


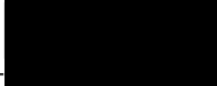
Habitats Regulations Assessment

for

Land To The North And West Of Garden
Square And Gardenia Close, Rendlesham

March 2019

Status: Issue

Quality management		
Project:	Land To The North And West Of Garden Square And Gardenia Close, Rendlesham	
Project No:	E18836	
Report title:	Habitats Regulations Assessment	
Report author:		Name: Nick Sibbett Title: Associate
Approved by:		Name: Dr Jo Parmenter Title: Director
Status:	Issue	
Date of last revision:	22 March 2019	

Client Details	
Client:	Capital Community Developments
Client Address:	30 Gardenia Close Rendlesham Suffolk IP12 2GX

Contact Details
<p>The Landscape Partnership Ltd</p> <p>Greenwood House 15a St Cuthberts Street Bedford MK40 3JG Tel: 01234 261315</p> <p>East Building Holland Court Cathedral Close Norwich NR1 4DY Tel: 01603 230777</p> <p>The Granary Sun Wharf Deben Road Woodbridge IP12 1AZ Tel: 01394 380509</p> <p>Ensign House (E&F) Tavern Quay Sweden Gate Surrey Quays London SE16 7TX Tel: 020 3092 4141</p> <p>The Landscape Partnership Ltd is a practice of Chartered Landscape Architects, Chartered Ecologists and Chartered Environmentalists, registered with the Landscape Institute and a member of the Institute of Environmental Management & Assessment & the Arboricultural Association.</p> <p>Registered Office: Greenwood House 15a St Cuthberts Street Bedford MK40 3JG Registered in England No 2709001</p>

Quality standards
<p>This report is certified BS 42020 compliant and has been prepared in accordance with The Chartered Institute of Ecology and Environmental Management's (CIEEM) Technical Guidance Series '<i>Ecological Report Writing</i>' and Code of Professional Conduct.</p> <p>The copyright of this document rests with The Landscape Partnership. All rights reserved.</p>

Contents

Non-technical summary

1	Introduction	1
1.1	Commission	1
1.2	The Habitats Regulations	1
1.3	Reporting standards	1
1.4	Site location and context	1
1.5	Description of the project	2
1.6	Objectives of this appraisal	2
2	Background and methodology	3
2.1	The Habitats Regulations Assessment Process	3
2.2	Why is Appropriate Assessment required?	3
2.3	European sites	4
2.4	Impacts in-combination with other Land-use Plans or Projects	5
3	Baseline information	6
3.1	The study area	6
3.2	European sites within the study area	6
3.3	Other relevant Plans or Projects potentially affecting European sites in the search area	12
3.4	Correspondence with Natural England	13
4	Considerations of Likely Significant Effects	14
4.1	Approach to consideration of likely significant effect	14
4.2	Likely Significant Effects connected with management of European sites	14
4.3	Suffolk Coastal District Council Core Strategy and Development Management Policies	14
4.4	Suffolk Coastal District Council Site Allocations and Area Specific Policies	16
4.5	Suffolk Coastal District Council's Leisure Strategy 2014-2024	17
4.6	Suffolk Coastal District Council project to implement mitigation for Local Plan potential recreational impacts upon European sites	17
4.7	Rendlesham Neighbourhood Plan	17
4.8	Suffolk Coastal Local Plan review	19
4.9	Consideration of Likely Significant Effects of the development on European sites, when considered in isolation	19
4.10	Consideration of Likely Significant Effects of the development on European sites, when considered in combination	20
4.11	Proposed mitigation in combination with other developments	20
4.12	Conclusion	21

Appendices

1	Excerpt from SCDC Site Allocations and Area Specific Policies DPD showing location of SSP12 (the site in Rendlesham).
2	Development layout
3	Natural England's response to SCDC Scoping Opinion request

Non-technical summary

The Landscape Partnership was commissioned by Capital Community Developments a Habitats Regulations Assessment to consider the potential for the development to impact upon European designated wildlife sites at Land To The North And West Of Garden Square And Gardenia Close, Rendlesham.

The objectives of the study were to identify any European sites within which would be directly or indirectly affected by the proposed development when considered in isolation or in—combination with other developments or projects. The overall aim of the assessment was to determine whether the development proposed at Rendlesham would have a significant effect upon the integrity of any European site.

No European sites were located within a 1km walking distance of the proposed development site. The following European sites were identified within 13km: Sandlings SPA, Deben Estuary SPA/Ramsar, Alde, Ore and Butley Estuaries SAC and Alde-Ore Estuary SPA/Ramsar.

The proposed development does not directly affect the integrity of any European sites, nor is it connected to their management. However, there is potential for it to cause indirect effects, with the greatest potential for adverse impact upon European sites considered to be visitor pressure due an increase in local population. The expansion of the local housing stock in Rendlesham would cause a corresponding increase in residents as well as dogs and cars. Dog walking is widely considered to be most problematic due to the problems associated with disturbance to qualifying features (birds/habitats etc.) and damage to habitats from nutrient enrichment (through fouling) and compaction/trampling. Other potential source of adverse impact may come from water availability and drainage treatment. The potential impacts of the development were considered in a standalone scenario as well as in-combination with other development in the area.

It was concluded that when considered in isolation, the proposed development would not cause any Likely Significant Effect upon European sites due to the location of the development and due to Local Plan Policy SSP12 which provides open green space on the site (which include suitable provision for daily dog walking), as well as a good infrastructure of cycleways and footpaths within the village, as well as the policies for Rendlesham and the rest of the District which support and promote new leisure and recreation facilities.

When considered in-combination with other development within the District, it was considered that there was potential for an unquantifiable (albeit likely small) Likely Significant Effect on local European sites. This will be addressed by making a payment to Suffolk Coastal District Council through a unilateral undertaking, of £321.22 per dwelling.

1 Introduction

1.1 Commission

- 1.1.1 The Landscape Partnership was commissioned by Capital Community Developments to carry out a Habitats Regulations Assessment to consider the potential for the development to impact upon European designated wildlife sites.

1.2 The Habitats Regulations

- 1.2.1 The Conservation of Habitats and Species Regulations 2017 are often abbreviated to the 'Habitats Regulations'. The Habitats Regulations interpret the European Birds Directive and Habitats Directive into English and Welsh law. For clarity, the following paragraphs consider the case in England only, with Natural England given as the appropriate nature conservation body. In Wales, the Countryside Council for Wales is the appropriate nature conservation body.
- 1.2.2 Special Protection Areas and Special Areas of Conservation are defined in the Regulations as a 'European site'. The Regulations regulate the management of land within European sites, requiring land managers to have the consent of Natural England before carrying out management. Byelaws may also be made to prevent damaging activities and if necessary land can be compulsorily purchased to achieve satisfactory management.
- 1.2.3 The Regulations define competent authorities as public bodies or statutory undertakers. Competent authorities are required to make an appropriate assessment of any plan or project they intend to permit or carry out, if the plan or project is likely to have a significant effect upon a European site. The permission may only be given if the plan or project is ascertained to have no adverse effect upon the integrity of the European site. If the competent authority wishes to permit a plan or project despite a negative assessment, imperative reasons of over-riding public interest must be demonstrated, and there should be no alternatives to the scheme. The permissions process would involve the Secretary of State and the option of consulting the European Commission. In practice, there will be very few cases where a plan or project is permitted despite a negative assessment. This means that a planning application has to be assessed by the Local Planning Authority, based on information provided by the applicant, and the assessment must either decide that it is likely to have no significant effect on a European site or ascertain that there is no adverse effect upon the integrity of the European site.

1.3 Reporting standards

- 1.3.1 This report was written in compliance with British Standard 42020:2013 'Biodiversity — Code of practice for planning and development' and the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct.
- 1.3.2 This report was prepared in accordance with the CIEEM 'Guidelines for Ecological Report Writing' as updated December 2017¹.
- 1.3.3 The report was prepared by Nick Sibbett. The report was reviewed by Dr Jo Parmenter, Director of The Landscape Partnership.

1.4 Site location and context

- 1.4.1 The site occupies a 5.05ha parcel of land on the northern edge of Rendlesham in east Suffolk. Rendlesham is located a short distance to the east of Woodbridge and lies approximately 10km inland of the coast at Shingle Street.
- 1.4.2 Rendlesham is a village situated within a rural landscape with arable land the predominant cover in the surrounding area. There are many small parcels of broadleaved, conifer and mixed woodland close in the local area. To the south of Rendlesham lies the large area of land occupied by the old RAF Bentwaters base which includes areas of lowland dry acid grassland. Further

¹ CIEEM (2017) Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester

afield are the larger areas of Rendlesham Forest to the south, and Tunstall Forest to the east, both of which form part of the Sandlings SPA.

- 1.4.3 The site itself is a parcel of agricultural land which is bordered by mature trees and residential areas to the south and east. The northern and western site boundaries abut deciduous woodland. A Water Recycling Centre is located within the woodland. Close to the northern boundary of the site. A link for future access to the proposed development site has been incorporated into the residential development on Tidy Road, in the southwest corner of the site.
- 1.4.4 The Ordnance Survey Grid Reference for the approximate centre of the proposed development site is TM 337 538. The location of the site is shown in Appendix 1 which is an excerpt from SCDC Site Allocations and Area Specific Policies DPD.
- 1.4.5 This report is written prior to 1st April. On that date, Suffolk Coastal District Council will cease to exist and it will be replaced by East Suffolk Council. References to Suffolk coastal District Council should be treated as references to East Suffolk Council for the period after 1st April 2019.

1.5 Description of the project

- 1.5.1 It is proposed that the site would be developed to provide up to 75 dwellings with associated infrastructure and areas of public open space. The development layout assessed in this report is included in Appendix 2. The site is identified as Policy SSP12 in Suffolk Coastal District Council Site Allocations and Area Specific Policies Development Plan Document, adopted January 2017.

1.6 Objectives of this appraisal

- 1.6.1 The purpose of this appraisal is to provide the LPA with the information it needs to decide whether the proposed development is likely to have no significant effect on a European site or ascertain that there is no adverse effect upon the integrity of the European site.

2 Background and methodology

2.1 The Habitats Regulations Assessment Process

- 2.1.1 A Habitats Regulations Assessment is a step-by-step process which is undertaken in order to determine whether a project or plan will have a likely significant effect (LSE) upon a European site. Before a competent authority can authorise a proposal, they must carry out an Appropriate Assessment of a plan or project in line with procedure detailed in the Habitats Regulations. The whole procedure is called a Habitats Regulations Assessment, with the Appropriate Assessment being part of only one of four stages necessary to complete an HRA. The results of the HRA are intended to influence the decision of the competent authority when considering whether or not to authorise a proposal.
- 2.1.2 *Stage One of the HRA is 'Screening'.* Plans or projects will be investigated for their potential to have a likely significant effect upon a European site. Proposals that are found not likely to have a significant effect upon a European site will be 'screened out' at this stage and no further investigation will be required.
- 2.1.3 *Stage Two of the HRA is the 'Appropriate Assessment and the Integrity Test'.* The Competent Authority must undertake an Appropriate Assessment which seeks to provide an objective and scientific assessment of how the proposed project may affect the qualifying features and conservation strategies of a European site. The Competent Authority may undertake their own Appropriate Assessment using information provided by the project proposer. However, the Competent Authority must also consult the Statutory Nature Conservation Body in order to obtain their views on how the proposed activity may affect the integrity of the European sites' qualifying features and conservation objectives, and it is possible that they may adopt this Appropriate Assessment for their own purposes.
- 2.1.4 The UK Government accepts the definition for the 'integrity' of a site as 'the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which the site is (or will be) designated.'. Other factors may also be used to describe the 'integrity' of a site. The Competent Authority must conclude, using scientific evidence and a precautionary approach, that there will be no harm to the integrity of a European site, prior to authorising the proposed activity. Information provided in the Appropriate Assessment will be used when considering the Integrity test.
- 2.1.5 *Stage Three of the HRA is 'Alternative solutions'.* If the Competent Authority is unable to determine that the proposed activity would not have an adverse impact upon the integrity of a European site, it may refuse to authorise the proposed activity or consider 'alternative solutions' if there are imperative reasons of overriding public interest (IROPI). If the proposed activity cannot ensure that the integrity of a site is maintained, it is likely that the proposal will be refused or withdrawn, but if changes to the proposal can be made which would rectify this a fresh application could be submitted.
- 2.1.6 *Stage Four of the HRA is 'Imperative reasons of overriding public interest and compensatory measures'.* If the Competent Authority determines that there are imperative reasons of overriding public interest that outweigh the potential adverse impacts upon the integrity of the site, they may decide to consent the proposed activity. In this case, the Competent Authority must notify the Secretary of State (or equivalent if not in England) at least 21 days before authorisation so that the Government can notify them with their agreement to consent, or otherwise.

2.2 Why is Appropriate Assessment required?

- 2.2.1 The appropriate assessment process is required under the Conservation of Habitats and Species Regulations 2017. Regulation 63(1) says that:
- A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which -*

(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, must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.

(2) A person applying for any such consent, permission or other authorisation shall provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable them to determine whether an appropriate assessment is required.

(3) The competent authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority may specify.

(4) They must also, if they consider it appropriate, take the opinion of the general public, and if they do so, they must take such steps for that purpose as they consider appropriate.

(5) In the light of the conclusions of the assessment, and subject to regulation 64 (considerations of overriding public interest), the competent authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

(6) In considering whether a plan or project will adversely affect the integrity of the site, the authority must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which they propose that the consent, permission or other authorisation should be given.

2.2.2 The Regulations also are applicable to Land Use Plans and Development Plan Documents. If the plan is likely to have a significant effect upon a European site, the permission may only be given if the plan is ascertained to have no adverse effect upon the integrity of the European site. This approach gives rise to a hierarchy of plans each with related appropriate assessments. For example, the appropriate assessment of a Core Strategy will affect policies within a Site Allocations Plan, which will then need its own appropriate assessment, and so on.

2.2.3 The competent authority is Suffolk Coastal District Council. The Appropriate Assessment of the Suffolk Coastal District Council Core Strategy and Development Management Policies (July 2013) identified a number of designated European sites within the District and concluded that the proposed scale and location of housing development planned for the District would not have any likely significant effects if the policies were modified as recommended. The recommendations were carried forward into the Core Strategy which has been adopted.

2.2.4 This Habitats Regulations Assessment is required because housing development is proposed on land within the District for which planning consent is sought; it contains the information provided to Suffolk Coastal District Council necessary for their own assessment.

2.3 European sites

2.3.1 European sites (also known as Natura 2000/N2K sites) are sites that have been classified or designated by Defra/Welsh Ministers or Natural England/Natural Resources Wales, as Special Protection Areas (SPA) for those sites where birds are the special interest feature, and Special Areas of Conservation (SAC) where the habitats or species (other than birds) are the reason for designation.

2.3.2 Wetlands of International Importance, designated under the Ramsar Convention, Ramsar sites, are not European sites. There may often be considerable overlap between the special interest features and physical boundaries of Ramsar sites, with European sites. However, for the purposes of planning and development, Government policy, through the NPPF, states that Ramsar sites should be treated equally/in the same way as European sites. The same applies for sites under consideration for designation including potential Special Protection Area (pSPA), Site of Community Importance (SCI), Candidate Special Area of Conservation (cSAC) and proposed Ramsar sites. In summary, although Appropriate Assessment only legally applies to European

sites, National Planning Policy provides further obligations to ensure that all those sites previously mentioned are subject to assessment. Therefore, for the purposes of this report, the term 'European site(s)' refers to all sites under assessment.

- 2.3.3 As the interest features of the Ramsar sites are usually very similar to the interest features of the SPA and / or SAC designations, both geographically and ecologically, the assessment below, for clarity does not always repeat Ramsar site names. The assessment does however consider Ramsar sites fully, and if an assessment for a Ramsar site was found to differ from that for the respective SPA / SAC, this would be clearly identified.
- 2.3.4 European Marine Site (EMS) is a term that is often used for a SPA or SAC that includes marine components (i.e. land/habitats up to 12 nautical miles out to sea and below the Mean High Water Mark). A European Marine Site does not have a statutory designation of its own but is designated for the same reasons as the relevant SPA or SAC, and because of this EMS are not always listed as a site in their own right, to avoid duplication. For the purpose of this document, an EMS is referred to as an Inshore SPA (or SAC) with Marine Components and it will be made clear if an SPA/SAC has marine components.

2.4 Impacts in-combination with other Land-use Plans or Projects

- 2.4.1 It is important to consider other land-use plans, projects, etc. in-combination with the proposed development, in order to assess potential cumulative impact upon the European sites that have been identified within the zone of influence. For example, it is possible that the Project being assessed may not have any impact upon a European site when considered alone, but when considered in-combination with another source, impacts may become likely. Alternatively, as an example, the Project being assessed may give rise to potential impact upon a European site when considered alone, and when considered in-combination with another source, the cumulative impact may be greater.
- 2.4.2 The proposed development site lies within the jurisdiction of Suffolk Coastal District Council. The Council has a set of adopted and emerging Land-use Plans, underpinned by their Core Strategy, that provide policies and supporting information that will shape the way the land in the District is used over the coming years e.g. housing provision, employment land and recreational facilities. Such land uses could have detrimental impacts on nearby European sites so the Council will have to have satisfied Natural England, the Appropriate Nature Conservation Organisation, through Plan-level HRA that their policies will have no likely significant effects upon European sites, before they can be adopted.
- 2.4.3 In addition, neighbouring districts and/or counties may have Land-use Plans that could potentially affect European sites. Also, existing developments and proposed developments, management carried out by land managers with the consent of Natural England, projects of statutory agencies and utility companies such as projects affecting the water environment, and third party effects such as recreation, may affect European sites. It is necessary to investigate which other plans, projects, management etc. occur within and surrounding the area of the proposed development at Rendlesham.

3 Baseline information

3.1 The study area

3.1.1 For the purpose of this assessment, a 13km zone of influence (study area) around the location of the proposed development has been used. The zone of influence is based upon the emerging RAMS document (this has not yet been made available to us by Suffolk Coastal DC). Recreational pressure is a key concern when assessing the impact of new homes and increased population upon European sites.

3.1.2 A search using Natural England's Interactive 'Magic Map'² revealed that a number of European sites lie within 13km (driving distance) of the proposed development. Each European site is listed below, with a brief site description and details of its qualifying features, the component SSSI/s that are within the study area and Natural England's Conservation Objectives.

3.2 European sites within the study area

3.2.1 The following sites of European importance (Ramsar, Special Protection Area, Special Area of Conservation) were identified within the search area and are detailed within the tables below. There are no sites of European importance within 1km walking distance of the proposed development site; all sites listed lie within the 13km driving distance zone of influence. The sites are listed by proximity to the proposed development site with the nearest being first in the list.

Sandlings SPA

Site description summary	Driving distance/ direction from Site (approx.)	Qualifying features/habitats ³	
<p>The Sandlings is a series of SSSI heathlands with habitats including acid grassland and heather-dominated plant communities. Lack of management in past years, along with the conversion to commercial conifer plantations and arable cultivation has resulted in remnants of heath that have been threatened with successional changes and bracken invasion. Recent initiatives are working towards restoration of the heathland habitats.</p> <p>The Sandlings qualifies as an SPA under Article 4.1 of the Birds Directive due to the presence of Woodlark <i>Lullula arborea</i> and Nightjar <i>Caprimulgus europaeus</i> during the breeding season; both are species of European importance and listed in Annex 1 of the Directive.</p>	2.9km south to parking place at the end of Friday Street	During the breeding season:	A224 Nightjar <i>Caprimulgus europaeus</i> : 3.2% of the GB breeding population Count as at 1992
			A246 Woodlark <i>Lullula arborea</i> : 10.3% of the GB breeding population Count as at 1997

² <http://www.natureonthemap.naturalengland.org.uk/magicmap.aspx>

³ Taken from the Natura 2000 Standard Data Form for Site UK9020286 Sandlings SPA dated December 2015.

Component SSSI/s within search area ⁴	
Sandlings Forest SSSI	Covers 2483.78ha and contains 2 units. 100% in unfavourable-recovering condition.
Tunstall Common SSSI	Covers 36.60ha and contains 1 unit. 100% in unfavourable-recovering condition.
Blaxhall Heath SSSI	Covers 45.90ha and contains 1 unit. 100% in unfavourable-recovering condition.
Conservation Objectives ⁵	
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;	<ul style="list-style-type: none"> • 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.

Deben Estuary SPA/Ramsar/Inshore SPA with Marine Components

Site description summary	Driving distance/direction from Site (approx.)	Qualifying features/habitats ⁶	
<p>The Deben Estuary is designated as SPA and as a Ramsar site. The estuary supports a highly complex mosaic of habitat types including mudflats, lower and upper saltmarsh, swamp and scrub. The composition of the mosaic varies with substrate, frequency and duration of tidal inundation, exposure, location and management.</p> <p>The SPA designation is based on large numbers of wintering Avocet and Dark-bellied Brent geese, whereas the Ramsar designation also includes a wider range of migrating and wintering birds, flora, and fauna including the rare snail <i>Vertigo angustior</i>.</p> <p>This SPA is a part of the Deben Estuary European Marine Site (EMS).</p>	6.8km southwest to Wilford Bridge, Melton.	Over wintering:	<p>A675 Dark-bellied Brent Goose <i>Branta bernicla bernicla</i>: (Western Siberia/Western Europe) 0.8% of the population 5 year peak mean 1991/92 – 1995/96</p> <p>A132 Avocet <i>Recurvirostra avosetta</i>: (Western Europe/Western Mediterranean – breeding) 7.5% of the GB population 5 year peak mean 1991/2-1995/6</p>

⁴ Condition status taken from Natural England data via Magic Map on 26th March 2018

⁵ Taken from Natural England's European Site Conservation Objectives for Sandlings SPA dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.

⁶ Taken from the Natura 2000 Standard Data Form for Site UK9009261 Deben Estuary SPA dated December 2015.

Component SSSI/s ⁷	
Deben Estuary SSSI	Covers 981.08ha and contains 22 units. 23.16% in favourable condition, 76.84% in unfavourable-declining condition.
Conservation Objectives ⁸	
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;	<ul style="list-style-type: none"> • 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.

Staverton Park & The Thicks, Wantisden SAC

Site description summary	Driving distance/ direction from Site (approx.)	Qualifying features/habitats ⁹
This site is representative of old acidophilous oak woods in the eastern part of its range, and its ancient oaks <i>Quercus</i> spp. have rich invertebrate and epiphytic lichen assemblages. Despite being in the most 'continental' part of southern Britain, the epiphytic lichen flora of this site includes rare and Atlantic species, such as <i>Haemotomma elatinum</i> , <i>Lecidea cinnabarina</i> , <i>Thelotrema lepadinum</i> , <i>Graphis elegans</i> and <i>Stenocybe septata</i> . Part of the site includes an area of old holly <i>Ilex aquifolium</i> trees that are probably the largest in Britain. The site has a very well-documented history and good conservation of woodland structure and function.	7km south, although privately managed	9190 Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains
Component SSSI/s ¹⁰		
Staverton Park and The Thicks, Wantisden SSSI	Covers 80.83ha and contains 3 units. 72.74% in favourable condition, 27.26% in unfavourable-no change condition.	
Conservation objectives ¹¹		

⁷ Condition status taken from Natural England data via Magic Map on 26th March 2018.

⁸ Taken from Natural England's European Site Conservation Objectives for Deben Estuary SPA dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice and also, used in conjunction with the Regulation 35 Conservation Advice document for the EMS.

⁹ Taken from the Natura 2000 Standard Data Form for Site UK0012741 Staverton Park and The Thicks, Wantisden SAC dated December 2015.

¹⁰ Condition status taken from Natural England data via Magic Map on 26th March 2018.

¹¹ Taken from Natural England's European Site Conservation Objectives for Staverton Park & The Thicks, Wantisden SAC dated 30th June 2014-version 2.

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;	<ul style="list-style-type: none"> • 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
---	--

Alde Ore & Butley Estuaries SAC/Inshore SAC with Marine Components

Site description summary	Driving distance/ direction from Site (approx.)	Qualifying features/habitats ¹²
<p>This estuary, made up of three rivers, is the only bar-built estuary in the UK with a shingle bar. This bar has been extending rapidly along the coast since 1530, pushing the mouth of the estuary progressively south-westwards. It is relatively wide and shallow, with extensive intertidal mudflats on both sides of the channel in its upper reaches and saltmarsh accreting along its fringes. The Alde subsequently becomes the south-west flowing River Ore, which is narrower and deeper with stronger currents. The smaller Butley River, which has extensive areas of saltmarsh and a reedbed community bordering intertidal mudflats, flows into the Ore shortly after the latter divides around Havergate Island. There is a range of littoral sediment and rock biotopes (the latter on sea defences) that are of high diversity and species richness for estuaries in eastern England. Water quality is excellent throughout. The area is relatively natural, being largely undeveloped by man and with very limited industrial activity. The estuary contains large areas of shallow water over subtidal sediments, and extensive mudflats and saltmarshes exposed at low water. Its diverse and species-rich intertidal sand and mudflat biotopes grade naturally along many lengths of the shore into vegetated or dynamic shingle habitat, saltmarsh, grassland and reedbed.</p>	8km northeast to car park at Iken Cliff	1130 Estuaries
		1140 Mudflats and sandflats not covered by seawater at low tide
		1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)
Component SSSI/s¹³		
Alde-Ore Estuary SSSI	Covers 2,533.95ha and contains 35 units. 51.68% in favourable condition, 34.58% in unfavourable-recovering condition, 13.74% in unfavourable-no change condition.	
Conservation objectives¹⁴		

¹² Taken from the Natura 2000 Standard Data Form for Site UK0030076 Alde, Ore and Butley Estuaries SAC dated December 2015.

¹³ Condition status taken from Natural England data via Magic Map on 26th March 2018.

¹⁴ Taken from Natural England's European Site Conservation Objectives for Alde Ore and Butley Estuaries SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.

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;	<ul style="list-style-type: none"> 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
---	--

Alde-Ore Estuary SPA/Ramsar/Inshore SPA with Marine Components

Site description summary	Driving distance/direction from Site (approx.)	Qualifying features/habitats ¹⁵	
<p>Alde-Ore Estuary SPA has extensive areas of saltmarsh and shingle habitats, which support a large number of wintering and breeding bird species.</p> <p>The Ramsar site, with the same boundaries as the SPA, comprises the estuary complex of the rivers Alde, Butley and Ore, including Havergate Island and Orfordness. Habitats include, intertidal mudflats, saltmarsh, vegetated shingle (including the second-largest and best-preserved area in Britain at Orfordness), saline lagoons and grazing marsh. The Orfordness/Shingle Street landform is unique within Britain in combining a shingle spit with a cusped foreland. The site supports nationally-scarce plants, British Red Data Book invertebrates, and notable assemblages of breeding and wintering wetland birds.</p> <p>This SPA is part of the Alde Ore & Butley European Marine Site (EMS).</p>	8km northeast to car park at Iken Cliff	During the breeding season:	A081 Marsh Harrier <i>Circus aeruginosus</i> : at least 1.9% of the GB breeding population 5 year mean, 1993-1997
			A183 Lesser Black-backed Gull <i>Larus fuscus</i> : (Western Europe/Mediterranean/Western Africa) 11.3% of the breeding population 5 year mean 1994-1998
			A132 Avocet <i>Recurvirostra avosetta</i> : (Western Europe/Western Mediterranean – breeding) 23.1% of the GB breeding population 5 year mean, 1990-1994
			A195 Little Tern <i>Sterna albifrons</i> : (Eastern Atlantic – breeding) 2% of the GB breeding population 5 count mean, 1993-4, 1996-8
			A191 Sandwich Tern <i>Sterna sandvicensis</i> : (Western Europe/Western Africa) 1.2% of the GB breeding population 5 year mean, 1992-1996
		Over wintering:	A151 Ruff <i>Philomachus pugnax</i> : (Western Africa – wintering) 0.4% of the GB population 5 year peak mean 1991/2-1995/6
			A132 Avocet <i>Recurvirostra avosetta</i> : (Western Europe/Western Mediterranean – breeding) 60.3% of the GB population 5 year peak mean 1991/2-1995/6
			A162 Common Redshank <i>Tringa totanus</i> : (Eastern Atlantic – wintering) 1.1% of the population 5 year peak mean 1991/2-1995/6
Component SSSI/s¹⁶			
Alde-Ore Estuary SSSI	Covers 2,533.95ha and contains 35 units. 51.68% in favourable condition, 34.58% in unfavourable-recovering condition, 13.74% in unfavourable-no change condition.		

¹⁵ Taken from the Natura 2000 Standard Data Form for Site UK9009112 Alde-Ore Estuary SPA dated December 2015.

¹⁶ Condition status taken from Natural England data via Magic Map on 26th March 2018.

Conservation Objectives¹⁷	
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;	<ul style="list-style-type: none"> • 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.

Orfordness - Shingle Street SAC/Inshore SAC with Marine Components

Site description summary	Driving distance/ direction from Site (approx.)	Qualifying features/habitats ¹⁸
<p>Coastal lagoons for which this is considered to be one of the best areas in the United Kingdom. Annual vegetation of drift lines for which this is one of only four known outstanding localities in the United Kingdom. This habitat is considered to be rare as its total extent in the United Kingdom is estimated to be less than 100 hectares. Perennial vegetation of stony banks for which this is considered to be one of the best areas in the United Kingdom.</p> <p>This is part of the Alde Ore & Butley European Marine Site (EMS).</p>	12.6km south to car park at Orford	1150 Coastal lagoons
		1210 Annual vegetation of drift lines
		1220 Perennial vegetation of stony banks
Component SSSI/s ¹⁹		
Alde-Ore Estuary SSSI	Covers 2,533.95ha and contains 35 units. 51.68% in favourable condition, 34.58% in unfavourable-recovering condition, 13.74% in unfavourable-no change condition.	
Conservation objectives ²⁰		
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;	<ul style="list-style-type: none">• 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	

¹⁷ Taken from Natural England's European Site Conservation Objectives for Alde-Ore Estuary SPA dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice and also, used in conjunction with the Regulation 35 Conservation Advice document for the EMS.

¹⁸ Taken from the Natura 2000 Standard Data Form for Site UK0014780 Orfordness – Shingle street SAC dated December 2015.

¹⁹ Condition status taken from Natural England data via Magic Map on 26th March 2018.

²⁰ Taken from Natural England's European Site Conservation Objectives for Orfordness – Shingle Street SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice and also, used in conjunction with the Regulation 35 Conservation Advice document for the EMS.

Outer Thames Estuary Marine SPA

Site description summary	Driving distance/ direction from Site (approx.)	Qualifying features/habitats ²¹	
This SPA is entirely marine and is designated because its habitats support 38% of the Great British population of over-wintering Red-throated Diver <i>Gavia stellata</i> , a qualifying species under Article 4.1 of the Birds Directive. The Outer Thames Estuary SPA covers vast areas of marine habitat off the east coast between Caister-on-Sea, Norfolk in the north, down to Margate, Kent in the south. The habitats covered by the SPA include marine areas and sea inlets where Red-throated Diver is particularly susceptible to noise and visual disturbance e.g. from wind farms and coastal recreation activities. Threats from effluent discharge, oil spillages and entanglement/drowning in fishing nets are significant.	3.4km East (to parking area at Sizewell)	Over winter:	A001 Red-throated Diver <i>Gavia stellata</i> : (North-western Europe – wintering) 38% of the population in Great Britain peak mean over the period 1989—2006/07
Component SSSI/s			
n/a			
Conservation Objectives²²			
Subject to natural change, maintain or enhance the red-throated diver population and its supporting habitat in favourable condition			

3.3 Other relevant Plans or Projects potentially affecting European sites in the search area

3.3.1 In addition to the potential impact that the proposed development may have upon the nearby European sites described above, other plans/documents/guidance as well as other projects, may also impact upon these sites, the most relevant of which are listed below and these may need to be considered alongside the development.

- Suffolk Coastal District Local Plan – Core Strategy and Development Management Policies July 2013 *Suffolk Coastal District Council*
- Suffolk Coastal District Local Plan – Site Allocations and Area Specific Policies adopted in January 2017 *Suffolk Coastal District Council*

²¹ Taken from the Natura 2000 Standard Data Form for Site UK9020309 Outer Thames Estuary SPA dated December 2015.

²² Taken from Natural England's Draft advice under Regulation 35(3) of The Conservation of Habitats and Species Regulations 2010 (as amended) and Regulation 18 of The Offshore Marine Conservation (Natural Habitats, & c.) Regulations 2007 (as amended) for Outer Thames Estuary SPA Version 3.7 March 2013.

- A project to implement mitigation for recreational impacts of the Suffolk Coastal District, Babergh District and Ipswich Borough Local Plans: Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). Not available.
- Suffolk Coastal District Council Leisure Strategy 2014 – 2024 *SCDC*
- Rendlesham Neighbourhood Plan 2014-2027 'made' in January 2015 *Rendlesham Parish Council*

Other influences

- 3.3.2 Other actions may also result in impact to European sites, such as management practices by landowners (with consent from Natural England), use by the general public (recreational pressure), existing developments, future (planned) developments and unplanned events, whether accidental, intentional or natural e.g. fires, storms, surges/flooding.

3.4 Correspondence with Natural England

Natural England responded to a Scoping Opinion request from SCDC on the 18th October 2017 upon an earlier planning application and their response is reproduced in full in Appendix 3.

4 Considerations of Likely Significant Effects

4.1 Approach to consideration of likely significant effect

- 4.1.1 The proposed development at Rendlesham has been allocated for housing in Policy SSP12 – Land west of Garden Square, Rendlesham, in the SCDC Site Allocations and Areas Specific Policies Development Plan Document (as adopted January 2012), and has consequently been taken into account through its accompanying HRA. Screening for likely significant effects upon European sites that might arise from the proposed development at Rendlesham considers the issues raised in the aforementioned HRA, and takes into account the mitigation measures required to ensure there are no residual negative impacts.

4.2 Likely Significant Effects connected with management of European sites

- 4.2.1 The development proposed at Rendlesham is not necessary for, or connected with, the nature conservation management of any European sites.

4.3 Suffolk Coastal District Council Core Strategy and Development Management Policies

- 4.3.1 Suffolk Coastal District Core Strategy and Development Management Policies was adopted in July 2013. This document sets out the strategic vision for the district and its communities. The Core Strategy document promotes the provision of at least 7,900 new homes across the District over the period 2010-2027. The focus for growth will be on the major centres e.g. east of Ipswich and the Felixstowe peninsula. New homes elsewhere in the District will be scattered across the market towns and smaller sustainable communities. Within settlements defined as Key Service Centres such as Rendlesham, new growth will be at a sustainable level that is appropriate to the function, character and environmental capacity of the town or village: 1,350 new homes (17% of 7,900) will be distributed across Key and Local Service Centres (inc. Rendlesham) within the District. Policy SP27 within the Suffolk Coastal District Council (SCDC) Core Strategy and Development Management Policies Development Plan Document²³, covers growth within the Key and Local Service Centres:

The strategy for the communities outside of the Market Towns and the Major Centres and identified as Key and Local Service Centres is to:-

(a) retain the diverse network of communities, supporting and reinforcing their individual character;

(b) permit housing development within defined physical limits or where there is a proven local support in the form of small allocations of a scale appropriate to the size, location, and characteristics of the particular community. An exception may also be made in respect of affordable housing in accordance with Policy DM1;

(c) promote the combination of open market and affordable housing in order to encourage and enable young and old the opportunity to remain within their local communities;

(d) enable organic development to occur in respect of settlements where opportunities within physical limits are severely limited. This may be in the form of the inclusion of potential sites within physical limits boundaries when they are drawn, or development within adjacent 'clusters' (see Policy DM4) subject to defined criteria;

(e) secure the provision of services and facilities required to meet the day to day needs of the local population, primarily at locations within the Key Service Centres but supported by increased access provision to enable residents of the smaller settlements to utilise them; and

²³ Suffolk Coastal District Council *Core Strategy & Development Management Policies Development Plan Document* July 2013
<http://www.suffolkcoastal.gov.uk/assets/Documents/LDF/SuffolkCoastalDistrictLocalPlanJuly2013.pdf>

(f) work with partners to address the issue of rural isolation through the innovative use of alternative transport other than by private motorcar, as well as improved communication technologies.

- 4.3.2 Section Six of the Appropriate Assessment²⁴ of the SCDC Core Strategy and Development Management Policies assesses each policy. Policy SP2 – Housing numbers is assessed in combination with other housing distribution policies, including SP27 – Key and Local Service Centres. The SCDC Core Strategy Appropriate Assessment concludes that due to an increase in human population from the cumulative new housing in the District and therefore an increase in visitor numbers to European sites in the District, in the absence of mitigation it cannot be ascertained that there will not be a Likely Significant Effect upon the integrity of the following European sites within close proximity to Leiston; Sandlings SPA, Minsmere-Walberswick SPA, Minsmere-Walberswick Heaths and Marshes SAC, Alde-Ore Estuary SPA, Alde-Ore and Butley SAC and Orfordness-Shingle Street SAC.
- 4.3.3 In order to ensure that there are no likely significant effects upon the aforementioned European sites, resulting from housing policy proposals in the SCDC Core Strategy document, the Appropriate Assessment describes mitigation measures that will be put in place. The principles of mitigation are 'to reduce demand for visits to European sites at risk from impact and to manage existing sites with a specific high risk to re-distribute visitors from sensitive areas'²⁵. To summarise the mitigation objectives are
- To provide new locations for countryside recreation, especially dog walking, for residents or existing and proposed housing, as a preferred alternative to European sites
 - To improve visitor infrastructure and management, including wardening, on existing European sites to reduce the impact of increased visitors
 - To quantify reductions in visitor harm achieved by mitigation projects
- 4.3.4 The SCDC Core Strategy Appropriate Assessment explains that a visitor management plan which guides a co-ordinated approach to visitor management throughout the Suffolk Coast and Heaths AONB designated sites, which includes the Sandlings SPA, is required. Visitor management would include on-site wardening and other measures, which are reproduced below:
- identifying key sites where visitor pressure is currently, or close to, causing harm
 - identifying the origin of visitors to those identified key sites
 - writing and implementing a visitor management plan for key sites without such a plan, or revising existing plans, to reduce visitor impact. Reduction in visitor impact might mean changes to visitor infrastructure (e.g. car parks, paths), new or revised interpretation, wardening, provision of alternative recreation opportunities in less sensitive locations, etc, bylaws, identification of parts of sites where recreation will not be encouraged, etc.
 - a monitoring programme, to determine visitor numbers and allow the impact of the visitor numbers to be identified, throughout time. The impact of visitor numbers may be difficult to determine and would rely on specialist studies as well as Natural England's programme of SSSI Condition assessment.
- 4.3.5 Capital works programmes are likely to be required as part of a visitor management strategy. It is probable that the funding required to implement these mitigation measures would need to come, at least in part, from new housing provision. The implementing body for a visitor management programme to cover the Suffolk Coast and Heaths AONB is currently unclear.

²⁴ The Landscape Partnership *Appropriate Assessment for Suffolk Coastal District Council Core Strategy and Development Management Policies* November 2011 <http://www.suffolkcoastal.gov.uk/assets/Documents/LDF/D2b/AARReportNov2011.pdf>

²⁵ The Landscape Partnership *Appropriate Assessment for Suffolk Coastal District Council Core Strategy and Development Management Policies* November 2011 <http://www.suffolkcoastal.gov.uk/assets/Documents/LDF/D2b/AARReportNov2011.pdf>

- 4.3.6 Section 5 in the SCDC Core Strategy Appropriate Assessment describes methods of assessing European site visitor increases from an increased human population. The methodology breaks visitors into three type categories: tourist, day trips or local greenspace users. Data from various visitor surveys and studies is then used to predict changes in visitors to European sites, based on changes to visitor numbers for each visitor category. This information is further used to predict how changes might have an adverse impact upon the integrity of European sites and what those impacts might be.
- 4.3.7 Policy SP17 – Green Space, in the SCDC Core Strategy provides a mechanism for implementing the mitigation measures proposed to negate the effects that increased numbers of visitors may have upon European sites:
- The Council will seek to ensure that communities have well-managed access to green space within settlements and in the countryside and coastal areas, in order to benefit health, community cohesion and greater understanding of the environment, without detriment to wildlife and landscape character. Where adequate green space is not provided as part of a development, developer contributions will be sought to fund the creation of appropriate green space and/ or management and improvement of access to green space. In particular, the Council will work on green infrastructure opportunities with partners in strategic housing growth areas in order to suitably complement development proposals. Developer contributions will be secured by means of conditions, legal agreements and/or through the Community Infrastructure Levy (CIL) (once a charging schedule has been adopted).*
- 4.3.8 Section 5 also concludes that pressure upon the District's water resources and water quality resulting from an increased human population is not likely to have an adverse impact upon European sites.
- 4.3.9 The effects of boating activity upon European sites in Suffolk District is discussed in Section 5 of the SCDC Core Strategy Appropriate Assessment. It is concluded that there would be no likely significant effect upon European sites resulting from policies within the Core Strategy. New boatyard development is not encouraged through planning policy and it is known that disturbance from boating is minor and less important than disturbance from land-based recreational activities, although users will travel a greater distance to participate in water-based activities than they would for land-based activities.
- 4.3.10 The Appropriate Assessment of the SCDC Core Strategy concludes that with the implementation of the outlined mitigation measures, there will be no likely significant effect upon the integrity of any European site as a result of the Core Strategy policies.

4.4 Suffolk Coastal District Council Site Allocations and Area Specific Policies

- 4.4.1 Suffolk Coastal District Council's Site Allocations and Area Specific Policies document allocates land for development and contain policies for specific sites and areas. There are two site specific allocations for Rendlesham, including SSP12 which is the subject of this HRA. Rendlesham is considered within paragraphs 2.91 to 2.105 of the Site Allocations document where it is noted that although identified as a Key Service Centre, Rendlesham is larger and contains a wider variety of facilities common to most Key Service Centres. It considers that Rendlesham has the capacity to support more than the 100 homes proposed for the village but highway factors.
- 4.4.2 Policy SSP12 – Land west of Garden Square, Rendlesham is specific to the site of this study and is reproduced below:

5.05ha of land west of Garden Square, Rendlesham, as shown on the Policies Map, is identified for a mixed residential development and greenspace provision for approximately 50 units.

Development will be expected to accord with the following criteria:

- Meet the minimum distance from the Water Recycling Centre within which new residential development is considered acceptable as advised by Anglian Water;*

- *Provision of a flood risk assessment;*
- *Accommodate the sewers that cross the site;*
- *The development will need to demonstrate there is adequate capacity on the foul sewerage network or that capacity can be made available;*
- *The design, layout, mix and type of housing proposed is compatible with the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan;*
- *Provision of affordable housing;*
- *The remaining greenspace should be used for a mix of informal open space suitable for daily dog walking, allotments or orchards in accordance with Rendlesham Neighbourhood Plan policy RNPP3;*
- *Provision of a substantial landscape buffer to the northern and western boundaries where it abuts open countryside;*
- *An archaeological assessment will be required; and*
- *A transport assessment.*

In addition, the air quality impacts of traffic from cumulative development at Melton crossroads and the Air Quality Management Area declared in Woodbridge will need to be investigated in the form of an Air Quality Assessment, together with a mitigation appraisal.

4.5 Suffolk Coastal District Council's Leisure Strategy 2014-2024

- 4.5.1 Suffolk Coastal District Council's Leisure Strategy 2014 – 2024 will increase access and availability of leisure and recreation opportunities to the wider community, enhancing and communicating the current and future offer to meet the wants and needs of local communities over the next ten years. This strategy suggests that opportunities may come forward outside the scope of this Neighbourhood Plan for increased leisure and recreation in ways which would not impact upon the nature conservation interest of designated sites in the District. Although the Leisure Strategy is not a Local Plan document, or a statutory document, it remains relevant as a mechanism for further mitigating recreational impacts of the SCDC Site Allocations and Areas Specific Policies document.

4.6 Suffolk Coastal District Council project to implement mitigation for Local Plan potential recreational impacts upon European sites

- 4.6.1 On Friday 24th November 2017, Suffolk Coastal District Council partners provided information about the project to implement mitigation for Local Plan potential recreational impacts upon European sites. This programme is called 'Recreational Avoidance and Mitigation Strategy', abbreviated to 'RAMS. Further detail can be found at https://issuu.com/suffolkbis/docs/rams_natasha_moreno-roberts_fdcc70933749a6.
- 4.6.2 The mitigation measures would be implemented through Policy SP17 – Green Space in the SCDC Core Strategy. This provides confidence that Core Strategy potential impacts are being addressed.

4.7 Rendlesham Neighbourhood Plan

- 4.7.1 Rendlesham Neighbourhood Plan was 'made' in January 2015. Rendlesham Neighbourhood Plan represents one part of the development plan for Rendlesham over the period 2014 to 2027 (the other part primarily including SCDC Local Plan Core Strategy and Development Management policies). The Plan will guide development within the Parish and provide guidance to developers looking to submit planning applications within the Neighbourhood Area. The Neighbourhood Plan is entirely consistent with SCDC Local Plan Core Strategy which has its own Appropriate Assessment that addresses the potential impacts on European sites that might occur from increased visitor pressure, due to an increase in human population resulting from the development of new homes that are planned for the District.

- 4.7.2 Rendlesham Neighbourhood Plan does not allocate land for housing. It does however, have objectives for how growth in the Parish should be guided:

Objective 3 –

To ensure that adequate land for housing is provided for sustainable growth to meet the needs of future generations and enable the provision of affordable housing.

The RNP would look for the principles contained within it to be included as part of any development brief for the outstanding allocation and any sites that are taken forward.

Objective 3a – Type and Design

To ensure that there is a healthy mix in the type and design of housing built, particularly homes which attract first time buyers and homes for those less mobile to enable them to stay in Rendlesham if they so choose.

Whilst new housing has introduced larger properties into the village, new housing should have regard to the sustainable mix of housing as identified in Appendix N.

Objective 3b – Density

To enable sufficient open space and on-street parking to be incorporated into housing schemes as identified in Appendix O.

Appropriate housing densities are essential on development sites to enable well designed schemes that will take forward the objectives in the RNP and the provision of amenity land.

Objective 3c – Street Scene

The street scene is an important part of the aesthetics of any housing development and development should be guided by the design principles in this NP.

Inadequate parking can lead to overcrowded street scenes and inconsiderate parking on pavements, causing obstruction to pedestrians and cyclists. The guidance provided in this NP should be used to ensure provision of on-street landscaped parking bays as well as off-road parking for residents.

Objective 3d – Sustainable Transport

Sustainable transport is an important aim and off road provision should be made on artery roads in developments to promote the use of cycling and shared space schemes within the village. Good examples of this can be found in Rendlesham and these principles should be followed when designing new housing schemes.

Objective 3e – Other Infrastructure

To ensure less tangible infrastructure is provided for. This list is not exclusive: telephony, sewage, and services such as doctors, dentist and family services.

Objective 3f – Rural Affordable Housing

To ensure that local homes are built for local people so that people who live and work in Rendlesham can afford to stay in the village when personal circumstances change eg the sale of a rented property, leaving home, downsizing for older people or finding more suitable accommodation because of disability.

In addition Policy RNPP3 provides guidance on providing growing space within new developments:

Policy RNPP3

New residential or mixed use development is required to make provision towards meeting identified local need for allotments, orchards and growing spaces.

4.8 Suffolk Coastal Local Plan review

- 4.8.1 The reviewed local plan is progressing towards submission to the Secretary of State.

4.9 Consideration of Likely Significant Effects of the development on European sites, when considered in isolation

Policy and background

- 4.9.1 Policy SSP12 in the SCDC Site Allocations and Area Specific Policies document provides a mechanism to ensure that greenspace suitable for daily dog walking is incorporated within the development.
- 4.9.2 Rendlesham Neighbourhood Plan (Appendix N) lists existing facilities within the village; leisure facilities included a recreation ground and pavilion, 3 play areas and a Community Centre. The Plan also identifies inadequate facilities and lack of access to the open countryside to the north, as weaknesses within its SWOT analysis. A good infrastructure of cycle paths and footways within the village are identified as strengths. The creation of leisure opportunities and the open space of the village green are identified as opportunities for the village. Policy RNPP1 provides detail to emphasise that redevelopment or change of use of public buildings and employment developments will be supported provided that they maintain or enhance existing leisure uses and future needs, and redevelopment or change of use involving residential development will only be permitted where they maintain or enhance existing/established leisure facilities. Policy RNPP2 is designed to protect the Local Green Space as a community open space. The Plan identifies that Rendlesham has a limited number of Public Rights of Way due to its former use as an UAF base. There will be additions to the network through the Bentwaters Master Plan which will provide a more direct route to Rendlesham Forest (and the Sandlings Walk), and further open countryside. The Plan also recognises the potential for future work with Suffolk County Council and landowners to improve pedestrian and cycle access, as well as to create sustainable travel options.

Potential for adverse impacts

- 4.9.3 It is widely recognised that an increase in housing and subsequent increase in residents can lead to increased visitor pressure on nearby European sites however, there are other factors that must also be considered. The criteria for determining if a development would have a likely significant effect, and require assessment, are based on the characteristics of the relevant European site and the objectives set by Natural England. The main factors to consider are
- Development on or close to the European site destroying part or all of the site, or changing the ecological functioning of the site (e.g. disrupting water flows or migration routes, or providing damaging levels of air pollution)
 - Increased public recreation, causing disturbance to birds, damage to vegetation, increased littering/flytipping, or leading to management compromises (e.g. grazing being restricted).
 - Reduction in water levels or flow, from increased water demand in the District requiring greater water abstraction
 - Reduction of water quality, from increased discharges of sewage and surface water drainage, or from pollution incidents, either during, or after, construction

- 4.9.4 Development on or close to the European site is a location-dependent factor, but the other factors may affect a European site at some distance from development.

Direct impact: development on or close to a European site

- 4.9.5 The proposed development is not on or close to any European site, such that any direct impact that would destroy or otherwise change the ecological functionality of a European site, could occur. The nearest European site is the Sandlings SPA which is located some 1.6km from the proposed development site in a straight-line measurement

Public recreation

4.9.6 European sites are more often than not, vulnerable to recreational pressure which can cause adverse impacts and detriment to the integrity of the qualifying features of such designated sites. Impacts usually associated with visitor pressure include noise and visual disturbance to species that are integral features of a European sites designation, trampling/compaction/erosion issues associated with pathways, nutrient enrichment associated with dog fouling (and illegal fires), and pollution from litter, spillages etc.

4.9.7 When considered alone the likely significant effect of residents from the proposed development site using European sites is likely to be negligible. This is due to the location of the development and the provision of open green space on the site (which include suitable provision for daily dog walking), a good infrastructure of cycleways and footpaths within the village, as well as the policies for Rendlesham and the rest of the District which support and promote new leisure and recreation facilities.

Water resources and water quality

4.9.8 The potential for developments to adversely impact the water availability that is necessary to maintain the ecological functionality of European sites is considered in the Appropriate Assessment of the SCDC Core Strategy. The SCDC Appropriate Assessment reports that water companies were confident that they had sufficient resources to supply the demands over the plan period.

4.9.9 There is potential for drainage from development schemes to cause adverse impacts to water quality which may in turn effect the qualifying features or functionality of nearby European sites. The Appropriate Assessment for the Core Strategy identifies that improvements to treatment plants within the region will be required before housing growth significantly increases.

4.9.10 When considered alone the likely significant effect on water resources and quality from the proposed development site on European sites is likely to be negligible, due to the scale and location of the development

Conclusion of likely significant effect of the development acting alone

4.9.11 It is concluded that there are mechanisms in place through Policy SSP12 of the SCDC Site Allocations document, through the policies and objectives of the Rendlesham Neighbourhood Plan and through the policies of the SCDC Core Strategy, to ensure that that there would be no likely significant effect upon any European site from the proposed development as a standalone development.

4.10 Consideration of Likely Significant Effects of the development on European sites, when considered in combination

4.10.1 The proposed development in combination with other development proposals for Rendlesham and Suffolk Coastal District, will inevitably result in an increase in visitor numbers to the nearby European sites (in particular the Sandlings SPA, but also the Deben Estuary SPA/Ramsar, the Alde-Ore Estuary SPA/Ramsar, and the Alde-Ore & Butley Estuaries SAC), that is greater than when considering the development alone. With the information available, it is not possible to accurately predict the level of increase in use of European sites for recreation purposes, or the degree of impact that may result. It is clear though that although the increase in visitors or the scale of impact they may have (on European sites) is not readily quantifiable but could have a likely significant effect upon the integrity of the European sites.

4.11 Proposed mitigation in combination with other developments

4.11.1 The proposed development, in combination with other development proposals for Rendlesham and the District is considered to have a Likely Significant Effect on European sites in the local area, and as such mitigation measures are required to prevent an adverse affect on the integrity of European sites.

4.11.2 The mitigation measure listed below has been prepared in line with Suffolk Coastal's requirement for unilateral undertakings at <https://www.eastsuffolk.gov.uk/planning/s106/habitat-mitigation/> accessed on 22nd March 2019.

Financial contribution

- 4.11.3 The developer agrees to make a financial contribution to Suffolk Coastal District Council using the Unilateral Undertaking process required. This is a payment of £321.22 per dwelling. It is being progressed together with a S106 agreement which accompanies the planning application.

Provision of on-site green infrastructure for recreation

- 4.11.4 The provision of on-site open space suitable for daily dog walking or other recreation types is shown in Appendix 2.

4.12 Conclusion

- 4.12.1 It is concluded that there would be no adverse affect on the integrity of any European site caused by the proposed development acting alone or in-combination with other plans or projects.

Appendix 1

- An archaeological investigation will be required;
- Developers will need to demonstrate there is adequate capacity in the foul sewerage network and WRC (Gedgrave) or that capacity can be made available; and
- Surface water disposal must be in accordance with the water management hierarchy.

RENDLESHAM

(NEIGHBOURHOOD PLAN - See RNP objectives housing 3 – 3f)



- 2.91 Rendlesham is unique in many ways. It is a Key Service Centre which is altogether larger, and contains a much wider variety of facilities than is common to most Key Service Centres given its historic legacy as a former US Airforce base. It also has a “made” Neighbourhood Plan, containing policies relating to the promotion of the village centre to continue to develop to meet the needs of existing and future residents, and the provision of allotments.
- 2.92 The village contains the one remaining housing allocation from the former Suffolk Coastal Local Plan 2001 which has now been re-assessed alongside other sites and re-allocated for residential development.
- 2.93 The Neighbourhood Plan builds on the work of the earlier masterplan for Rendlesham and “saved” policies AP159; AP160 and AP161 and seeks to ensure that the village continues to develop and function to meet the needs of new and established residents and businesses, concentrating on the provision of services and facilities required to meet the needs of the new and growing population. Across the main road from the main residential area, is a large employment site containing a mix of uses (the former technical base). A comprehensive

Appendix 2



Appendix 3

From: Jackson, John (NE) [mailto:John.Jackson@naturalengland.org.uk]
Sent: 18 October 2017 11:29
To: Jane Rodens
Subject: 227922 - DC/17/4188/EIA - Rendlesham, Suffolk

Dear Jane,

Thank you for consulting Natural England on the scoping opinion for this development. The development falls within the 13 km 'zone of influence' for the Deben, Sandlings, Alde-Ore and Stour and Orwell N2K sites, as set out in the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). It is anticipated that new housing development in this area is 'likely to have a significant effect' on the interest features of the aforementioned designated sites, when considered in combination, through increased recreational pressure. As such, we advise that a suitable contribution to the emerging Suffolk RAMS should be sought from this residential development to enable you to reach a conclusion of "no likely significant effect" whilst ensuring that the delivery of the RAMS remains viable.

As the development is of significant size, associated green infrastructure to provide alternative recreational opportunities should also be provided, and detailed at the planning application stage.

The development is potentially within the setting of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, and the Suffolk Coast and Heaths AONB Unit should be consulted on the scope of landscape assessments.

Best Regards

John

John Jackson
Lead Adviser
Sustainable Development
Norfolk & Suffolk Area Team 09
Natural England
Dragonfly House
2 Gilders Way
NORWICH
NR3 1UB
Please Note New Telephone Number: 020 80 264 866
Mob. 07747 065 256

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

[Click here to report this email as spam.](#)

