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Habitats Regulations Assessment (Screening for Likely Significant Effects) of the Suffolk Coastal District Local Plan at First Draft Plan Stage

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Summary

This report is the Habitats Regulations Assessment (HRA) of the Suffolk Coastal District Local Plan at First Draft Plan stage. A plan level HRA considers the implications of a plan or project for European wildlife sites, in terms of any possible harm to the habitats and species that form an interest feature of the European sites in close proximity to the proposed plan. This HRA report draws on a range of background evidence, understanding of the European sites, and a mitigation strategy currently being developed for the Suffolk coastal and heathland European sites.

All aspects of the emerging plan that influence sustainable development for the Suffolk Coastal District are checked through this assessment for risks to European sites. Risks need to be identified in order to inform the screening for likely significant effects, which is an initial stage of assessment to establish whether there is any possibility of the implementation of the plan causing significant effects on any European site. Where the potential for significant effects is identified, or there are uncertainties, a more detailed appropriate assessment is made. This report has regard for relevant case law, including a European Court of Justice Judgment that highlights the need for appropriate use of avoidance and mitigation measures at the correct stage of HRA. This HRA recommends a number of wording amendments to the Suffolk Coastal District Local Plan.

Explanatory text relating to these recommendations made at the screening stage has been added to the screening table where appropriate.

The screening table has identified a number of key themes and a small number of site allocations for more detailed assessment at the appropriate assessment stage. The appropriate assessment will be undertaken after the Regulation 18 consultation and will consider the following; recreation pressure from new residential development and a check of the applicability of the Suffolk HRA RAMs for the increased housing numbers, recreation pressure from tourism, urbanisation effects in close proximity (fire risk, lighting, noise etc), air quality from increased road traffic, water quality and resources

The appropriate assessment will also check in more detail the potential risks arising from the following allocations: SCLP12.3 North Felixstowe Garden Neighbourhood, SCLP12.16 Tourism accommodation (Felixstowe), SCLP12.24 Land rear of Rose Hill, Saxmundham (Housing), SCLP12.26 Saxmundham garden neighbourhood, SCLP12.47 Land to the South of Eyke CoE Primary School and East of The Street, Eyke (Mixed use), and SCLP12.65 Land West of B1125, Westleton (Housing).

These considerations at appropriate assessment are precautionary, to ensure that the HRA provides a robust assessment of all potential impacts and identifies clear mitigation needs. The appropriate assessment will be undertaken after the Regulation 18 consultation.

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1. Introduction and Background Information

Context

- 1.1 This report is the Habitats Regulations Assessment (HRA) of the Suffolk Coastal District Local Plan at First Draft Plan stage. This HRA report has been prepared by Footprint Ecology, on behalf of Suffolk Coastal District Council. It has been written with the benefit of ongoing discussions with planning officers within the District Council, and forms part of the evidence base for the new Local Plan at 'Regulation 18' consultation stage, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 This section provides the background context for this HRA. This report is a HRA of the emerging Suffolk Coastal District Local Plan, and is a report that will be further updated as the preparation of the Local Plan progresses. A HRA considers the implications of a plan or project for European wildlife sites, in terms of any possible harm to the habitats and species that form an interest feature of the European sites in close proximity to the proposed plan or project, which could occur as a result of the plan or project being put in place. In this instance, the HRA is undertaken at plan level. HRA will also be required for development projects coming forward in the future in accordance with the Local Plan. An explanation of the HRA assessment process is summarised in this section below, and also described in greater detail in Appendix 1.
- 1.3 The Suffolk Coastal District covers much of the coastal part of the County of Suffolk, with a stretch of 48.8km of open coast, a significant proportion of which is designated as part of a suite of coastal and heathland European wildlife sites, as well as being within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). The Suffolk Coastal District adjoins the Waveney District to the north, which works collaboratively with Suffolk Coastal District on many Council functions, with a number of shared services. The two Councils are now working towards the creation of one single East Suffolk Council which will come into existence in April 2019, when the two individual authorities will be dissolved. At this point in time, both Waveney District and Suffolk Coastal District are preparing separate Local Plans, each taking account of up to date evidence, current local circumstances and needs, and current planning legislation and national policy, guidance and good practice.
- 1.4 The Suffolk Coastal District is part of the Ipswich Housing Market Area and the Ipswich Functional Economic Area, which means that spatial planning for the District is closely aligned with that of the neighbouring authorities and growth delivery is driven by the need of the Housing Market Area and Functional

Economic Area. A number of studies and strategies have been undertaken collectively to inform the Local Plan evidence base.

- 1.5 A summary of the key aspects of the emerging Suffolk Coastal District Local Plan in terms of growth objectives over the plan period is provided in this section below.
- 1.6 When embarking on new HRA work, it is important to take stock and consider how well the measures recommended or put in place to protect European site interest in previous plan iterations have progressed, and what evidence there is available to support the continuation of such measures, or to indicate that they may need modification. This HRA therefore looks at the measures that were recommended by the previous HRA for the current documents that form the existing Suffolk Coastal District Local Plan. In order to protect European sites, and any changes in circumstances, evidence, statutory advice or local understanding of the issues needs to be considered. A summary of previous and other relevant HRA work is also provided in this section below.

Habitats Regulations Assessment process

- 1.7 A 'Habitats Regulations Assessment,' normally abbreviated to HRA, is the step by step process of ensuring that a plan or project being undertaken by, or permitted by a public body, will not adversely affect the ecological integrity of a European wildlife site. Where it is deemed that adverse effects cannot be ruled out, a plan or project must not proceed, unless exception tests are met. This is because European legislation, which is transposed into domestic legislation and policy, affords European sites the highest levels of protection in the hierarchy of sites designated to protect important features of the natural environment.
- 1.8 The relevant European legislation is the Habitats Directive 1992¹ and the Wild Birds Directive 2009², which are transposed into domestic legislation through the Conservation of Habitats and Species Regulations 2017. These Regulations are normally referred to as the 'Habitats Regulations' and the most recent update consolidates previous versions and corrects some minor errors in transposition. The 2017 Regulations have not changed any of the requirements in relation to European sites.
- 1.9 The legislation sets out a clear step by step approach for decision makers considering any plan or project. In England, those duties are also supplemented by national planning policy through the National Planning Policy Framework (NPPF). This national planning policy also refers to Ramsar sites, which are listed

¹ Council Directive 92/43/EEC

² Council Directive 2009/147/EC

in accordance with the international Ramsar Convention. The NPPF requires decision makers to apply the same protection and process to Ramsar sites as that set out in legislation for European sites. Formally proposed sites, i.e. sites proposed for European designation and going through the designation process, and those providing formal compensation for losses to European sites, are also given the same protection. This report refers to all the above sites as 'European sites' for assessment purposes, as the legislation is applied to all such sites, either directly or as a result of policy.

- 1.10 It should be noted that the European Directives operate on the basis that sites are in place to serve as an ecologically functioning network, and ultimately it is the preservation of that network as a whole that is the overall aim of the European Directives. The network is often referred to as the Natura 2000 Network or 'N2K.'
- 1.11 The duties set out within the Habitats Regulations apply to any public body or individual holding public office with a statutory remit and function, referred to as 'competent authorities.' The requirements are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. A more detailed guide to the step by step process of HRA is provided in this report at Appendix 1.
- 1.12 In assessing the implications of any plan or project, in this case a local plan, for European sites in close proximity, it is essential to fully understand the sites in question, their interest features, current condition, sensitivities and any other on-going matters that are influencing each of the sites. Every European site has a set of 'interest features,' which are the ecological features for which the site is designated or classified, and the features for which Member States should ensure the site is maintained or, where necessary restored. Each European site has a set of 'conservation objectives' that set out the objectives for the site interest, i.e. what the site should be achieving in terms of restoring or maintaining the special ecological interest of European importance. These objectives are set by Natural England, and published for each European site in high level generic form and then with supplementary advice that relates to the interpretation of these at each individual site.
- 1.13 The site conservation objectives are relevant to any HRA, because they identify what should be achieved for the site, and a HRA may therefore consider whether any plan or project may compromise the achievement of those objectives. A summary of relevant European sites is provided within this section below. Further information on European site interest and links to the conservation objectives can be found at Appendix 2 of this report. The European sites of relevance to this HRA are discussed below and Appendix 3.

The emerging Suffolk Coastal District Local Plan

- 1.14 A Local Plan is produced by a local planning authority to set the quantum and direction of sustainable development for the forthcoming plan period. The National Planning Policy Framework (NPPF) 2012³ states that sustainable development is the achievement of social, economic and environmental aspirations, and these three dimensions of sustainable development are mutually dependant. For the natural environment, the NPPF advises that sustainable development should include protecting, enhancing and improving biodiversity, and moving from a net loss of biodiversity to achieving net gains. The recently published Defra 25 year plan⁴ sets out an ambitious programme for improving the natural environment, including the achievement of environmental net gains through development, of which biodiversity is an important part.
- 1.15 The Defra strategy follows on from the review of England’s wildlife sites and ecological network, set out in the report to Defra in 2010 entitled ‘Making Space for Nature,’⁵ which was prepared by a group of national experts chaired by Professor Sir John Lawton. Within this report, it is identified that in order to make our ecological networks and wildlife sites capable of future resilience, there is a need for more wildlife sites, and that existing networks need to be bigger, better and more connected. The future health of designated sites is very much dependant on the future health of wider biodiversity and the ecological networks that sustain them. In planning for the long-term sustainability of designated sites, it is therefore necessary to protect and enhance wider biodiversity through the planning system as well as the designated sites. This HRA recognises this need within the appropriate assessment section in relation to biodiversity gains through planning.
- 1.16 Alongside an ambitious strategy for growth, the emerging Suffolk Coastal District Local Plan also has a significant focus on the natural environment, and its importance to the local economy, local communities and visiting tourists. Protective policies have been included within the First Draft Local Plan, and these are discussed further in the screening and appropriate assessment

3

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁴ <https://www.gov.uk/government/publications/25-year-environment-plan>

⁵ <https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today>

sections of this report, with recommendations for strengthening policy wording and supporting text.

- 1.17 The First Draft Plan for the Suffolk Coastal District has been prepared following the earlier Issues and Options Document, which was published in August 2017 for public consultation. A call for sites was undertaken in late 2016 to identify potential development sites for inclusion within the Local Plan. The consultation responses and evidence produced to date is informing the development of the plan, and at First Draft Local Plan stage there is a presentation of preferred options for policies and site allocations, which will be the subject of public consultation in summer 2018. This will then inform the preparation of a Final Draft Plan later in 2018 and into 2019.
- 1.18 The Suffolk Coastal District Local Plan sets out the Council's intended framework for bringing forward sustainable development across the District between 2016 and 2036. The plan includes spatial policies, development management policies and site allocations. This HRA assesses all parts of the emerging plan at First Draft stage.
- 1.19 The methodology for calculating housing growth requirements is explained within the plan as following the latest Government proposals for assessing housing need. With the National Planning Policy Framework currently being updated by Government, and the recent publication of a new method for calculating housing need that is yet to be finalised, the housing figures may change. At First Draft Local Plan stage, the housing requirement for the Suffolk Coastal District is identified at 10,900 over the plan period, equating to 545 new dwellings annually. In addition, the plan seeks to deliver in excess of the baseline requirement for 13ha of employment land and incorporates policy aimed at delivering 15 new permanent gypsy and traveller pitches.
- 1.20 Tourism is an important part of the economy for the District. Suffolk Coastal District and Waveney District Councils have published an East Suffolk tourism Strategy 2017-2022.⁶ This is a strategy for improving the visitor economy through a range of actions to improve the visitor experience, ensure the required visitor facilities are in place for the long term and effectively market the East Suffolk tourism offer. The strategy does not set any particular targets, but the monitoring of success is related to increased day and overnight visits, tourism spend and tourism related jobs.
- 1.21 There are also a number of Neighbourhood Plans that have already been made by several Suffolk Coastal communities, including Rendlesham, Framlingham,

⁶ <http://www.eastsuffolk.gov.uk/assets/Visitors/East-Suffolk-Tourism-Strategy.pdf>

Great Bealings, Leiston and Melton. A positive referendum vote was received for the Martlesham and Wenhaston with Mells Hamlet Neighbourhood Plans. A number of others are currently in preparation.

- 1.22 The First Draft Local Plan sets out the evidence to inform the housing and employment growth need for the District, and how that relates to the wider Ipswich Strategic Planning Area with neighbouring local planning authorities.

Relevant HRA work and other evidence and assessment

- 1.23 The following documents are of relevance to this HRA due to their consideration of the natural environment and resources, and also the historic HRA work for the documents that form the currently adopted Local Plan.

The adopted Local Plan HRAs

- 1.24 This HRA for the First Draft Local Plan for the Suffolk Coastal District follows a number of previous HRA documents for the currently adopted Local Plan, including a HRA for the Core Strategy and Development Management Policies DPD (2013), the Site Allocations and Area Specific Policies DPD (2017) and the Felixstowe Area Action Plan DPD (2017).
- 1.25 The HRA for the Core Strategy highlighted a number of potential risks to European sites arising from the quantum of growth proposed. This included a focus on the potential impact of increased recreation pressure, assessing visitor data from the Tourism Board and other visitor surveys relevant to the European sites, to identify this impact pathway as a key risk arising from the Core Strategy. The HRA concluded that measures would be required to mitigate for the recreational impact of the residential development coming forward. Recommended measures within the Core Strategy HRA are the provision of alternative natural greenspace for recreation and visitor management at the coastal and heathland European sites to include a visitor management plan and monitoring. These recommendations formed the basis of the Suffolk Coast HRA Recreation Avoidance and Mitigation Strategy (RAMS), which is outlined below.
- 1.26 The HRA for the Site Allocations DPD considers each site allocation in turn and assessed potential risks and distance from European sites. The HRA concludes no adverse effects on any European sites with reliance on the mitigation measures set out within the Core Strategy, along with some amendments to the policy wording within the Site Allocations DPD to give greater clarity on project level HRA requirements. The HRA for the Felixstowe Area Action Plan concludes that the mitigation set out within the Core Strategy and the Site Allocations DPD, with the addition of the Site Allocations DPD policy requiring project level HRA

for any new car parking within 1km of a European site, allows a conclusion of no adverse effects on site integrity.

Suffolk Coast HRA RAM Strategy

- 1.27 The Suffolk Coast HRA RAMS is a means by which sustainable housing growth can be delivered in the Suffolk Coastal District and its neighbouring local planning authority areas of Ipswich Borough, Babergh District, Mid Suffolk District and Waveney District, whilst adequately protecting Suffolk's coastal, estuarine and heathland European wildlife sites. It is being developed as a strategy that provides a solution to the additional recreation pressure risks highlighted by each of the local plan HRAs for the authorities. The RAMS sets out an integrated suite of avoidance and mitigation measures that are supported by comprehensive evidence and experience gained from other European site mitigation strategies. The RAMS is being prepared by Footprint Ecology, under the guidance of a steering group with representatives from the local planning authorities and Natural England. The RAMS has evolved over time with detailed analysis of the best options for implementation being recently undertaken. It is now in the final stages of preparation ready for implementation later this year.
- 1.28 The RAMS has been developed on the basis of housing numbers in the existing local plans for each of the local planning authorities. An important aspect of this HRA of the Suffolk Coastal District Local Plan is to ensure that the RAMS remains a viable mitigation solution for the new local plan, having regard for the increased housing numbers and locations for growth identified within the emerging plan. This analysis forms part of the appropriate assessment within this HRA report.

Sustainability Appraisal for the emerging Local Plan

- 1.29 Suffolk Coastal District Council is currently undertaking its sustainability appraisal to inform the preparation of the Local Plan. A sustainability appraisal is undertaken by local planning authorities on local planning documents to assess whether the economic, environmental and social needs of the local area are being met. The appraisal runs alongside the preparation of a local plan, appraising the options being taken forward and whether alternatives might have a greater positive or lesser negative effect on economic, environmental and social objectives. Sustainability appraisal also incorporates the requirements of the European Strategic Environmental Assessment Directive.
- 1.30 The Scoping Report for the Suffolk Coastal Local Plan was consulted upon as part of the consultation on the Local Plan Issues and Options. As part of the scoping stage, relevant background documentation and evidence on economic, environmental and social factors for the local area is reviewed. Comments

received have been considered in finalising the Scoping Report. A Sustainability Appraisal has been undertaken on the First Draft Local Plan.

- 1.31 There are some elements of cross over between HRA and the sustainability appraisal. The appraisal will consider environmental sustainability in terms of natural resources such as air and water, and how they may be affected by the plan. These are similarly important supporting aspects of European site ecological integrity. The sustainability appraisal scoping report has set a biodiversity objective 'to conserve and enhance biodiversity and geodiversity, with a number of indicators within that objective that relate to European sites, including any change in designated site condition and the recorded number of visitors using designated sites. The recommendations of this HRA have been identified in the Sustainability Appraisal.

Water and flooding evidence documents

- 1.32 The last water cycle study to be undertaken for the Suffolk Coastal District area was the Haven Gateway Water Cycle Study, with Stage 1 undertaken in 2008 and stage 2 in 2009. This work concluded that there is a sustainable water supply to meet the demand of the currently adopted Suffolk Coastal District Local Plan, but highlighted that in terms of water quality, there were a number of waste water treatment works and associated infrastructure improvements required over the plan period. As part of this HRA, progress in terms of water infrastructure upgrades and a continued water supply for the new plan period will be checked.
- 1.33 A Strategic Flood Risk Assessment (SFRA) has been undertaken to inform the emerging Local Plan and will be published alongside consultation on First Draft Local Plan. Further consideration will be given to the SFRA in undertaking subsequent stages of HRA after the consultation on the First Draft Local Plan.

Transport Modelling

- 1.34 Initial Transport modelling has been undertaken by WSP. The model provides a baseline for the current situation at 2016, and then uses national TEMPRO data to provide a scenario for 2036, in the absence of new growth. This has regard for a range of predicted changes over time, including vehicle emissions improvements. The model has then been run for differing scenarios relating to the Local Plans. Further modelling of the preferred option will be undertaken in taking the plan forward. This data will indicate potential traffic changes which will inform consideration of air quality impacts within the appropriate assessment.

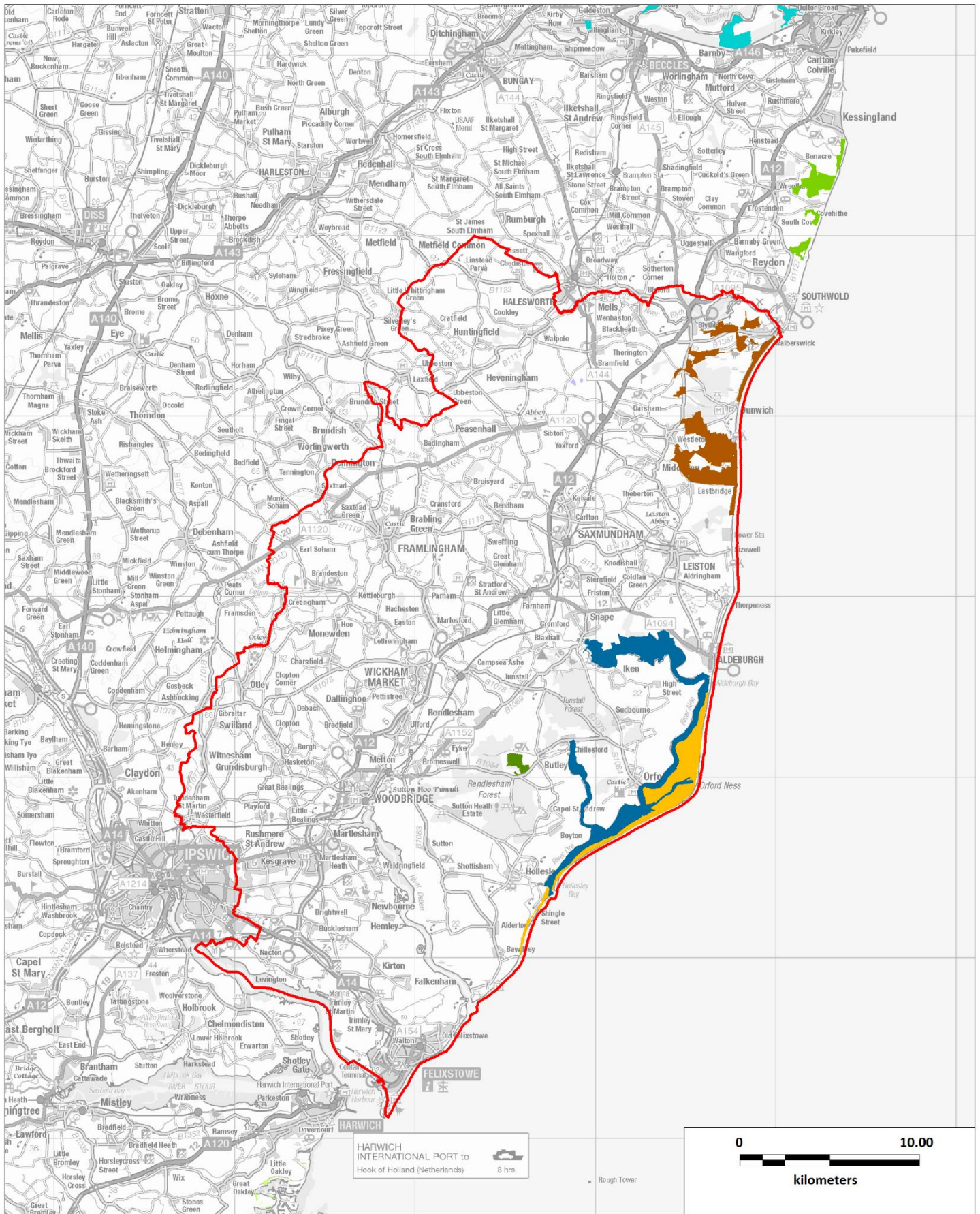
European sites

- 1.35 In undertaking a HRA it is necessary to gather information on the European sites that could be potentially affected by the plan or project. A 20km buffer from the edge of the District was used to initially identify sites that may be potentially affected. This buffer is used by Footprint Ecology for local plan HRAs as it is deemed precautionary enough to capture most potential impact pathways (i.e. the means by which a European site may be affected) between plan implementation within a local planning authority's administrative area. The list of European sites within 20km was then evaluated in terms of relevant threats, vulnerabilities and current issues.
- 1.36 European sites within 20km are shown in Map 1 (SACs), Map 2 (SPAs) and Map 3 (Ramsar sites). Sites are listed in Table 1. Full details of the interest features and current pressures/threat for each site are summarised in Appendix 3.

Table 1: European Sites within a 20km radius

SAC	SPA	Ramsar
Alde-Ore & Butley Estuaries	Alde-Ore Estuary	Alde-Ore Estuary
Benacre to Easton Bavents Lagoons	Benacre to Easton Bavents	Broadland
Dew's Ponds	Breydon Water	Deben
Hamford Water	Broadland	Hamford Water
Minsmere to Walberswick Heaths & Marshes	Deben Estuary	Minsmere-Walberswick
Orfordness to Shingle Street	Hamford Water	Stour and Orwell Estuaries
Staverton Park and the Thicks	Minsmere to Walberswick	
The Broads	Outer Thames Estuary	
	Sandlings	
	Stour and Orwell Estuaries	

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



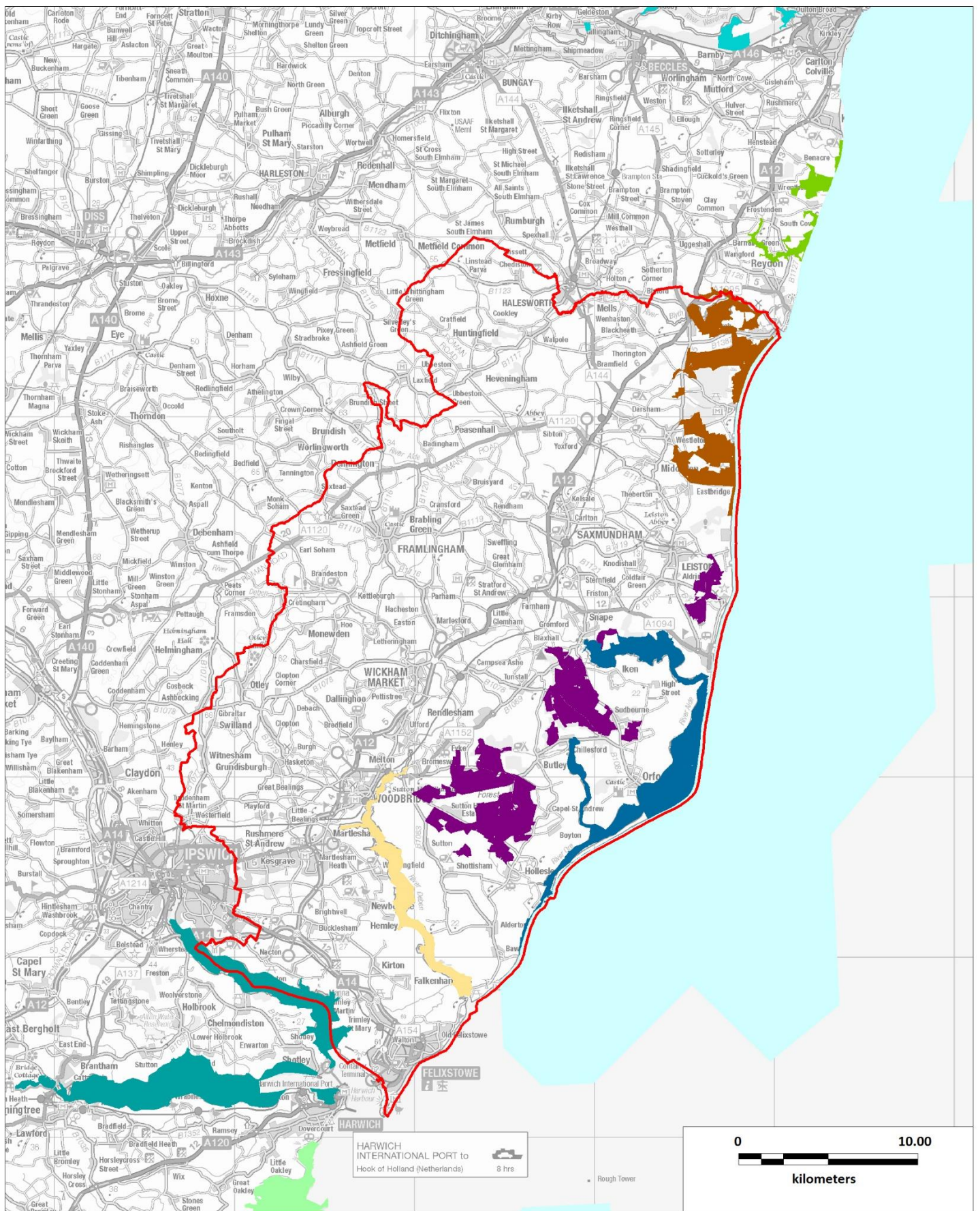
 Suffolk Coastal District

SACs

-  Alde-Ore & Butley Estuaries
-  Hamford Water
-  Staverton Park & The Thicks, Wantisden
-  Benacre to E. Bavents Lagoons
-  Minsmere to W'wick Heaths & Marshes
-  The Broads
-  Dew's Ponds
-  Orfordness-Shingle Street

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

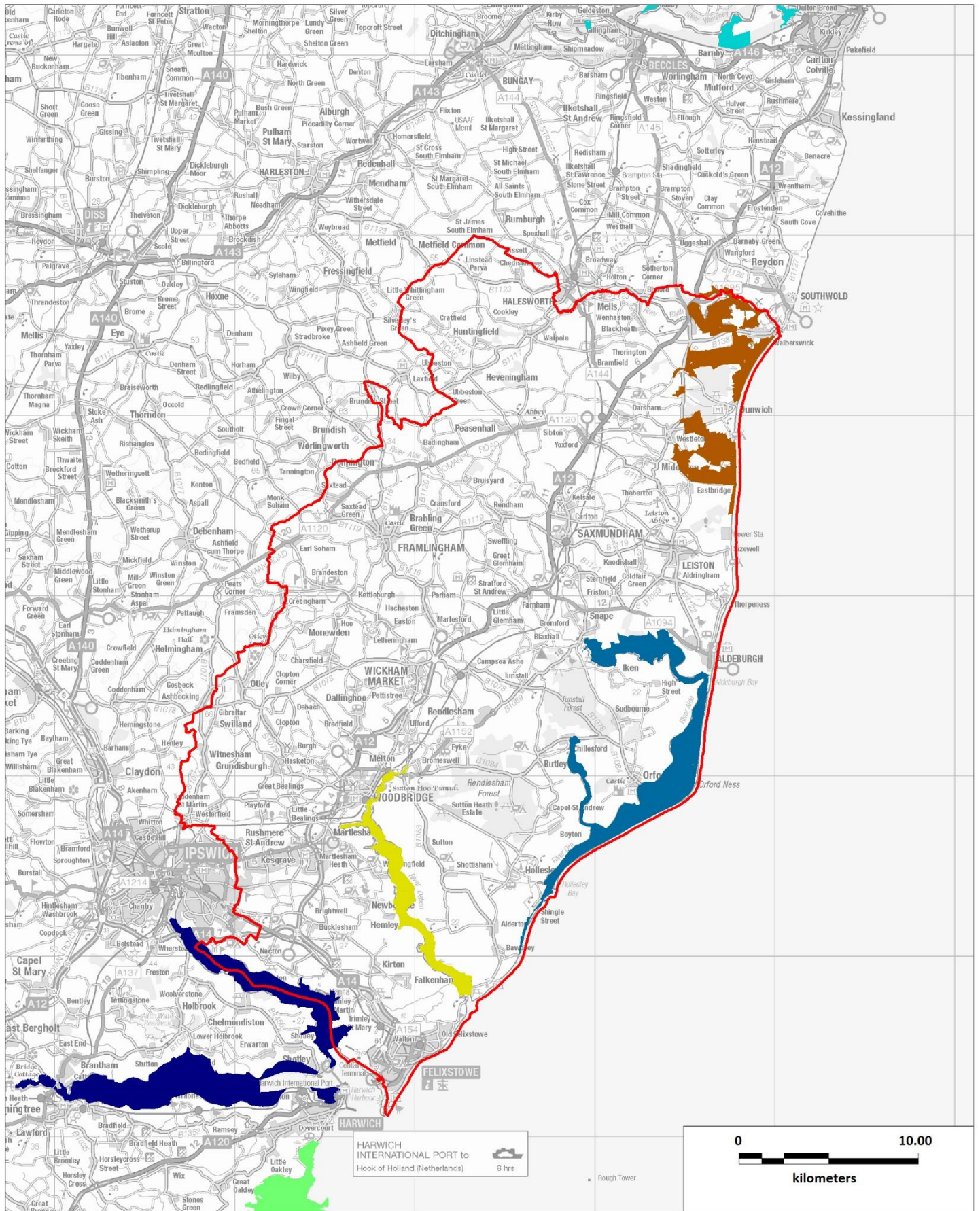


 Suffolk Coastal District

SPAs

-  Alde-Ore Estuary
-  Benacre to Easton Bavents
-  Broadland
-  Deben Estuary
-  Hamford Water
-  Minsmere-Walberswick
-  Outer Thames Estuary
-  Sandlings
-  Stour and Orwell Estuaries

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



- Suffolk Coastal District
- Ramsar sites**
- Alde-Ore Estuary
- Deben Estuary
- Minsmere-Walberswick
- Broadland
- Hamford Water
- Stour and Orwell Estuaries

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- 1.37 In assessing the implications of any plan or project for European sites, it is essential to fully understand the ecology and sensitivity of the sites, in order to identify how they may be affected. This section and the accompanying detailed site information within Appendices 2 and 3 identifies those sites that could potentially be affected by the policies and proposals within the Suffolk Coastal District Local Plan. Every European site has a set of ‘interest features’ which are the ecological features for which the site is designated or classified, and the features for which Member States should ensure the site is maintained or, where necessary restored.
- 1.38 Each European site also has a set of ‘conservation objectives’ for the site interest, i.e. what the site should be achieving in terms of restoring or maintaining the special ecological interest of European importance. Also relevant to the HRA is the consideration of how a plan or project may affect the achievement of conservation objectives for each European site. The site conservation objectives are relevant to any HRA, because they identify what should be achieved for the site, and a HRA may therefore consider whether any plan or project may compromise the achievement of those objectives. The background to conservation objectives and key considerations are explained in Appendix 2. Appendix 3 sets out the site interest features for each European site.
- 1.39 The Habitats Directive requires competent authorities to ‘maintain and restore’ European sites. Where sites are meeting their conservation objectives, the requirement is to maintain this position and not allow deterioration. Where a site requires restoration, competent authorities should work to bring site interest features back to a status that enables conservation objectives to be met.
- 1.40 In addition to conservation objectives, Natural England produces Site Improvement Plans (SIPs) for each European site in England as part of a wider programme of work under the ‘Improvement Programme for England’s Natura 2000 sites.’ Each plan includes a set of actions for alleviating issues that are impeding the delivery of conservation objectives, with lead delivery bodies identified and indicative timescales. The SIPs can provide an additional useful reference for HRA work, identifying where there are site sensitivities. These will be reviewed as part of the appropriate assessment.

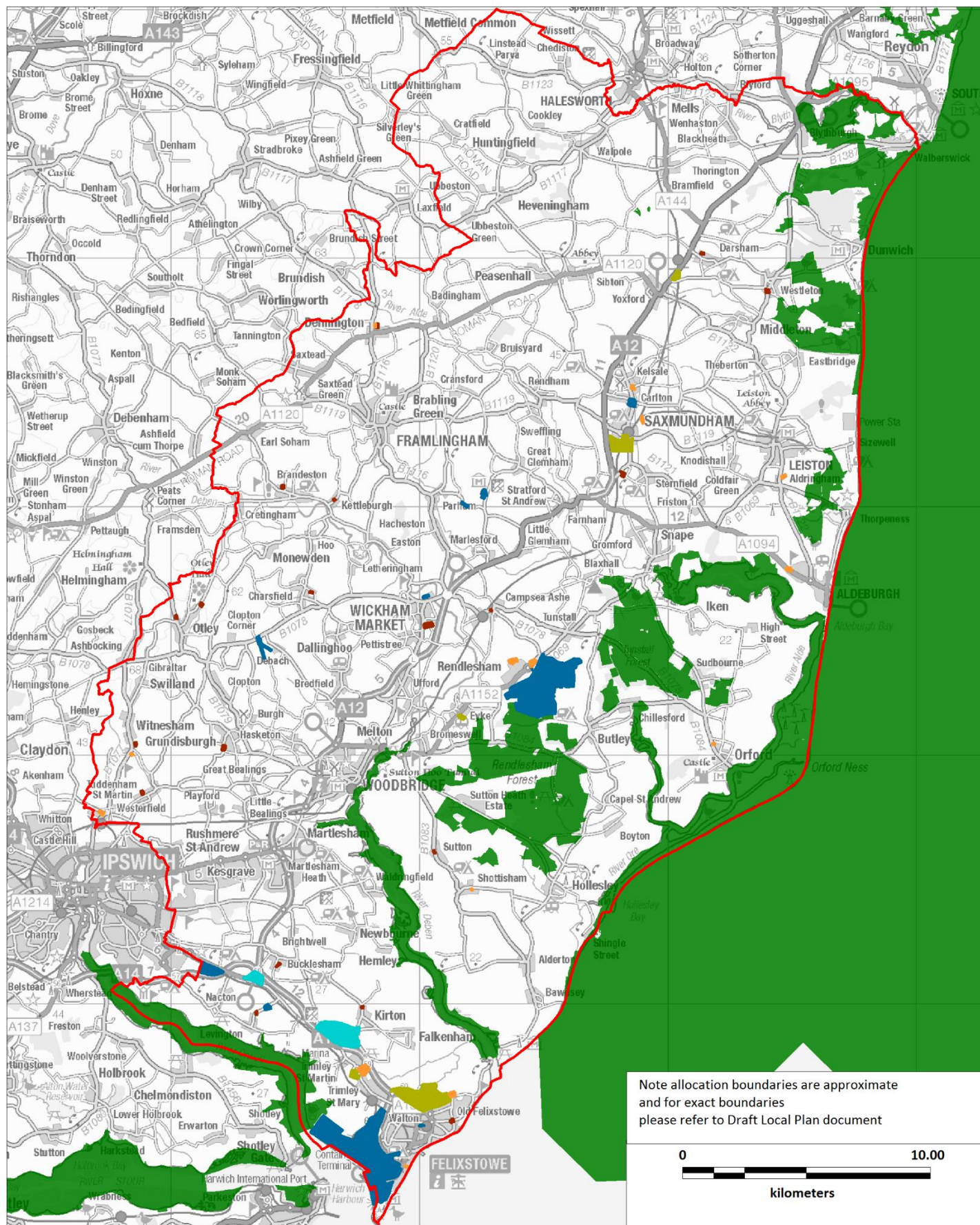
2. Consideration of Site Allocations








- 2.1 All aspects of the emerging plan that influence sustainable development for the Suffolk Coastal District are checked through this assessment for risks to European sites. Risks need to be identified in order to inform the screening for likely significant effects. European sites are at risk if there are possible means by which any aspect of a plan can, when being taken forward for implementation, pose a potential threat to the wildlife interest of the sites. This is often referred to as the 'impact pathway' as it is an identifiable means by which the plan or project could potentially affect the European site.
- 2.2 All policies are checked as part of HRA, but of particular relevance is the quantum and location of proposed growth. GIS data showing proposed allocations were provided to us by Suffolk Coastal District Council. These data showed locations for housing and employment growth being presented as preferred sites within the First Draft Local Plan. This enables a check for relevant potential pathways by looking at the growth that will come forward in close proximity to the European sites.
- 2.3 Map 4 shows the allocations and their proximity to the European sites. This then enables a consideration of any sites in very close proximity of 400m, within close proximity of 1km and also those that fall within the 13km zone of influence currently being used to inform the RAM Strategy. This then enables an initial consideration of the potential impact pathways that may be of relevance, serves to inform the initial screening of the plan for likely significant effects. These impact pathways are then considered in greater detail within the appropriate assessment. Table 2 provides an initial summary of all potentially relevant impact pathways.
- 2.4 It should be noted that the consideration of site allocations and Maps 4 and 5 within this HRA report for the First Draft Local Plan has been undertaken using available GIS data provided by Suffolk Coastal District Council during the preparation of the First Draft Local Plan. For the exact boundaries of site allocations, the published First Draft Local Plan should be referred to. The existing allocations shown on the map are those contained in the Site Allocations and Area Specific Policies DPD and Felixstowe Peninsula Area Action Plan DPD which are proposed to be carried forward into the new Local Plan.

Table 2: Summary of potential impact pathways - i.e. potential mechanisms where by the different European sites could be impacted (? = possible)

Site	Recreation	Air quality	Water quality	Water abstraction	Urban effects
Alde-Ore & Butley Estuaries SAC, Alde-Ore Estuary SPA, Alde-Ore Ramsar	✓		✓	✓	
Benacre to Easton Bavents Lagoons SAC, Benacre to Easton Bavents SPA	✓		✓	✓	
Breydon Water SPA/Ramsar	✓		✓	?	
Dew's Ponds SAC			✓	✓	
Hamford Water SAC/SPA/Ramsar					
Minsmere to Walberswick Heaths & Marshes SAC, Minsmere-Walberswick SPA/Ramsar	✓	✓	✓	✓	✓
Orfordness to Shingle Street SAC	✓	✓	✓		✓
Staverton Park and the Thicks SAC	?	✓	✓	✓	✓
Outer Thames Estuary SPA					
Sandlings SPA	✓	✓			✓
The Broads SAC, Broadland SPA/Ramsar	✓	✓	✓	✓	✓
Stour and Orwell Estuaries SPA/Ramsar	✓		✓	✓	
Deben Estuary SPA/Ramsar	✓		✓	✓	

Map 4: Relevant sites within the Local Plan



- | | | | | | |
|---|--|---|---------------------------------------|---|---------------------------------------|
|  | Suffolk Coastal District |  | Existing housing allocation |  | Proposed housing allocation |
|  | European Sites (SAC/SPA/Ramsar) |  | Existing employment allocation |  | Proposed mixed use allocation |
| | | | |  | Proposed employment allocation |

3. Screening for likely significant effects

- 3.1 HRA is a step by step process, with the competent authority required to undertake screening for likely significant effects on European sites, after determining that the plan or project in question is not one that is entirely necessary for site management. Once relevant background information and potential impact pathways are understood, the HRA can progress to the screening for likely significant effects stage, fully informed by the background research undertaken. The screening for likely significant effects is undertaken on all policies within the plan. It is an initial check, made on a precautionary basis, to determine whether any part of the plan poses a risk to European sites in terms of its future implementation.
- 3.2 The Suffolk Coastal District Local Plan is being prepared to steer sustainable development in the Suffolk Coastal District, and whilst protection and enhancement of the natural environment is an integral part of sustainable development, the plan is not singularly focussed on European site management. The screening for likely significant effects is therefore undertaken.
- 3.3 When a HRA is being undertaken on a plan or project that is initiated by the competent authority themselves, there is greater opportunity to identify potential issues arising from the plan or project in the initial stages of design or preparation. Where a competent authority is approving a project being proposed by another party, the application for permission is usually made when the proposal has already been designed and all details finalised, thus the opportunity to identify issues early on is more limited unless an applicant chooses to hold early discussions with the competent authority.
- 3.4 For the Suffolk Coastal District Local Plan, Suffolk Coastal District Council is both the plan proposer and the competent authority, thus allowing the HRA to influence the plan in its earlier stages, at later refining stages and up to submission for Examination.

What constitutes a likely significant effect?

- 3.5 At the screening stage of HRA, there is the opportunity to identify changes to the plan that could be made to avoid risks to European sites. Any requirement for assessing the effectiveness of changes should be made at the appropriate assessment stage. The screening for likely significant effects is an initial check to identify risks or uncertainties in policy wording and recommend any obvious changes that can avoid those risks with clarifications, corrections or instructions for development project level HRA. Any recommendations that need to be justified in terms of effectiveness and applicability should be considered within

the appropriate assessment stage of HRA. As described in Appendix 1, screening for likely significant effect is an initial check to identify risks and uncertainties that could potentially be significant for the European sites, and to recommend any obvious changes that can avoid those risks. Where risks cannot be avoided with simple clarifications, corrections or instructions for project level HRA, a more detailed assessment is undertaken to gather more information about the likely significant effects and give the necessary scrutiny to potential mitigation measures. This is the appropriate assessment stage of HRA.

- 3.6 The screening check of each aspect of the plan is essentially looking for two things to enable a conclusion of no likely significant effect;
- Whether it is possible to say with certainty that there are no possible impacts on European sites, or
 - Whether, in light of a potential risk, simple clarifications can be built into the policy and/or its supporting text, which serve to avoid any likely impacts.
- 3.7 If one of these can be met, it enables a competent authority to screen out from further stages of assessment. Where there is the potential for European sites to be affected, or mitigation measures need to be checked to ensure they are effective and appropriate, more detailed consideration is required and this then screens those aspects of the plan in to the appropriate assessment.
- 3.8 A likely significant effect could be concluded on the basis of clear evidence of risk to European site interest, or there could be a scientific and plausible justification for concluding that a risk is present, even in the absence of direct evidence. The latter is a precautionary approach, which is one of the foundations of the high-level of protection pursued by EU policy on the environment, in accordance with the EU Treaty.⁷ The precautionary principle should be applied at all stages in the HRA process. follows the principles established in case law relating to the use of such a principle in applying the European Directives and domestic Habitats Regulations. In particular, the European Court in the 'Waddensee' case⁸ refers to "*no reasonable scientific doubt*" and the 'Sweetman' case⁹ the Advocate General identified that a positive conclusion on screening for likely significant effects relates to where there "*is a possibility of there being a significant effect*".

⁷ Article 191 of the Treaty on the Functioning of the EU. Previously Article 174 of the Treaty of the EC.

⁸ European Court of Justice case C - 127/02

⁹ European Court of Justice case C - 258/11

- 3.9 An additional recent European Court of Justice Judgment in 2018 (Case C-323/17) clarified that the need to carefully explain actions taken at each HRA stage, particularly at the screening for likely significant effects stage. The Judgment is a timely reminder of the need for clear distinction between the stages of HRA, and good practice in recognising the function of each. The screening for likely significant effects stage should function as a screening or checking stage, to determine whether further assessment is required. Assessing the nature and extent of potential impacts on European site interest features, and the robustness of mitigation options, should be done at the appropriate assessment stage.
- 3.10 Table 3 below records the conclusions drawn and recommendations made on a policy by policy check for likely significant effects of the Suffolk Coastal District Local Plan at First Draft stage. Potential risks are highlighted. For a number of policies, particularly those related to site allocations, the screening has identified a likely significant effect. These can be categorised as follows:
- For policies that do not set a quantum of development or specific locations, the potential for significant effects relates to the possibility of development coming forward in a particular location or with particular characteristics. In such instances, the risks may be simply avoided with straightforward clarifications, which remove any uncertainty. The recommendations add text to the policy to explain how the policy should be implemented to prevent adverse effects. This does not exclude the need for project level HRA but enables a conclusion of no likely significant effects at the plan level, because the identified risks to European sites have been removed. Project level HRA provides a means of checking for any further risks unforeseen at the plan level, and for developing project specific mitigation measures in greater detail within a project level appropriate assessment.
 - For policies that do set a quantum of development or specific locations, the risks are primarily related to recreation pressure, but there are also potential impact pathways relating to urbanisation effects, water and air quality. The further detailed assessment of these impact pathways is discussed in more detail in the appropriate assessment chapter.
- 3.11 The screening table below provides a record of screening of the entire plan at First Draft stage. The screening table considers all policies individually, apart from site allocations, which are considered collectively on the basis of distance, apart from those where their close proximity or other concerns highlight a potential risk to European sites. Whilst each allocation has been checked individually, an individual line for each within the screening table is not considered necessary and would create an unwieldy table.

- 3.12 The initial screening was undertaken prior to the finalisation of the First Draft Local Plan for public consultation at Regulation 18 stage. This enabled the Council's planning officers to make the recommended amendments to remove likely significant effects. The recommendations column therefore also includes the action taken by Suffolk Coastal District Council in response to the recommendation. The public consultation version of the Local Plan therefore has the recommendations incorporated, and the outstanding matters from the screening table are limited to those being taken to appropriate assessment stage. The public consultation version of the Local Plan at First Draft also includes references to the appropriate assessment work to be undertaken for the specific allocations identified as requiring further assessment in the screening table.
- 3.13 The screening table includes a final column that is yet to be populated. This will be populated when the Local Plan is re-screened later at the Final Draft Plan stage. There may also be a need to undertake further screening on any proposed modifications after Examination in Public, prior to adoption. This ensures that the final adopted plan has an up to date HRA report.

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Table 3: Screening for likely significant effects – Suffolk Coastal District First Draft Local Plan

Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
Introduction		No LSE Context setting includes importance of European sites	N/A	N/A	
SCLP2.1 Growth in the Ipswich strategic planning area		LSE Key policy setting out the proposed growth for Suffolk Coastal District.	Quantum and location of development could pose risks in terms of air and water pollution, water resources, recreation and urbanisation impacts	Location of growth the needs to be checked. Housing growth needs to be compared with current RAMS housing numbers	
SCLP2.2 Strategic infrastructure priorities		Clarification required to remove LSE Policy commits to collaborative working on large schemes that will need project level HRA	Depending on location of development, could pose risks in terms of air and water pollution, water resources, recreation and urbanisation impacts	Clarification to remove LSE - Add within supporting text a reference to joint working by public bodies for HRA purposes. Supporting text now added to SCLP2.3 “Strategic projects may require joint working by public bodies to ensure the requirements of the Habitats Directive are met.” LPA action – Change made.	
SCLP2.3 Cross-boundary mitigation of effects on protected habitats		LSE until HRA finalised A protective policy specifically for European sites, but may need revisiting.	Robustness of mitigation to protect new growth needs checking	This policy may be revisited after appropriate assessment to check it is fit for purpose in view of assessment findings	
Vision		No LSE Includes importance of European sites	N/A	N/A	
Strategic priorities and objectives		No LSE Provided for information to cross reference objectives with policies. Natural Environment adequately included.	N/A	N/A	
SCLP3.1 Presumption in favour of		Clarification required to remove LSE.	Misinterpretation of legislative requirements	Clarification to remove LSE - Add to the end of supporting text relating to designated sites to highlight that the presumption in favour does not apply	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
sustainable development				where there is a likely significant effect on a European site. Recommendation is not mitigation. LPA action – Changes made.	
SCLP3.2 Strategy for growth in Suffolk Coastal District		LSE – employment and housing growth needs to be checked for potential risks	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment - Level and location of grow the needs to be checked. Housing growth needs to be compared with current RAMS housing numbers	
SCLP3.3 Settlement hierarchy		LSE – location of housing growth needs to be checked for potential risks	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment - Level and location of grow the needs to be checked. Housing growth needs to be compared with current RAMS housing numbers	
SCLP3.4 Settlement boundaries		No LSE. Defines settlements and does not promote development itself. Development outside settlements governed by policy.	N/A	N/A	
SCLP3.5 Proposals for major energy infrastructure projects		Clarification required to remove LSE.	Misinterpretation of legislative requirements	Clarification to remove LSE - Add HRA to the 3 rd bullet point in addition to EIA. Also suggest adding to supporting text to note the need to work with other competent authorities to prepare project wide HRAs when a project requires multiple permissions. Recommendation is not mitigation. LPA action – Changes made.	
SCLP3.6 Infrastructure provision		Clarification required to remove LSE.	Misinterpretation of project level HRA requirements	Clarification to remove LSE – Add to supporting text to identify that the necessary infrastructure requirements for a project will need to form part of the HRA for a project, and that the	

Suffolk Coastal District Local Plan HRA

Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
				applicant should therefore submit the necessary information to demonstrate that infrastructure provision will not pose a risk to European sites. Recommendation is not mitigation. Note that infrastructure funded by CIL will be approved separately, with its own HRA as required. LPA action – Changes made.	
SCLP4.1 Employment areas		LSE – employment growth needs to be checked for potential risks	Air and water pollution, water resources and urbanisation impacts	Appropriate assessment - Level and location of grow the needs to be checked	
SCLP4.2 New employment areas		LSE – employment growth needs to be checked for potential risks	Air and water pollution, water resources and urbanisation impacts	Appropriate assessment - Level and location of grow the needs to be checked	
SCLP4.3 Expansion and intensification of employment sites		No LSE. Qualitative, does not promote development and environmental impacts caveated.	N/A	N/A	
SCLP4.4 Protection of employment sites		No LSE. Qualitative, does not promote development and environmental impacts caveated.	N/A	N/A	
SCLP4.5 Economic development in rural areas		Clarification required to remove LSE.	Misinterpretation of project level HRA requirements	Clarification to remove LSE – Add 'natural environment' to 3 rd bullet point. Recommendation is not mitigation. LPA action – Changes made.	
SCLP4.6 Conversion and replacement of rural buildings for employment use		No LSE. Qualitative, does not promote development and environmental impacts caveated.	N/A	N/A	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
SCLP4.7 Farm diversification		No LSE. Qualitative, does not promote development. No impact pathways unless in close proximity to European sites.	Project level HRA may be required in some instances.	N/A	
SCLP4.8 Retail hierarchy		No LSE. Qualitative, does not promote development. No impact pathways.	N/A	N/A	
SCLP4.9 New retail development		No LSE. Retail development in centres does not lead to any impact pathways.	N/A	N/A	
SCLP4.10 Development in town centres		No LSE. Retail development in centres does not lead to any impact pathways.	N/A	N/A	
SCLP4.11 Town centre environments		No LSE. Qualitative. Enhancement in centres does not lead to any impact pathways.	N/A	Biodiversity enhancement - Suggest adding reference to urban biodiversity, within policy and/or supporting text. Recommendation is not mitigation. LPA action – Changes made.	
SCLP4.12 Retail in Martlesham and Kesgrave		No LSE. Retail development in centres does not lead to any impact pathways.	N/A	N/A	
SCLP4.13 District and local centres and local shops		No LSE. Retail development in centres does not lead to any impact pathways.	N/A	N/A	
SCLP5.1 Housing development in large villages		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	
SCLP5.2		No LSE for this individual policy as qualitative. Housing development	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
Housing development in small villages		location and scale will be considered within the appropriate assessment			
SCLP5.3 Housing development in the countryside		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	
SCLP5.4 Housing in clusters in the countryside		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	
SCLP5.5 Conversion of buildings in the countryside for housing		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	Biodiversity enhancement - Suggest adding 'any impacts on the natural environment are adequately mitigated' to the end of 5th bullet point. Recommendation is not mitigation. LPA action – Changes made.	
SCLP5.6 Rural workers dwellings		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	
SCLP5.7 Infill and garden development		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	
SCLP5.8 Housing mix		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	
SCLP5.9 Self build and custom build housing		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
SCLP5.10 Affordable housing on residential developments		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	
SCLP5.11 Affordable housing on exceptions sites		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	
SCLP5.12 Houses in multiple occupation		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	
SCLP5.13 Residential annexes		No LSE. Qualitative. Residential annexes are not counted as a net increase in dwellings for HRA purposes	N/A	N/A	
SCLP5.14 Extensions to residential curtilages		No LSE. Qualitative. Residential extensions are not counted as a net increase in dwellings for HRA purposes	N/A	N/A	
SCLP5.15 Residential moorings, jetties and slipways		No LSE. Jetties and slipways will need project level HRA. Qualitative policy and caveat already present in policy. Housing development location and scale will be considered within the appropriate assessment (which includes residential moorings).	Air and water pollution, water resources, recreation and urbanisation impacts re residential moorings. Project level HRA may be required in some instances for jetty's and slipways.	N/A	
SCLP5.16 Residential caravans and mobile homes		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment (which includes residential caravans/mobile home pitches).	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
SCLP5.17 Gypsies, travellers and travelling showpeople		No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment (which includes gypsy/traveller/showpeople pitches).	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	
SCLP6.1 Tourism		LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	
SCLP6.2 Existing and new tourism attractions		LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	
SCLP6.3 Tourism development within the AONB and heritage coast		LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed 4 th bullet point needs to be changed to ‘avoids or mitigates for adverse impacts.’ Incorrect terminology as a minimised adverse impact is still an adverse impact. LPA action – Changes made.	
SCLP6.4 Tourism outside of the AONB		LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	
SCLP6.5 New self catering tourist accommodation		LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	
SCLP6.6 Existing tourist accommodation		No LSE. Qualitative policy, does not add new development.	N/A	N/A	
SCLP7.1		LSE.	Air quality implications from increased transport pressure on	Appropriate assessment – risks from increased transport to be assessed	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
Sustainable transport		Potential risks to European sites from increased levels of car use.	roads in close proximity to European sites		
SCLP7.2 Parking proposals and standards		No LSE. Qualitative, does not promote developments and includes provision for protecting water quality.	N/A	N/A	
SCLP8.1 Community facilities and assets		No LSE. Qualitative.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	
SCLP8.2 Open space		LSE. Policy will need strengthening to support mitigation requirements	Policy needs to include necessary mitigation requirements for recreation pressure	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements that need to be stated in policy. Possible wording additions re SANGs	
SCLP8.3 Allotments		No LSE. Does not promote a type of development with impact pathways.	N/A	N/A	
SCLP8.4 Digital infrastructure		No LSE. Qualitative.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	
SCLP9.1 Low carbon renewable energy		No LSE. Qualitative and includes protective caveats for the natural environment.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	
SCLP9.2 Sustainable construction		No LSE. Qualitative, environmentally positive policy.	N/A	N/A	
SCLP9.3 Coastal change management area		No LSE. Environmentally protective policy, with caveats re the environment.	N/A	N/A	
SCLP9.4 Coastal change rollback or relocation		No LSE. Qualitative/protective.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
SCLP9.5 Flood risk		No LSE. Environmentally protective policy.	N/A	N/A	
SCLP9.6 Sustainable drainage systems		No LSE. Environmentally protective policy, with enhancement provision for biodiversity.	N/A	N/A	
SCLP9.7 Holistic water management		No LSE. Environmentally protective policy.	N/A	N/A	
SCLP10.1 Biodiversity and geodiversity		LSE. Policy will need strengthening to support mitigation requirements	Policy needs to include necessary mitigation requirements for recreation pressure	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements that need to be stated in policy.	
SCLP10.2 Visitor management of European sites		LSE. Policy will need strengthening to support mitigation requirements	Policy is in accordance with previous HRA recommendations (site allocations), but now needs to include necessary mitigation requirements for recreation pressure	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements that need to be stated in policy.	
SCLP10.3 Landscape character		No LSE. Environmentally protective policy with green infrastructure enhancements.	N/A	N/A	
SCLP10.4 Settlement coalescence		No LSE. Qualitative policy, does not add new development.	N/A	N/A	
SCLP11.1 Design quality		No LSE. Qualitative policy, does not add new development, and requires natural features to be retained and enhanced.	N/A	N/A	
SCLP11.2 Residential amenity		No LSE. Qualitative policy, does not add new development.	N/A	N/A	
SCLP11.3 Historic environment		No LSE. Protective policy for heritage assets, does not add new development.	N/A	N/A	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
SCLP11.4 Non-designated heritage assets		No LSE. Protective policy for heritage assets, does not add new development.	N/A	N/A	
SCLP11.5 Conservation areas		No LSE. Protective policy for heritage assets, does not add new development.	N/A	N/A	
SCLP11.6 Archaeology		No LSE. Protective policy for heritage assets, does not add new development.	N/A	N/A	
SCLP11.7 Parks and gardens of historic or landscape interest		No LSE. Environmentally protective policy.	N/A	Biodiversity enhancement - Suggest adding reference to the biodiversity interest of parks and gardens within supporting text. LPA action – Changes made.	
SCLP11.8 Areas to be protected from development		No LSE. Environmentally protective policy.	N/A	N/A	
SCLP11.9 Newbourne former land settlement association holdings		No LSE. Qualitative policy, does not add new development.	N/A	N/A	
Area polices and site allocations requiring specific comment					
SCLP12.1 Neighbourhood plans		LSE. Neighbourhood plans will need to adhere to the findings and mitigation requirements for growth	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – consideration of housing growth and location to have regard for neighbourhood plans.	
SCLP12.2 Strategy for Felixstowe		LSE Vision policy so does not promote development but policy does not refer to European sites in close proximity.	Air and water pollution, water resources, recreation and urbanisation impacts. Reference is made in general terms in supporting	Clarification to remove LSE – Add ‘protected habitats’ before ‘landscapes’ LPA action – Changes made.	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
			text to European sites, but policy only refers to landscape.		
SCLP12.3 North Felixstowe Garden Neighbourhood		LSE 2,000 dwellings in one location	Potential for concentrated increased recreation pressure to European sites in close proximity due to large allocation	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements and for this very large allocation there is likely to be a need for on-site SANGs as well as contribution to RAMS.	
SCLP12.16 Tourism accommodation (Felixstowe)		LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	
SCLP12.17 Strategy for Communities surrounding Ipswich		No LSE Vision policy so does not promote development	N/A	N/A	
SCLP12.18 Brightwell Lakes		No LSE Detailed discussions with the planning officer, NE and developer/consultants have provided for adequate mitigation	Recreation pressure risks have been fully mitigated for with a combination of a proportionate financial contribution to the RAMS and the provision of a SANG as part of the development. Project level HRA already undertaken.	N/A	
SCLP12.22 Ipswich garden suburb country park		No LSE Detailed discussions with the planning officer, NE and developer/consultants have provided for adequate mitigation	Recreation pressure risks have been fully mitigated for. This policy provides for the SANG to mitigate for development. Project level HRA already undertaken.	N/A	
SCLP12.23 Strategy for Aldeburgh		No LSE Vision policy so does not promote development. Sensitive environment referred to in policy	N/A	N/A	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
Strategy for Framlingham – text not policy		No LSE Vision text so does not promote development	N/A	N/A	
Strategy for Leiston – text not policy		LSE Potential for impacts on Minsmere-Walberswick over and above RAMS	Impacts over and above those covered by RAMS will be Sizewell C and associated development	Clarification to remove LSE – Add to supporting text in 5th paragraph a reference to the wider natural environment as well as the Leiston community. LPA action – Changes made.	
SCLP12.25 Strategy for Saxmundham		No LSE Vision policy so does not promote development. Supporting text highlights natural environment issues.	N/A	N/A	
SCLP12.26 South Saxmundham garden neighbourhood		LSE 800 dwellings in one location	Potential for concentrated increased recreation pressure to European sites in close proximity due to large allocation	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements and for this very large allocation there is likely to be a need for on-site SANGs as well as contribution to RAMS.	
SCLP12.28 Strategy for Woodbridge		No LSE Vision policy so does not promote development. Supporting text highlights natural environment issues.	N/A	N/A	
SCLP12.29 Strategy for Rural Areas		No LSE Vision policy with strong protective wording in relation to the natural environment and European sites	N/A	N/A	
Site allocations within 400m of a European site boundary					
SCLP12.24		LSE	Disturbance to estuary birds from recreation pressure.	Appropriate assessment – consideration of nature of	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
Land rear of Rose Hill, Saxmundham (Housing).		300m from River Alde SPA/SAC/Ramsar	Note that the Site Allocations HRA highlighted risks, but did not assess in detail. Stated the need for project level HRA, also stated that there is the potential for the allocation to be undeliverable.	development and proximity to River Alde SPA/SAC/Ramsar. Policy refers to the need for project level HRA, but further assessment required, and text to inform HRA scope	
SCLP12.4 Port of Felixstowe (Employment).		LSE Adjacent to Stour and Orwell SPA/Ramsar	Dredging, contamination, noise, lighting, disturbance risks, but within an areas of existing high levels of activity. Policy is qualitative and does not identify new growth, therefore can be considered at project level.	Clarification to remove LSE – Add to supporting text to identify that project level HRA needs to consider nature of development and proximity to Stour and Orwell SPA/Ramsar. Policy refers to the need for project level HRA, but further clarification required in supporting text, re inclusion of issues such as dredging, contamination, noise, lighting, disturbance as part of project HRA scope. LPA action – Changes made.	
SCLP12.36 Bentwaters Park, Rendlesham. (Employment).		LSE Boundary abuts the Sandlings SPA and is within 400m of Staverton Park and the Thicks SPA	Risks relate to disturbance, noise, light and other urban effects, but the policy does not promote new development, rather it is qualitative setting out requirements for new development at this existing employment site. No further assessment required at the plan level. Policy identifies need to have regard for designations.	Clarification to remove LSE – Add to supporting text to identify that project level HRA may be required and projects will only be approved with effective measures to prevent impacts on European sites, and that project level HRA will need to consider a range of urbanisation effects such as noise and lighting. Recommendation is not mitigation. LPA action – Changes made.	
SCLP12.65 Land West of B1125, Westleton. (Housing).		LSE Concentration of 800 dwellings in one location	400m from Minsmere-Walberswick SPA/Ramsar and Minsmere-Walberswick Heaths & Marshes SAC; easy access on foot to protected site	Appropriate assessment – consideration of nature of development and proximity to Minsmere-Walberswick.	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
			and risks relate to recreation and urban effects (increased fire risk, cat predation, other predators etc.)		
Site allocations within 400m to 1km of a European site boundary					
SCLP12.33 Levington Park (Employment).		LSE 900m from Stour & Orwell SPA	Hydrological risks - checked on maps, none found. Project level HRA should make a more detailed check, but can be dealt with through project level mitigation.	Clarification to remove LSE – Policy to refer to need for project level HRA and add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checked and adequately mitigated for if required. Recommendation is not mitigation. LPA action – Changes made.	
SCLP12.38 Land to the east of Aldeburgh Road, Aldringham. (Housing).		LSE (other than that being dealt with through RAMS) 900m from Sandlings SPA	Hydrological risks - checked on maps, none found. Project level HRA should make a more detailed check, but can be dealt with through project level mitigation. Recreation risks to be dealt with through the RAMS	Clarification to remove LSE – Policy to refer to need for project level HRA and add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checked and adequately mitigated for if required. Recommendation is not mitigation. LPA action – Changes made.	
SCLP12.47 Land to the South of Eyke CoE Primary School and East of The Street, Eyke (Mixed use).		LSE Just over 400m from Sandlings SPA	Urbanisation impacts and possible concerns that impacts relating to recreation are over and above RAMS mitigation	Appropriate assessment – consideration of nature of development and proximity to Sandlings SPA	
SCLP12.52 Land adjacent Levington Park,		LSE (other than that being dealt with through RAMS)	Hydrological risks - checked on maps, none found.	Clarification to remove LSE – Add to supporting text to identify that project level HRA will need to ensure that	

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Policy	Description	Initial LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Re-screen
Bridge Road, Levington. (Housing).		Just over 700m from Stour & Orwell SPA/Ramsar	Recreation risks to be dealt with through the RAMS	hydrological impacts are checked and adequately mitigated for if required. Recommendation is not mitigation. LPA action – Changes made.	
SCLP12.30 Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin. (Employment).		LSE (other than that being dealt with through RAMS) Over 900m from Stour & Orwell SPA/Ramsar	Hydrological risks - checked on maps, none found, and separated by main road and railway line. Recreation risks to be dealt with through the RAMS	Clarification to remove LSE – Add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checks and adequately mitigated for if required. Recommendation is not mitigation. LPA action – Changes made.	
All other employment site allocations over 1km from a European site boundary		No LSE Distance removes impact pathways. Introductory text makes reference to the potential need for project level HRA.	N/A	N/A	
Housing site allocations over 1km but within 13km from a European site boundary		LSE – level of housing growth within 13km RAMS zone of influence needs to be checked for potential risks	Recreation impacts	Appropriate assessment - Level of housing growth needs to be compared with current RAMS housing numbers	
All other housing site allocations over 13km from a European site boundary		No LSE Distance removes impact pathways	N/A	N/A	

4. Screening Conclusions and Potential Impact Pathways

- 4.1 The screening for likely significant effects table has identified a number of recommended text changes that can strengthen policy or completely avoid risks with the removal of potentially harmful aspects. These are clarifications, corrections or instructions for the development project HRA, that do not require further scrutiny at the appropriate assessment stage. Additionally, the screening table has flagged key topics and a small number of allocations for more in-depth consideration within an appropriate assessment. These impact pathways are introduced in this section, and then the following appropriate assessment sections assess these in more detail in relation to the plan policies and allocations.
- 4.2 There is now a strong body of evidence showing how increasing levels of development, even when well outside the boundary of protected wildlife sites, can have negative impacts on the sites and their wildlife interest. The issues are particularly acute in southern England, where work on heathlands (Mallord 2005; Underhill-Day 2005; Liley & Clarke 2006; Clarke, Sharp & Liley 2008; Sharp *et al.* 2008; Clarke & Liley 2013; Clarke *et al.* 2013) and coastal sites (Saunders *et al.* 2000; Randall 2004; Liley & Sutherland 2007; Clarke, Sharp & Liley 2008; Liley 2008; Stillman *et al.* 2009) demonstrates links between housing, development and nature conservation impacts.

Recreation impact concerns

- 4.3 The impact of recreation on the coastal and heathland European sites has already been recognised in previous HRA work and is the reason for the development of the Suffolk HRA RAMS. As discussed earlier in this report, the RAMS has initially been prepared using housing figures from the current local plans for the relevant local planning authorities. There are increased housing numbers in the emerging Suffolk Coastal District Local Plan, and at First Draft stage, there are both existing allocations being taken forward and new preferred options for site allocations.
- 4.4 All but one (SCLP12.46, Land off Laxfield Road, Dennington) of the allocations within the First Draft Local Plan falls within the 13 km zone of influence currently being proposed for the RAMS. The appropriate assessment will need to consider the extent to which the RAMS is currently able, or can be expanded to accommodate, the new quantum of housing for the emerging plan. There is also a need to have regard for the proximity of site allocations. Where these fall very close to European site boundaries, there may be impacts that are over and

above the capabilities for mitigation set out within the RAMS. As set out in the screening table, a number of individual site allocations are recommended for further consideration at appropriate assessment for this reason.

Air quality impact concerns

- 4.5 Reductions in air quality associated with increased traffic are primarily as a result of increased nitrogen deposition, but are also related to increases in both sulphur and ammonia. Traffic generated air quality reductions can impact on vegetation communities (Bobbink, Hornung & Roelofs 1998; Stevens *et al.* 2011). The Design Manual for Roads and Bridges (DMRB) currently advises that the effect of traffic emissions is focussed on the first 200m to the side of a road. There is a declining effect out to 200m and beyond this it is currently agreed that the effects are *de minimis*, i.e. of no consequence against background levels. Following a recent case decision from Ashdown Forest (Wealden v SSCLG 2017) it is essential that air quality considerations have appropriate regard for any impacts that may act in-combination in HRA work. An appropriate assessment of air quality should be undertaken with regard for the principles of this recent case.
- 4.6 The length of roads within 200m of the European sites and visual checks of how those road sections relate to allocations within the Suffolk Coastal District would suggest that there is a relevant pathway with air quality issues and transport that requires further consideration. Map 5 illustrates where roads are within 200m of European sites. Air quality impacts are therefore assessed further within the appropriate assessment section this HRA.
- 4.7 The transport modelling undertaken to support the emerging Local Plan will be checked to establish where road traffic increases are likely to occur as a result of the site allocations. The nature and extent of any increases within 200m of European sites will be considered in terms of the implications of such increases for air quality, and the potential to affect sensitive European site interest features.

Water issues

- 4.8 Water issues include water quality and water quantity (i.e. water availability), and flood management. Run-off, outflow from sewage treatments and overflow from septic tanks can result in increased nutrient loads and contamination of water courses. Abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. Such impacts particularly relate to aquatic and wetland habitats.

- 4.9 The Currently adopted Suffolk Coastal District Local Plan documents are supported by a Water Cycle Study, prepared in 2009. This concluded that the proposed development within the current Local Plan documents are capable of being supported by the current network in terms of water quality and water availability, although there is a need for some water infrastructure upgrades within the current plan period to fully accommodate growth. These are waste water treatment capacity issues will need to be reviewed with Anglian Water and the Environment Agency, to check that the necessary improvements have been undertaken or are currently programmed and resourced.
- 4.10 For flood risk there is currently work underway to prepare the Strategic Flood Risk Assessment to inform the preparation of the Local Plan, but this will be finalised after the Regulation 18 consultation. This will be reviewed to consider any HRA related implications.

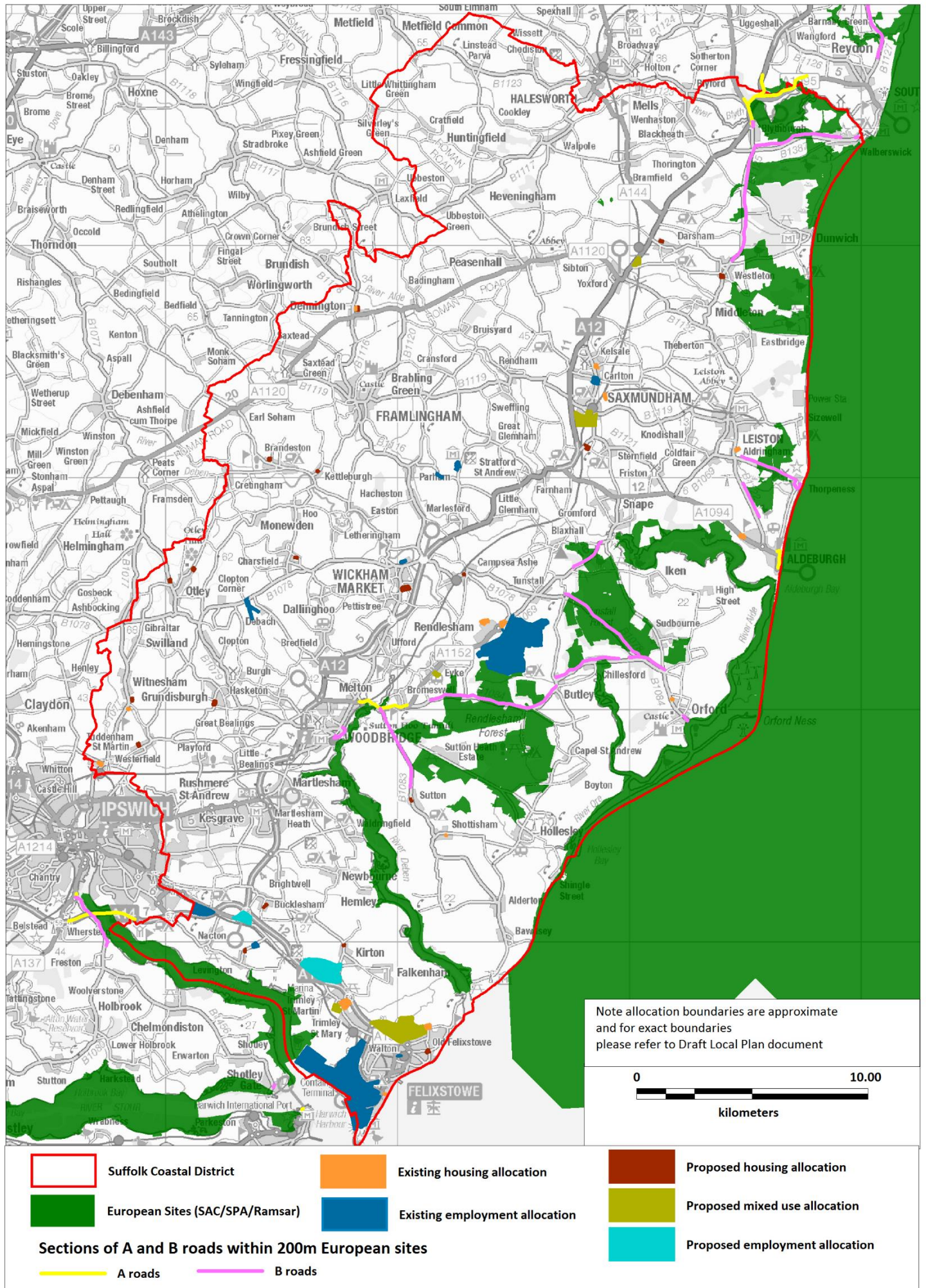
Urban effects

- 4.11 Urban effects relate to issues where development is close to the European site boundary and is an umbrella term relating to impacts such as cat predation, fly tipping and vandalism (see Underhill-Day 2005 for review). These impacts are particularly relevant for allocations that are proposed within 400m of European sites.

European sites without impact pathways

- 4.12 The Outer Thames Estuary marine site and Hamford Water are both not considered relevant to any of the various pathways discussed above and these can be ruled out for any likely significant effect.

Map 5: Sections of A and B roads within European sites



5. Appropriate assessment

- 5.1 Once a likely significant effect has been identified, the purpose of the appropriate assessment is to examine evidence and information in more detail to establish the nature and extent of the predicted impacts, in order to answer the question as to whether such impacts could lead to adverse effects on European site integrity.
- 5.2 An appropriate assessment should be based on evidence, and that can take different forms (direct evidence, comparable evidence, modelling, expert opinion, Natural England's advice etc). In reality however, appropriate assessments are often undertaken with some evidence, but not enough to give absolute or definitive answers. The assessment is therefore often drawing on the knowledge and experience of the assessors, to make scientifically justified decisions about risk.
- 5.3 The 'precautionary principle' is described in the screening section. It is equally relevant for the appropriate assessment as it is for screening likely significant effects. It is an accepted principle that is embedded within the wording of the legislation, and latterly within case decisions, both European and domestic. Essentially, the appropriate assessment stage is, in accordance with the Habitats Regulations, an assessment that enables a competent authority to only give effect to a plan or authorise/undertake a project after having ascertained that it will not adversely affect the integrity of the European site.
- 5.4 It is for the competent authority to gather the information and evidence necessary for the appropriate assessment to give them certainty that adverse effects will not occur. Fundamentally that therefore means that in the absence of certainty, the plan or project should not normally proceed (subject to the further exceptional tests explained in Appendix 1). Hence the precaution is in the competent authority's duty to only allow plans or projects to proceed whether there is certainty and to apply a precautionary approach where uncertainties remain. Competent authorities should have enough evidence to satisfy themselves that there are feasible measures to prevent adverse effects. These should be feasible in terms of cost, practical implementation, timeliness and attributing responsibility.
- 5.5 The following themes will form the appropriate assessment, which will be undertaken when the HRA is updated after Regulation 18 consultation:
- Recreation – residential. Checking that the RAMS remains fit for purpose for the increased housing from the current Local Plan and reviewing its progress towards adoption

- Recreation from tourism – checking that the local plan does not give rise to additional recreation impacts as a result of its promotion of tourism growth
- Other urbanisation effects – checking development in close proximity for any urbanisation risks other than recreation.
- Water – a re-check of previous conclusions from earlier HRA work and review of any new information, including discussion with Anglian Water
- Air Quality – consideration of traffic increases in close proximity to European sites as a result of site allocations
- Site allocations check – detailed consideration of all allocations that have been identified in the screening table as requiring further assessment
- Biodiversity net gain – ensuring that wider biodiversity is adequately protected and contribution are made through spatial planning to biodiversity restoration. This underpins European site protection and long term maintenance.

5.6 The appropriate assessment sections will be informed by the most up to date information available at the time of preparation, prior to Regulation 19 consultation. The appropriate assessment will be informed by the current site conservation objectives site improvement plans and direct discussion with Natural England officers.

6. Recommendations

- 6.1 This HRA, undertaken at First Draft Local Plan stage has recommendations from the screening assessment for policy wording changes, and also identifies key topic areas for consideration at appropriate assessment.
- 6.2 As noted within the screening table, all recommendations for wording changes have been undertaken within the Regulation 18 consultation version of the First Draft Local Plan. The screening stage will be undertaken again for the Regulation 19 stage. In the interim, the appropriate assessment themes will be progressed as described in Section 5.
- 6.3 Comments from the consultation, particularly from Natural England as statutory consultee on HRA, will be reviewed to inform the next iteration of this HRA report. If necessary additional discussions with Natural England will be undertaken to resolve any issues.

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8. Appendix 1 - The Habitats Regulations Assessment Process

- 8.1 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, which are commonly referred to as the 'Habitats Regulations.' The most recent version of the Habitats Regulations does not affect the principles of European site assessment as defined by the previous Regulations, and which forms the focus of this report. Regulation numbers have changed from the 2010 Regulations.
- 8.2 The Habitats Regulations are in place to transpose European legislation set out within the Habitats Directive (Council Directive 92/43/EEC), which affords protection to plants, animals and habitats that are rare or vulnerable in a European context, and the Birds Directive (Council Directive 2009/147/EC), which originally came into force in 1979, and which protects rare and vulnerable birds and their habitats. These key pieces of European legislation seek to protect, conserve and restore habitats and species that are of utmost conservation importance and concern across Europe. Although the Habitats Regulations transpose the European legislation into domestic legislation, the European legislation still directly applies, and in some instances, it is better to look to the parent Directives to clarify particular duties and re-affirm the overarching purpose of the legislation.
- 8.3 European sites include Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) classified under the Birds Directive. The suite of European sites includes those in the marine environment as well as terrestrial, freshwater and coastal sites. European sites have the benefit of the highest level of legislative protection for biodiversity. Member states have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted, with a precautionary approach embedded in the legislation, i.e. it is necessary to demonstrate that impacts will not occur, rather than they will. The overarching objective is to maintain sites and their interest features in an ecologically robust and viable state, able to sustain and thrive into the long term, with adequate resilience against natural influences. Where sites are not achieving their potential, the focus should be on restoration.
- 8.4 The UK is also a contracting party to the Ramsar Convention, which is a global convention to protect wetlands of international importance, especially those wetlands utilised as waterfowl habitat. In order to ensure compliance with the requirements of the Convention, the UK Government expects all competent

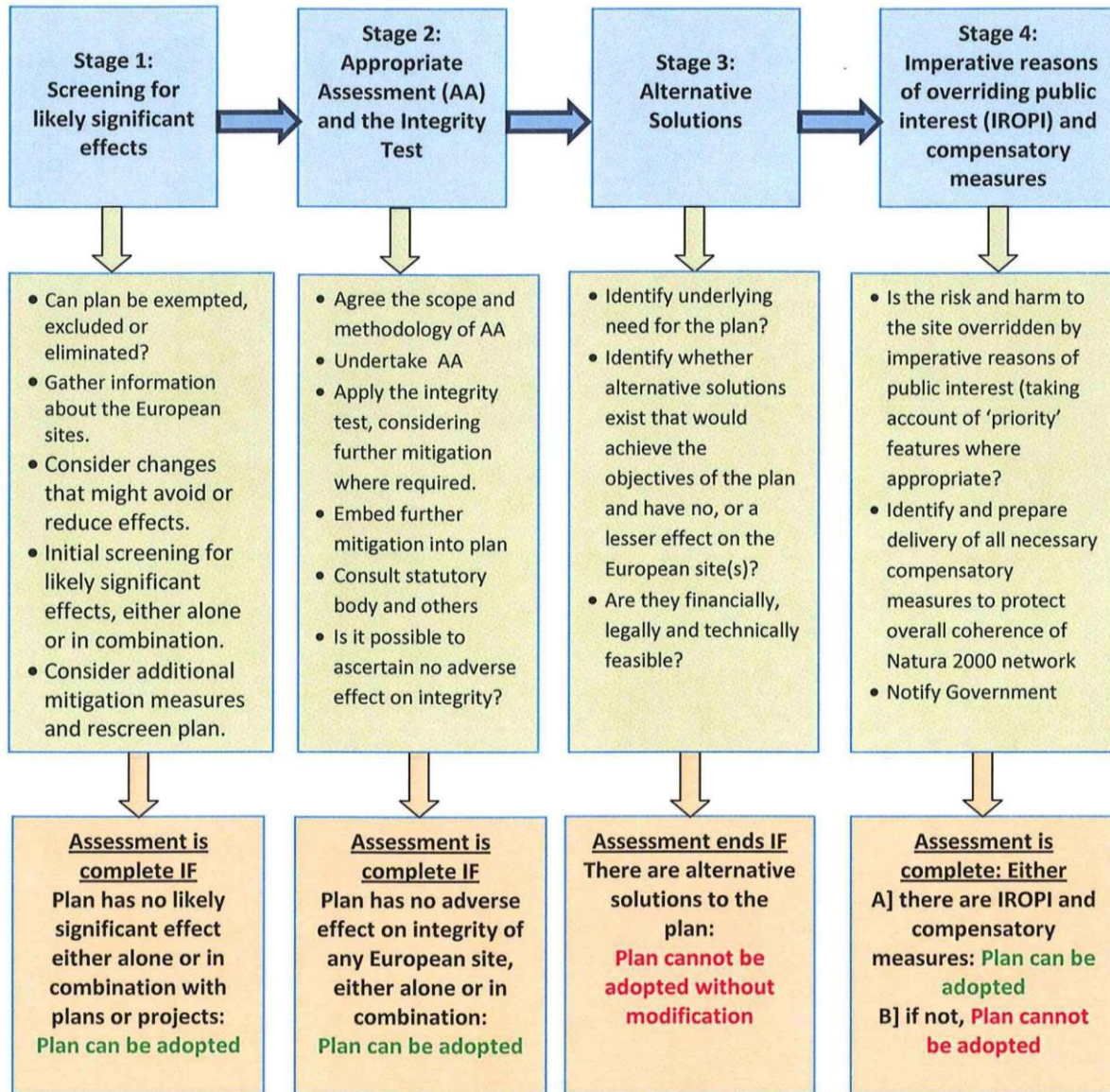
authorities to treat listed Ramsar sites as if they are part of the suite of designated European sites, as a matter of government policy, as set out in Section 118 of the National Planning Policy Framework. Most Ramsar sites are also a SPA or SAC, but the Ramsar features and boundary lines may vary from those for which the site is designated as a SPA or SAC.

- 8.5 It should be noted that in addition to Ramsar sites, the National Planning Policy Framework also requires the legislation to be applied to potential SPAs and possible SACs, and areas identified or required for compensatory measures where previous plans or projects have not been able to rule out adverse effects on site integrity, yet their implementation needs meet the exceptional tests of Regulation 64 of the Habitats Regulations, as described below.
- 8.6 The step by step process of HRA is summarised in the diagram below. Within the Habitats Regulations, local planning authorities, as public bodies, are given specific duties as 'competent authorities' with regard to the protection of sites designated or classified for their species and habitats of European importance. Competent authorities are any public body individual holding public office with a statutory remit and function, and the requirements of the legislation apply where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. Regulation 63 of the Habitats Regulations sets out the HRA process for plans and projects, which includes development proposals for which planning permission is sought. Additionally, Regulation 105 specifically sets out the process for assessing emerging land use plans.
- 8.7 The step by step approach to HRA is the process by which a competent authority considers any potential impacts on European sites that may arise from a plan or project that they are either undertaking themselves, or permitting an applicant to undertake. The step by step process of assessment can be broken down into the following stages, which should be undertaken in sequence:
- Check that the plan or project is not directly connected with or necessary for the management of the European site
 - Check whether the plan or project is likely to have a significant effect on any European site, from the plan or project alone
 - Check whether the plan or project is likely to have a significant effect on any European site, from the plan or project in-combination with other plans or projects
 - Carry out an Appropriate Assessment
 - Ascertain whether an adverse effect on site integrity can be ruled out
- 8.8 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential impacts. A competent authority may consider that there is a need to undertake further levels of evidence gathering and assessment in order to have certainty, and this is the Appropriate

Assessment stage. At this point the competent authority may identify the need to add to or modify the project in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.

- 8.9 For plans, the stages of HRA are often quite fluid, with the plan normally being prepared by the competent authority itself. This gives the competent authority the opportunity to repeatedly explore options to prevent impacts, refine the plan and rescreen it to demonstrate that all potential risks to European sites have been successfully dealt with.
- 8.10 When preparing a plan, a competent authority may therefore go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect European site interest features.
- 8.11 After completing an assessment, a competent authority should only approve a project or give effect to a plan where it can be ascertained that there will not be an adverse effect on the integrity of the European site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or modified the project with restrictions or conditions, in light of their Appropriate Assessment findings.
- 8.12 Where adverse effects cannot be ruled out, there are further exceptional tests set out in Regulation 64 for plans and projects and in Regulation 107 specifically for land use plans. Exceptionally, a plan or project could be taken forward for imperative reasons of overriding public interest where adverse effects cannot be ruled out and there are no alternative solutions. It should be noted that meeting these tests is a rare occurrence and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.
- 8.13 In such circumstances where a competent authority considers that a plan or project should proceed under Regulations 64 or 107, they must notify the relevant Secretary of State. Normally, planning decisions and competent authority duties are then transferred, becoming the responsibility of the Secretary of State, unless on considering the information, the planning authority is directed by the Secretary of State to make their own decision on the plan or project at the local level. The decision maker, whether the Secretary of State or the planning authority, should give full consideration to any proposed 'overriding reasons' for which a plan or project should proceed despite being unable to rule out adverse effects on European site interest features, and ensure that those reasons are in the public interest and are such that they override the

potential harm. The decision maker will also need to secure any necessary compensatory measures, to ensure the continued overall coherence of the European site network if such a plan or project is allowed to proceed.



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Figure 1: Outline of the assessment of plans under the Habitat Regulations

9. Appendix 2 –Conservation Objectives

- 9.1 As required by the Directives, 'Conservation Objectives' have been established by Natural England, which should define the required ecologically robust state for each European site interest feature. All sites should be meeting their conservation objectives. When being fully met, each site will be adequately contributing to the overall favourable conservation status of the species or habitat interest feature across its natural range. Where conservation objectives are not being met at a site level, and the interest feature is therefore not contributing to overall favourable conservation status of the species or habitat, plans should be in place for adequate restoration.
- 9.2 Natural England has embarked on a project to renew all European site Conservation Objectives, in order to ensure that they are up to date, comprehensive and easier for developers and consultants to use to inform project level HRAs in a consistent way. In 2012, Natural England issued now a set of generic European site Conservation Objectives, which should be applied to each interest feature of each European site. These generic objectives are the first stage in the project to renew conservation objectives, and the second stage, which is to provide more detailed and site-specific information for each site to support the generic objectives, is now underway.
- 9.3 The new list of generic Conservation Objectives for each European site includes an overarching objective, followed by a list of attributes that are essential for the achievement of the overarching objective. Whilst the generic objectives currently issued are standardised, they are to be applied to each interest feature of each European site, and the application and achievement of those objectives will therefore be site specific and dependant on the nature and characteristics of the site. The second stage, provision of the more supplementary information to underpin these generic objectives, will provide much more site-specific information, and this detail will play a fundamental role in informing HRAs, and importantly will give greater clarity to what might constitute an adverse effect on a site interest feature.
- 9.4 In the interim, Natural England advises that HRAs should use the generic objectives and apply them to the site-specific situation. This should be supported by comprehensive and up to date background information relating to the site.
- 9.5 For SPAs, the overarching objective is to:
- 9.6 'Avoid the deterioration of the habitats of qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is

maintained and the site makes a full contribution to achieving the aims of the Birds Directive.'

9.7 This is achieved by, subject to natural change, maintaining and 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 populations of the qualifying features.
- The distribution of the qualifying features within the site.

9.8 For SACs, the overarching objective is to:

'Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.'

9.9 This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the qualifying natural habitats and habitats of qualifying species.
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species.
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely.
- The populations of qualifying species.
- The distribution of qualifying species within the site.

9.10 Conservation objectives inform any HRA of a plan or project, by identifying what the interest features for the site should be achieving, and what impacts may be significant for the site in terms of undermining the site's ability to meet its conservation objectives.

10. Appendix 3 – The Nature Conservation Interest of the European Sites

- 10.1 The Suffolk Coastal District lies in an area of considerable importance for nature conservation with a number of European sites located within and just outside the District, some of which are offshore. The range of sites, habitats and designations is complex with some areas having more than one designation.
- 10.2 The relevant European sites are summarised in Table 4 below, where the interest features, threats and pressures and links to the relevant conservation objectives are listed.

Table 4: Summary of relevant European sites, their interest features and relevant pressures/threats. Pressures/threats are taken from the [site improvement plans](#) (SIP) and are listed in priority order. Hyperlinks in the first column link to the relevant site page on the Natural England website, providing details of the site’s conservation objectives, citation etc. Pale blue shading indicates marine sites.

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
Alde-Ore & Butley Estuaries SAC , Alde-Ore Estuary SPA Also a Ramsar site	H1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) H1130 Estuaries H1140 Mudflats and sandflats not covered by seawater at low tide A151(NB) <i>Philomachus pugnax</i> : Ruff A132(NB) <i>Recurvirostra avosetta</i> : Pied avocet A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier A162(NB) <i>Tringa totanus</i> : Common redshank A132(B) <i>Recurvirostra avosetta</i> : Pied avocet A183(B) <i>Larus fuscus</i> : Lesser black-backed gull A191(B) <i>Sterna sandvicensis</i> : Sandwich tern A195(B) <i>Sterna albifrons</i> : Little tern	Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine)
The Broads SAC , Broadlands SPA Also a Ramsar site	H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i> : Desmoulin’s whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>) H7140 Transition mires and quaking bogs H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp H3150 Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i> -type vegetation S1355 <i>Lutra lutra</i> : Otter S1903 <i>Liparis loeselii</i> : Fen orchid S4056 <i>Anisus vorticulus</i> : Little ramshorn whirlpool snail A021(B) <i>Botaurus stellaris</i> : Bittern A038(B) <i>Cygnus cygnus</i> <i>Cygnus</i> : Whooper Swan	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 3 rd party

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Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
	A151(NB) <i>Philomachus pugnax</i> : Ruff A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier A082(NB) <i>Circus cyaneus</i> : Hen harrier A037(NB) <i>Cygnus columbianus bewickii</i> : Bewick swan A050(NB) <i>Anas penelope</i> : Eurasian wigeon A051(NB) <i>Anas strepera</i> : Gadwall A056(NB) <i>Anas clypeata</i> : Northern shoveler	
Benacre to Easton Bavents Lagoon SAC , Benacre to Easton Bavents SPA	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	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).
Breydon Water SPA	Waterbird assemblage A037(NB) <i>Cygnus columbianus bewickii</i> : Bewick swan 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 A151(NB) <i>Philomachus pugnax</i> : Ruff A193(B) <i>Sterna hirundo</i> : Common tern	Shooting/scaring, change in land management, public access/disturbance, hydrological changes, fisheries (marine and estuarine).
Dew's Ponds SAC	S1166 <i>Triturus cristatus</i> : Great crested newt	None identified
Minsmere to Walberswick Heaths & Marshes SAC , Minsmere-Walberswick SPA Also a 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 A132(B) <i>Recurvirostra avosetta</i> : Pied avocet	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)

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Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
	A195(B) <i>Sterna albifrons</i> : Little tern A394(NB) <i>Anser albifrons albifrons</i> : Greater white-fronted goose	
Outer Thames Estuary SPA	A001 (W) <i>Gavia stellate</i> : Red-throated Diver A195 (B) <i>Sterna hirundo</i> : Common Tern A193 (B) <i>Sternula albifrons</i> : Little Tern	
Sandlings SPA	A224(B) <i>Caprimulgus europaeus</i> : European nightjar A246(B) <i>Lullula arborea</i> : Woodlark	Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance,
Hamford Water SAC Hamford Water SPA Also a Ramsar site	A132(NB) <i>Recurvirostra avosetta</i> : Pied avocet A156(NB) <i>Limosa limosa islandica</i> : Black-tailed godwit A048(NB) <i>Tadorna tadorna</i> : Common shelduck Waterbird assemblage A137(NB) <i>Charadrius hiaticula</i> : Ringed plover A046a(NB) <i>Branta bernicla bernicla</i> : Dark-bellied brent goose A162(NB) <i>Tringa totanus</i> : Common redshank A141(NB) <i>Pluvialis squatarola</i> : Grey plover A195(B) <i>Sterna albifrons</i> : Little tern A052(NB) <i>Anas crecca</i> : Eurasian teal 4035 <i>Gortyna borelii lunata</i> : Fisher's estuarine moth	Coastal squeeze, site management (scrub control), disturbance to breeding and overwintering birds, possible atmospheric air pollution issues
Deben Estuary SPA Also a Ramsar site	A675(NB) <i>Branta bernicla bernicla</i> : Dark-bellied brent goose A132(NB) <i>Recurvirostra avosetta</i> : Avocet	Coastal squeeze, disturbance to birds, water and air pollution
Orfordness to Shingle Street SAC	H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks H1150# Coastal lagoons	
Stour and Orwell Estuaries SPA Also a Ramsar site	A156(NB) <i>Limosa limosa islandica</i> : Black-tailed godwit A143(NB) <i>Calidris canutus</i> : Red knot A149(NB) <i>Calidris alpina alpina</i> : Dunlin Waterbird assemblage A162(NB) <i>Tringa totanus</i> : Common redshank A141(NB) <i>Pluvialis squatarola</i> : Grey plover A046a(NB) <i>Branta bernicla bernicla</i> : Dark-bellied brent goose	Coastal squeeze, disturbance to birds, air pollution and new development

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Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
	A054(NB) <i>Anas acuta</i> : Northern pintail A132(B) <i>Recurvirostra avosetta</i> : Pied avocet	
Staverton Park and the Thick, Wantisden SAC	9190 Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains	Woodland management, disease, atmospheric pollution