



Habitats Regulations Assessment of the Draft Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document

October 2020

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1. Introduction

1.1 The European Habitats Directive¹ and Wild Birds Directive² provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) also states that Ramsar sites should be afforded the same level of protection as the European sites.

1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).

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

‘Where a land use plan:

(a) Is likely to have a significant effect on a European sites or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) Is not directly connected with or necessary to the management of the site, The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives.’

1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy would adversely affect the integrity of any sites.

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

¹ 92/43/EEC

² 2009/147/EEC

Union³, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

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

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

1.5 The Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD) is being produced by East Suffolk Council. The SPD will apply to the whole of the East Suffolk Council area, although the related RAMS tariff will only apply in the identified RAMS zone. This report considers whether there are likely to be significant effects on protected European sites and where a full Appropriate Assessment may be required.

1.6 East Suffolk Council is covered by two Local Plans, the East Suffolk Council - Suffolk Coastal Local Plan adopted September 2020 and the Waveney Local Plan adopted March 2019.

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

³ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

Recreational Avoidance and Mitigation Strategy (which this SPD supports) and requires payment towards mitigation from residential developments within 13km of the protected European sites.

2. Protected sites covered by this report

2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of East Suffolk Council. The locations of the sites are shown on maps in Appendix 2 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 3, along with a summary of the pressures and threats as documented in the Appropriate Assessments for the Local Plans.

Table 1: Relevant European protected sites

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

3. Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD)

- 3.1 This HRA report reviews the Draft Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD).
- 3.2 Appropriate Assessments carried out for the Local Plans identified a likely significant effect from increased recreational pressure on Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar Sites arising from the delivery of new housing. To address this, East Suffolk Council, Ipswich Borough Council, Mid Suffolk District Council and Babergh District Council produced a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). This strategy set out a tariff based approach to mitigating the impact of recreational disturbance on European Sites resulting from increased housing development across the Local Authority areas. Delivery of the RAM strategy fulfils a key requirement of the Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans.
- 3.3 The Draft Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document, supports the delivery of the mitigation measures set out in the Suffolk Coast RAMS and provides a framework for implementing those provisions. The Supplementary Planning Document also includes information for developers and applicants to assist them in meeting the other requirements under the Conservation of Habitats and Species Regulations (2017) (as amended) (the Habitats Regulations). The Draft Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document builds on the approach set out in Suffolk Coastal Local Plan policies SCLP2.3: Cross-boundary mitigation of effects on Protected Habitats and SCLP10.1 (Biodiversity and Geodiversity) and Waveney Local Plan policy WLP8.34 (Biodiversity and Geodiversity). Both local plans were subject to Sustainability Appraisal including Strategic Environmental Assessment throughout their development.
- 3.4 Chapter 1 (sections 1.1 and 1.2) of the SPD provides the background to the Suffolk Coast RAMS and sets out the purpose of the SPD. This section is

descriptive and has therefore not been included in the screening table in section 5 of this report.

- 3.5 Section 2.1 of the SPD covers the policy background, and explains the development of the Suffolk Coast RAMS which the SPD supports. Section 2.2 of the SPD is also descriptive, and clarifies which European Sites the Suffolk Coast RAMS applies to. The SPD explains that twelve European Sites formed the focus of the Suffolk Coast RAMS report. Section 2.3 of the SPD explains the zone of influence where the RAMS tariff will be collected. The list of relevant sites and the zone of influence were both established through the Suffolk Coast RAMS (informed by the relevant Local Plan Appropriate Assessments) and neither were reviewed or changed through the SPD process. As these sections merely describe what is already set out in the Suffolk Coast RAMS, they have not been included in the screening table in section 5 of this report.
- 3.6 Section 2.4 of the SPD sets out the per dwelling tariff that is payable within the zone of influence. This is taken from the Suffolk Coast RAMS and is included here for ease of reference. This section also covers what additional measures (in addition to the RAMS tariff) might be required in certain circumstances. This additional guidance goes beyond what is included in the Suffolk Coast RAMS and has therefore been included in the screening table in section 5 of this report.
- 3.7 Chapter 3 of the SPD provides guidance for those the making a planning application with the zone of influence. Section 3.1 sets out the types of development that RAMS will be applied to. The Suffolk Coast RAMS established that the tariff should apply to all new residential developments where there is a net increase in dwelling numbers. The SPD provides further guidance on the exact types of residential development that the tariff will apply to. Similarly, section 3.2 clarifies the types of planning applications that the RAMS tariff will apply to. Section 3.3 sets out the mechanisms that the council has put in place to collect RAMS contributions, and explains the relationship between the tariff and any other contributions that may be payable. The additional guidance in these sections goes beyond what is included in the Suffolk Coast RAMS and has therefore been included in the screening table in section 5 of this report.
- 3.8 Sections 3.4 and 3.5 of the SPD deal with detailed technical matters relating the payment of fees and the refusal of planning permission. This additional

guidance goes beyond what is included in the Suffolk Coast RAMS and has therefore been included in the screening table in section 5 of this report.

- 3.9 Section 3.6 of the SPD briefly summarises the requirements within the Habitats Regulations to ensure that impacts of development are adequately mitigated. This section sets out the Council’s approach to the consideration of alternative mitigation measures. This additional guidance goes beyond what is included in the Suffolk Coast RAMS and has therefore been included in the screening table in section 5 of this report.
- 3.10 Section 3.7 of the SPD cross-references the strategy and summarises the approach to the spending of collected RAMS contributions. Although mostly descriptive this does highlight a key aspect of the RAMS project (implementing the mitigation) and has therefore been included in the screening table in section 5 of this report.

4. Other Plans and Projects

- 4.1 Regulation 105 of the Habitats Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plans are the Local Plans. The Local Plans set out the broad scale and distribution of development across the area of East Suffolk formerly covered by Suffolk Coastal District and Waveney District.
- 4.5 The Draft Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD) adds detail to Suffolk Coastal Local Plan policies SCLP2.3: Cross-boundary mitigation of effects on Protected Habitats and SCLP10.1 (Biodiversity and Geodiversity) and Waveney Local Plan policy WLP8.34 (Biodiversity and Geodiversity) and provides further guidance on the implementation of those policies.
- 4.6 A screening process considered each policy in the Suffolk Coastal and Waveney Local Plans and concluded whether significant effects were likely and if Appropriate Assessment was therefore needed. The Appropriate Assessments

of the Suffolk Coastal and Waveney Local Plans considered the following themes:

- Recreation pressure,
- Air quality and traffic emissions,
- Biodiversity net gain,
- Urbanisation,
- Water quality, resources and treatment, and
- Flood risk and coastal erosion.

4.7 Mitigation measures were identified within the Appropriate Assessments and incorporated within both Local Plans, resulting in a conclusion that neither plan would lead to any adverse effects on European wildlife sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts. Delivery of the Suffolk Coast RAMS (supported by this SPD) fulfils a key requirement of the Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans.

5. Assessment of likely significant effects of the Draft Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD) on European protected sites

- 5.1 Table 3 below considers each relevant section of the Draft Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD) in relation to whether there is potential for a likely significant effect on protected European sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected sites. The relevant sections are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

Table 3: Likely significant effects of the Draft Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document

Section	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
2.4 The Tariff	Sets out the per dwelling tariff that is payable within the zone of influence. This is taken from the Suffolk Coast RAMS and is included here for ease of reference. The section also covers what additional measures (in addition to the RAMS tariff) might be required in certain circumstances, including the provision of SANG. The RAMS tariff payments and any additional measures will be used to ensure the mitigation of impacts and will therefore not give rise to any likely significant effects.	None	None	No
3.1 What types of development does this apply to?	Sets out the types of development that RAMS will be applied to. RAMS tariff payments will be used to deliver mitigation measures and this section of the SPD ensures that all relevant types of development that could lead to recreational disturbance impacts contribute to those mitigation measures.	None	None	No
3.2 What types of application does this apply to?	Sets out the types of applications that RAMS will be applied to. RAMS tariff payments will be used to deliver mitigation measures and this section of the SPD	None	None	No

Section	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
	ensures that all relevant types of development that could lead to recreational impacts contribute to those mitigation measures.			
3.3 When and how do I pay the contribution?	Sets out the mechanisms that the council has put in place to collect the RAMS contributions and explains the relationship between the tariff and any other contributions that may be payable. The guidance in this section ensures that contributions are collected in a timely and appropriate manner, ensuring that mitigation measures can be funded.	None	None	No
3.4 Legal / Admin fees	Sets out detailed technical matters relating the payment of fees. This section clarifies the process for applicants but doesn't directly relate to delivery of development.	None	None	No
3.5 What if I don't get planning permission or choose not to implement my planning permission?	Sets out detailed technical matters relating to the refusal of planning permission and the refund process. This section clarifies the process for applicants but doesn't directly relate to delivery of development.	None	None	No
3.6 Do I have to pay the Suffolk Coast RAMS tariff?	Briefly summarises the requirements within the Habitats Regulations to ensure that impacts of development are adequately mitigated. This section sets	None	None	No

Section	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
	out the Council’s approach to the consideration of alternative measures, ensuring that effects are appropriately mitigated.			
3.7 How will the tariff be spent?	Cross-references the strategy and briefly summarises the approach to the spending of RAMS contributions. Although mostly descriptive, this does highlight a key aspect of the RAMS project (implementing the mitigation).	None	None	No

7. Summary and conclusions

- 7.1 The Draft Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (RAMS SPD) provides additional guidance to inform the determination of planning applications alongside the Waveney and Suffolk Coastal Local Plans. The SPD provides further guidance on the implementation of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy, to help ensure the impacts of new residential development are adequately mitigated.
- 7.2 Delivery of the Suffolk Coast RAMS (supported by this SPD) fulfils a key requirement of the Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans. Implementation of the SPD will not lead to likely significant effects on protected European sites.
- 7.3 This Screening Statement will be finalised taking into account any response from Natural England as the statutory nature conservation body.

Signed:

Dated:

Desi Reed
Planning Policy and Delivery Manager
East Suffolk Council

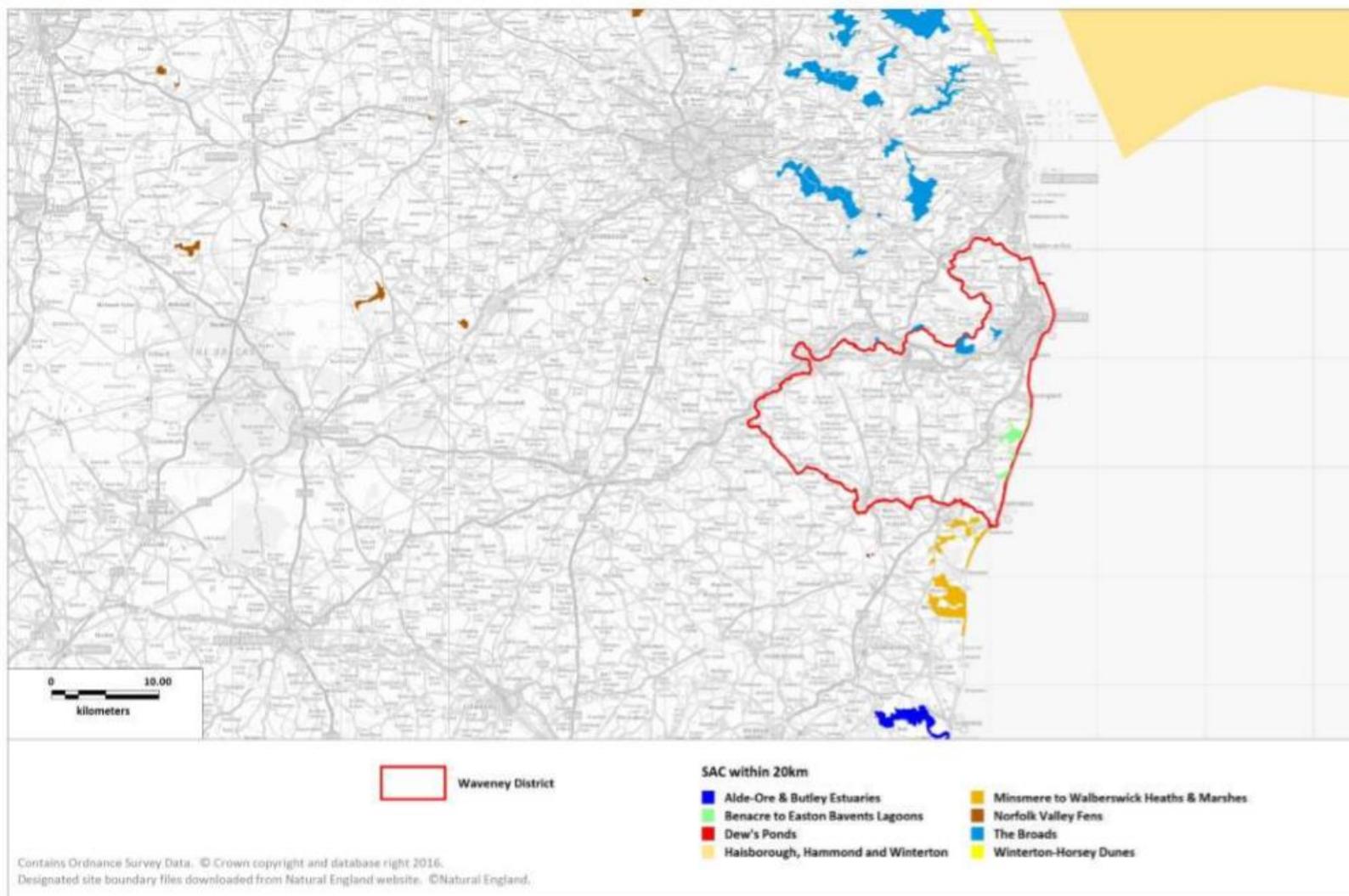
Appendix 1: Sources of background information

- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019)
- Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan stage (incorporating Main Modifications) (May 2020)
- The Habitats Regulations Assessment of the Waveney Local Plan (December 2018)

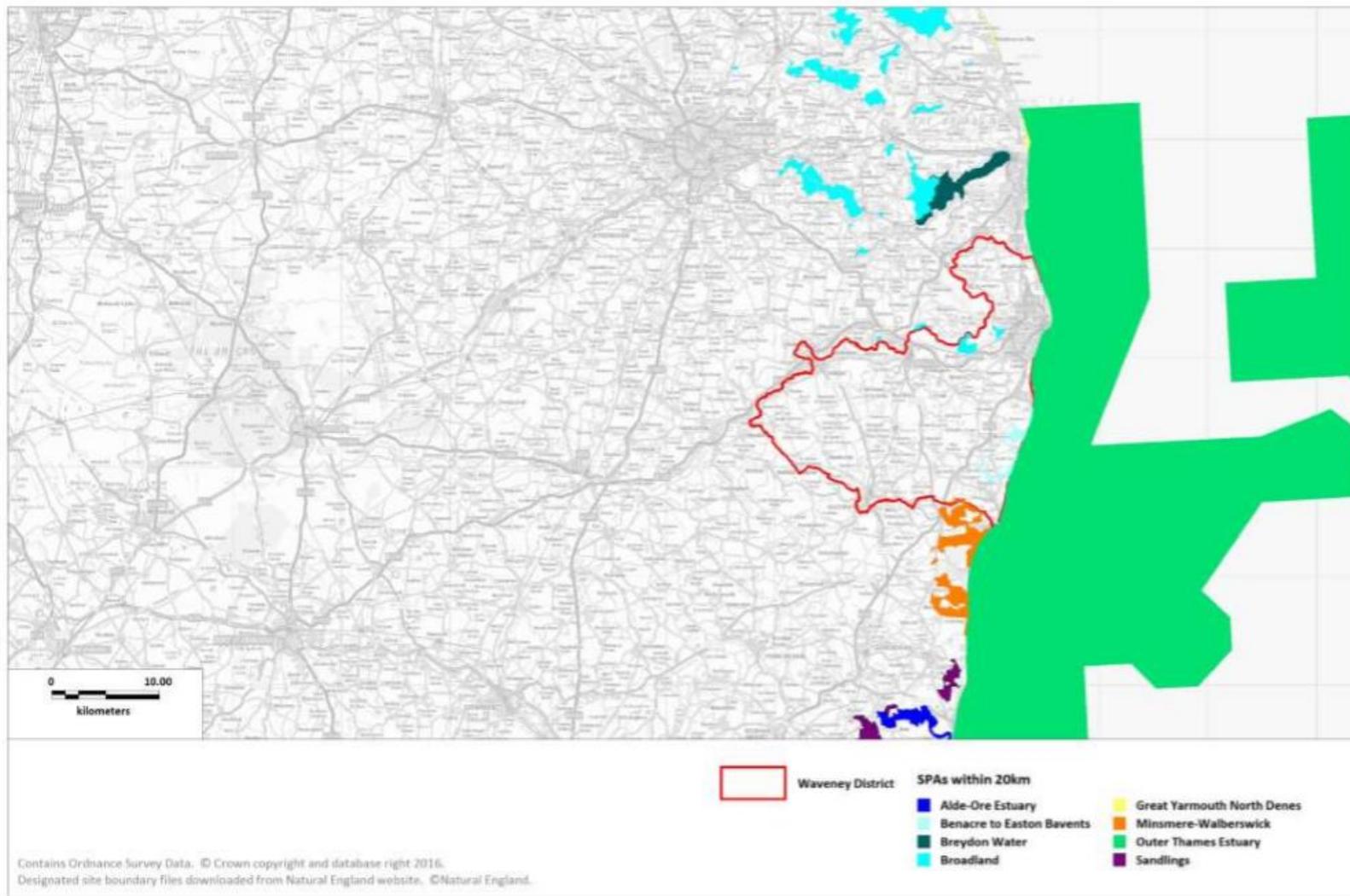
Appendix 2: Locations of European protected sites

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

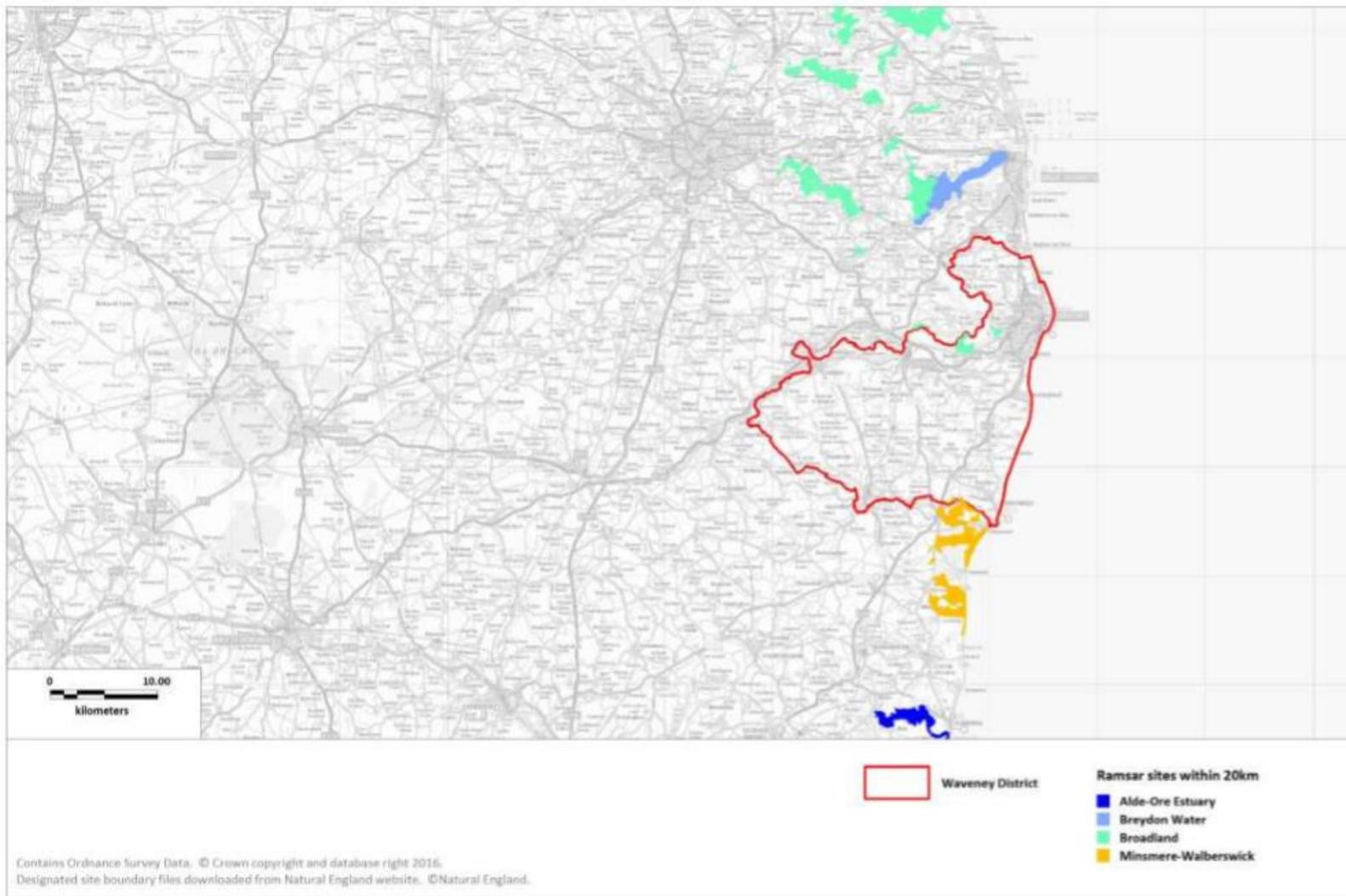
Map 1: SACs



Map 2: SPAs

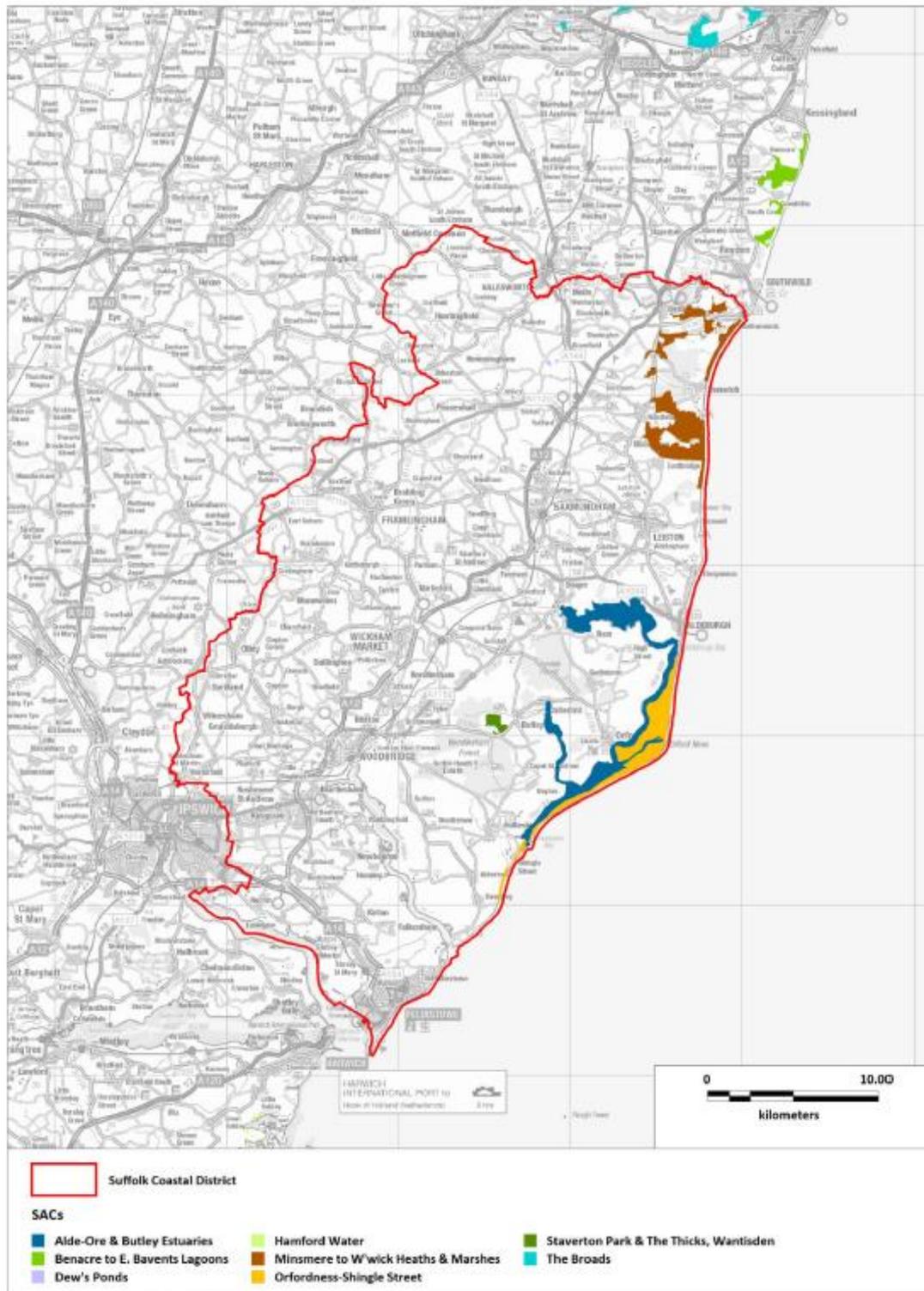


Map 3: Ramsar Sites



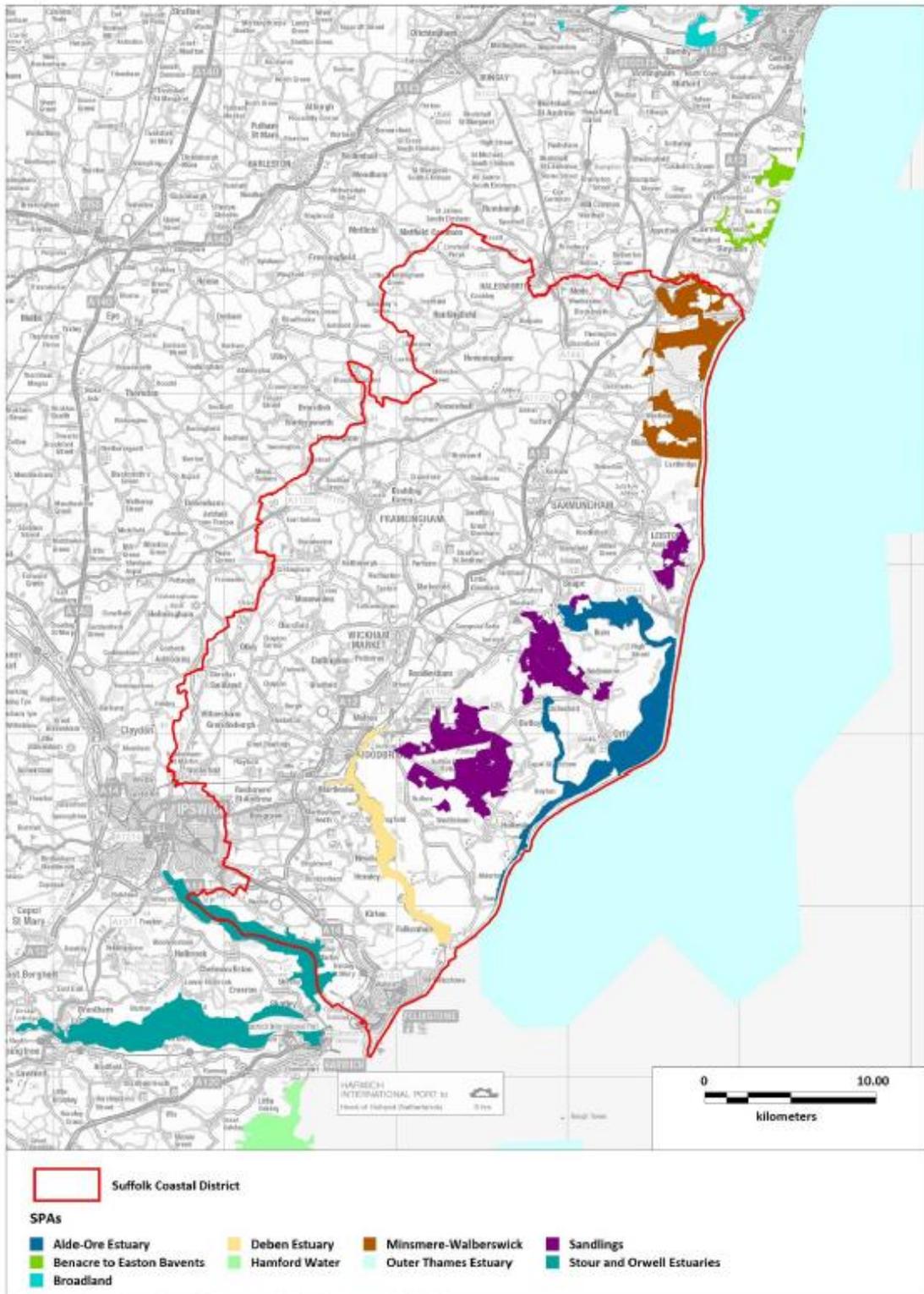
European protected sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

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



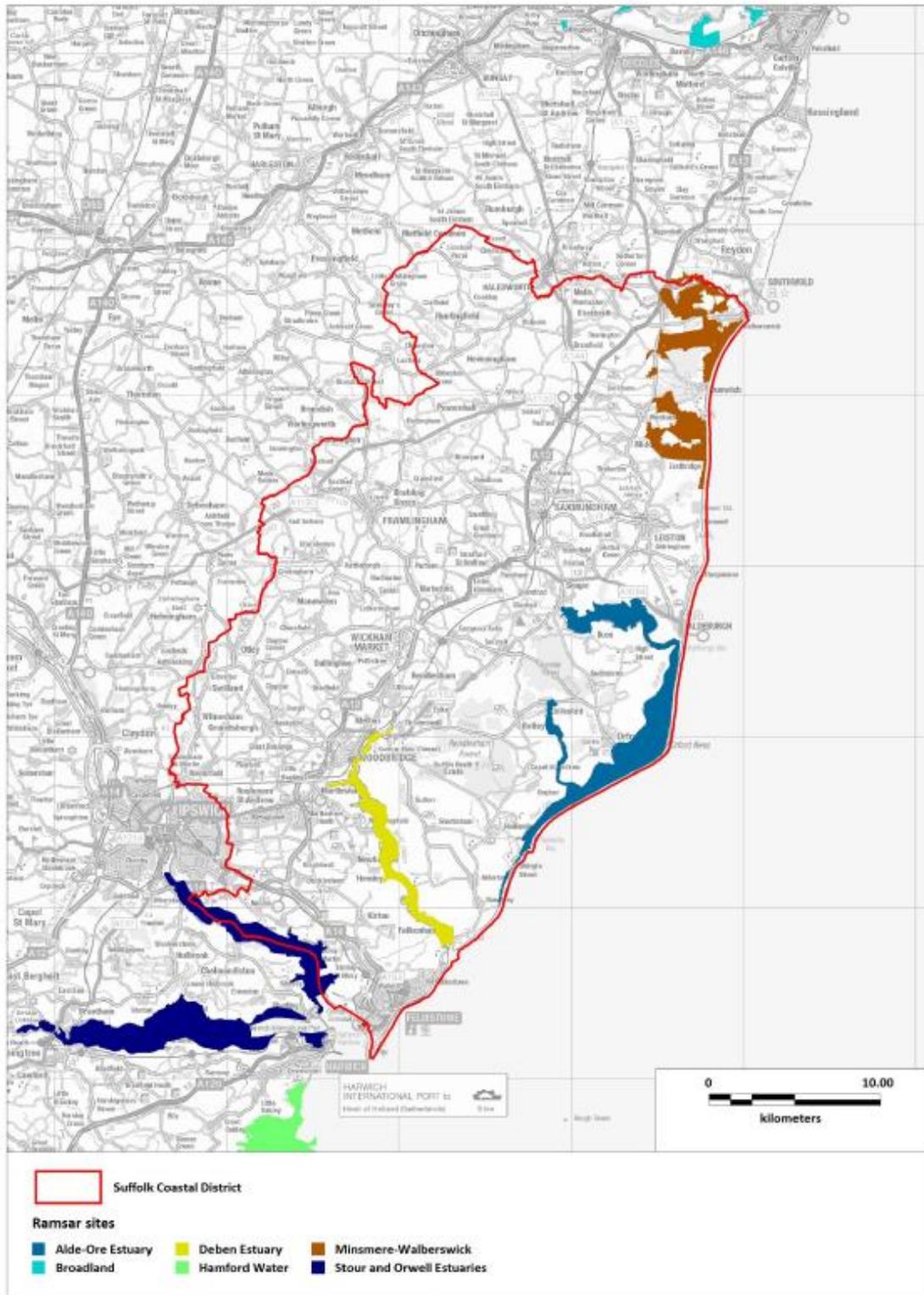
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Map 2: SPA sites where boundary within 20km of Suffolk Coastal District



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



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Appendix 3: Relevant European protected sites

Name	Qualifying features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan Stage (December 2018))
Special Areas of Conservation			
Alde-Ore and Butley Estuaries	H1130:Estuaries H1140: Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats H1330: Atlantic salt meadows	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; The supporting processes on which qualifying natural habitats rely.	Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine) (Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)
Benacre to Easton Barents Lagoons	H1150# Coastal lagoons, A195(B) Sterna albifrons: Little tern A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats,	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).

		The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.	
Dew's Ponds	S1166 Triturus cristatus: Great crested newt	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.	None identified
Minsmere to Walberswick Heaths and Marshes	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) Anas crecca: Eurasian teal A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats,	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)

	<p>A082(NB) Circus cyaneus: Hen harrier A224(B) Caprimulgus europaeus: European nightjar A056(B) Anas clypeata: Northern shoveler A056(NB) Anas clypeata: Northern shoveler A051(B) Anas strepera: Gadwall A051(NB) Anas strepera: Gadwall A132(B) Recurvirostra avosetta: Pied avocet A195(B) Sterna albifrons: Little tern A394(NB) Anser albifrons albifrons: Greater white-fronted goose</p>	<p>The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.</p>	
<p>Orfordness – Shingle Street</p>	<p>H1150: Coastal Lagoons H1210: Annual vegetation of drift lines H1220: Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.</p>	<p>Not identified in Suffolk Coastal Final Draft Local Plan HRA.</p>

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

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

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

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

		<p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	
<p>Minsmere to Walberswick (also Ramsar site)</p>	<p>H4030 European dry heaths</p> <p>H1210 Annual vegetation of drift lines</p> <p>H1220 Perennial vegetation of stony banks</p> <p>A052(B) <i>Anas crecca</i>: Eurasian teal</p> <p>A021(B) <i>Botaurus stellaris</i>: Great bittern</p> <p>A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier</p> <p>A082(NB) <i>Circus cyaneus</i>: Hen harrier</p> <p>A224(B) <i>Caprimulgus europaeus</i>: European nightjar</p> <p>A056(B) <i>Anas clypeata</i>: Northern shoveler</p> <p>A056(NB) <i>Anas clypeata</i>: Northern shoveler</p> <p>A051(B) <i>Anas strepera</i>: Gadwall</p> <p>A051(NB) <i>Anas strepera</i>: Gadwall</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of the qualifying features,</p> <p>The structure and function of the habitats of the qualifying features,</p> <p>The supporting processes on which the habitats of the qualifying features rely,</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p>	<p>Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)</p>

	<p>A132(B) <i>Recurvirostra avosetta</i>: Pied avocet A195(B) <i>Sterna albifrons</i>: Little tern A394(NB) <i>Anser albifrons</i>: Greater white-fronted goose</p>		
Outer Thames Estuary	<p>A001 (W) <i>Gavia stellata</i> Red-throated Diver A195 (B) <i>Sterna hirundo</i> Common Tern A193 (B) <i>Sternula albifrons</i> Little Tern</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.</p>	<p>Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.</p>
Sandlings	<p>A224: European nightjar (breeding) A246: Woodlark (breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features;</p>	<p>Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.</p>

		<p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	
<p>Stour and Orwell Estuaries (also Ramsar site)</p>	<p>A046a: Dark bellied brent goose (non-breeding)</p> <p>A054: Northern pintail (non-breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A141: Grey plover (non-breeding)</p> <p>A143: Red knot (non-breeding)</p> <p>A149: Dunlin (non-breeding)</p> <p>A156: Black-tailed godwit (non-breeding)</p> <p>A162: Common redshank (non-breeding)</p> <p>Waterbird assemblage</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	<p>Coastal squeeze, disturbance to birds, air pollution and new development.</p>

Appendix 4: Natural England Consultation Response

To be added on finalisation of Statement