



Habitats Regulations Assessment Screening Statement

Draft Kirkley Waterfront Planning Position Statement

July 2024

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1. Introduction

1.1 The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) 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

Union¹, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a 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 Kirkley Waterfront Planning Position Statement is being produced by East Suffolk Council. The Position Statement applies to site WLP2.4 'Kirkley Waterfront and Sustainable Urban Neighbourhood' allocated in the East Suffolk- Waveney Local Plan, March 2019. This report considers whether there are likely to be significant effects on protected Habitat sites and whether a full Appropriate Assessment may be required.
- 1.6 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 Waveney Local Plan being the relevant development plan related to the Kirkley Waterfront Planning Position Statement).
- 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

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

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.

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 site WLP2.4 'Kirkley Waterfront and Sustainable Urban Neighbourhood' of the East Suffolk- Waveney Local Plan. 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
Benacre to Easton Bavents SPA
Benacre to Easton Bavents Lagoons SAC
Breydon Water SPA, Ramsar
Broadland SPA, Ramsar
Great Yarmouth North Denes SPA
Haisborough, Hammond and Winterton SAC
Minsmere to Walberswick Heaths & Marshes SAC
Minsmere – Walberswick SPA, Ramsar
Outer Thames Estuary SPA
Southern North Sea SAC
The Broads SAC

3. Kirkley Waterfront Planning Position Statement

- 3.1 This HRA report reviews the draft reviews the 'Kirkley Waterfront Planning Position Statement Proposed Scope and Structure (April 2024)'.
- 3.2 Site WLP2.4 'Kirkley Waterfront and Sustainable Urban Neighbourhood' is allocated in the East Suffolk- Waveney Local Plan, March 2019. The Kirkley Waterfront Development Brief Supplementary Planning Document (SPD), was adopted in May 2013, and is a material consideration when determining planning applications for the site. Since the adoption of the SPD in 2013, planning policy has changed both nationally and locally (with the adoption the Local Plan in 2019) and other elements have also changed, such as the construction of a new bridge across Lake Lothing. The Kirkley Waterfront Planning Position Statement will support the implementation of Policy WLP2.4 of the East Suffolk Council - Waveney Local Plan (adopted March 2019) by clarifying the requirements of the Kirkley Waterfront Development Brief SPD and providing up-to-date guidance regarding the planning policy situation and the expectations of the Council. The Position Statement provides updated advice and policy interpretation guidance but will not amend the Local Plan policy.
- 3.3 The Position Statement is to be read alongside the Planning Policy and supporting text in the Local Plan and the guidance in the SPD. The Position Statement will follow a similar structure to the SPD to assist the reading of the documents together:
- Introduction
 - Context
 - Land use
 - Streets and transport
 - Open space and biodiversity
 - Urban design guidance
 - Flood risk management
 - Outline masterplan
 - Implementation
 - Planning application requirements

The introduction and context chapters to the Position Statement will explain the the role of different planning policies and documents and update recent changes to the site (e.g. delivery of the Gull Wing bridge across Lake Lothing) and any changes in policy context. As this section is factual and descriptive it has not been included in the screening table in section 5 of this report.

- 3.4 Other section of the Position Statement provide detailed guidance on different aspects of the site and policy requirements. These sections have been screened individually in section 5 of this document.

4. Other Plans and Projects

- 4.1 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended, including through EU exit legislation) 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. The Local Plan of relevance the Kirkley Waterfront Planning Position Statement is the East Suffolk Council- Waveney Local Plan which was adopted in March 2019. The Local Plan sets out the broad scale and distribution of development across the northern area of East Suffolk formerly covered by Waveney District Council.
- 4.3 The draft Kirkley Waterfront Planning Position Statement will support the implementation of policy WLP2.4 of the East Suffolk Council - Waveney Local Plan (adopted March 2019) and existing SPD for the site. The Position Statement is to be read alongside the Policy and supporting text in the Local Plan and the guidance in the SPD. Policy WLP2.4 allocates the site for, amongst uses:
- approximately 1,380 dwellings (including a retirement community)
 - approximately 7.5 hectares of employment land
 - a new primary school and pre-school
 - a local retail centre
 - a playing field; and
 - marina facilities
- 4.4 Through the production of the Waveney Local Plan, a screening process considered each policy (including allocation policies) in the Local Plan and concluded whether significant effects are likely and that an Appropriate Assessment is needed. The Appropriate Assessment of the Waveney Local Plan subsequently considered the following themes:
- Transport and air quality
 - Water quality
 - Flood risk and coastal erosion,

- Tourism, retail and employment development, and
- Recreation (described as visitation in the HRA)

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

5. Assessment of likely significant effects of the Draft Kirkley Waterfront Planning Position Statement on Habitat sites

- 5.1 Table 3 below considers each relevant section of the draft Kirkley Waterfront Planning Position Statement 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 which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

Table 3: Likely significant effects of the Draft Kirkley Waterfront Planning Position Statement

Section	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Land use	<p>This section will identify the existing services and uses on, and surrounding, the site which will need to be considered as part of any future proposals.</p> <p>It will confirm the quantity of development that has been delivered since the adoption of the SPD and confirm the amount and type of development still to be delivered, including preferred location and density.</p> <p>This section will also set out the evidence of the type of marine and leisure activities that require employment land and quayside access.</p> <p>This section updates the requirements of the SPD and the allocation policy to reflect the recent history of the site. It will be factual and descriptive and will not introduce new requirements for the site. This section will therefore not give rise to</p>	None	None	No

Section	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	any likely significant effects beyond what has already been considered through the Local Plan Appropriate Assessment.			
Streets and transport	<p>This section will identify vehicle, pedestrian and cycling links across parcels of land in different ownership.</p> <p>This section will explain the need for east-west links to the new bridge (delivery of which is nearing completion) and the need for HGV access to areas of the site. The section will also reflect the opportunities identified through the Council's district-wide Cycling and Walking Strategy which has been adopted since the Local Plan.</p> <p>This section updates the requirements of the SPD and the allocation policy to reflect the recent history of the site. It will be factual and descriptive and will not introduce new requirements for the site. This section will therefore not give rise to any likely significant effects beyond what</p>	None	None	No

Section	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	has already been considered through the Local Plan Appropriate Assessment.			
Open space and biodiversity	<p>This section will set guidance on the Biodiversity Net Gain (BNG) requirements for the site. BNG is requirement that has been introduced nationally since the SPD and Local Plan were adopted.</p> <p>This section provides supplementary guidance to reflect the recent introduction of a mandatory national requirement. It is a factual update to reflect a requirement that will be requested as part of any planning application on the site.</p> <p>The inclusion of reference to BNG in the position statement is factual and is not considered to in itself give rise to any likely significant effects.</p>	None	None	No
Urban design guidance	This section will highlight what will be expected from any development proposals in terms of design considerations.	None	None	No

Section	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	This section covers detailed design considerations and will not give rise to any likely significant effects.			
Flood risk management	<p>This section will address the need for land raising across the site and set out the need for a unified approach to this.</p> <p>The requirement for land raising was highlighted in the SPD. This section will build on that requirement and clarify the need for a co-ordinated approach.</p> <p>This section clarifies an existing requirement in the SPD and is not considered to give rise to any likely significant effects.</p>	None	None	No
Outline masterplan	<p>This section will update the existing masterplan, set out in the SPD, to reflect recent permitted applications.</p> <p>This section updates the requirements of the SPD to reflect the recent history of the site. It is therefore not considered to give rise to any likely significant effects beyond</p>	None	None	No

Section	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	what has already been considered through the Local Plan Appropriate Assessment.			
Implementation	<p>This section will update the guidance in the existing SPD in relation to infrastructure requirements, viability and the phasing of site delivery to reflect recent permitted applications.</p> <p>This section will update the requirements of the SPD to reflect the recent history of the site. It is therefore not considered to give rise to any likely significant effects beyond what has already been considered through the Local Plan Appropriate Assessment.</p>	None	None	No
Planning Application Requirements	<p>This section will provide guidance for the developers and landowners of the site to clarify specific planning application requirements.</p> <p>The guidance the aims to support applicants and does not in itself promote new development beyond what has already been considered through the Local Plan Appropriate Assessment. This section will</p>	None	None	No

Section	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	therefore not lead to likely significant effects on Habitat Sites.			

6. Summary and conclusions

- 6.1 Site WLP2.4 'Kirkley Waterfront and Sustainable Urban Neighbourhood' is allocated in the East Suffolk- Waveney Local Plan, March 2019. The Kirkley Waterfront Development Brief Supplementary Planning Document (SPD), was adopted in May 2013.
- 6.3 Through the production of the Waveney Local Plan, a screening process considered each policy (including allocation policies) in the Local Plan. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plan, resulting in conclusions that the plan will not lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Waveney District.
- 6.2 The Local Plan remains the starting point for decision-making, in line with the national legislation. The Kirkley Waterfront Planning Position Statement will support the implementation of policy WLP2.4 in the Waveney Local Plan by clarifying the requirements of the Kirkley Waterfront Development Brief SPD and providing up-to-date guidance regarding the planning policy situation and the expectations of the Council. The Position Statement is to be read alongside the Planning Policy and supporting text in the Local Plan and the guidance in the SPD.
- 6.3 Implementation of the Kirkley Waterfront Planning Position Statement will not lead to likely significant effects on protected Habitat sites.
- 6.4 Natural England were consulted on a draft of this Screening Statement as statutory nature conservation body. Their response is contained in Appendix 4. Natural England confirmed they had no comments to make on the conclusions of this screening statement.

Signed: 

Dated: 31 July 2024

Andrea McMillan

Planning Manager (Policy, Delivery and Specialist Services)
East Suffolk Council

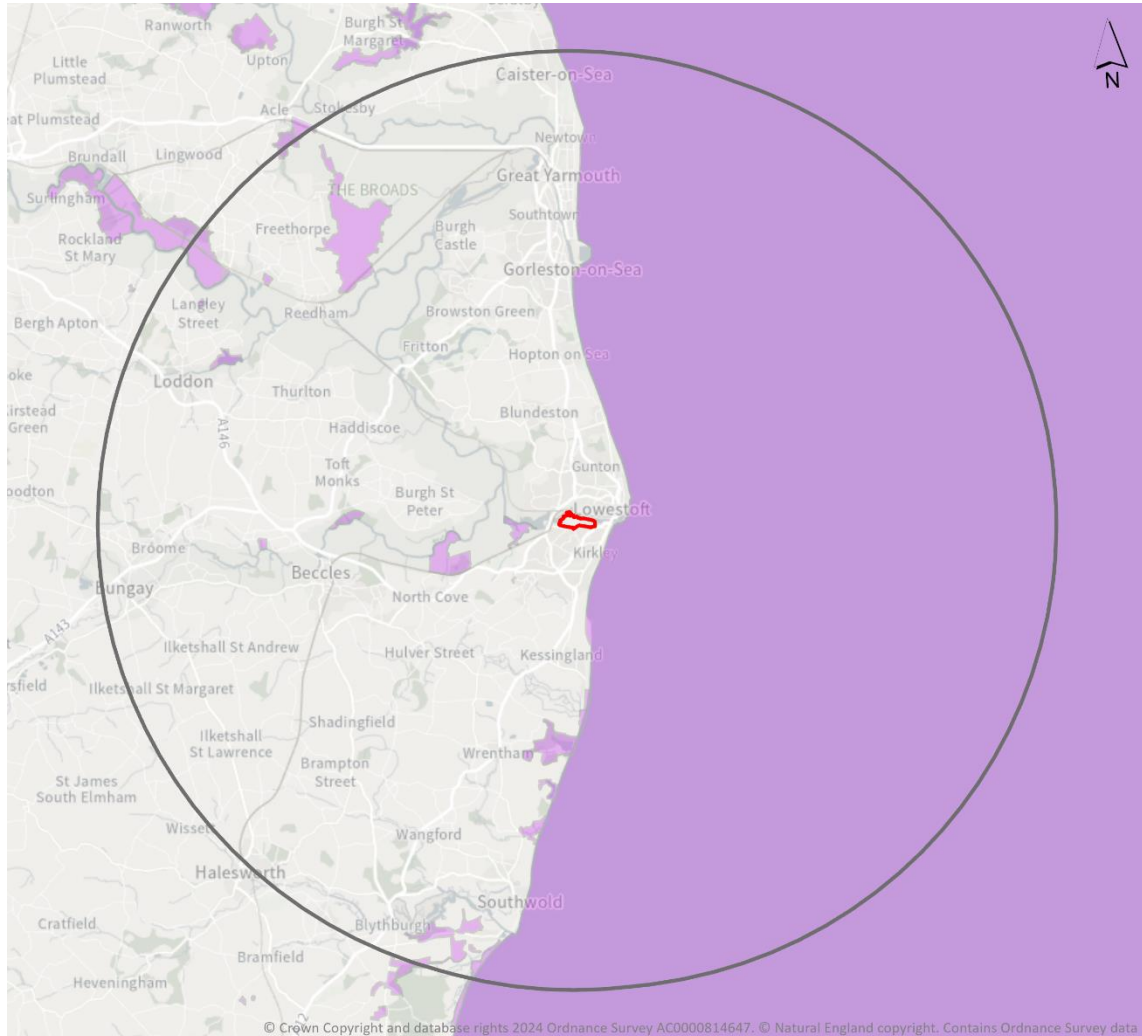
Appendix 1: Sources of background information

- East Suffolk Council – Waveney Local Plan (March 2019)
- Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief Supplementary Planning Document (May 2013).
- 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 WLP2.4 Kirkley Waterfront
and Sustainable Urban Neighbourhood





- Kirkley Waterfront
- 20Km Buffer
- Special Areas of Conservation

0 2 4 8 Km



Appendix 3: Relevant Habitat sites

Name	Qualifying features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan Stage (December 2018))
Special Areas of Conservation			
Benacre to Easton Bavents 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, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).
Minsmere to Walberswick Heaths and Marshes	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) <i>Anas crecca</i> : Eurasian teal A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	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)

	A082(NB) <i>Circus cyaneus</i> : Hen harrier A224(B) <i>Caprimulgus europaeus</i> : European nightjar A056(B) <i>Anas clypeata</i> : Northern shoveler A056(NB) <i>Anas clypeata</i> : Northern shoveler A051(B) <i>Anas strepera</i> : Gadwall A051(NB) <i>Anas strepera</i> : Gadwall A132(B) <i>Recurvirostra avosetta</i> : Pied avocet A195(B) <i>Sterna albifrons</i> : Little tern A394(NB) <i>Anser albifrons</i> : Greater white-fronted goose	The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.	
Southern North Sea	1351: <i>Phocoena phocoena</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.	Not identified in Suffolk Coastal Final Draft Local Plan HRA.

The Broads	<p>H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i></p> <p>S1016 <i>Vertigo moulinsiana</i>: Desmoulin's whorl snail</p> <p>H7230 Alkaline fens</p> <p>H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p> <p>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>)</p> <p>H7140 Transition mires and quaking bogs</p> <p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp</p> <p>H3150 Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i>-type vegetation</p> <p>S1355 <i>Lutra lutra</i>: Otter</p> <p>S1903 <i>Liparis loeselii</i>: Fen orchid</p> <p>S4056 <i>Anisus vorticulus</i>: Little ramshorn whirlpool snail</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species,</p> <p>The structure and function (including typical species) of qualifying natural habitats,</p> <p>The structure and function of the habitats of qualifying species,</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</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>
Special Protection Areas			
Benacre to Easton Bavents	<p>H1150# Coastal lagoons,</p> <p>A195(B) <i>Sterna 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</p>	<p>Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).</p>

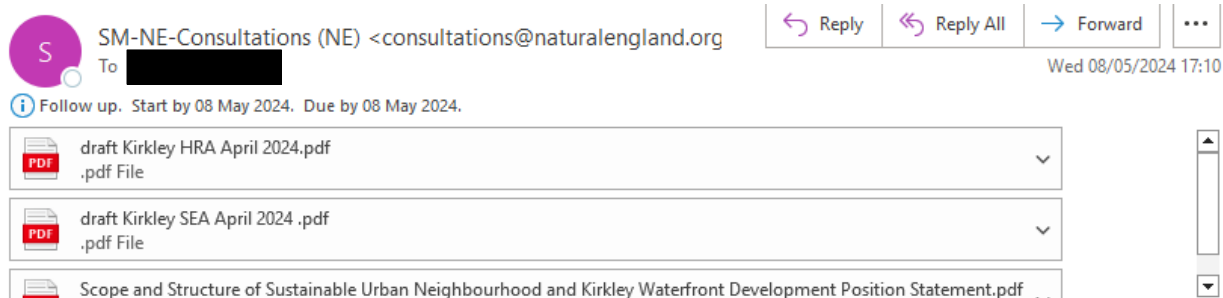
	A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats 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.	
Breydon Water (also Ramsar site)	A132(NB) <i>Recurvirostra avosetta</i> : Pied avocet A140(NB) <i>Pluvialis apricaria</i> : European golden plover A142(NB) <i>Vanellus vanellus</i> : Northern lapwing Waterbird assemblage A193(B) <i>Sterna hirundo</i> : Common tern A151(NB) <i>Philomachus pugnax</i> : Ruff A037(NB) <i>Cygnus columbianus bewickii</i> : Bewick swan	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.	Shooting/scaring, change in land management, public access/disturbance, hydrological changes, fisheries (marine and estuarine).
Broadland (also Ramsar site)	H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation	Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water

	<p>S1016 <i>Vertigo moulinsiana</i>: Desmoulin's whorl snail</p> <p>H7230 Alkaline fens</p> <p>H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>)</p> <p>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>)</p> <p>H7140 Transition mires and quaking bogs</p> <p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp</p> <p>H3150 Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i>-type vegetation</p> <p>S1355 <i>Lutra lutra</i>: Otter</p> <p>S1903 <i>Liparis loeselii</i>: Fen orchid</p> <p>S4056 <i>Anisus vorticulus</i>: Little ramshorn whirlpool snail</p>	<p>Status of its Qualifying Features, by maintaining or restoring;</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species,</p> <p>The structure and function (including typical species) of qualifying natural habitats,</p> <p>The structure and function of the habitats of qualifying species,</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</p>	<p>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>
Great Yarmouth and North Denes	<p>H2110 Embryonic shifting dunes</p> <p>H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")</p> <p>H2150# Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>)</p> <p>H2190 Humid</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>Inappropriate coastal management, coastal squeeze, public access/disturbance, hydrological changes, inappropriate scrub control, inappropriate pest control, invasive species, undergrazing, air pollution</p>

	dune slacks, A195(B) <i>Sterna albifrons</i> : Little Tern	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 Ramsar site)	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) <i>Anas crecca</i> : Eurasian teal A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier A082(NB) <i>Circus cyaneus</i> : Hen harrier A224(B) <i>Caprimulgus europaeus</i> : European nightjar A056(B) <i>Anas clypeata</i> : Northern shoveler A056(NB) <i>Anas clypeata</i> : Northern shoveler A051(B) <i>Anas strepera</i> : Gadwall A051(NB) <i>Anas strepera</i> : Gadwall	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, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)

	A132(B) <i>Recurvirostra avosetta</i> : Pied avocet A195(B) <i>Sterna albifrons</i> : Little tern A394(NB) <i>Anser albifrons</i> albifrons: Greater white-fronted goose		
Outer Thames Estuary	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	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.	Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.

Appendix 4: Natural England Consultation Response



Dear Laura Mundy,

Our Ref: 473421

East Suffolk Council - Kirkley Waterfront Planning Position Statement: SEA Draft Screening Opinion & HRA Screening Assessment

Thank you for your consultation on the above dated 19 April 2024.

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.

Further information on when to consult Natural England on planning proposals is here- [Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](#)

Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.

Natural England advises Local Planning Authorities to use the following tools to assess the impacts of the proposal on the natural environment:

Impact Risk Zones:

Natural England has provided Local Planning Authorities (LPAs) with Impact Risk Zones (IRZs) which can be used to determine whether the proposal impacts statutory nature conservation sites. Natural England recommends that the LPA uses these IRZs to assess potential impacts. If proposals do not trigger an Impact Risk Zone then Natural England will provide an auto-response email.

Standing Advice:

Natural England has published Standing Advice. Links to standing advice are in Annex A

If after using these tools, you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require Natural England's advice.

Further information on LPA duties relating to protected sites and areas is here- [Protected sites and areas: how to review planning applications - GOV.UK \(www.gov.uk\)](#)

Further guidance is also set out in Planning Practice Guidance on the natural environment [Natural environment - GOV.UK \(www.gov.uk\)](#) and on Habitats Regulations Assessment [Appropriate assessment - GOV.UK \(www.gov.uk\)](#)

Non detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.

Should the proposal change, please consult us again.

Yours sincerely,

[Redacted Signature]

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