



Draft Habitats Regulations  
Screening Assessment of the East  
Suffolk Community Infrastructure  
Levy Charging Schedule

March 2021

## Contents

1. Introduction .....	3
2. Protected sites covered by this report .....	5
3. Draft East Suffolk Community Infrastructure Levy Charging Schedule .....	6
4. Other Plans and Projects .....	6
5. Assessment of likely effects of the Draft East Suffolk Community Infrastructure Levy Charging Schedule on European protected sites .....	7
6. Summary and conclusions .....	9
Appendix 1: Sources of background information .....	10
Appendix 2: Locations of European protected sites .....	11
Appendix 3: Relevant European protected sites .....	19
Appendix 4: Natural England Consultation Response.....	31

## 1. Introduction

1.1 The European Habitats Directive<sup>1</sup> and Wild Birds Directive<sup>2</sup> 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, including through EU exit legislation).

1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) (as amended, including through EU exit legislation) 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

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<sup>1</sup> 92/43/EEC

<sup>2</sup> 2009/147/EEC

Union<sup>3</sup>, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

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

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

1.5 The Draft East Suffolk Community Infrastructure Levy Charging Schedule is being produced by East Suffolk Council. The Charging Schedule will apply to the whole of the East Suffolk. 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 Suffolk Coastal Local Plan (adopted in September 2020) and the Waveney Local Plan (adopted in 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 Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) and

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

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 Barents SPA
Benacre to Easton Barents 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. Draft East Suffolk Community Infrastructure Levy Charging Schedule

- 3.1 Community infrastructure Levy (CIL) is a levy which local authorities across the country can choose to charge on new developments within their area. Funds collected through the CIL can be used to support the delivery of infrastructure which the local authority, local communities and stakeholders consider necessary to support the future growth of an area.
- 3.2 If a council wishes to secure developer contributions through the application of Community Infrastructure Levy (CIL), it must set out the delineation between the infrastructure types that will be sought through a S106 agreement and those through CIL. The CIL Charging Schedule sets out the amount of CIL liable for different development types, varied by zone (for residential uses).
- 3.3 At present, there are two separate CIL Charging Schedules operating in East Suffolk, firstly in the former Waveney District Council area (which was adopted in 2013) and secondly, in the former Suffolk Coastal District Council area (which was adopted in 2015). The age of the two CIL Charging Schedules and the fact that there are some differences between them, allied to the formal establishment of East Suffolk Council on 1st April 2019, means that the time is right for the Council to prepare a single CIL Charging Schedule for the whole of the East Suffolk district.
- 3.4 The Council plans to undertake a formal consultation on a new draft CIL Charging Schedule for the whole of East Suffolk in summer 2021.

### 4. Other Plans and Projects

- 4.1 Regulation 105 of the 2017 Regulations (as amended, including through EU exit legislation) requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plans are the Local Plans. The Local Plans set out the broad scale and distribution of development across the area

of East Suffolk formerly covered by Suffolk Coastal District and Waveney District.

4.3 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:

- a. Recreation pressure,
- b. Air quality and traffic emissions,
- c. Biodiversity net gain,
- d. Urbanisation,
- e. Water quality, resources and treatment, and
- f. Flood risk and coastal erosion.

4.4 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.

## 5. Assessment of likely effects of the Draft East Suffolk Community Infrastructure Levy Charging Schedule on European protected sites

5.1 The Draft East Suffolk Community Infrastructure Levy Charging Schedule will not allocate any land or sites for new dwellings or other types of development that could give rise to likely significant effects on protected European Sites.

5.2 The CIL Charging Schedule is a financial tool to raise funding from development to support infrastructure delivery.

5.3 The CIL charge will not be used to fund the mitigation of recreational impacts arising from new residential development, this is being secured separately through the Council's Recreational disturbance Avoidance and Mitigation

Strategy (RAMS) and this approach will continue after the adoption of any new CIL charging Schedule.

## 6. Summary and conclusions

- 6.1 Community Infrastructure Levy (CIL) is a levy which local authorities across the country can choose to charge on new developments within their area. Funds collected through the CIL can be used to support the delivery of infrastructure which the local authority, local communities and stakeholders consider necessary to support the future growth of an area. The CIL Charging Schedule sets out the amount of CIL liable for different development types, varied by zone (for residential uses).
- 6.2 The Charging Schedule is a financial tool to raise funding from development to support infrastructure delivery; it does not allocate any land or sites for new dwellings or other types of development.
- 6.3 On that basis, it is considered, that the East Suffolk Community Infrastructure Levy Charging Schedule will not lead to likely significant effects on protected European sites.
- 6.4 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

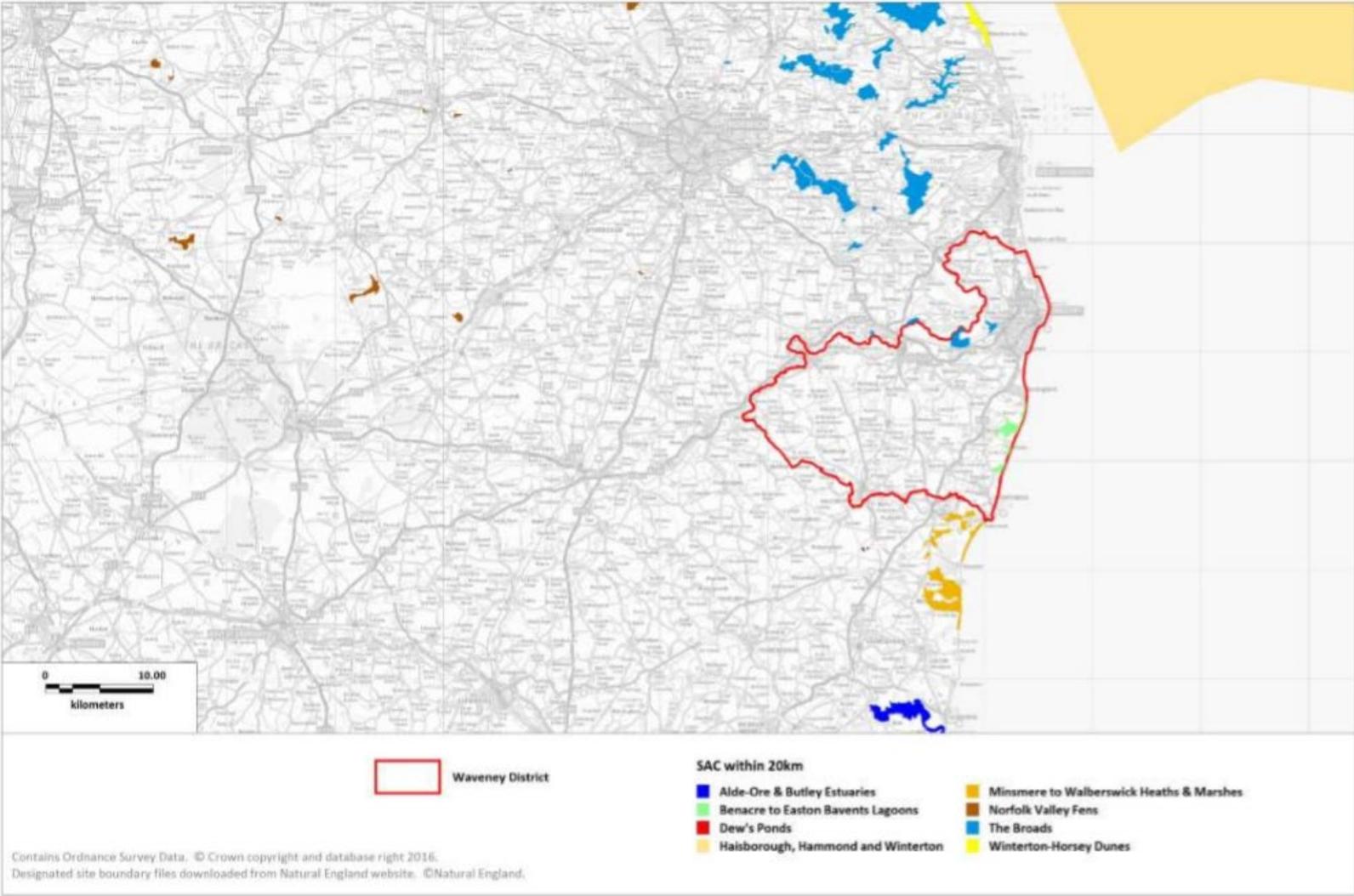
## Appendix 1: Sources of background information

- East Suffolk Council – Suffolk Coastal Local Plan (September 2020)
- East Suffolk Council – Waveney Local Plan (March 2019)
- Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan stage (incorporating Main Modifications) (May 2020)
- The Habitats Regulations Assessment of the Waveney Local Plan (December 2018)

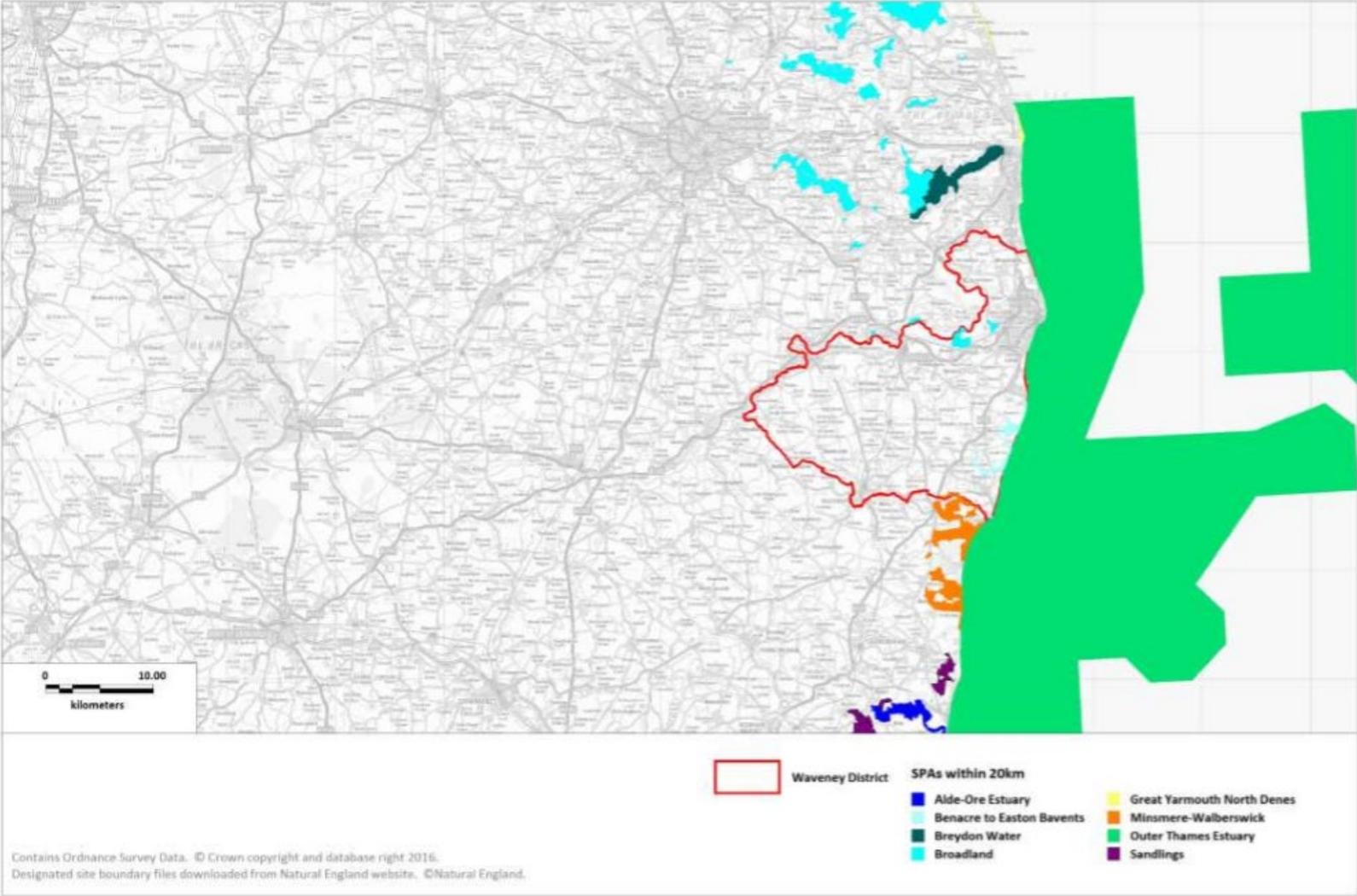
## Appendix 2: Locations of European protected sites

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

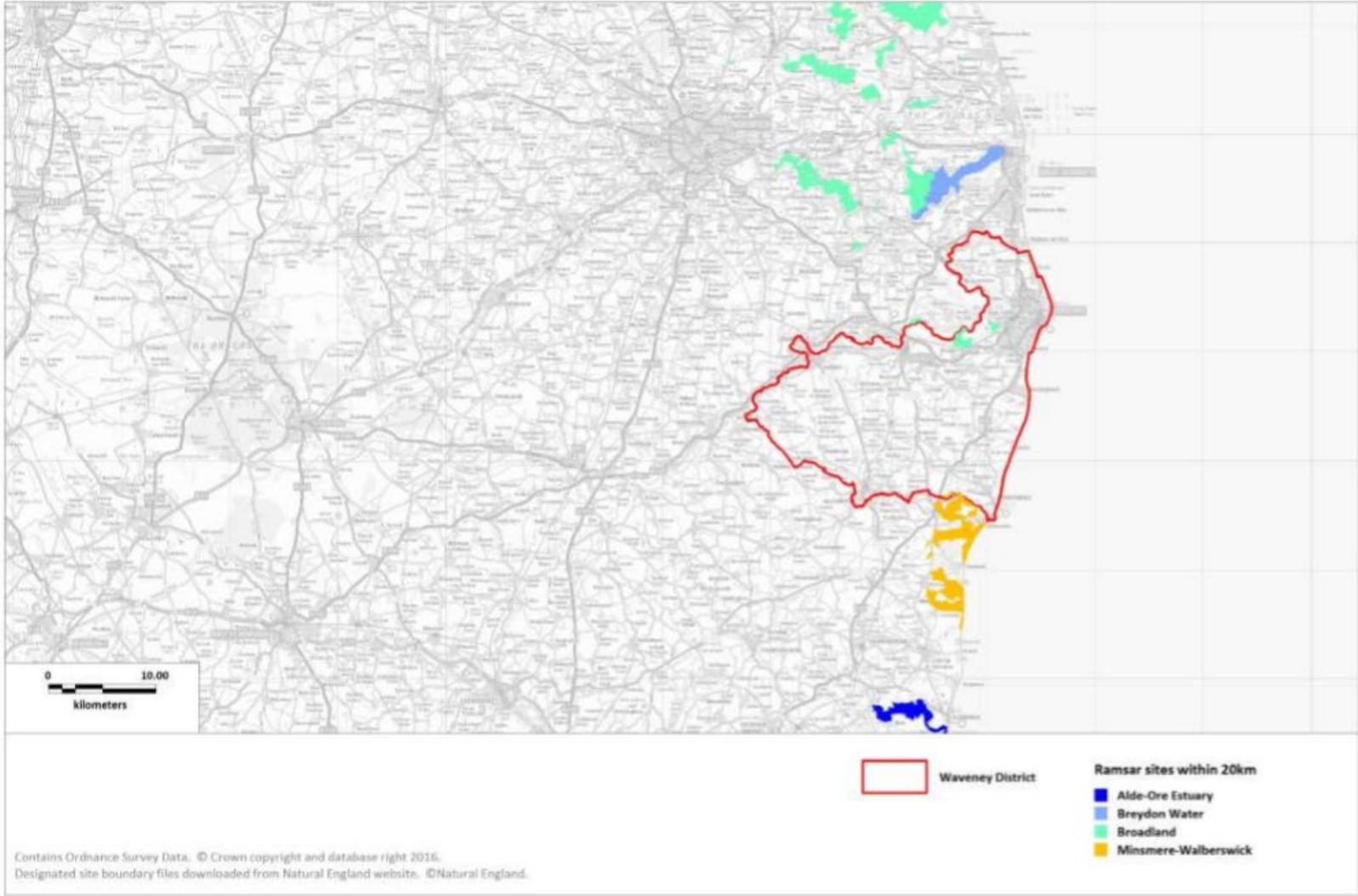
Map 1: SACs



Map 2: SPAs

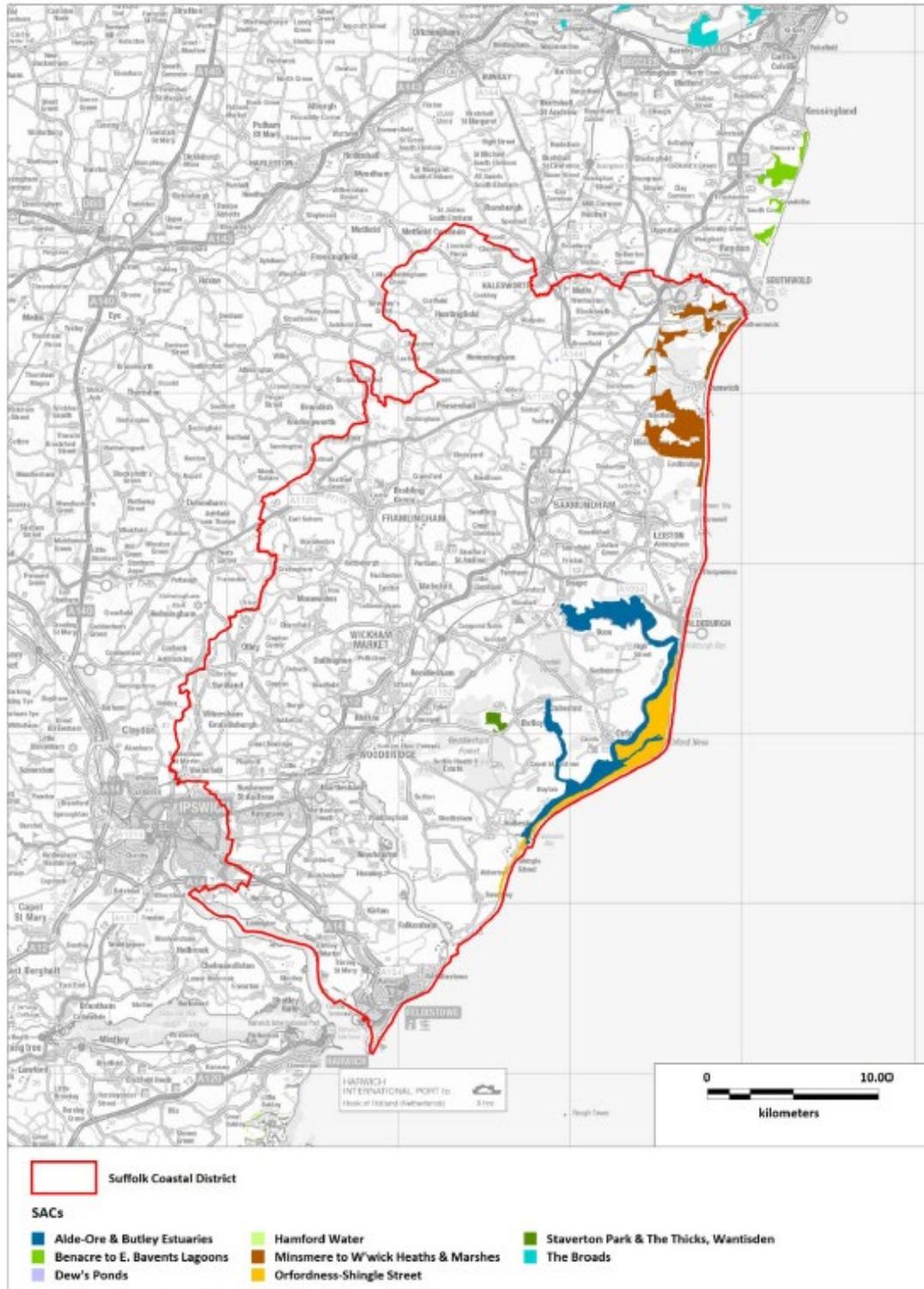


Map 3: Ramsar Sites



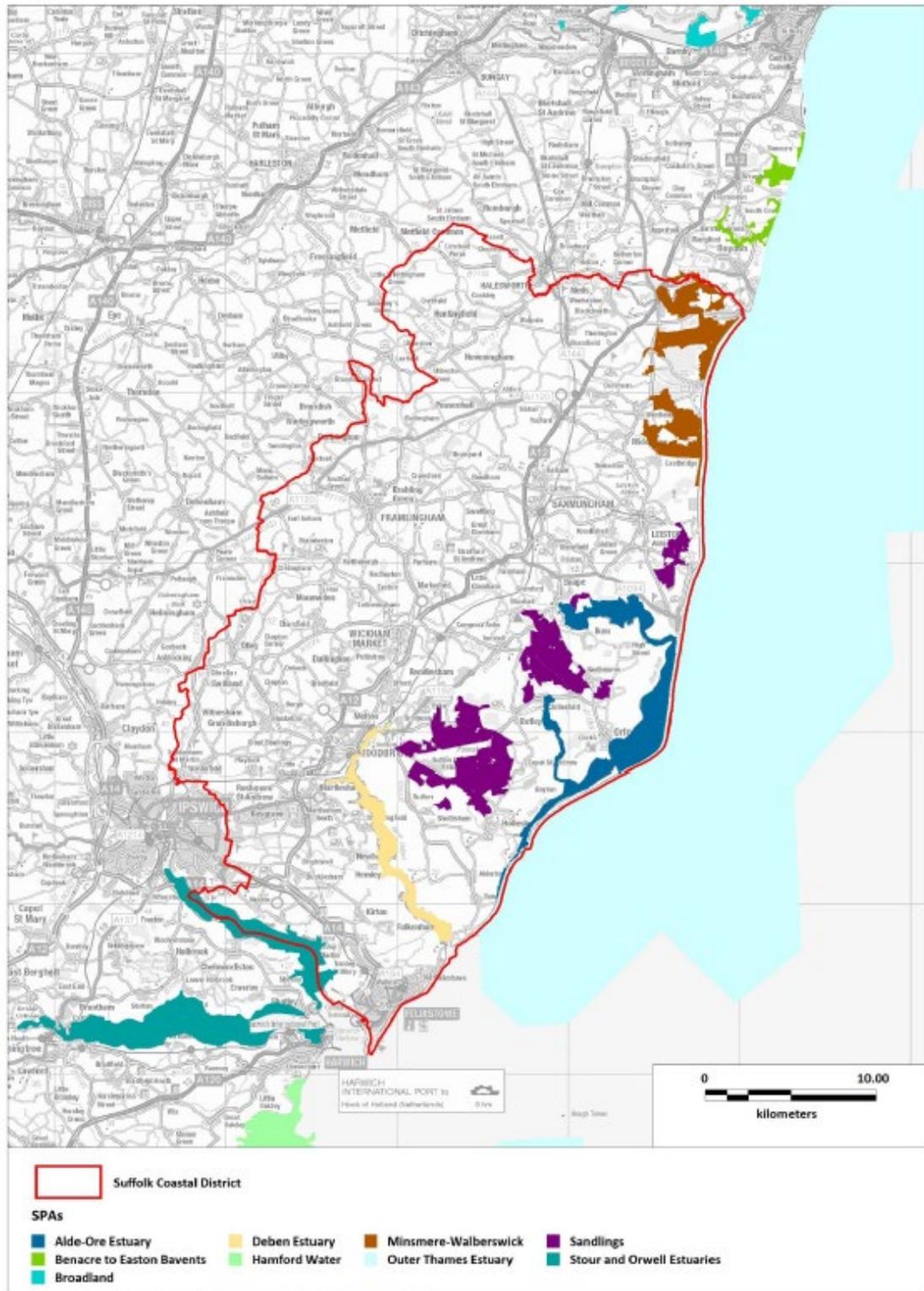
## European protected sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

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



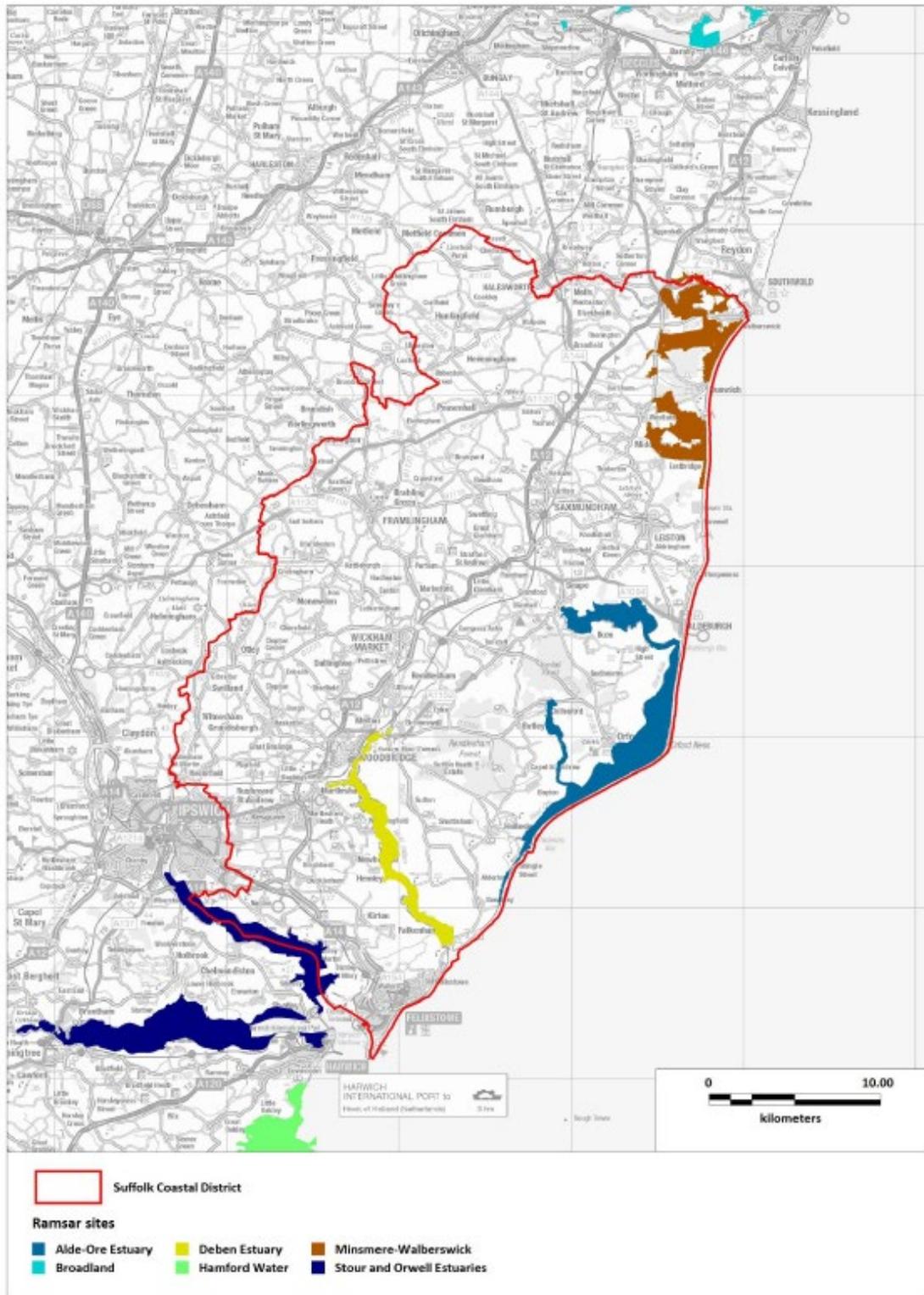
Contains Ordnance Survey Data. © Crown copyright and database right 2017.  
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**Map 2: SPA sites where boundary within 20km of Suffolk Coastal District**



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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))
<b>Special Areas of Conservation</b>			
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 Bavents Lagoons	H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i> : Little tern A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).

		<p>maintaining or restoring;</p> <p>The extent and distribution of qualifying natural habitats,</p> <p>The structure and function (including typical species) of qualifying natural habitats, and,</p> <p>The supporting processes on which qualifying natural habitats rely.</p>	
Dew's Ponds	S1166 Triturus cristatus: Great crested newt	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of qualifying species,</p> <p>The structure and function of the habitats of qualifying species,</p> <p>The supporting processes on which the habitats of qualifying species rely,</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</p>	None identified
Minsmere to Walberswick	H4030 European dry heaths	<p>Ensure that the integrity of the site is maintained or</p>	Coastal squeeze, public access/disturbance, changes in species

<p>Heaths and Marshes</p>	<p>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 A195(B) <i>Sterna albifrons</i>: Little tern A394(NB) <i>Anser albifrons albifrons</i>: Greater white-fronted goose</p>	<p>restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.</p>	<p>distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)</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</p>	<p>Not identified in Suffolk Coastal Final Draft Local Plan HRA.</p>

		<p>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>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>:</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the</p>	<p>Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management,</p>

	<p>Desmoulin`s whorl snail H7230 Alkaline fens H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) H91E0# Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) H7140 Transition mires and quaking bogs H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid S4056 Anisus vorticulus: Little ramshorn whirlpool snail</p>	<p>Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.</p>	<p>inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party</p>
<b>Special Protection Areas</b>			
<p>Alde-Ore Estuary (also Ramsar site)</p>	<p>A081: Eurasian marsh harrier (breeding) A132: Pied avocet (non-breeding) A132: Pied avocet (breeding) A151: Ruff (non-breeding) A162: Common redshank (non-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>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>A183: Lesser black-backed gull (breeding) A191: Sandwich tern (breeding) A195: Little tern (breeding)</p>	<p>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>(Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)</p>
<p>Benacre to Easton Bavents</p>	<p>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</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,</p>	<p>Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).</p>

		The distribution of the qualifying features within the site.	
Broadlands (also Ramsar site)	<p>H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the Caricion <i>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</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, The distribution of qualifying species within the site.</p>	<p>Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party</p>

<p>Deben Estuary (also Ramsar site)</p>	<p>A046a: Dark bellied brent goose (non-breeding) A132: Pied avocet (non-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; 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>Coastal squeeze, disturbance to birds, water and air pollution.</p>
<p>Outer Thames Estuary</p>	<p>A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: 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: The extent and distribution of the habitats of the qualifying features; The structure and function of the</p>	<p>Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.</p>

		habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.	
Minsmere to Walberswick (also Ramsar site)	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) <i>Anas crecca</i> : Eurasian teal A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier A082(NB) <i>Circus cyaneus</i> : Hen harrier A224(B) <i>Caprimulgus europaeus</i> : European nightjar A056(B) <i>Anas clypeata</i> : Northern shoveler A056(NB) <i>Anas clypeata</i> : Northern shoveler A051(B) <i>Anas strepera</i> : Gadwall A051(NB) <i>Anas strepera</i> : Gadwall A132(B) <i>Recurvirostra avosetta</i> : Pied avocet	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)

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

		<p>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>Stour and Orwell Estuaries (also Ramsar site)</p>	<p>A046a: Dark bellied brent goose (non-breeding) A054: Northern pintail (non-breeding) A132: Pied avocet (non-breeding) A141: Grey plover (non-breeding) A143: Red knot (non-breeding) A149: Dunlin (non-breeding) A156: Black-tailed godwit (non-breeding) A162: Common redshank (non-breeding) Waterbird assemblage</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</p>	<p>Coastal squeeze, disturbance to birds, air pollution and new development.</p>

		The distribution of the qualifying features within the site.	
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## Appendix 4: Natural England Consultation Response

To be added following consultation with Natural England.