



# **Habitats Regulations Assessment Screening Statement**

**Draft Housing in Clusters and Small  
Scale Residential Development in  
the Countryside  
Supplementary Planning Document**

June 2022

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# 1. Introduction

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

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

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

'Where a land use plan:

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

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

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

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

Union<sup>1</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 Housing in Clusters and Small Scale Residential Development in the Countryside Supplementary Planning Document (SPD) is being produced by East Suffolk Council. The SPD will apply to the whole of the East Suffolk Council area, outside of the Broads. This report considers whether there are likely to be significant effects on protected Habitat sites and where a full Appropriate Assessment may be required.
- 1.6 East Suffolk (outside of the Broads) is covered by two Local Plans, the East Suffolk Council - Suffolk Coastal Local Plan adopted September 2020 and the Waveney Local Plan adopted March 2019.
- 1.7 Both Local Plans were subject to Habitats Regulations Assessment as part of their production. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plans, resulting in conclusions that the plans will not lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts. Both Appropriate Assessments identified recreational disturbance particularly from dog walkers as a significant effect. The Council has subsequently produced a Recreational

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

Avoidance and Mitigation Strategy and requires payment towards mitigation from residential developments within 13km of the protected Habitat sites.

## 2. Protected sites covered by this report

- 2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of 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 Habitat 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. Draft Housing in Clusters and Small Scale Residential Development in the Countryside SPD

- 3.1 This HRA report reviews the scope of the draft Housing in Clusters and Small Scale Residential Development in the Countryside Supplementary Planning Document.
- 3.2 The draft Housing in Clusters and Small Scale Residential Development in the Countryside Supplementary Planning Document will provide focused guidance to support the implementation of Policy SCLP5.4 Housing Clusters in the Countryside (Suffolk Coastal Local Plan) and Policy WLP8.7 Small Scale Residential Development in the Countryside (Waveney Local Plan). The SPD, when adopted, will be a material consideration in determination of applications for planning permission. The SPD will not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority.
- 3.3 The assessment has been carried out at an early stage, prior to full drafting, but based the proposed content of the SPD. The first section of the SPD will set out the policy context and purpose of the SPD. This section will be descriptive and therefore has not been included in the screening table in Section 5 of this report. The remaining sections of the draft SPD will provide guidance on specific criteria in each of the policies, including :
- Guidance to help determine what is a 'Cluster'/Countryside settlement;
  - Guidance to help determine what is a 'Gap';
  - Guidance on the relationship of the policies with Settlement Boundaries, which identify land (settlements) that is not in the Countryside;
  - Guidance on the definition of 'highway';
  - Guidance on the role/presence of existing non-residential uses in a Cluster;
  - Guidance on what is expected from engagement or consultation where required as part of the policies;
  - Guidance on considering potential impact on local character and landscape, and on design considerations;
  - Guidance on how the policies relate to other Local Plan policies including policies for housing in the countryside, other housing policies such as

housing mix, design and landscape policies and Policy SCLP11.9 Strategy for Newbourne in the Suffolk Coastal Local Plan; and

- Guidance on Permitted Development rights.

These elements have all been considered in the screening table in section 5.



## 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.
- 4.3 The draft Housing in Clusters and Small Scale Residential Development in the Countryside Supplementary Planning Document will add detail to policies within both the Suffolk Coastal Local Plan and the Waveney Local Plan, specifically policy SCLP5.4: Housing Clusters in the Countryside of the Suffolk Coastal Local Plan and policy WLP8.7: Small Scale Residential Development in the Countryside of the Waveney Local Plan.
- 4.4 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.
- 4.5 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 Habitat sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts.

## 5. Assessment of likely significant effects of the draft Housing in Clusters and Small Scale Residential Development in the Countryside SPD on Habitat Sites

- 5.1 Table 3 below considers each relevant likely element of the draft Housing in Clusters and Small Scale Residential Development in the Countryside SPD in relation to whether there is potential for a likely significant effect on protected Habitat sites. This assessment has been carried out at an early stage, prior to full drafting, but based the proposed content of the SPD. 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 elements are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment. The Habitats Regulation Assessments of policies SCLP5.4 and WLP8.7 both concluded no likely significant effects. Both Local Plan Appropriate Assessments did, however, consider the general housing growth promoted by the Plans and identified recreational disturbance as a likely significant effect. To mitigate this effect the Council has subsequently produced a Recreational Avoidance and Mitigation Strategy and requires payment towards mitigation from residential developments within 13km of the protected Habitat sites.

**Table 3: Likely significant effects of the Draft Housing in Clusters and Small Scale Residential Development in the Countryside SPD**

<b>Topic</b>	<b>Assessment of potential impact on Habitat sites</b>	<b>Habitat sites that could possibly be affected</b>	<b>Likely significant effect identified</b>	<b>AA needed?</b>
Guidance to help determine what is a 'Cluster' / Countryside settlement	<p>This section will provide detailed guidance to aid the determination of planning applications by clarifying the definitions of 'cluster' and 'countryside settlement'. This focused guidance is qualitative and will not in itself promote development.</p> <p>The guidance in this section builds on policies SCLP5.4 and WLP8.7 of the Local Plans. The Habitats Regulation Assessments of both these policies concluded no likely significant effects. Overall housing growth was considered through the Appropriate Assessment of the Local Plan and the necessary mitigation incorporated into the Plan.</p> <p>This guidance in this section will not lead to likely significant effects on Habitat Sites.</p>	None	None	No
Guidance to help determine what is a 'Gap'	This section will provide detailed guidance to aid the determination of planning applications by clarifying the definition of	None	None	No

<b>Topic</b>	<b>Assessment of potential impact on Habitat sites</b>	<b>Habitat sites that could possibly be affected</b>	<b>Likely significant effect identified</b>	<b>AA needed?</b>
	<p>‘gap’ in context of criteria b) of SCLP5.4 and the first bullet point of WLP8.7. This focused guidance is qualitative and will not in itself promote development.</p> <p>The guidance in this section builds on policies SCLP5.4 and WLP8.7 of the Local Plans. The Habitats Regulation Assessments of both these policies concluded no likely significant effects. Overall housing growth was considered through the Appropriate Assessment of the Local Plan and the necessary mitigation incorporated into the Plan.</p> <p>This guidance in this section will not lead to likely significant effects on Habitat Sites.</p>			
Guidance on the relationship of the policies with Settlement Boundaries	This section will provide detailed guidance to aid the determination of planning applications by providing further explanation of relationship between policies SCLP5.4 and WLP8.7 and other policies in the Local Plans which define settlement boundaries. This focused	None	None	No

<b>Topic</b>	<b>Assessment of potential impact on Habitat sites</b>	<b>Habitat sites that could possibly be affected</b>	<b>Likely significant effect identified</b>	<b>AA needed?</b>
which identify land (settlements) that is not in the Countryside	<p>guidance is qualitative and will not in itself promote development.</p> <p>The guidance in this section builds on policies SCLP5.4 and WLP8.7 of the Local Plans. The Habitats Regulation Assessments of both these policies concluded no likely significant effects. Overall housing growth was considered through the Appropriate Assessment of the Local Plan and the necessary mitigation incorporated into the Plan.</p> <p>This guidance in this section will not lead to likely significant effects on Habitat Sites.</p>			
Guidance on the definition of 'highway'	This section will provide detailed guidance to aid the determination of planning applications by clarifying the definition of 'highway' in context of the penultimate bullet point of SCLP5.4. This focused guidance is qualitative and will not in itself promote development.	None	None	No

<b>Topic</b>	<b>Assessment of potential impact on Habitat sites</b>	<b>Habitat sites that could possibly be affected</b>	<b>Likely significant effect identified</b>	<b>AA needed?</b>
	<p>The guidance in this section builds on policies SCLP5.4 and WLP8.7 of the Local Plans. The Habitats Regulation Assessments of both these policies concluded no likely significant effects. Overall housing growth was considered through the Appropriate Assessment of the Local Plan and the necessary mitigation incorporated into the Plan.</p> <p>This guidance in this section will not lead to likely significant effects on Habitat Sites.</p>			
Guidance on the role/ presence of existing non-residential uses in a Cluster	<p>This section will provide detailed guidance to aid the determination of planning applications by clarifying consideration of non residential uses in defining a cluster. This focused guidance is qualitative and will not in itself promote development.</p> <p>The guidance in this section builds on policies SCLP5.4 and WLP8.7 of the Local Plans. The Habitats Regulation Assessments of both these policies concluded no likely</p>	None	None	No

<b>Topic</b>	<b>Assessment of potential impact on Habitat sites</b>	<b>Habitat sites that could possibly be affected</b>	<b>Likely significant effect identified</b>	<b>AA needed?</b>
	significant effects. Overall housing growth was considered through the Appropriate Assessment of the Local Plan and the necessary mitigation incorporated into the Plan. This guidance in this section will not lead to likely significant effects on Habitat Sites.			
Guidance on what is expected from engagement or consultation where required as part of the policies	This section will set out the Council's expectations in relation to engagement and consultation as required by both policies. This focused guidance is qualitative and will not in itself promote development.  The guidance in this section builds on policies SCLP5.4 and WLP8.7 of the Local Plans. The Habitats Regulation Assessments of both these policies concluded no likely significant effects. Overall housing growth was considered through the Appropriate Assessment of the Local Plan and the necessary mitigation incorporated into the Plan.	None	None	No

<b>Topic</b>	<b>Assessment of potential impact on Habitat sites</b>	<b>Habitat sites that could possibly be affected</b>	<b>Likely significant effect identified</b>	<b>AA needed?</b>
	This guidance in this section will not lead to likely significant effects on Habitat Sites.			
Guidance on considering potential impact on local character and landscape, and on design considerations;	<p>This section will provide detailed guidance clarifying how character and landscape impacts will be considered in the determination of planning applications in where policies SCLP5.4 and WLP8.7 are a factor. This focused guidance is qualitative and will not in itself promote development.</p> <p>The guidance in this section builds on policies SCLP5.4 and WLP8.7 of the Local Plans. The Habitats Regulation Assessments of both these policies concluded no likely significant effects. Overall housing growth was considered through the Appropriate Assessment of the Local Plan and the necessary mitigation incorporated into the Plan.</p> <p>This guidance in this section will not lead to likely significant effects on Habitat Sites.</p>	None	None	No



<b>Topic</b>	<b>Assessment of potential impact on Habitat sites</b>	<b>Habitat sites that could possibly be affected</b>	<b>Likely significant effect identified</b>	<b>AA needed?</b>
Guidance on how the policies relate to other Local Plan policies including policies for housing in the countryside, other housing policies such as housing mix, design and landscape policies and Policy SCLP11.9 Strategy for Newbourne in the Suffolk Coastal Local Plan	<p>This section will provide detailed guidance to aid the determination of planning applications by setting out the relationship between policies SCLP5.4 and WLP8.4 and other relevant policies in the Local Plans. This focused guidance is qualitative and will not in itself promote development.</p> <p>The guidance in this section builds on policies SCLP5.4 and WLP8.7 of the Local Plans. The Habitats Regulation Assessments of both these policies concluded no likely significant effects. Overall housing growth was considered through the Appropriate Assessment of the Local Plan and the necessary mitigation incorporated into the Plan.</p> <p>This guidance in this section will not lead to likely significant effects on Habitat Sites.</p>	None	None	No
Guidance on Permitted Development rights	This section will provide detailed guidance to aid the determination of planning applications by explaining current permitted development rights in the context of SCLP5.4 and WLP87. This focused	None	None	No

Topic	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>guidance is qualitative and will not in itself promote development.</p> <p>The guidance in this section builds on policies SCLP5.4 and WLP8.7 of the Local Plans. The Habitats Regulation Assessments of both these policies concluded no likely significant effects. Overall housing growth was considered through the Appropriate Assessment of the Local Plan and the necessary mitigation incorporated into the Plan.</p> <p>This guidance in this section will not lead to likely significant effects on Habitat Sites.</p>			

## 6. Summary and conclusions

- 6.1 The Housing in Clusters and Small Scale Residential Development in the Countryside SPD will provide additional technical guidance to inform the determination of planning applications alongside the Waveney and Suffolk Coastal Local Plans. The SPD will provide focused guidance to support the implementation of Policy SCLP5.4 Housing Clusters in the Countryside (Suffolk Coastal Local Plan) and Policy WLP8.7 Small Scale Residential Development in the Countryside (Waveney Local Plan). The guidance contained in the draft SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for East Suffolk. The SPD, when adopted, will be a material consideration in the determining of applications for planning permission.
- 6.2 Implementation of the Housing in Clusters and Small Scale Residential Development in the Countryside SPD will not lead to likely significant effects on protected Habitat sites.
- 6.3 Natural England were consulted on a draft of this Screening Statement as statutory nature conservation body. Their response is contained in Appendix 4.

Signed:



Dated: 14/06/2022

Andrea McMillan

Planning Manager (Policy, Delivery and Specialist Services)

East Suffolk Council

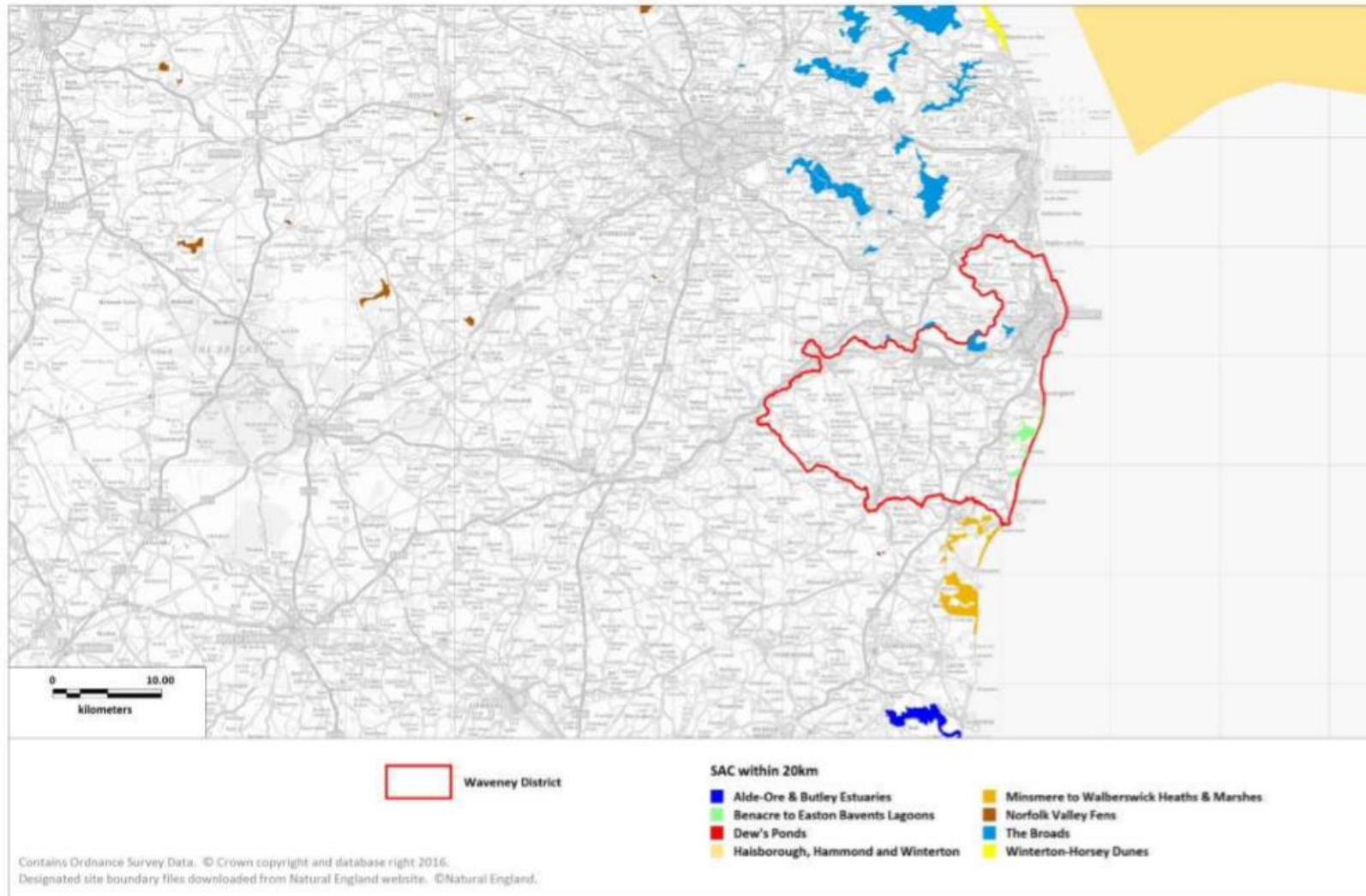
## Appendix 1: Sources of background information

- 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)
- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019)

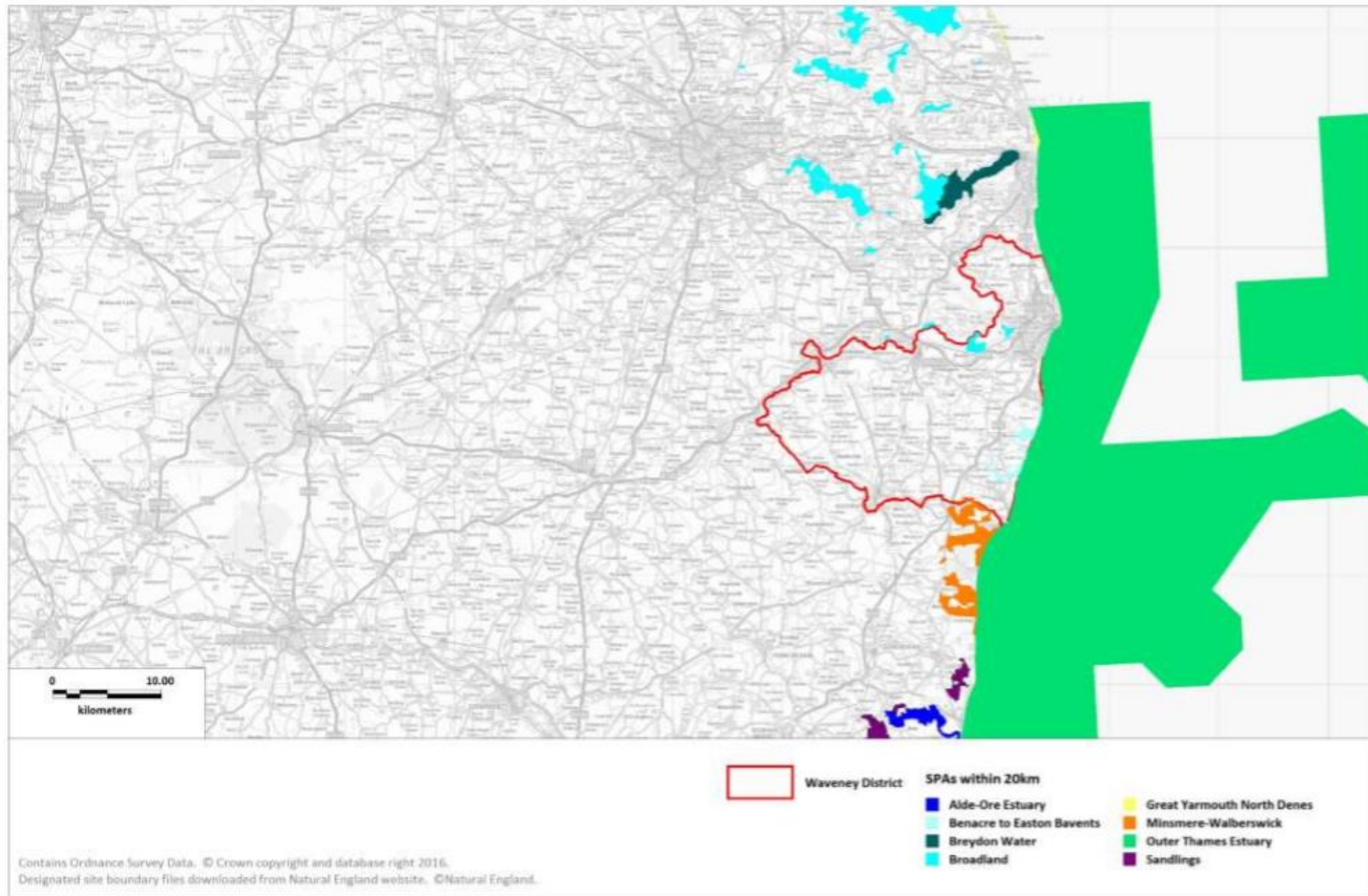
## Appendix 2: Locations of Habitat sites

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

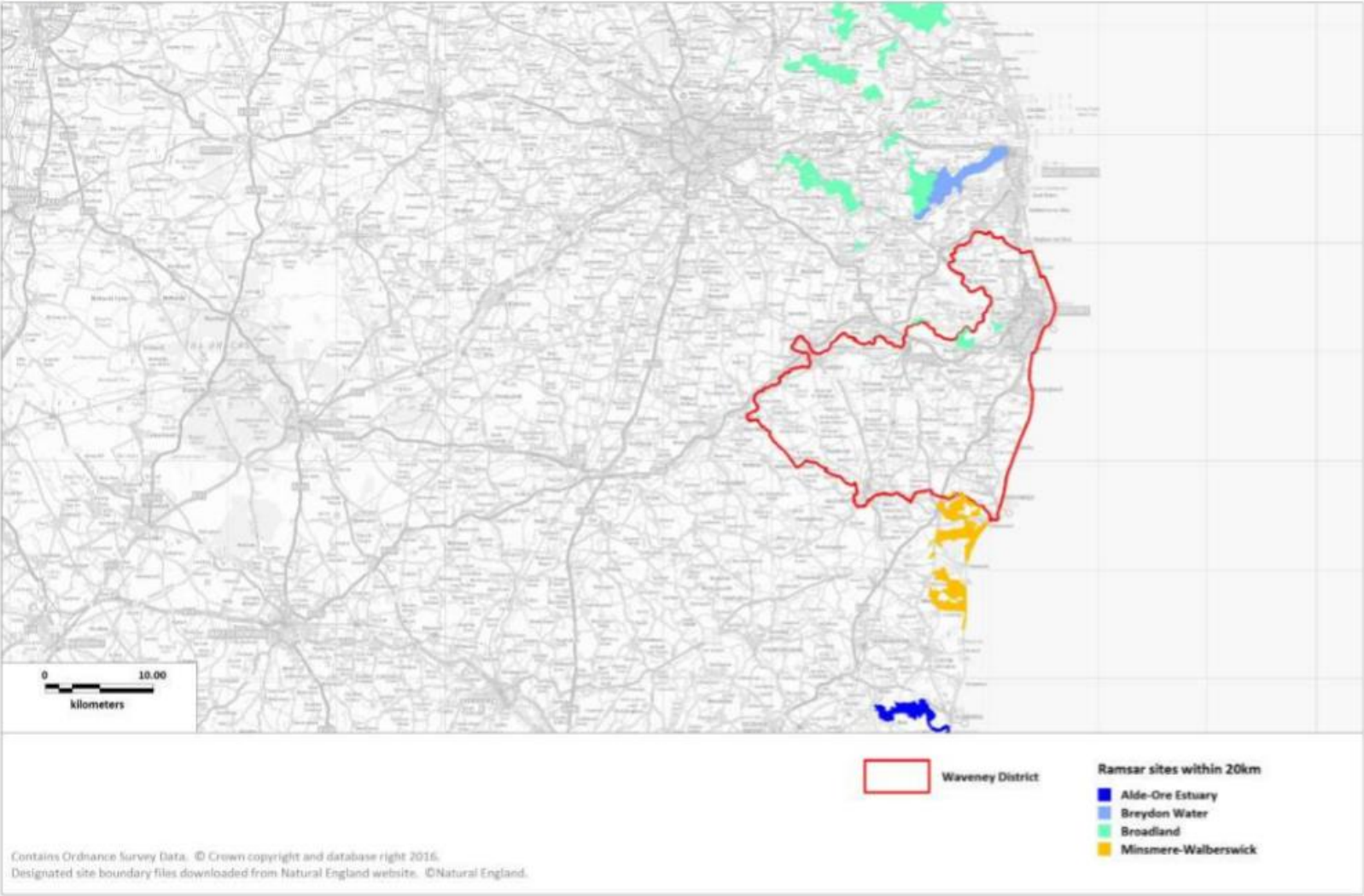
**Map 1: SACs**



**Map 2: SPAs**



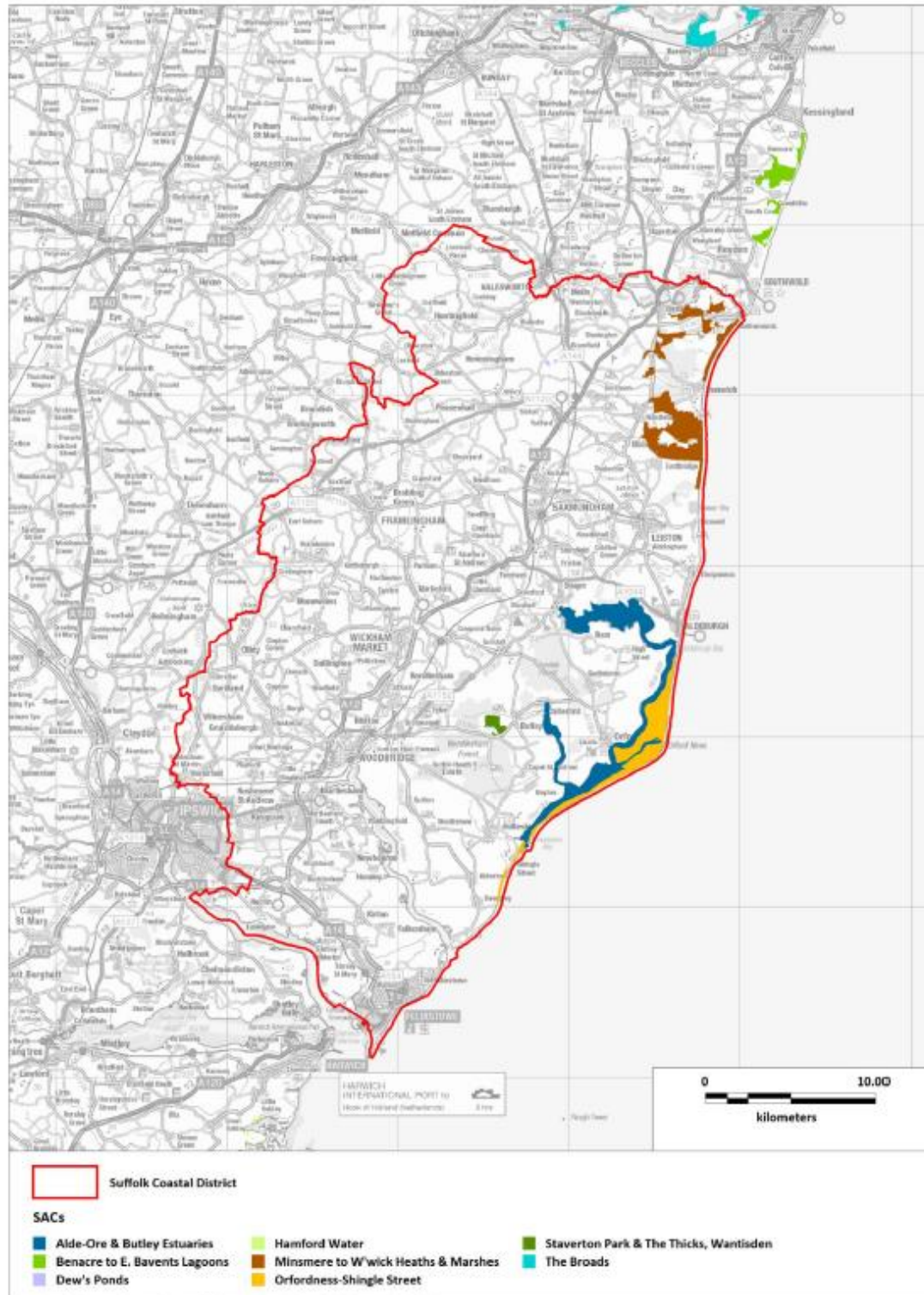
Map 3: Ramsar Sites



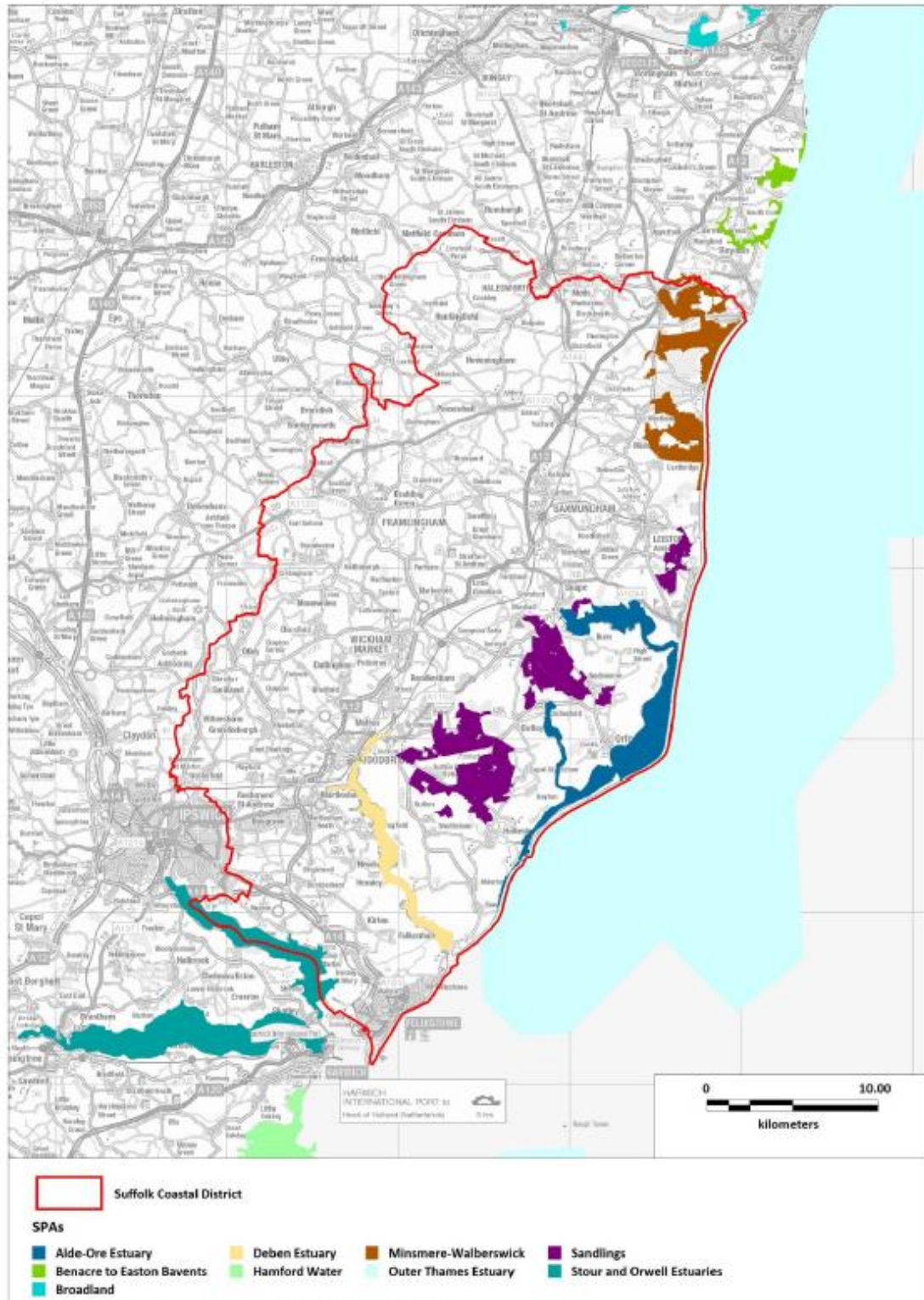


## Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

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

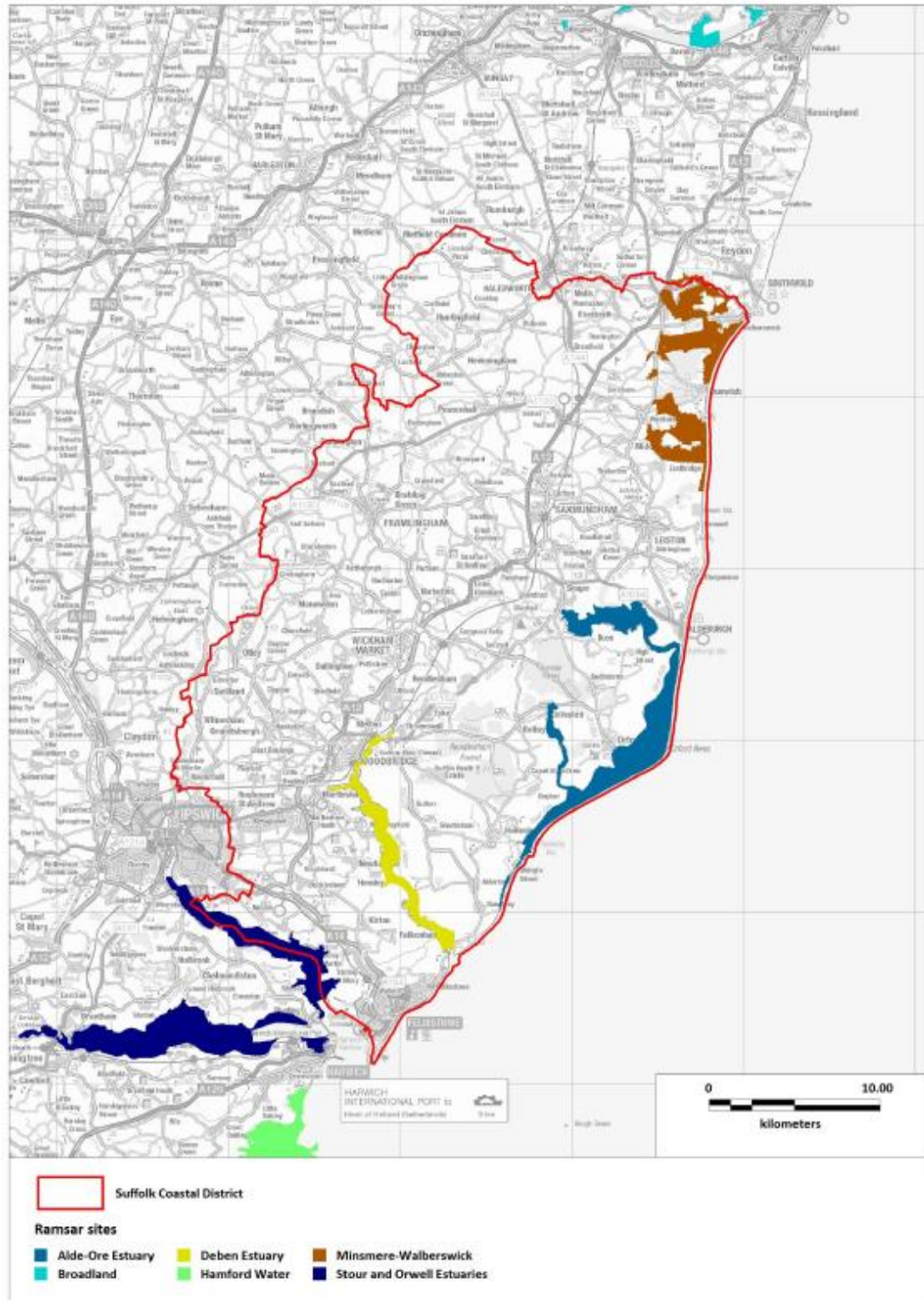


**Map 2: SPA sites where boundary within 20km of Suffolk Coastal District**





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



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## Appendix 3: Relevant Habitat sites

Name	Qualifying features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan Stage (December 2018))
<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 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 Heath 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) <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>A132(B) <i>Recurvirostra avosetta</i>: Pied avocet</p> <p>A195(B) <i>Sterna albifrons</i>: Little tern</p> <p>A394(NB) <i>Anser albifrons</i>: Greater white-fronted goose</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>	
Orfordness – Shingle Street	<p>H1150: Coastal Lagoons</p> <p>H1210: Annual vegetation of drift lines</p> <p>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:</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>	Not identified in Suffolk Coastal Final Draft Local Plan HRA.

Staverton Park and The Thicks, Wantisden	H9190: Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains; Dry oak-dominated woodland.	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.	Woodland management, disease, atmospheric pollution.
The Broads	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	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,	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



	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	The populations of qualifying species, and, The distribution of qualifying species within the site.	
<b>Special Protection Areas</b>			
Alde-Ore Estuary (also Ramsar site)	A081: Eurasian marsh harrier (breeding) A132: Pied avocet (non-breeding) A132: Pied avocet (breeding) A151: Ruff (non-breeding) A162: Common redshank (non-breeding) A183: Lesser black-backed gull (breeding) A191: Sandwich tern (breeding) A195: 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; 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.	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 Bvents	H1150# Coastal lagoons, A195(B) Sterna albifrons: Little tern	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to	Public access/disturbance, water pollution, physical modification, changes

	A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.	in species distributions, fisheries (marine and estuarine).
Broadlands (also 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	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,	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

	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>	
Minsmere to Walberswick (also Ramsar site)	<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>

	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		
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: The extent and distribution of the habitats of the qualifying features;	Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.

		<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

Date: 31 May 2022  
Our ref: 390546  
Your ref: SPD.

Ben Wright  
East Suffolk Council  
[Ben.Wright@eastsuffolk.gov.uk](mailto:Ben.Wright@eastsuffolk.gov.uk)

**BY EMAIL ONLY**



Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Ben Wright

### **Housing in Clusters and Small-Scale Residential Development in the Countryside Supplementary Planning Document (SPD) – SEA and HRA**

Thank you for your consultation on the above dated 28 April 2022, which was received by Natural England on 28 April 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

**Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.**

Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.

### **Strategic Environmental Assessment/Habitats Regulations Assessment**

A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance [here](#). While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

Please send all planning consultations electronically to the consultation hub at [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Jacqui Salt  
Consultations Team