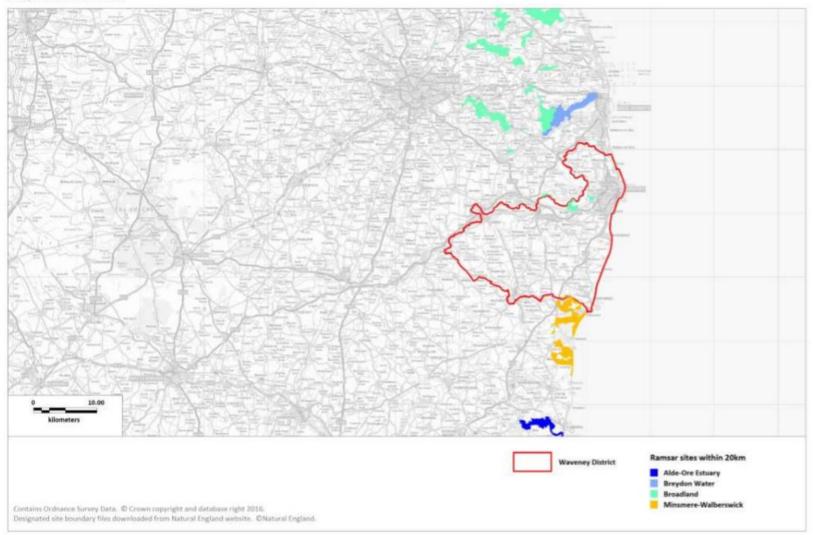
Map 1: SACs



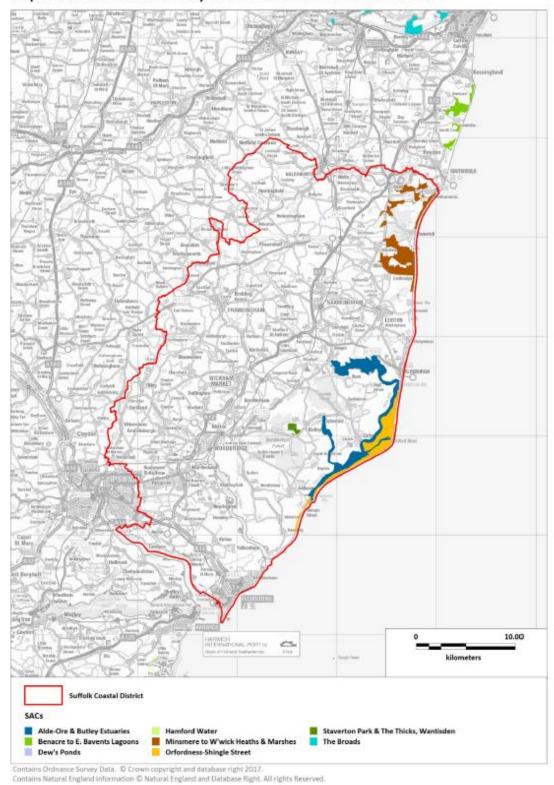
Map 2: SPAs



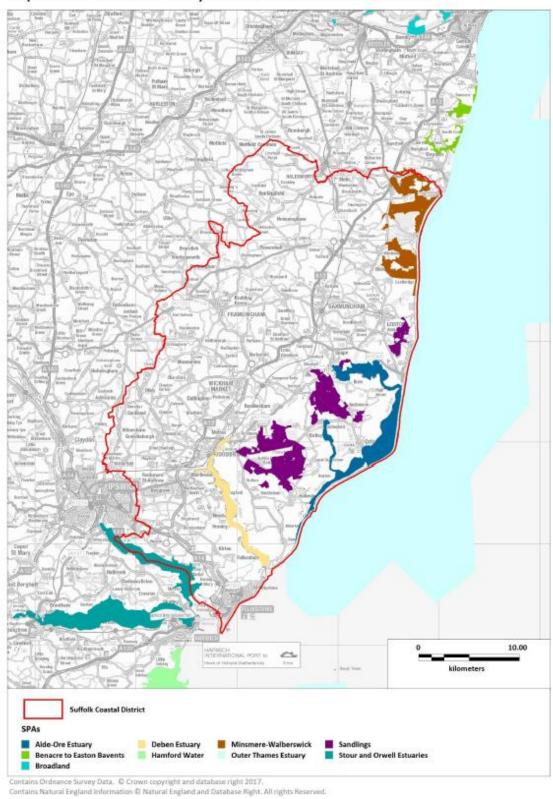
Map 3: Ramsar Sites



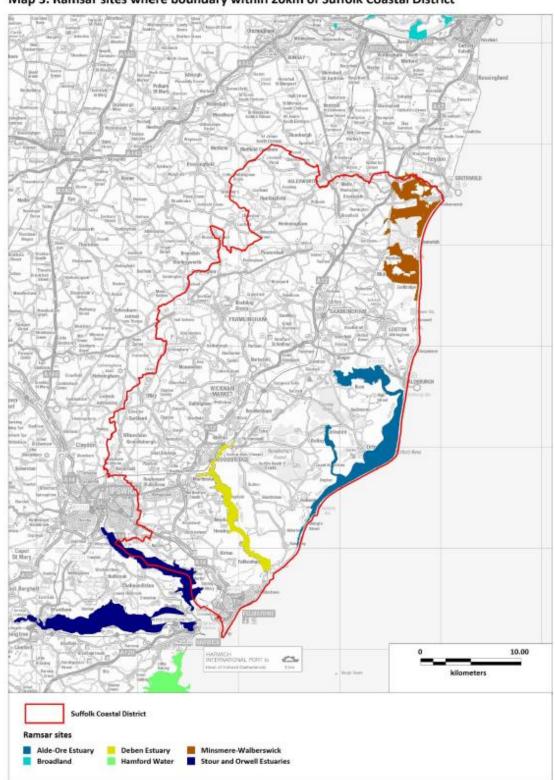
Habitat sites within 20km of the East Suffolk Council-Suffolk Coastal Local Plan Area



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



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

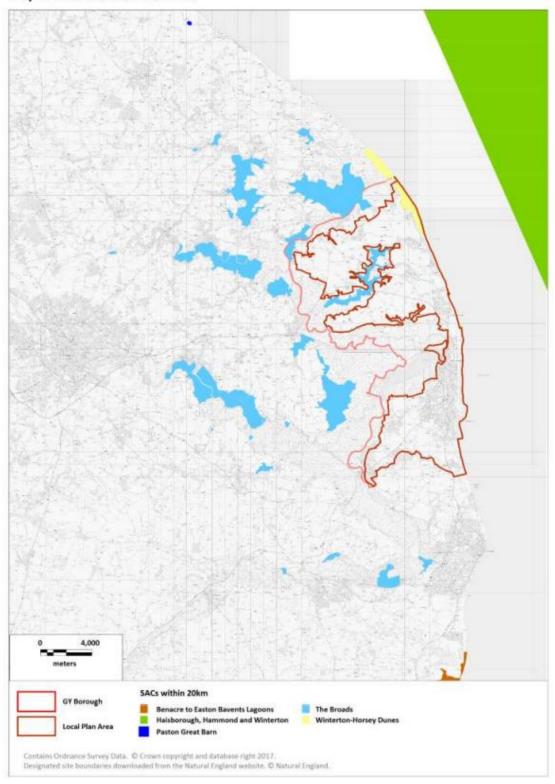


Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District

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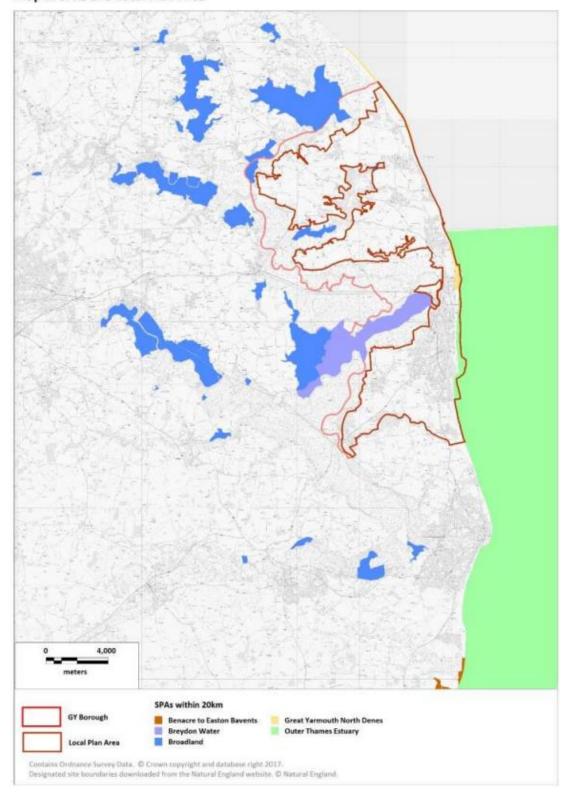
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Habitat sites within 20km of the Great Yarmouth Local
Plan Area

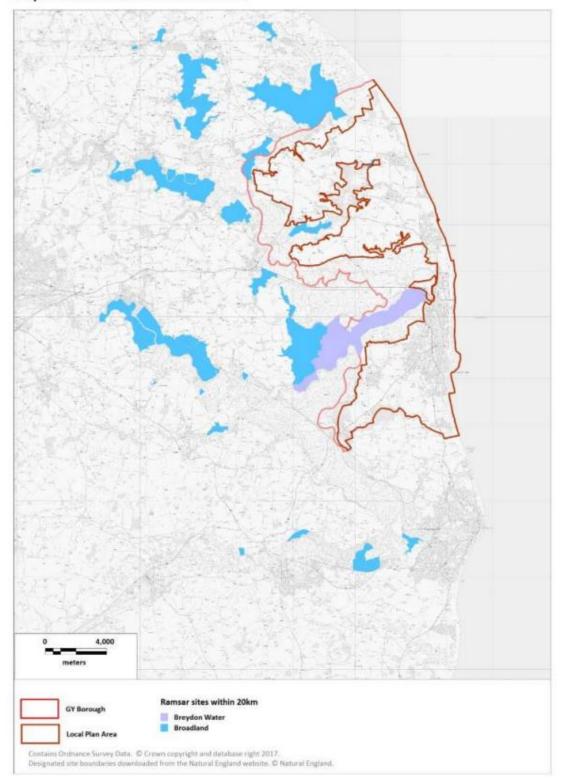
Coastal Adaptation SPD



Map 1: SACs and Local Plan Area

Map 2: SPAs and Local Plan Area

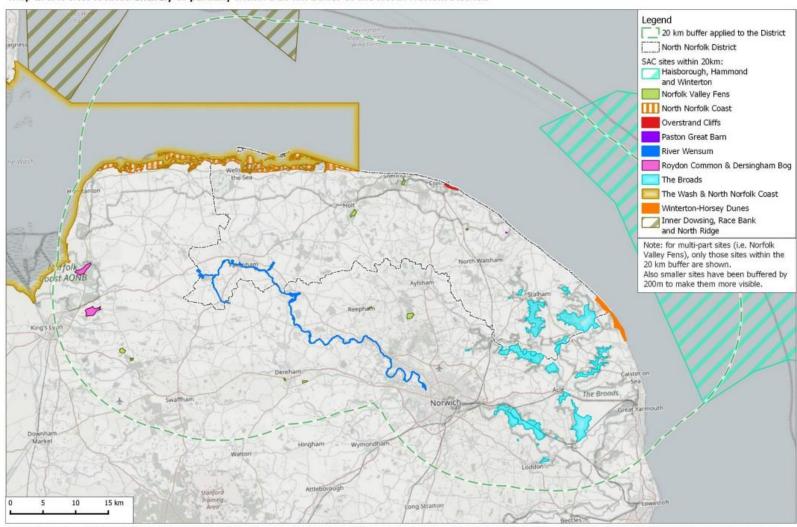




Map 3: Ramsar sites and Local Plan Area

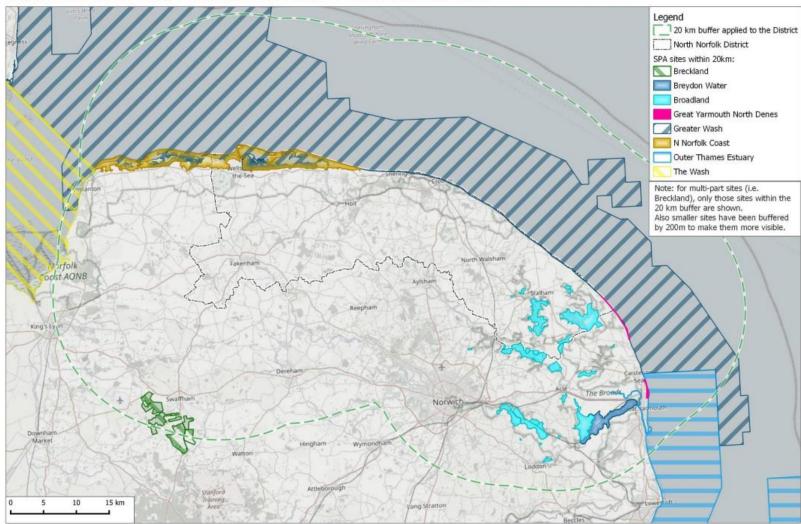
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Habitat sites within 20km of the North Norfolk Local Plan Area



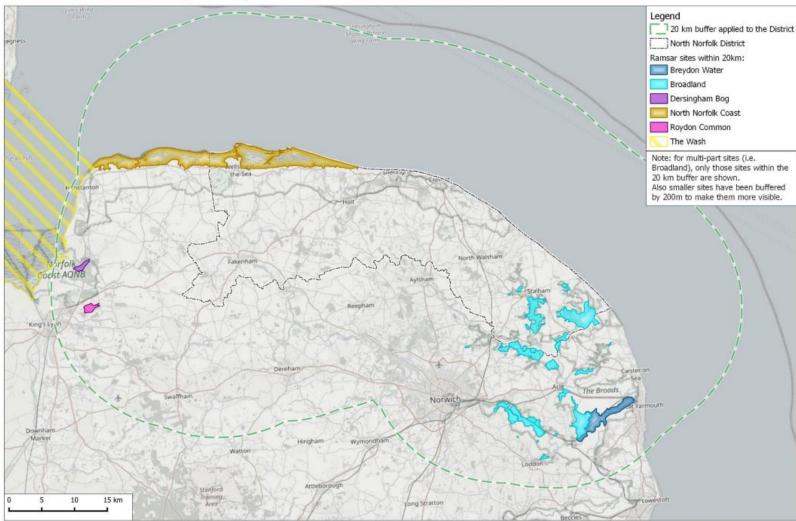
Map 2: SAC sites located entirely or partially within a 20 km buffer of the North Norfolk District.

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Map 3: SPA sites located entirely or partially within a 20 km buffer of the North Norfolk District.

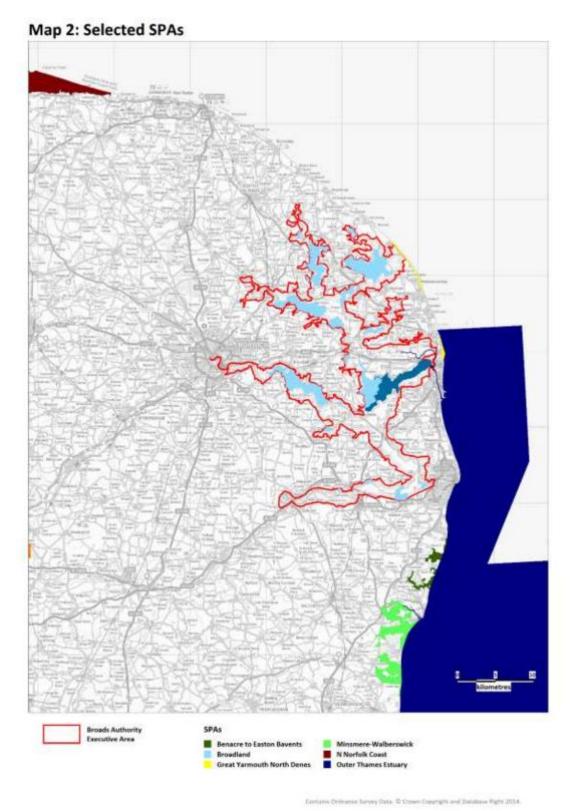
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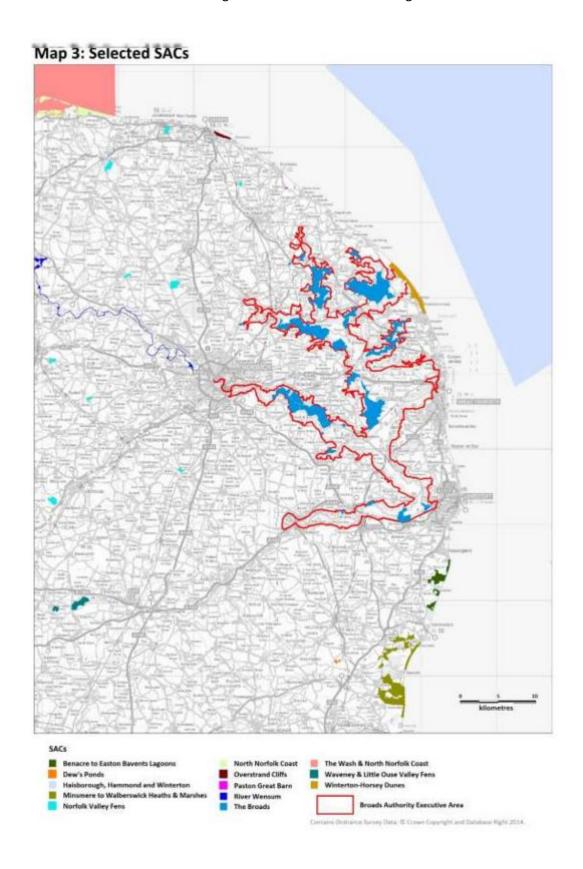


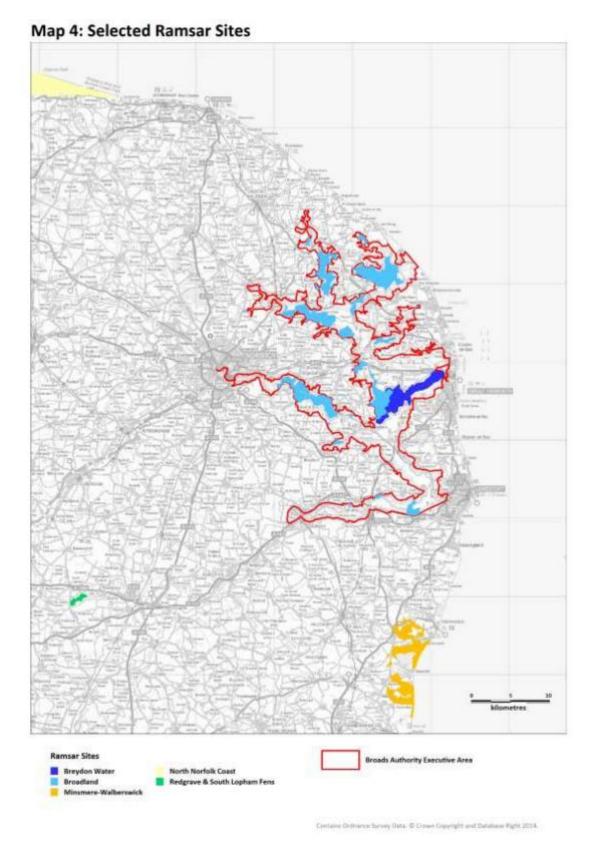
Map 4: Ramsar sites located entirely or partially within a 20 km buffer of the North Norfolk District.

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Coastal Adaptation SPD Habitats Regulations Assessment Screening Statement—October 2022
Habitat sites within 20km of The Broads Authority Local Plan Area







## Appendix 3: Relevant Habitat sites

Name	Qualifying features	Conservation Objectives
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.
Benacre to Easton Bavents Lagoons	H1150# Coastal lagoons, A195(B) Sterna albifrons: Little tern 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, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
Breckland	H2330 Inland dunes with open Corynephorus and Agrostis grasslands H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition H4030 European dry heaths H6210 Seminatural dry grasslands and scrubland facies: on calcareous substrates (Festuco-	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,

	Brometalia), (note that this includes the priority feature "important orchid rich sites") H91E0# Alluvial woods with A. glutinosa, F. excelsior S1166 Great crested newt, Triturus cristatus	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.
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.
Haisborough, Hammond and Winterton	H1110 Sandbanks which are slightly covered by sea water all the time H1170 Reefs	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.

Inner Dowsing, Race Bank and North Ridge	H1110 Sandbanks which are slightly covered by sea water all the time H1170 Reefs	The Conservation Objective for the Inner Dowsing, Race Bank and North Ridge SAC is to maintain or restore the habitat Annex 1 Sandbanks which are slightly covered by seawater all the time in Favourable Condition, and the habitat Annex I reef in Favourable Condition.
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 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	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, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
Norfolk Valley Fens	H4010 Northern Atlantic wet heaths with Erica tetralix H4030 European dry heaths H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia), (note that this includes the priority feature "important orchid rich	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,

	sites") H6410 Molinia meadows on calcareous, peat or clay-silt soil H7210# Calcareous fens with C. mariscus and species of C. davallianae H7230 Alkaline fens H91E0# Alluvial woods with A. glutinosa, F. excelsior S1014 Snail, Vertigo angustior S1016 Desmoulin's Whorl Snail, Vertigo moulinsiana	The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.
North Norfolk Coast	H1150# Coastal lagoons H1220 Perennial vegetation of stony banks H1420 Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi) H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with Ammophila arenaria ('White dunes') H2130# Fixed dunes with herbaceous vegetation ('Grey dunes') H2190 Humid dune slacks S1355 Otter, Lutra lutra S1395 Petalwort, Petalophyllum ralfsii	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, The structure and function (including typical species) of qualifying natural habitats, and, 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.

	Baltic coasts	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.
River Wensum	H3260 Water courses of plain to montane levels with R. fluitantis S1016 Desmoulin's Whorl Snail, Vertigo moulinsiana S1092 Freshwater Crayfish, Austropotamobius pallipes S1096 Brook Lamprey, Lampetra planeri S1163 Bullhead, Cottus gobio	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, The distribution of qualifying species within the site.
Roydon Common and Dersingham Bog (also Ramsar)	H4010 Northern Atlantic wet heaths with Erica tetralix H4030 European dry heaths	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site

	H7150 Depressions on peat substrates of the Rhynchosporion Mixed lowland valley mire Wetland invertebrate assemblage	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.
Staverton Park and The Thicks, Wantisden	H9190: Old acidophilous oak woods with Quercus robur on sandy plains; Dry oak-dominated woodland.	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring:  The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.
The Broads	H7210# Calcareous fens with Cladium mariscus and species of the Caricion davallianae S1016 Vertigo moulinsiana: Desmoulin's whorl snail H7230 Alkaline fens H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) H91E0# Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) H7140 Transition mires and quaking bogs	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,

	H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp 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 supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.
The Paston Great Barn	S1308: Barbastelle bat Barbastella barbastellus	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.
The Wash and North Norfolk Coast	H1110 Sandbanks which are slightly covered by sea water all the time H1140 Mudflats and sandflats not covered by seawater at low tide H1150# Coastal lagoons H1160 Large shallow inlets and bays H1170 Reefs H1310 Salicornia and other annuals colonising mud and sand	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; ¬

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	H1330 Atlantic salt meadows (Glauco-	The extent and distribution of qualifying natural habitats
	Puccinellietalia maritimae) H1420	and habitats of qualifying species
	Mediterranean and thermo-Atlantic	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
	halophilous scrubs (Sarcocornetea fruticosi)	qualifying natural habitats
	S1355 Otter, Lutra lutra S1365 Harbour	The structure and function of the habitats of qualifying
	(Common) Seal, Phoca vitulina	species
		The supporting processes on which qualifying natural
		habitats and the habitats of qualifying species rely
		The populations of qualifying species, and,
		The distribution of qualifying species within the site.
Winterton-Horsey Dunes	H2150# Atlantic decalcified fixed dunes	Ensure that the integrity of the site is maintained or
·	(Calluno-Ulicetea) H2190 Humid dune slacks	restored as appropriate, and ensure that the site
	H2110 Embryonic shifting dunes H2120	contributes to achieving the Favourable Conservation
	Shifting dunes along the shoreline with	
	Ammophila arenaria ("white dunes")	restoring;
	,	The extent and distribution of the qualifying natural
		habitats
		The structure and function (including typical species) of
		the qualifying natural habitats, and,
		The supporting processes on which the qualifying
		natural habitats rely
Special Protection Areas	I	natural nasitats rely
Alde-Ore Estuary	A081: Eurasian marsh harrier (breeding)	Ensure that the integrity of the site is maintained or restored
(also Ramsar site)	A132: Pied avocet (non-breeding)	as appropriate, and ensure that the site contributes to
,	A132: Pied avocet (breeding)	achieving the aims of the Wild Birds Directive, by maintaining
	A151: Ruff (non-breeding)	or restoring:
	A162: Common redshank (non-breeding)	The extent and distribution of the habitats of the qualifying
	A183: Lesser black-backed gull (breeding)	features;

	A191: Sandwich tern (breeding) A195: Little tern (breeding)	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.
Benacre to Easton Bavents	H1150# Coastal lagoons, A195(B) Sterna albifrons: Little tern 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 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.
Breckland	Nightjar, Caprimulgus europaeus - A224, b Stone-curlew, Burhinus oedicnemus - A133, b Woodlark, Lullula arborea - A246, b	· · · · ·

		The distribution of the qualifying features within the site.
Broadlands (also Ramsar site)	H7210# Calcareous fens with Cladium mariscus and species of the Caricion davallianae S1016 Vertigo moulinsiana: Desmoulin's whorl snail H7230 Alkaline fens H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) H91E0# Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) H7140 Transition mires and quaking bogs H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp 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	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, 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;

Great Yarmouth North Denes	Little tern Sterna albifrons - A195, b	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.  Subject to natural change, maintain in favourable condition5 the habitats for the internationally important populations of the regularly occurring Annex 1 bird species, under the Birds Directive, in particular: Sand/shingle areas Shallow coastal waters
Greater Wash	Common Scoter, Melanitta nigra - A065, nb Common Tern, Sterna hirundo - A193, b Little Gull, Hydrocoloeus (Larus) minutus - A177, nb Little Tern, Sternula albifrons - A195, b Red- throated Diver, Gavia stellata - A001-A, nb Sandwich Tern, Thalasseus sandvicensis - A191, b	as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:
Outer Thames Estuary	A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: Little Tern (Breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:  The extent and distribution of the habitats of the qualifying features;  The structure and function of the habitats of the qualifying features;

		The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.
Minsmere to Walberswick (also	H4030 European dry heaths	Ensure that the integrity of the site is maintained or restored
Ramsar site)	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 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	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.
North Norfall, Coost (also Dorsey)	white-fronted goose	Encure that the integrity of the cite is maintained or restored
North Norfolk Coast (also Ramsar)	Avocet, Recurvirostra avosetta - A132-A, b Bittern, Botaurus stellaris - A021, b Common Tern, Sterna hirundo - A193, b Dark-bellied Brent Goose, Branta bernicla bernicla - A675, nb Knot, Calidris canutus - A143, nb Little Tern, Sternula albifrons - A195, b Marsh Harrier, Circus aeruginosus - A081, b Montagu's Harrier, Circus pygargus - A084, b	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,

	Pink-footed Goose, Anser brachyrhynchus - A040, nb Sandwich Tern, Thalasseus sandvicensis - A191, b Waterbird assemblage Wigeon, Mareca penelope - A050, nb Marsh and coastal habitats, Red-data book/RDB plants, invertebrates and a lichen Dark-bellied Brent Goose, Branta bernicla - Wintering Knot, Calidris canutus - Wintering Pink-footed Goose, Anser brachyrhynchus - Wintering Waterbird assemblage - Wintering Wetland plant assemblage Wigeon, Mareca penelope - Wintering	The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.
Outer Thames Estuary	A001 (W) Gavia stellate Red-throated Diver A195 (B) Sterna hirundo Common Tern A193 (B) Sternula albifrons Little Tern	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.
Sandlings	A224: European nightjar (breeding) A246: Woodlark (breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

Stour and Orwell Estuaries (also Ramsar site)	A046a: Dark bellied brent goose (non-breeding) A054: Northern pintail (non-breeding) A132: Pied avocet (non-breeding) A141: Grey plover (non-breeding) A143: Red knot (non-breeding) A149: Dunlin (non-breeding) A156: Black-tailed godwit (non-breeding) A162: Common redshank (non-breeding) Waterbird assemblage	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.  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.
The Wash (also Ramsar)	Bar-tailed Godwit, Limosa lapponica - A157, nb Bewick's Swan, Cygnus columbianus bewickii - A037, nb Black-tailed Godwit, Limosa limosa islandica - A616, nb Common Scoter, Melanitta nigra - A065, nb Common Tern, Sterna hirundo - A193, b Curlew, Numenius arquata - A160, nb Dark-bellied Brent Goose, Branta bernicla bernicla - A675, nb Dunlin, Calidris alpina alpina - A672, nb	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

Gadwall, Mareca strepera - A051, nb Goldeneye, Bucephala clangula - A067, nb Grey Plover, Pluvialis squatarola - A141, nb Knot, Calidris canutus - A143, nb Little Tern, Sternula albifrons - A195, b Oystercatcher, Haematopus ostralegus - A130, nb Pinkfooted Goose, Anser brachyrhynchus - A040, nb Pintail, Anas acuta - A054, nb Redshank, Tringa totanus - A162, nb Sanderling, Calidris alba - A144, nb Shelduck, Tadorna tadorna -A048, nb Turnstone, Arenaria interpres -A169, nb Waterbird assemblage Wigeon, Mareca penelope - A050, nb Bar-tailed Godwit, Limosa lapponica -Wintering Curlew, Numenius arquata -Wintering Dark-bellied Brent Goose, Branta bernicla - Wintering Dunlin, Calidris alpina -Wintering Estuary Grey Plover, Pluvialis squatarola - Wintering Harbour (Common) Seal, Phoca vitulina Knot, Calidris canutus -Oystercatcher, Haematopus Wintering ostralegus - Wintering Pink-footed Goose, Anser brachyrhynchus - Wintering Pintail, Anas acuta - Wintering Redshank, Tringa totanus - Wintering Sanderling, Calidris alba -Wintering Shelduck, Tadorna tadorna -Wintering Turnstone, Arenaria interpres -

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.

	Wintering Waterbird assemblage - Wintering	
	Wetland invertebrate assemblage	

## **Appendix 4: Natural England Consultation Response**

Date: 14 October 2022

Our ref: 405837

BY EMAIL ONLY



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

Dear Laura Mundy

Natural England's response to the consultation on the draft strategic environmental assessment for the coastal adaptation supplementary planning document

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.

Thank you for the opportunity to comment on the draft strategic environmental assessment and Habitat Regulations Assessment that relate to the coastal adaptation supplementary planning document.

## Summary of response:

- Natural England looked for consistency of language between coastal adaptation supplementary planning document (SPD), the Shoreline Management Plan (SMP) and the Local Plans so that policies can be interpreted clearly and implemented correctly by planners and relevant stakeholders
- We recognise that there is generally a consistency of language between the SPD and the relevant planning policies they relate to (i.e. Local and Neighbourhood Plans)
- The SPD does a good job of explaining the hierarchy of embedded policy details clearly (e.g. Coastal Management Areas are identified in Local Plans which are derived from SMPs)
- We concur with the conclusions of the documents presented to us that the coastal adaptation SPD does not require an EIA
- We also concur with the conclusions of the Habitat Regulations Assessment (HRA) on the coastal adaptation SPD that it will not lead to likely significant effects on protected European sites

Natural England is pleased with the approach and cooperation between the planning authorities across the Norfolk and Suffolk coastline to establish this joined up strategic approach and welcome the delivery of this work, which seeks to establish a consistent interpretation of policies related to coastal change and adaptation along the Norfolk and Suffolk coastline.

We understand that the aim of the SPD is to provide guidance on the correct interpretation of planning policy and aid the implementation of relevant policies and it cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses. On this basis Natural England does not wish to offer substantive comments on the SPD as this is the role of Development Plans of each Local Authority. However, please see below some very brief comments on the SPD.

## Comments

Section 4.29 SPD: "Open Land Uses Open land uses are likely to be appropriate within the CCMA and indeed may be encouraged as part of the implementation of 'roll-back' proposals and could include Biodiversity Net Gain". What leavers and/or mechanisms will be used to encourage the implementation of roll-back in this context? A reference to local plan policies would be useful here if available.

Section 4.45 (Table 2): It would be easier to interpret the table if the explanations of Level A and B CEVA" (section 4.47) came before the table.

Section 5.7 and 5.8 SPD: In the "Identifying alternative sites or land" and "Identifying appropriate site sizes" sections of the SPD, there is no reference to European Designated sites in the guidance around identification of alternative and appropriate sites. Natural England would like to point out that any alternative sites should seek to avoid likely significant effects if on or near European Designated sites and not undermine the sites conservation objectives.

General comments - Coastal SPD HRA: Document refers to both Supplementary Planning document and SPD interchangeably. Once the SPD acronym has been introduced, it is more concise to use the abbreviated SPD.

Draft Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment screening opinions

Natural England are satisfied with the conclusions of the SEA and HRA Screening Documents; it is not necessary for a SEA to be undertaken in relation to the SPD and we agree with the conclusion of the HRA Screening Statement. Implementation of the SPD will not lead to likely significant effects on protected European sites and therefore no further assessment is necessary

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me

Yours sincerely

Daniel Turner Norfolk and Suffolk Team