

# Suffolk Coastal Local Plan Review Habitats Regulations Assessment Position Statement November 2018

## Note for Scrutiny Committee

*Rachel Hoskin, Director, Footprint Ecology*

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### 1. Purpose of this note

- 1.1 This note provides a summary of the progression of the Habitats Regulations Assessment (HRA) report being prepared alongside the Suffolk Coastal Local Plan Review. The report is being written by Footprint Ecology, commissioned by the District Council, to enable the Council to fulfil its legislative and policy duties in relation to the protection of European wildlife sites.
- 1.2 This note follows the provision of a similar note for Cabinet during the preparation of the HRA at First Draft Local Plan stage. The first iteration of the HRA was then published alongside the First Draft Local Plan for consultation in July 2018. This note now provides a summary of progression of the HRA at Final Draft Local Plan stage for Scrutiny Committee.
- 1.3 A 'Habitats Regulations Assessment,' normally abbreviated to HRA, is the step by step process of ensuring that a plan or project being undertaken by, or permitted by a public body, will not adversely affect the ecological integrity of any European wildlife site. Where it is deemed that adverse effects cannot be ruled out, a plan or project must not proceed, unless exception tests are met. This is because European legislation, which is transposed into domestic legislation and policy, affords European sites the highest levels of protection in the hierarchy of sites designated to protect important features of the natural environment.

- 1.4 The relevant European legislation is the Habitats Directive 1992<sup>1</sup> and the Wild Birds Directive 2009<sup>2</sup>, which are transposed into domestic legislation through the Conservation of Habitats and Species Regulations 2017. These Regulations are normally referred to as the 'Habitats Regulations.'
- 1.5 Within and in close proximity to the Suffolk Coastal District are a broad range of European wildlife sites, many of which are located on the coast. Additionally, there are designated heathlands, woodlands and wetlands with habitats and species of international importance. European wildlife sites include Special Protection Areas (SPAs) classified for birds, Special Areas of Conservation (SACs) designated for habitats and non-avian species, and Ramsar sites, which are wetlands of international importance identified through the Ramsar Convention, but are treated as European wildlife sites as a matter of Government Policy in the National Planning Policy Framework 2012. The European sites of consideration within the HRA are shown on the maps in Appendix 1.
- 1.6 A plan level HRA considers the implications of a plan or project for European wildlife sites, in terms of any possible harm to the habitats and species that form an interest feature of the European wildlife sites in close proximity to the proposed plan. The assessment is drawing on a range of background evidence, understanding of the European sites, and a mitigation strategy currently being developed for the Suffolk coastal and heathland European wildlife sites in partnership with neighbouring local planning authorities. The HRA Recreation Avoidance Mitigation Strategy (RAMS) is nearing completion and will provide strategic mitigation for recreation pressure arising from increased residential growth within the currently adopted plans.

## 2. HRA current position

- 2.1 Risks to European wildlife sites are initially identified in a stage in the HRA process called the screening for likely significant effects stage. This is an initial stage of assessment to establish whether there is any possibility of the implementation of the plan causing significant effects on any European site. Where the potential for significant effects is identified, or there are uncertainties, a more detailed appropriate assessment is made. For the Regulation 18 consultation, the HRA report included a complete screening for likely significant effects to identify which aspects of the plan could be amended to prevent likely significant effects, and which aspects required further detailed assessment at the appropriate assessment stage.
- 2.2 The screening has now been repeated for the plan at Final Draft Plan stage. The screening table is included at Appendix 2 of this note. It provides a column showing

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

<sup>2</sup> Council Directive 2009/147/EC

the initial screening findings at First Draft Local Plan (Regulation 18) stage and now the re-screen at Final Draft Local Plan (Regulation 19) stage.

- 2.3 The screening exercise undertaken has considered the potential risks from policies and from the site allocations located within very close proximity of a European site (400m), within close proximity of a European site (1km) and also those that fall within the 13km zone of influence currently being used to inform the RAMS.
- 2.4 The HRA report has regard for relevant case law, including a recent European Court of Justice Judgment<sup>3</sup> that highlights the need for appropriate use of avoidance and mitigation measures at the correct stage of HRA. The initial screening recorded for Regulation 18 stage included recommendations for a number of wording amendments to the First Draft Local Plan, which were considered beneficial but are not considered to constitute mitigation. Explanatory text relating to these recommendations was also included in the screening table. Subsequently, these recommendations were incorporated into the consultation version of the First Draft Local Plan. Where this has occurred, it has now enabled a conclusion of no likely significant effects when re-screened at Final Draft Local Plan stage.
- 2.5 The screening assessment, for both the First and Final Drafts, has also identified a number of key themes and a small number of site allocations for more detailed assessment at the appropriate assessment stage. An initial overview of the likely appropriate assessment conclusions and recommendations is provided in the final column of the screening table at Appendix 2 of this note.
- 2.6 The appropriate assessment ensures that the HRA provides a robust assessment of all potential impacts and identifies clear mitigation needs. This is particularly relevant given the recent European Court Judgment, and the precautionary approach does not necessarily mean that these themes and allocations present insupportable risks, but rather that there is a need to give more detailed scrutiny to these particular aspects of the plan, in order to have certainty that the plan will be fully compliant with the legislation. The appropriate assessment considers the following themes in more detail, and an initial overview of likely conclusions and recommendations is provided here:

### *Recreation pressure*

- 2.7 The HRA RAMS requires developer contributions, through Section 106 legal agreement, towards strategic avoidance and mitigation measures that have been planned to manage access at the coastal and heathland European wildlife sites. Measures include dedicated staff to deliver projects, wardens for on site liaison with visitors, a range of visitor education measures and further data gathering in relation to visitor use. The evidence supporting the RAMS indicates that developer contributions would be

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<sup>3</sup> European Court of Justice Case C – 323/17 ‘People Over Wind.’

required for all additional housing development within 13km of the European wildlife sites.

- 2.8 The appropriate assessment is considering recreation pressure from new residential development, and in particular a check of the applicability of the HRA RAMs for the increased housing numbers being promoted through the Final Draft Local Plan. Having been involved in the preparation of the HRA RAMS, we have confidence that there are options to expand the HRA RAMS to accommodate future growth. As a strategic mitigation strategy, it has been designed to adapt and have a rolling programme of measures into the future. Once the dedicated delivery staff are in place there is confidence that there will be good evidence to inform future reviews and increase capacity.
- 2.9 Recreation pressure from tourism is also being considered, but it is noted that the tourism policies do not promote a particular location, type or quantum of tourism growth, rather they are qualitative policies, with the exception of SCLP12.16. This is a Felixstowe seafront focussed development for tourism accommodation that is not in close proximity to any European site. The appropriate assessment is unlikely to raise any concerns other than possible options for protective/precautionary supporting text.

### *Urbanisation impacts*

- 2.10 Where an allocation is in close proximity to a European site, there are two considerations in the appropriate assessment; firstly, whether a contribution to the HRA RAMS is adequate or whether additional recreation access management measures are required, and secondly whether the close proximity might bring other urbanisation impacts such as increased fire risk, lighting, noise etc. These matters can usually be resolved with protective measures such as restricted lighting, layout design and preventing direct access from the development. The appropriate assessment is therefore likely to recommend the need for additional project level HRA checks to alleviate these concerns. The allocations for which this applies are listed below in the screening table at Appendix 2.

### *Air quality from increased road traffic*

- 2.11 The appropriate assessment includes a section on air quality, considering whether the allocations may bring additional road traffic on roads in close proximity to European sites, therefore potentially reducing air quality in these locations. The main roads through the District are the A12 and A14. The A12 only comes in close proximity at the very northern tip of the District, but is not in close proximity to any allocations. The appropriate assessment section of the HRA on air quality will be informed by the transport modelling work undertaken by WSP. This covers the whole of the District in terms of assessment, and also focusses on potential traffic increases at particular junctions. The appropriate assessment section for air quality will not raise immediate

concerns, but may make recommendations for targeted evidence gathering in future, to inform future plan reviews.

### *Water quality and resources*

- 2.12 The appropriate assessment section of the HRA will be informed by the Water Cycle Study. Liaison with the consultants for the study, water utility companies, the Environment Agency and Natural England will provide confidence that there will not be any adverse effects. Natural England has not raised any water quality concerns to date.

### *SANGs provision for Garden Neighbourhoods*

- 2.13 Within the Local Plan there are two large scale housing/mixed use allocations being promoted as Garden Neighbourhoods. The two garden neighbourhoods are proposed at Saxmundham and Felixstowe.
- SCLP12.3 North Felixstowe Garden Neighbourhood. 560 dwellings of the total of 2,000 dwellings already have planning permission. The HRA therefore considers the remaining 1440 dwellings to come forward
  - SCLP12.29 South Saxmundham Garden Neighbourhood. 800 dwellings.
- 2.14 The appropriate assessment is advising that that these large-scale housing sites have the potential to result in recreation pressure from new residential development that requires avoidance and mitigation measures over and above that accommodated by adherence to the HRA RAMs. In other words, in addition to a contribution towards HRA RAMs, the developments will need to put in place further bespoke measures.
- 2.15 Specifically designed natural greenspace, referred to as Suitable Alternative Natural Greenspaces (SANGs) are included within the HRA RAMS as a measure where there is a concentration of residential development at one location, with the additional risk to European sites being that the most local access points on the nearby European sites will receive a large influx of additional visitors as new residents seek local recreation space, particularly for daily walking/dog walking. They are provided directly by developers and not funded through the strategy.
- 2.16 The design of the SANGs in terms of their layout, size and facilities should be an early consideration for development sites, ideally at the strategic/master planning stage. Good practice in SANGs design is now widely recognised and include the following:
- Creating a rural and wilderness feel, in order to provide a similar experience to recreation being undertaken on European sites
  - Avoiding visual and audible detractors such as busy roads, urbanised landscapes, industrial and manmade features
  - Providing an experience that avoids a 'busy' feel. SANGs design elsewhere has quantified this with a measurement of no more than one person per hour per ha, but other means of quantifying a tranquil feel may also be appropriate

- Seeking to provide a minimum of 8ha per 1000 residents, but ensuring that the proposed size is justified in light of local circumstances (a greater size may be required in some instances). Resident numbers are usually calculated on the basis of 2.4 residents per dwelling, unless local information suggests otherwise (2.4 residents per dwelling is based on the 2011 census as a national average).
- Ensuring that the SANG enables at least one circular walk of no less than 2.5km but ensure that the walking route provision is based on local evidence (there may be a reason why the average walk is greater in some circumstances).

2.17 The appropriate assessment is looking at the available evidence in relation to access to European sites that are in the vicinity of the Garden Neighbourhood allocations, to gain an overview of the key considerations for SANGs design specifically at these locations. For Felixstowe, a summary of the considerations are:

- Close proximity of European sites indicates that the SANG needs to be locationally convenient and easy to access
- Design needs to be dog walker focussed
- Provision of long walking routes within the SANG and incorporating the wider footpath network to create long walks that do not include or draw people close to the estuaries
- Walking routes need to feel like a long and exhilarating walk as an alternative to the estuaries.

2.18 For Saxmundham, a summary of the considerations are:

- Close driving distance of a range of attractive European site access points indicate that the SANG needs to be of high quality and designed to deter visitors from honey pot locations
- The site needs to be large in order to provide a desirable alternative to getting in the car to visit the European sites
- Provision of walking routes within the SANG needs to be carefully designed to accommodate circular walks that provide a varied and high quality experience in terms of visual and other sensory factors as an alternative to the European sites.

2.19 These considerations are being explained in more detail within the appropriate assessment.

### *Allocations in close proximity to European sites*

2.20 As noted above, a small number of allocations are in close proximity to European sites, and the appropriate assessment is likely to suggest additional safeguards and potential mitigation measures to be assessed and secured at the project level. Map 4 in Appendix 1 of this note shows the proximity of allocations to the European sites. These allocations are:

- SCLP12.27 - Land to rear of Rose Hill, Saxmundham Road, Aldeburgh (housing). 300m from the River Alde.
- SCLP12.32 Former Council Offices, Melton Hill (mixed use). Abuts the Deben Estuary.
- SCLP12.69 Land West of B1125, Westleton (housing). 400m from Minsmere-Walberswick.
- SCLP12.70 Land at Cherry Tree, Darsham Road, Westleton (housing). 400m from Minsmere-Walberswick.
- SCLP12.51 Land to the South of Eyke CoE Primary School and East of The Street, Eyke (mixed use). Just over 400m from the Sandlings.

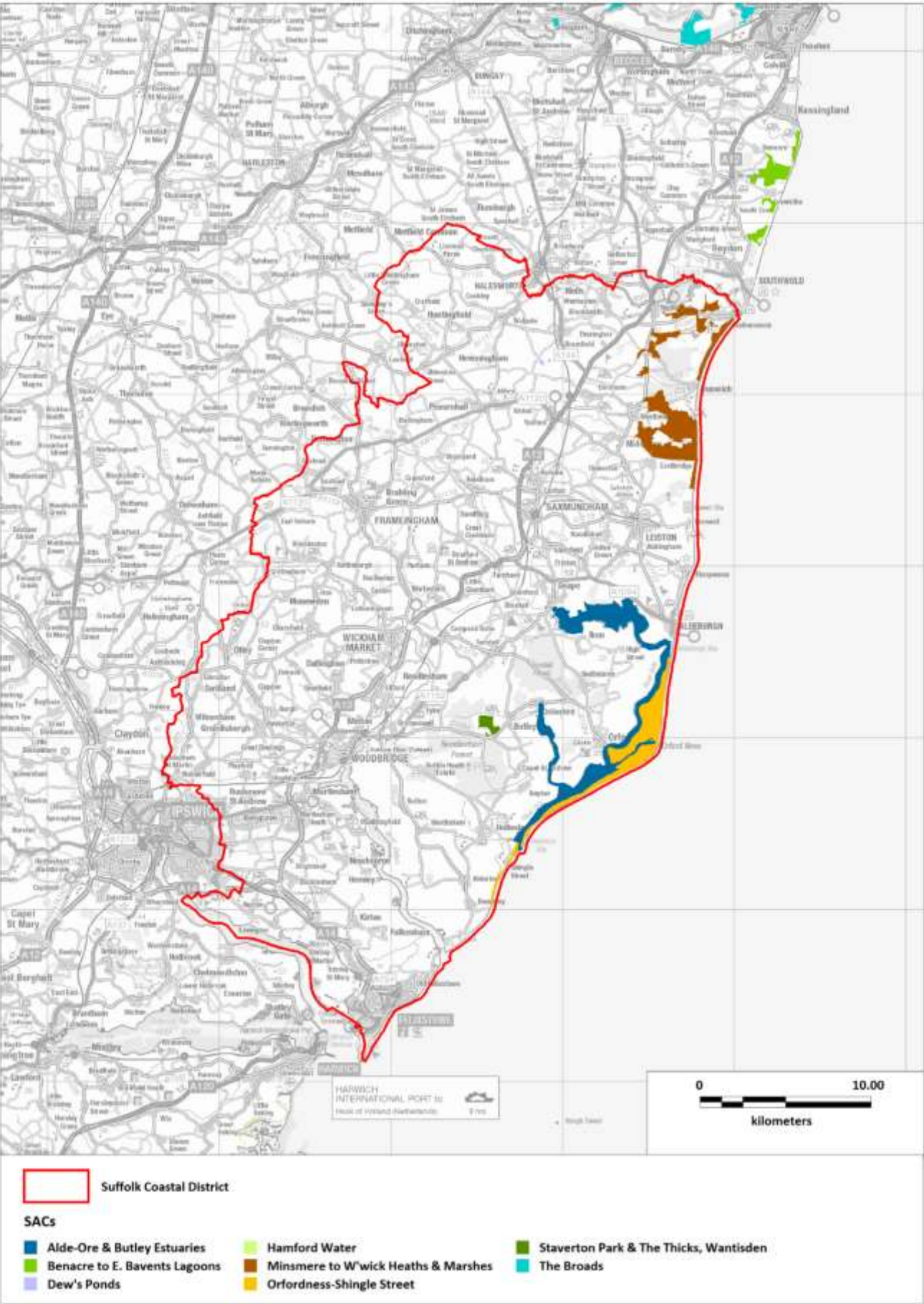
## 3. Conclusions

- 3.1 This note is a position statement produced for Scrutiny Committee, in relation to the production of the Final Draft Local Plan. This note provides a summary of the work being undertaken and an initial view, based on evidence being used and the screening conclusions. It is advised that the report will not raise any insurmountable concerns. It is likely to recommend only minor further changes to policy and supporting text, that are likely to be focussed on supporting text, with any minor changes to policy content being for clarity. Particular direction will be given for the master planning of the garden neighbourhood allocations to ensure that the SANGs provision is of high quality and there is confidence in its function as a mitigation measure.



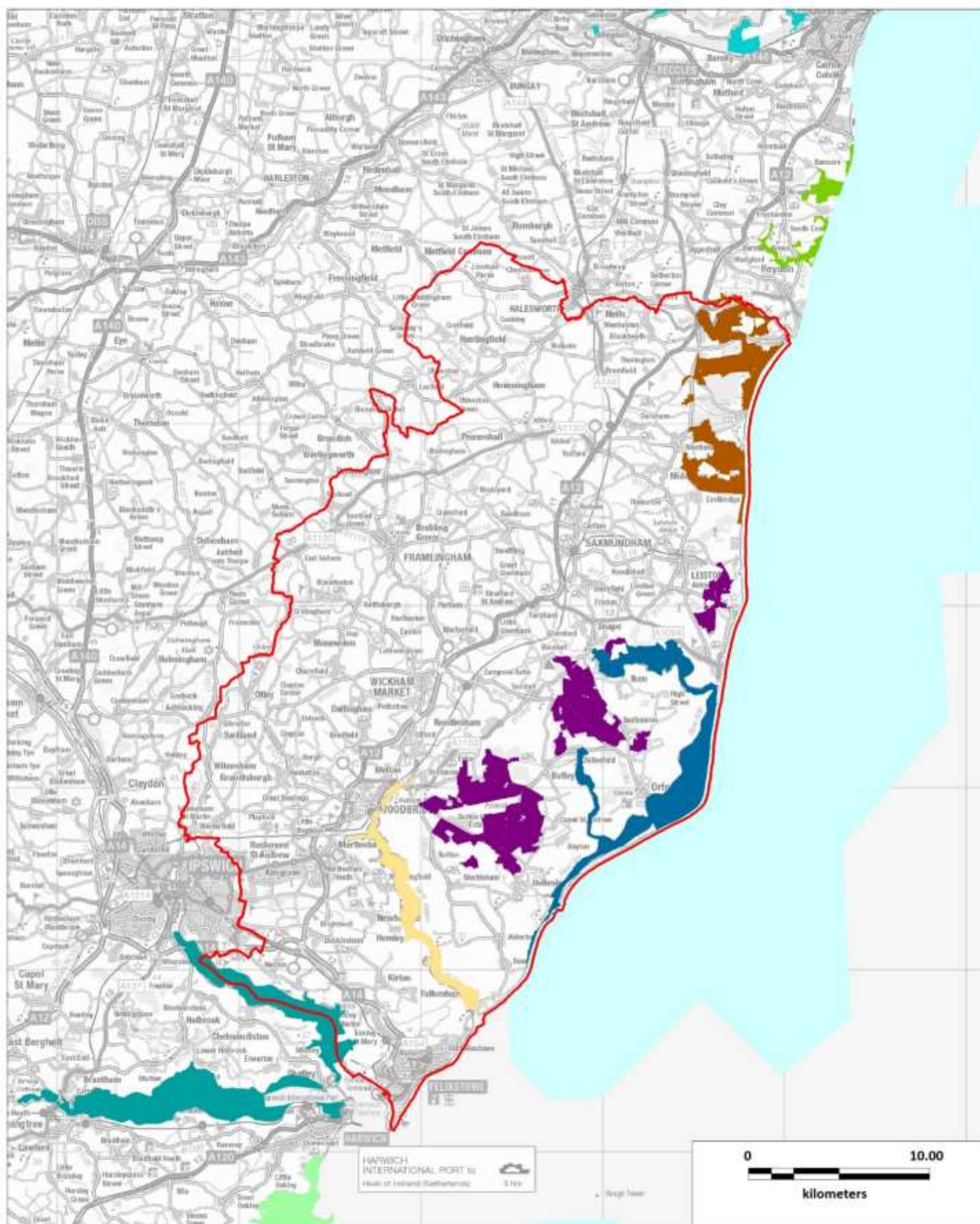
Appendix 1 – European sites of relevance to the HRA

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





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



**Suffolk Coastal District**

**SPAs**

■ Alde-Ore Estuary

■ Deben Estuary

■ Minsmere-Walberswick

■ Sandlings

■ Benacre to Easton Bavents

■ Hamford Water

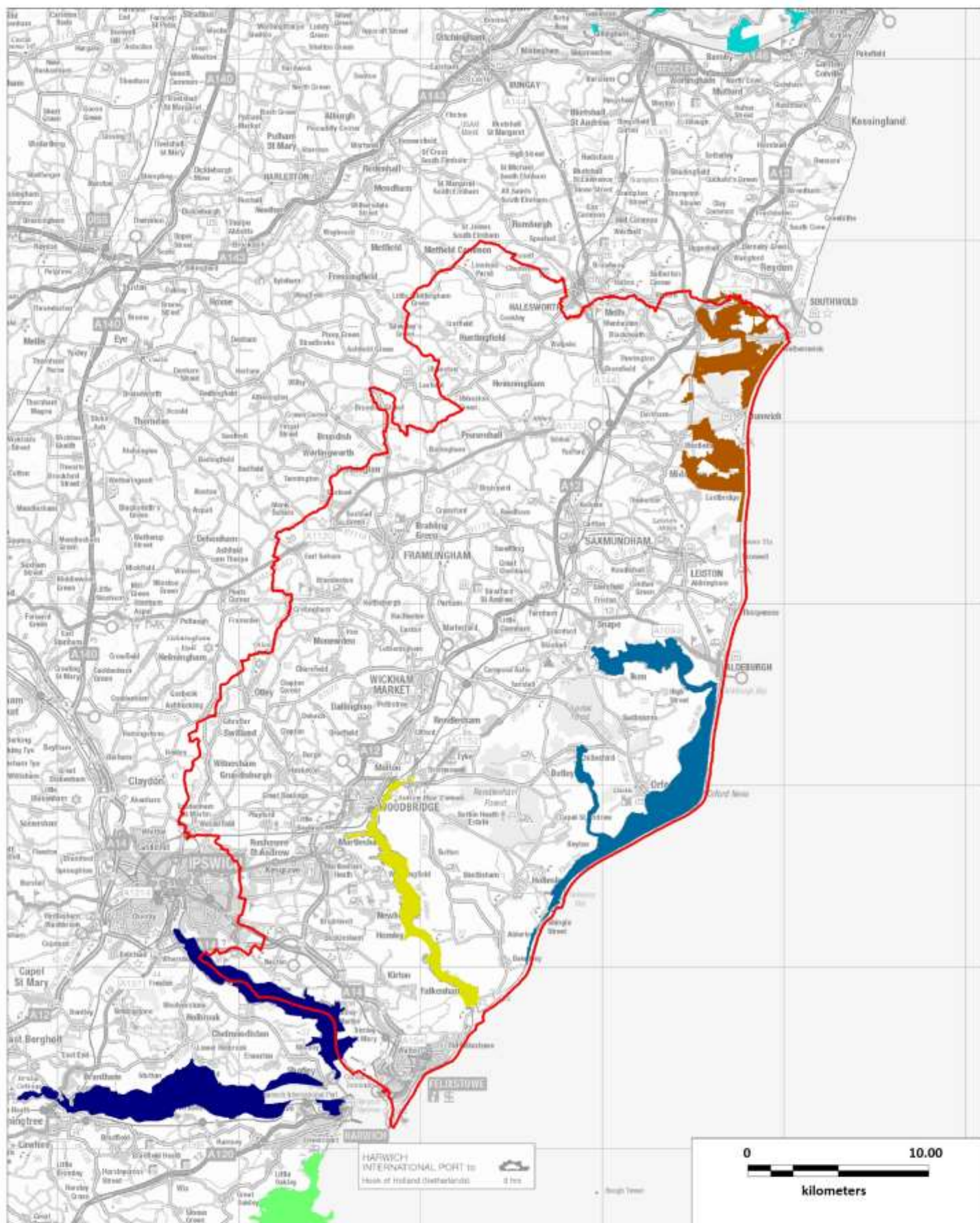
■ Outer Thames Estuary

■ Stour and Orwell Estuaries

■ Broadland

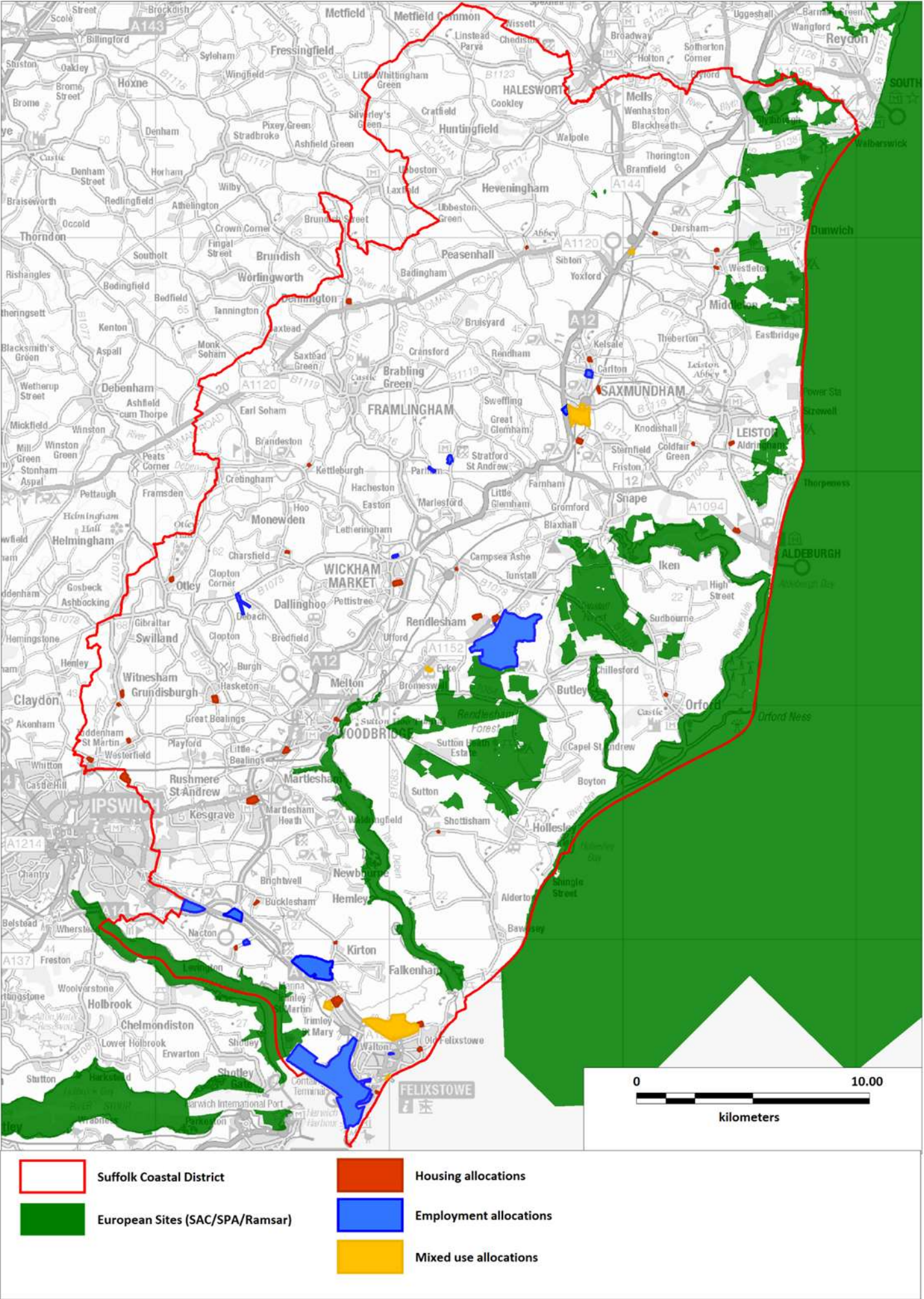


**Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District**





Map 4: Relevant sites within the Local Plan



Appendix 2 –Screening for likely significant effects – at Draft Local Plan (Regulation 18) and re-screened at Final Draft Local Plan (Regulation 19). Final column indicates scope of AA and expectations for AA conclusions.

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
Introduction	No LSE Context setting includes importance of European sites	N/A	N/A	N/A	N/A
SCLP2.1 Growth in the Ipswich strategic planning area	LSE Key policy setting out the proposed growth for Suffolk Coastal District.	Quantum and location of development could pose risks in terms of air and water pollution, water resources, recreation and urbanisation impacts	Location of growth the needs to be checked. Housing growth needs to be compared with current RAMS housing numbers	As per previous recommendations, consideration at <u>appropriate assessment</u> of overall quantum of growth and ability of RAMS to mitigate	The AA will review the quantum of growth provided for within the RAMS, and options to accommodate further growth. It is anticipated that the AA will conclude that the RAMs can continue to adapt into the long term for new growth.
SCLP2.2 Strategic infrastructure priorities	Clarification required to remove LSE Policy commits to collaborative working on large schemes that will need project level HRA	Depending on location of development, could pose risks in terms of air and water pollution, water resources, recreation and urbanisation impacts	Clarification to remove LSE - Add within supporting text a reference to joint working by public bodies for HRA purposes. Supporting text now added to SCLP2.3 “Strategic projects may require joint working by public bodies to ensure the requirements of the Habitats Directive are met.” LPA action – Change made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
SCLP2.3 Cross-boundary mitigation of effects on protected habitats	LSE until HRA finalised A protective policy specifically for European sites, but may need revisiting.	Robustness of mitigation to protect new growth needs checking	This policy may be revisited after appropriate assessment to check it is fit for purpose in view of assessment findings	As per previous recommendations, consideration at <u>appropriate assessment</u> to ensure the policy	The only reason for flagging this policy for AA is that there may be wording tweaks, but currently the policy provides adequate

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
				meets the mitigation requirements	coverage of mitigation needs
Vision	No LSE Includes importance of European sites	N/A	N/A	N/A	N/A
Strategic priorities and objectives	No LSE Provided for information to cross reference objectives with policies. Natural Environment adequately included.	N/A	N/A	N/A	N/A
SCLP3.1 Presumption in favour of sustainable development	Clarification required to remove LSE.	Misinterpretation of legislative requirements	Clarification to remove LSE - Add to the end of supporting text relating to designated sites to highlight that the presumption in favour does not apply where there is a likely significant effect on a European site. Recommendation is not mitigation. LPA action – Changes made.	Policy removed from the plan, supporting text remains, but previously included text removed to reflect new NPPF and PINs advice for not repeating key aspects of national policy. <u>No LSE</u>	N/A
SCLP3.1 Strategy for growth in Suffolk Coastal District	LSE – employment and housing growth needs to be checked for potential risks	Air and water pollution, water resources, recreation and urbanisation impacts	(First Draft Local Plan policy ref SCLP3.2) Appropriate assessment - Level and location of growth needs to be checked. Housing growth needs to be compared with current RAMS housing numbers	As per previous recommendations, consideration at <u>appropriate assessment</u> of overall quantum of growth and ability of RAMS to mitigate (noting revised figures relating to residual need)	The AA will review the quantum of growth provided for within the RAMS, and options to accommodate further growth. It is anticipated that the AA will conclude that the RAMs can continue to adapt into the long term for new growth.
SCLP3.2 Settlement hierarchy	LSE – location of housing growth needs to be checked for potential risks	Air and water pollution, water resources, recreation and urbanisation impacts	(First Draft Local Plan policy ref SCLP3.3) Appropriate assessment - Level and location of growth needs	As per previous recommendations, consideration at	The AA will review the geographical spread of growth within the plan.

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
			to be checked. Housing growth needs to be compared with current RAMS housing numbers	<u>appropriate assessment</u> of locations for growth	It is anticipated that the AA will conclude that the RAMs can continue to provide flexibility in targeting measures towards areas of new growth.
SCLP3.3 Settlement boundaries	No LSE. Defines settlements and does not promote development itself. Development outside settlements governed by policy.	N/A	(First Draft Local Plan policy ref SCLP3.4)  N/A	N/A	N/A
SCLP3.4 Proposals for major energy infrastructure projects	Clarification required to remove LSE.	Misinterpretation of legislative requirements	(First Draft Local Plan policy ref SCLP3.5) Clarification to remove LSE - Add HRA to the 3 <sup>rd</sup> bullet point in addition to EIA. Also suggest adding to supporting text to note the need to work with other competent authorities to prepare project wide HRAs when a project requires multiple permissions. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
SCLP3.5 Infrastructure provision	Clarification required to remove LSE.	Misinterpretation of project level HRA requirements	(First Draft Local Plan policy ref SCLP3.6) Clarification to remove LSE – Add to supporting text to identify that the necessary infrastructure requirements for a project will need to form part of the HRA for a project, and	Following amendments at Regulation 18, <u>no LSE</u>	N/A



Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
			<p>that the applicant should therefore submit the necessary information to demonstrate that infrastructure provision will not pose a risk to European sites.</p> <p>Recommendation is not mitigation.</p> <p>Note that infrastructure funded by CIL will be approved separately, with its own HRA as required.</p> <p>LPA action – Changes made.</p>		
SCLP4.1 Employment areas	LSE – employment growth needs to be checked for potential risks	Air and water pollution, water resources and urbanisation impacts	Appropriate assessment - Level and location of grow the needs to be checked	As per previous recommendations, consideration at <u>appropriate assessment</u>	<p>The AA will review the extent and distribution of employment growth within the plan.</p> <p>It is anticipated that the AA will conclude that any employment allocations in close proximity to European sites will be able to provide project level measures to prevent urbanisation, air and water impacts.</p>
SCLP4.2 New employment areas	LSE – employment growth needs to be checked for potential risks	Air and water pollution, water resources and urbanisation impacts	Appropriate assessment - Level and location of grow the needs to be checked	As per previous recommendations, consideration at <u>appropriate assessment</u> , but noting that new text is added to ensure designated sites are not adversely affected	As above.

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
SCLP4.3 Expansion and intensification of employment sites	No LSE. Qualitative, does not promote development and environmental impacts caveated.	N/A	N/A	N/A	N/A
SCLP4.4 Protection of employment sites	No LSE. Qualitative, does not promote development and environmental impacts caveated.	N/A	N/A	N/A	N/A
SCLP4.5 Economic development in rural areas	Clarification required to remove LSE.	Misinterpretation of project level HRA requirements	Clarification to remove LSE – Add ‘natural environment’ to 3 <sup>rd</sup> bullet point. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
SCLP4.6 Conversion and replacement of rural buildings for employment use	No LSE. Qualitative, does not promote development and environmental impacts caveated.	N/A	N/A	N/A	N/A
SCLP4.7 Farm diversification	No LSE. Qualitative, does not promote development. No impact pathways unless in close proximity to European sites.	Project level HRA may be required in some instances.	N/A	N/A	N/A
SCLP4.8 Retail hierarchy	No LSE. Qualitative, does not promote development. No impact pathways.	N/A	N/A	Policy removed and subsumed into town centre policy. <u>No LSE</u>	N/A
SCLP4.8 New retail and commercial leisure development	No LSE. Retail development in centres does not lead to any impact pathways.	N/A	(First Draft Local Plan policy ref SCLP4.9) N/A	N/A	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
SCLP4.9 Development in town centres	No LSE. Retail development in centres does not lead to any impact pathways.	N/A	(First Draft Local Plan policy ref SCLP4.10) N/A	N/A	N/A
SCLP4.10 Town centre environments	No LSE. Qualitative. Enhancement in centres does not lead to any impact pathways.	N/A	(First Draft Local Plan policy ref SCLP4.11) Biodiversity enhancement - Suggest adding reference to urban biodiversity, within policy and/or supporting text. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
SCLP4.11 Retail and commercial leisure in Martlesham	No LSE. Retail development in centres does not lead to any impact pathways.	N/A	(First Draft Local Plan policy ref SCLP4.12) N/A	N/A	N/A
SCLP4.12 District and local centres and local shops	No LSE. Retail development in centres does not lead to any impact pathways.	N/A	(First Draft Local Plan policy ref SCLP4.13) N/A	N/A	N/A
SCLP5.1 Housing development in large villages	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP5.2 Housing development in small villages	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP5.3	No LSE for this individual policy as qualitative. Housing development location and scale	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
Housing development in the countryside	will be considered within the appropriate assessment				
SCLP5.4 Housing in clusters in the countryside	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP5.5 Conversion of buildings in the countryside for housing	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	Biodiversity enhancement - Suggest adding 'any impacts on the natural environment are adequately mitigated' to the end of 5th bullet point. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
SCLP5.6 Rural workers dwellings	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP5.7 Infill and garden development	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP5.8 Housing mix	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP5.9 Self build and custom build housing	No LSE for this individual policy as qualitative. Housing development location and scale	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
	will be considered within the appropriate assessment				
SCLP5.10 Affordable housing on residential developments	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment.	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP5.11 Affordable housing on exceptions sites	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP5.12 Houses in multiple occupation	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP5.13 Residential annexes	No LSE. Qualitative. Residential annexes are not counted as a net increase in dwellings for HRA purposes	N/A	N/A	N/A	N/A
SCLP5.14 Extensions to residential curtilages	No LSE. Qualitative. Residential extensions are not counted as a net increase in dwellings for HRA purposes	N/A	N/A	N/A	N/A
SCLP5.15 Residential moorings, jetties and slipways	No LSE. Jetties and slipways will need project level HRA. Qualitative policy and caveat already present in policy. Housing development location and scale will be considered within the appropriate	Air and water pollution, water resources, recreation and urbanisation impacts re residential moorings. Project level HRA may be required in some instances for jetty's and slipways.	N/A	N/A	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
	assessment (which includes residential moorings).				
SCLP5.16 Residential caravans and mobile homes	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment (which includes residential caravans/mobile home pitches).	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP5.17 Gypsies, travellers and travelling showpeople	No LSE for this individual policy as qualitative. Housing development location and scale will be considered within the appropriate assessment (which includes gypsy/traveller/showpeople pitches).	Air and water pollution, water resources, recreation and urbanisation impacts	N/A	N/A	N/A
SCLP6.1 Tourism	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	As per previous recommendations, consideration at <u>appropriate assessment</u>	Tourism will be an AA topic, but tourism related policies don't promote particular tourism growth of any size or location. It is therefore anticipated that the AA will conclude 'no adverse effects.'
SCLP6.2 Tourism destinations	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	As per previous recommendations, consideration at <u>appropriate assessment</u>	Tourism will be an AA topic, but tourism related policies don't promote particular tourism growth of any size or location. It is therefore anticipated that the AA will



Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
					conclude' no adverse effects.'
SCLP6.3 Tourism development within the AONB and heritage coast	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed 4 <sup>th</sup> bullet point needs to be changed to 'avoids or mitigates for adverse impacts.' Incorrect terminology as a minimised adverse impact is still an adverse impact. LPA action – Changes made.	Amendments at Regulation 18 undertaken, noting that tourism will be covered by the <u>appropriate assessment</u>	Tourism will be an AA topic, but tourism related policies don't promote particular tourism growth of any size or location. It is therefore anticipated that the AA will conclude' no adverse effects.'
SCLP6.4 Tourism outside of the AONB	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	As per previous recommendations, consideration at <u>appropriate assessment</u>	Tourism will be an AA topic, but tourism related policies don't promote particular tourism growth of any size or location. It is therefore anticipated that the AA will conclude' no adverse effects.'
SCLP6.5 New tourist accommodation	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – risks from tourism related development to be assessed	As per previous recommendations, consideration at <u>appropriate assessment</u>	Tourism will be an AA topic, but tourism related policies don't promote particular tourism growth of any size or location. It is therefore anticipated that the AA will conclude' no adverse effects.'
SCLP6.6 Existing tourist accommodation	No LSE. Qualitative policy, does not add new development.	N/A	N/A	N/A	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
SCLP7.1 Sustainable transport	LSE. Potential risks to European sites from increased levels of car use.	Air quality implications from increased transport pressure on roads in close proximity to European sites	Appropriate assessment – risks from increased transport to be assessed	As per previous recommendations, consideration at <u>appropriate assessment</u>	Air quality will be an AA topic. Need to consider transport modelling.
SCLP7.2 Parking proposals and standards	No LSE. Qualitative, does not promote developments and includes provision for protecting water quality.	N/A	N/A	N/A	N/A
SCLP8.1 Community facilities and assets	No LSE. Qualitative.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	N/A	N/A
SCLP8.2 Open space	LSE. Policy will need strengthening to support mitigation requirements	Policy needs to include necessary mitigation requirements for recreation pressure	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements that need to be stated in policy. Possible wording additions re SANGs	New wording added in relation to supporting biodiversity and delivering green infrastructure, which provides adequate links re SANGs. <u>No LSE.</u>	N/A
SCLP8.3 Allotments	No LSE. Does not promote a type of development with impact pathways.	N/A	N/A	N/A	N/A
SCLP8.4 Digital infrastructure	No LSE. Qualitative.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	N/A	N/A
SCLP9.1 Low carbon renewable energy	No LSE. Qualitative and includes protective caveats for the natural environment.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	N/A	N/A
SCLP9.2 Sustainable construction	No LSE. Qualitative, environmentally positive policy.	N/A	N/A	N/A	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
SCLP9.3 Coastal change management area	No LSE. Environmentally protective policy, with caveats re the environment.	N/A	N/A	N/A	N/A
SCLP9.4 Coastal change rollback or relocation	No LSE. Qualitative/protective.	Project level HRA may be required in some instances depending on proximity to European sites.	N/A	N/A	N/A
SCLP9.5 Flood risk	No LSE. Environmentally protective policy.	N/A	N/A	N/A	N/A
SCLP9.6 Sustainable drainage systems	No LSE. Environmentally protective policy, with enhancement provision for biodiversity.	N/A	N/A	References made to water quality and biodiversity. <u>No LSE</u>	N/A
SCLP9.7 Holistic water management	No LSE. Environmentally protective policy.	N/A	N/A	N/A	N/A
SCLP10.1 Biodiversity and geodiversity	LSE. Policy will need strengthening to support mitigation requirements	Policy needs to include necessary mitigation requirements for recreation pressure	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements that need to be stated in policy.	Supporting text and policy wording notably strengthened in relation to biodiversity and designated sites, and the RAMS <u>No LSE</u> as adequate links and strong wording provided.	N/A
SCLP10.2 Visitor management of European sites	LSE. Policy will need strengthening to support mitigation requirements	Policy is in accordance with previous HRA recommendations (site allocations), but now needs to include necessary mitigation requirements for recreation pressure	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements that need to be stated in policy.	As per previous recommendations, consideration at <u>appropriate assessment</u> , where recreation pressure is the primary assessment topic.	No issues identified, flagged for AA in case AA findings suggest a need to revise wording further.
SCLP10.3	No LSE	N/A	New policy at Regulation 19 stage	<u>No LSE</u>	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
Environmental quality	A strong environmentally positive policy securing adequate assessment of impacts on the environment,				
SCLP10.4 Landscape character	No LSE. Environmentally protective policy with green infrastructure enhancements.	N/A	(First Draft Local Plan policy ref SCLP10.3) N/A	N/A	N/A
SCLP10.5 Settlement coalescence	No LSE. Qualitative policy, does not add new development.	N/A	(First Draft Local Plan policy ref SCLP10.4)  N/A	N/A	N/A
SCLP11.1 Design quality	No LSE. Qualitative policy, does not add new development, and requires natural features to be retained and enhanced.	N/A	N/A	N/A	N/A
SCLP11.2 Residential amenity	No LSE. Qualitative policy, does not add new development.	N/A	N/A	N/A	N/A
SCLP11.3 Historic environment	No LSE. Protective policy for heritage assets, does not add new development.	N/A	N/A	N/A	N/A
SCLP11.4 Listed buildings	No LSE Protective policy for heritage assets, does not add new development.	N/A	New policy at Regulation 19 stage	<u>No LSE</u>	N/A
SCLP11.5 Conservation areas	No LSE. Protective policy for heritage assets, does not add new development.	N/A	N/A	N/A	N/A
SCLP11.6 Non-designated heritage assets	No LSE. Protective policy for heritage assets, does not add new development.	N/A	(First Draft Local Plan policy ref SCLP11.4)  N/A	N/A	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
SCLP11.7 Archaeology	No LSE. Protective policy for heritage assets, does not add new development.	N/A	(First Draft Local Plan policy ref SCLP11.6)  N/A	N/A	N/A
SCLP11.8 Parks and gardens of historic or landscape interest	No LSE. Environmentally protective policy.	N/A	(First Draft Local Plan policy ref SCLP11.7)  Biodiversity enhancement - Suggest adding reference to the biodiversity interest of parks and gardens within supporting text. LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
SCLP11.9 Areas to be protected from development	No LSE. Environmentally protective policy.	N/A	(First Draft Local Plan policy ref SCLP11.8)  N/A	N/A	N/A
SCLP11.10 Newbourne former land settlement association holdings	No LSE. Qualitative policy, does not add new development.	N/A	(First Draft Local Plan policy ref SCLP11.9) N/A	N/A	N/A
<b>Area polices and site allocations requiring specific comment</b>					
SCLP12.1 Neighbourhood plans	LSE. Neighbourhood plans will need to adhere to the findings and mitigation requirements for growth	Air and water pollution, water resources, recreation and urbanisation impacts	Appropriate assessment – consideration of housing growth and location to have regard for neighbourhood plans.	As per previous recommendations, consideration at <u>appropriate assessment</u> , noting changes to housing figures	The AA will review the quantum of growth provided for within the RAMS, and options to accommodate further growth.

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
					It is anticipated that the AA will conclude that the RAMs can continue to adapt into the long term for new growth.
SCLP12.2 Strategy for Felixstowe	LSE Vision policy so does not promote development but policy does not refer to European sites in close proximity.	Air and water pollution, water resources, recreation and urbanisation impacts. Reference is made in general terms in supporting text to European sites, but policy only refers to landscape.	Clarification to remove LSE – Add ‘protected habitats’ before ‘landscapes’ LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
SCLP12.3 North Felixstowe Garden Neighbourhood	LSE 2,000 dwellings in one location	Potential for concentrated increased recreation pressure to European sites in close proximity due to large allocation	Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements and for this very large allocation there is likely to be a need for on-site SANGs as well as contribution to RAMS.	<u>Appropriate Assessment</u> to assess SANGs requirements and make recommendations for master planning.	The assessment of SANGs requirements for the Garden Neighbourhoods has already been undertaken, as described within this note. The policy supporting text has already been amended to some extent to provide clear requirement for SANGs, incorporating assessment recommendations. Policy wording also strengthened. Further minor tweaks may be required, but policy is considered to provide



Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
					adequate coverage of mitigation needs.
SCLP12.17 Tourism accommodation (Felixstowe)	LSE. Potential risks to European sites from additional tourism related visits	Air and water pollution, water resources, recreation and urbanisation impacts	(First Draft Local Plan policy ref SCLP12.16) Appropriate assessment – risks from tourism related development to be assessed	As per previous recommendations, consideration at <u>appropriate assessment</u>	Tourism will be an AA topic, but tourism related policies don't promote particular tourism growth of any size or location. It is therefore anticipated that the AA will conclude 'no adverse effects.'
SCLP12.18 Strategy for Communities surrounding Ipswich	No LSE Vision policy so does not promote development	N/A	(First Draft Local Plan policy ref SCLP12.17)  N/A	N/A	N/A
SCLP12.19 Brightwell Lakes	No LSE Detailed discussions with the planning officer, NE and developer/consultants have provided for adequate mitigation	Recreation pressure risks have been fully mitigated for with a combination of a proportionate financial contribution to the RAMS and the provision of a SANG as part of the development. Project level HRA already undertaken.	(First Draft Local Plan policy ref SCLP12.18)  N/A	N/A	N/A
SCLP12.23 Ipswich garden suburb country park	No LSE Detailed discussions with the planning officer, NE and developer/consultants have provided for adequate mitigation	Recreation pressure risks have been fully mitigated for. This policy provides for the SANG to mitigate for development. Project level HRA already undertaken.	(First Draft Local Plan policy ref SCLP12.22) N/A	N/A	N/A
SCLP12.26 Strategy for Aldeburgh	No LSE Vision policy so does not promote development. Sensitive	N/A	(First Draft Local Plan policy ref SCLP12.23) N/A	N/A	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
	environment referred to in policy				
Strategy for Framlingham – text not policy	No LSE Vision text so does not promote development	N/A	N/A	N/A	N/A
Strategy for Leiston – text not policy	LSE Potential for impacts on Minsmere-Walberswick over and above RAMS	Impacts over and above those covered by RAMS will be Sizewell C and associated development	Clarification to remove LSE – Add to supporting text in 5th paragraph a reference to the wider natural environment as well as the Leiston community. LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
SCLP12.28 Strategy for Saxmundham	No LSE Vision policy so does not promote development. Supporting text highlights natural environment issues.	N/A	(First Draft Local Plan policy ref SCLP12.25)  N/A	N/A	N/A
SCLP12.29 South Saxmundham garden neighbourhood	LSE 800 dwellings in one location	Potential for concentrated increased recreation pressure to European sites in close proximity due to large allocation	(First Draft Local Plan policy ref SCLP12.26) Appropriate assessment – the findings of the appropriate assessment of housing growth will inform mitigation requirements and for this very large allocation there is likely to be a need for on-site SANGs as well as contribution to RAMS.	<u>Appropriate Assessment</u> to assess SANGs requirements.	The assessment of SANGs requirements for the Garden Neighbourhoods has already been undertaken, as described within this note. The policy supporting text has already been amended to some extent to provide clear requirement for SANGs, incorporating assessment recommendations. Policy wording also strengthened. Further minor tweaks may be

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
					required, but policy is considered to provide adequate coverage of mitigation needs.
SCLP12.31 Strategy for Woodbridge	No LSE Vision policy so does not promote development. Supporting text highlights natural environment issues.	N/A	(First Draft Local Plan policy ref SCLP12.28) N/A	N/A	N/A
SCLP12.34 Strategy for Rural Areas	No LSE Vision policy with strong protective wording in relation to the natural environment and European sites	N/A	(First Draft Local Plan policy ref SCLP12.34) N/A	N/A	N/A
<b>Site allocations within 400m of a European site boundary</b>					
SCLP12.27 Land to rear of Rose Hill, Saxmundham Road, Aldeburgh (Housing).	LSE 300m from River Alde SPA/SAC/Ramsar	Disturbance to estuary birds from recreation pressure. Note that the Site Allocations HRA highlighted risks, but did not assess in detail. Stated the need for project level HRA, also stated that there is the potential for the allocation to be undeliverable.	(First Draft Local Plan policy ref SCLP12.24) Appropriate assessment – consideration of nature of development and proximity to River Alde SPA/SAC/Ramsar. Policy refers to the need for project level HRA, but further assessment required, and text to inform HRA scope	As per previous recommendations, consideration at <u>appropriate assessment</u>	AA is likely to recommend that project level HRA assesses any additional mitigation needs over and above a RAMS contribution. This will need to be stated in policy or supporting text
SCLP12.7 Port of Felixstowe (Employment).	LSE Adjacent to Stour and Orwell SPA/Ramsar	Dredging, contamination, noise, lighting, disturbance risks, but within an areas of existing high levels of activity. Policy is qualitative and does not identify new growth,	(First Draft Local Plan policy ref SCLP12.4)  Clarification to remove LSE – Add to supporting text to identify that project level HRA needs to consider nature of	Following amendments at Regulation 18, <u>no LSE</u>	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
		therefore can be considered at project level.	development and proximity to Stour and Orwell SPA/Ramsar. Policy refers to the need for project level HRA, but further clarification required in supporting text, re inclusion of issues such as dredging, contamination, noise, lighting, disturbance as part of project HRA scope. LPA action – Changes made.		
SCLP12.32 Former Council Offices, Melton Hill (mixed use).	LSE 100 dwellings Abuts Deben Estuary	Risks relate to disturbance, noise, light and other urban effects	New allocation at Regulation 19 stage.	Appropriate assessment – consideration of nature of development and proximity to Deben Estuary	AA is likely to recommend that project level HRA assesses any additional mitigation needs over and above a RAMS contribution. This will need to be stated in policy or supporting text
SCLP12.41 Bentwaters Park, Rendlesham. (Employment).	LSE Boundary abuts the Sandlings SPA and is within 400m of Staverton Park and the Thicks SPA	Risks relate to disturbance, noise, light and other urban effects, but the policy does not promote new development, rather it is qualitative setting out requirements for new development at this existing employment site. No further assessment required at the plan level. Policy identifies need to have regard for designations.	(First Draft Local Plan policy ref SCLP12.36)  Clarification to remove LSE – Add to supporting text to identify that project level HRA may be required and projects will only be approved with effective measures to prevent impacts on European sites, and that project level HRA will need to consider a range of urbanisation effects such as noise and lighting. Recommendation is not mitigation.	Following amendments at Regulation 18, <u>no LSE</u>	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
SCLP12.69 Land West of B1125, Westleton. (Housing).	LSE 20 dwellings	400m from Minsmere-Walberswick SPA/Ramsar and Minsmere-Walberswick Heaths & Marshes SAC; easy access on foot to protected site and risks relate to recreation and urban effects (increased fire risk, cat predation, other predators etc.)	LPA action – Changes made.  (First Draft Local Plan policy ref SCLP12.65)  Appropriate assessment – consideration of nature of development and proximity to Minsmere-Walberswick.	As per previous recommendations, consideration at <u>appropriate assessment</u> , due to proximity. Note reduction in housing numbers from 35 to 20	AA is likely to recommend that project level HRA assesses any additional mitigation needs over and above a RAMS contribution. This will need to be stated in policy or supporting text
SCLP12.70 Land at Cherry Tree, Darsham Road, Westleton (Housing).	LSE 15 dwellings	400m from Minsmere-Walberswick SPA/Ramsar and Minsmere-Walberswick Heaths & Marshes SAC; easy access on foot to protected site and risks relate to recreation and urban effects (increased fire risk, cat predation, other predators etc.)	New allocation at Regulation 19 stage.	<u>Appropriate assessment</u> – consideration of nature of development and proximity to Minsmere-Walberswick	AA is likely to recommend that project level HRA assesses any additional mitigation needs over and above a RAMS contribution. This will need to be stated in policy or supporting text
<b>Site allocations within 400m to 1km of a European site boundary</b>					
SCLP12.33 Land at Woodbridge Town Football Club	LSE 120 dwellings	Hydrological risks - checked on maps, none found. Project level HRA should make a more detailed check, but can be dealt with through project level mitigation.	New allocation at Regulation 19 stage.	Clarification to remove LSE – Policy to refer to need for project level HRA and add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checked and	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
				adequately mitigated for if required. Recommendation is not mitigation.	
SCLP12.38 Levington Park (Employment).	LSE 900m from Stour & Orwell SPA	Hydrological risks - checked on maps, none found. Project level HRA should make a more detailed check, but can be dealt with through project level mitigation.	(First Draft Local Plan policy ref SCLP12.33)  Clarification to remove LSE – Policy to refer to need for project level HRA and add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checked and adequately mitigated for if required.  Recommendation is not mitigation.  LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
SCLP12.43 Land to the east of Aldeburgh Road, Aldringham. (Housing).	LSE (other than that being dealt with through RAMS) 900m from Sandlings SPA	Hydrological risks - checked on maps, none found. Project level HRA should make a more detailed check, but can be dealt with through project level mitigation. Recreation risks to be dealt with through the RAMS	(First Draft Local Plan policy ref SCLP12.38)  Clarification to remove LSE – Policy to refer to need for project level HRA and add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checked and adequately mitigated for if required.  Recommendation is not mitigation.  LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A



Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
SCLP12.51 Land to the South of Eyke CoE Primary School and East of The Street, Eyke (Mixed use).	LSE Just over 400m from Sandlings SPA	Urbanisation impacts and possible concerns that impacts relating to recreation are over and above RAMS mitigation	(First Draft Local Plan policy ref SCLP12.47) Appropriate assessment – consideration of nature of development and proximity to Sandlings SPA	As per previous recommendations, consideration at <u>appropriate assessment</u> , due to proximity. Note increase in housing numbers from 45 to 65	AA is likely to recommend that project level HRA assesses any additional mitigation needs over and above a RAMS contribution. This will need to be stated in policy or supporting text
SCLP12.57 Land at Bridge Road, Levington. (Housing).	LSE (other than that being dealt with through RAMS) Just over 700m from Stour & Orwell SPA/Ramsar	Hydrological risks - checked on maps, none found. Recreation risks to be dealt with through the RAMS	(First Draft Local Plan policy ref SCLP12.52) Clarification to remove LSE – Add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checked and adequately mitigated for if required. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
SCLP12.35 Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin. (Employment).	LSE (other than that being dealt with through RAMS) Over 900m from Stour & Orwell SPA/Ramsar	Hydrological risks - checked on maps, none found, and separated by main road and railway line. Recreation risks to be dealt with through the RAMS	(First Draft Local Plan policy ref SCLP12.30) Clarification to remove LSE – Add to supporting text to identify that project level HRA will need to ensure that hydrological impacts are checked and adequately mitigated for if required. Recommendation is not mitigation. LPA action – Changes made.	Following amendments at Regulation 18, <u>no LSE</u>	N/A
<b>All other employment site allocations over</b>	No LSE Distance removes impact pathways. Introductory text	N/A	N/A	N/A	N/A

Policy	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version	Recommendations and actions taken for Reg 19 consultation version	Appropriate Assessment – initial advice
<b>1km from a European site boundary</b>	makes reference to the potential need for project level HRA.				
<b>Housing site allocations over 1km but within 13km from a European site boundary</b>	LSE – level of housing growth within 13km RAMS zone of influence needs to be checked for potential risks	Recreation impacts	Appropriate assessment - Level of housing growth needs to be compared with current RAMS housing numbers	As per previous recommendations, consideration at <u>appropriate assessment</u>	The AA will review the quantum of growth provided for within the RAMS, and options to accommodate further growth. It is anticipated that the AA will conclude that the RAMs can continue to adapt into the long term for new growth.
<b>All other housing site allocations over 13km from a European site boundary</b>	No LSE Distance removes impact pathways	N/A	N/A	N/A	N/A