



Boxford Neighbourhood Plan, Pre-Submission 2021

Habitats Regulations Assessment (HRA): Screening Report, and Appropriate Assessment – August 2021





1. Introduction	5
1.1 The Purpose of This Report	5
1.2 The Boxford Neighbourhood Plan Pre-Submission Draft 2021	5
2. Legislative Background	6
2.1 Habitats Regulations Assessment (HRA)	6
3. HRA Screening	7
3.1 Habitat Regulations Assessment of Development Plans	7
3.2 Court Judgements and their consideration in this Report	7
3.3 Habitats (European) Sites	8
3.4 Method and Approach	10
3.5 Results of HRA Screening of Boxford Neighbourhood Plan Policies	14
4. Appropriate Assessment and Considering the Integrity Test	27
4.1 Introduction to Appropriate Assessment	27
4.2 Approach and Methodology of the Appropriate Assessment	28
4.3 Stage 2 Appropriate Assessment for Boxford Neighbourhood Plan Regulation 14 Pre-submission Draft	29
4.4 Other Plans & Projects	32
5. Recommendations	36
4. Conclusion	37
5. References	38
Appendix I	39
Boxford Neighbourhood Plan Area	39
Appendix II	40
Boxford Parish and Habitats Sites within 20km	40
Appendix III	41
Characteristics of Habitats Sites	41
List of Tables and Figures	
Table 1: Habitats Sites within 20km of the development.....	9
Table 2: Screening categorisation.....	12
Table 3: Assessment of potential impacts.....	13
Table 4: Summary of findings from the HRA screening.....	15
Table 5: Other plans or projects considered for in combination effects.....	32
Table 6: Results of embedding mitigation within the policy text of Boxford Neighbourhood Plan Pre-submission Draft 2021	34

Figure 1: Outline of the Four Stage Approach to the Assessment of Plans under the Habitats Regulations 11



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Glossary of Acronyms

AA	Appropriate Assessment
BDC	Babergh District Council
DC	District Council
DPD	Development Plan Document
EA	Environment Agency
EC	European Commission
EU	European Union
Ha	Hectare
HRA	Habitats Regulations Assessment
IFCA	Inshore Fisheries Conservation Authority
IRZ	Impact Risk Zone (for SSSIs)
Km	Kilometre
LPA	Local Planning Authority
NDP/NP	Neighbourhood Development Plan / Neighbourhood Plan
NE	Natural England
NPPF	National Planning Policy Framework
PRoW	Public Right of Way
RAMS	Recreational disturbance Avoidance and Mitigation Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SIP(s)	Site Improvement Plans(s)
SPA	Special Protection Area
SSSI	Site of Specific Scientific Interest
SuDS	Sustainable Drainage System
ZOI	Zone of Influence



1. Introduction

1.1 The Purpose of This Report

This report screens to determine whether the Boxford Neighbourhood Plan Pre-Submission Draft 2021 requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) and (4) of the EU Habitats Directive and with Regulation 63 of the Conservation of Habitats and Species Regulations 2017. A Stage 1 HRA is required when it is deemed that likely adverse significant effects may occur on protected Habitats (European) Sites as a result of the implementation of a plan/project, either alone or in combination with other plans and projects.

1.2 The Boxford Neighbourhood Plan Pre-Submission Draft 2021

The main purpose of the Plan is to set out and identify the best ways to direct local planning towards community wants and needs, while protecting the natural environment and cultural assets, ensuring a more sustainable future for the community. The Regulation 14 draft Neighbourhood Development Plan will set out planning policies for Boxford Parish and within the confines of the Neighbourhood Plan boundary as defined (see Appendix 1).

Once formally 'made' or 'adopted', a Neighbourhood Plan carries the same legal weight as Local Development Plans adopted up by the Local Planning Authority (LPA), in this case Babergh District Council.



2. Legislative Background

2.1 Habitats Regulations Assessment (HRA)

Under the provisions of the EU Habitats Directive and translated into English law by the Habitats Regulations (The Conservation of Habitats and Species Regulations 2017, as amended), a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any Habitats Site, in terms of impacting the site's conservation objectives.

The first stage of HRA is the screening assessment of the impacts of a land use proposal against the conservation objectives of Habitats sites. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. European sites are also known as Natura 2000 sites and Habitats Sites in the NPPF (2021).

This HRA Screening Report has been undertaken in order to support the Boxford Neighbourhood Plan which is being produced by Boxford Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012. The area covered by the Plan is shown in Appendix 1.

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA.

In line with the Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats Site.

On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU) and on 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a period of negotiations regarding the UK's exit from the EU. On 26 June 2018 The European Union (Withdrawal) Act 2018 received Royal Assent and work to prepare the UK statute book for Brexit is complete and the UK has now left the EU. The European Union (Withdrawal) Act 2018 made sure that UK laws continue to operate following the UK's exit. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament. The requirements for HRA under the Conservation of Habitats and Species Regulations 2017 (as amended) remain in place with minor changes being affected by the Conservation of Habitats and Species Amendment (EU Exit) Regulations 2019. Parliament will however be at liberty to introduce future changes to the Conservation of Habitats and Species Regulations 2017 (as amended) since, after 31 December 2020, the UK is no longer bound by the EU Habitats and Wild Birds Directives.

At the present time the position, under section 6(3) EU (Withdrawal) Act 2018 (as amended), is that the courts in the UK, with the sole exception of the Supreme Court, will continue to be bound by HRA judgements handed down by the CJEU and by domestic courts prior to 31 December 2020 when interpreting the Conservation of Habitats and Species Regulations 2017 (as amended). This is the case as long as the Conservation of Habitats and Species Regulations 2017 (as amended) remain unmodified by Parliament



3. HRA Screening

3.1 Habitat Regulations Assessment of Development Plans

This section forms a plan level Habitats Regulations Assessment (HRA) screening report as required by Regulation 63 of The Conservation of Habitats and Species Regulations 2017.

This section of this Report aims to:

- Identify the Habitats sites within 20km of the Boxford Neighbourhood Plan area.
- Summarise the reasons for designation and Conservation Objectives for each site to be considered in this assessment.
- Screen the Boxford Neighbourhood Development Plan for its potential to impact upon a Habitats site.
- Assess the potential for in combination effects from other projects and plans in the area.
- Identify if there are any outstanding issues that need further investigation.

3.2 Court Judgements and their consideration in this Report

3.2.1 CJEU People Over Wind v Coillte Teoranta C-323/17

As previously mentioned, in line with the Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats Site.

This HRA Screening Report does not therefore consider mitigation measures within the assessment of Likely Significant Effects resulting from the Boxford Neighbourhood Plan.

3.2.2 CJEU Holohan C- 461/17

This Court judgement now imposes more detailed requirements on the competent authority for any plans or projects at Appropriate Assessment stage:

1. [...] an 'Appropriate Assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.
2. [...] the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the



construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

3. [...] where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'Appropriate Assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

Within this Stage 1 HRA Screening report, the assessment will determine the requirement for whether or not a Stage 2 Appropriate Assessment is needed for the Boxford Neighbourhood Development Plan.

3.3 Habitats (European) Sites

'Habitats sites' is the term used in the NPPF (2021) to describe the network of sites of nature protection areas. The aim of the network is to assure the long-term survival of Europe's most valuable and threatened species and Habitats.

The sites are designated under the European Union (EU) Birds Directive (Council Directive 79/409/EEC on the Conservation of Wild Birds) and the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora).

The Birds Directive requires the establishment of Special Protection Areas (SPAs). The Habitats Directive similarly requires Special Areas of Conservation (SACs) to be designated for other species, and for Habitats. Wetlands of International Importance (Ramsar sites) are also part of the Habitats (Sites) network. This is because all SPAs and SACs are comprised of Sites of Special Scientific Interest (SSSIs) and all Ramsar sites in England are SSSIs. Together, SPAs, SACs and Ramsar Sites make up the Habitats Sites in England. The following offers a description and explanation of SPAs, SACs and Ramsar Sites.

3.3.1 Explanation of SPAs, SACs and Ramsar Sites

Special Protection Areas (SPAs)

SPAs are areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries. Example: The Stour and Orwell Estuaries SPA is internationally important for wintering waterfowl. *Legislation: The Conservation of Habitats & Species Regulations 2017 (as amended).*

Special Areas of Conservation (SACs)

SACs are areas designated to protect habitat types that are in danger of disappearance, have a small natural range, or are highly characteristic of the region; and to protect species that are endangered, vulnerable, rare, or endemic. Example: Waveney and Little Ouse Valley Fens for calcareous fens, *Molinia* meadows and Desmoulin's whorl snail *Legislation: The Conservation of Habitats & Species Regulations 2017 (as amended).*



Ramsar Sites (Wetlands of International Importance)

Ramsar Sites are designated to protect the biological and physical features of wetlands, especially for waterfowl Habitats. Example: Redgrave and South Lopham Fens is an extensive example of lowland base-rich valley, remarkable for its lack of fragmentation which supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. Ramsar sites often overlap with SACs and SPAs and UK planning policy determines that they should be accorded the same importance when developments are proposed. *Legislation: Ramsar Convention (1971) – Wetlands of International Importance.*

3.3.2 Habitats Sites to be considered

There are seven Habitats sites (SPA/SAC/Ramsar) which lie within 20 km of Boxford parish and are shown on the map in Appendix 2.

Table 1: Habitats Sites within 20km of the development

SPA	SAC	Ramsar
Stour and Orwell Estuaries	Essex Estuaries	Stour and Orwell Estuaries
Colne Estuary		Colne Estuary
Abberton Reservoir		Abberton Reservoir

After consideration of potential impact pathways and Zones of Influence for recreational disturbance as confirmed on MAGIC website www.magic.gov.uk, the Plan area lies within the 13km Zone of Influence for the Stour & Orwell Estuaries SPA and Ramsar site but outside the 9.7km evidenced ZOI for the Colne Estuary SPA and Ramsar site. The Plan Area is also outside of the Impact Risk Zone for Abberton Reservoir as identified on MAGIC maps.

Natural England agreed that Habitats sites in Essex were not within scope of the Suffolk Coast RAMS for Babergh DC Ref 186522 25 May 2016 and measures cannot be secured outside of the area of jurisdiction of Babergh District Council or a strategic mitigation scheme.

It was therefore concluded that just two Habitats sites (Stour & Orwell Estuaries SPA and Ramsar site) should be assessed for any likely significant effects resulting from the Boxford Neighbourhood Plan Pre-Submission Draft 2021. Any mitigation considered necessary would need to be secured at application stage in line with policies in the Babergh and Mid Suffolk Joint Local Plan and the HRA Appropriate Assessment as the competent authority for planning decisions.



3.3.3 Conservation Objectives

Information on each of the above Habitats sites has been obtained from the Natural England website.

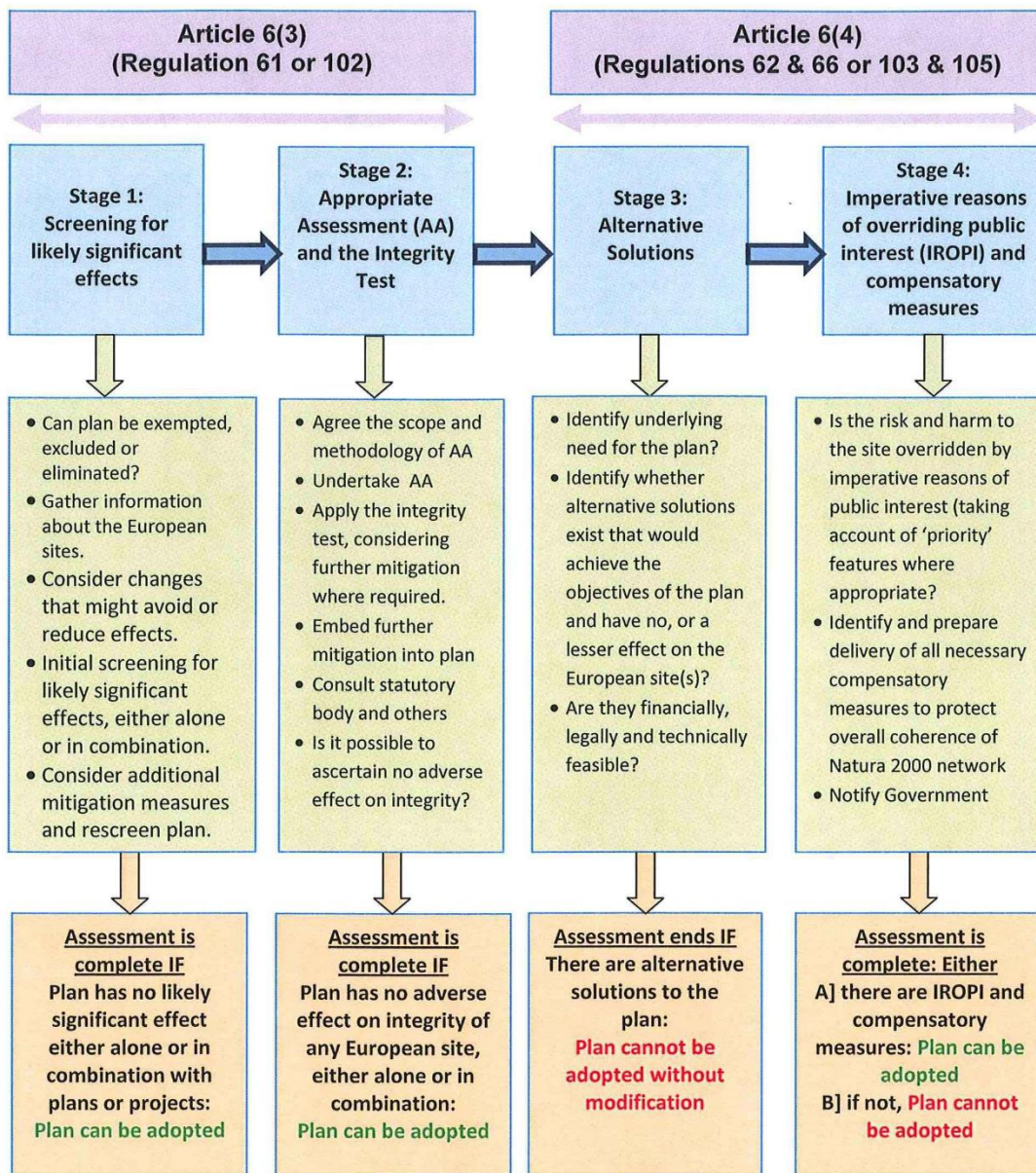
The justification for the importance of each Habitats site and the reasons for designation - the Conservation Objectives and Designation Features - for each site are included in Appendix 3. It also reflects the Supplementary Advice for Conservation Objectives which describes the range of ecological attributes that are most likely to contribute to a site's overall integrity and key vulnerabilities to consider within Habitats Regulations assessments.

3.4 Method and Approach

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, now The Conservation of Habitats & Species Regulations 2017 (as amended), which includes the need to undertake a HRA screening report; this is necessary to ensure the making of the neighbourhood plan is not likely to have a significant effect on a Habitats (European site or a European offshore marine) site), either alone or in combination with other plans or projects.



Outline of the four stage approach to the assessment of plans under the Habitats Regulations



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Figure 1: Outline of the Four Stage Approach to the Assessment of Plans under the Habitats Regulations



3.4.1 Stage 1: HRA screening

This screening stage identifies if alternatives are needed because any policies or projects will have an impact on a Habitats Site, amendments need to be made in Neighbourhood Development Plans. Table 4 identifies the different categories assigned to each policy in the plan: Category A identifies those policies or projects that may not result in a Likely Significant Effect and are considered to have No Negative Effect. Category B identifies those policies or projects that will have No Likely Significant Effect. Category C identifies those policies or projects that might have Likely Significant Effect and thus upon a European Site either alone or in combination with other plans or projects.

Each of the policies in the Boxford Neighbourhood Plan has been screened to identify whether they would have any impact on a Habitats Site and allocated to a category as shown in Table 2.

Table 2: Screening categorisation

Category A: No negative effect
Policies or projects that will not be likely to have any negative effect on a Habitats site.
Category B: No Likely Significant Effect
Policies or projects that could have an effect but would not be likely to have a likely significant effect on a Habitats site alone or in combination. This conclusion could only be reached if the effects, even in combination and taking the precautionary principle into account, are considered trivial.
Category C: Likely Significant Effect
Policies or projects which are predicted to have a likely significant effect on a Habitats Site either on its own or in combination with other plans and projects and require revision or further assessment (Appropriate Assessment).

3.4.2 Potential impacts of the Boxford Neighbourhood Plan on Habitats Sites

There are a wide range of potential impacts from development which can be summarised as -

- Land take by developments;
- Impact on protected species found within but which travel outside the protected sites (functionally linked land) may be relevant where development could result in effects on qualifying interest species within the Habitats site, for example through the loss of feeding grounds for an identified species.
- Increased disturbance, for example from recreational use resulting from new housing development and / or improved access due to transport infrastructure projects;
- Changes in water availability, or water quality as a result of development and increased demands for water treatment, and changes in groundwater regimes due to increased impermeable areas;
- Changes in atmospheric pollution levels due to increased traffic, waste management facilities etc. Pollution discharges from developments such as industrial Developments, quarries and waste management facilities.



Each policy in the neighbourhood plan will therefore be assessed against the above criteria in the table below.

Table 3: Assessment of potential impacts

Nature of potential impact	How the Boxford Neighbourhood Plan (alone or in combination with other plans and project) could affect a Habitats site?	Why these effects are/ not considered likely to be significant?
Land take by development	Although the Plan area contains land within the 13km Zone of Influence (ZOI) of the 2 Habitats sites within scope of this HRA screening report, no development is allocated on designated land.	N/A
Impact on protected species outside the protected sites	The Plan area does not contain any functionally linked land for use by designated features of the Habitats sites.	N/A
Recreational pressure and disturbance	HRA / AA work undertaken at the Local Plan level indicates that there could be a potential pathway for development in the Plan area to impact on the SPA & Ramsar sites within the scope of the HRA as the Parish lies within the Zone of Influence. The Plan also does allocate land for residential development however, the location identified within the Parish is just outside of the Zol for the Suffolk Coast RAMS.	<p>The Boxford Neighbourhood Plan identifies that there are several residential developments that have been permitted within the Plan Area and the Babergh and Mid Suffolk Joint Local Plan (November 2020) identifies an additional area for 5 residential dwellings in Boxford. It can therefore be demonstrated that the planned Local Housing Requirement for Boxford up to 2037 has therefore already been met.</p> <p>The Boxford Neighbourhood Plan allocates one site for development, and this site is not included in the Babergh and Mid Suffolk Joint Local Plan. However, although some of the Plan Area lies within the 13km Zone of Influence for the Stour and Orwell Estuaries SPA and Ramsar, this location of the development is outside of the Zol and therefore there is no credible evidence to reasonably suggest that the development will result in a likely significant effect on the Habitats sites within scope of this assessment. Future developments within the 13km Zone of Influence for the Stour and Orwell Estuaries SPA and Ramsar, however will be subject a project level HRA as required by the Babergh and Mid Suffolk Joint Local Plan. However, where these have not been allocated in either Plan, these will not be covered by the Suffolk Coast RAMS mitigation unless the latter is updated. A policy relating</p>



Nature of potential impact	How the Boxford Neighbourhood Plan (alone or in combination with other plans and project) could affect a Habitats site?	Why these effects are/ not considered likely to be significant?
		to residential development within the ZOI of the Suffolk coast RAMS is therefore recommended for the final Neighbourhood Plan to ensure that any impacts from recreational disturbance are assessed and mitigated to avoid AEOI of Stour & Orwell Estuaries SPA and Ramsar, in combination with other plans and projects.
Water quantity and quality	Boxford Parish is served by the Boxford STW which discharges into the River Box which connects into the River Stour before eventually flowing the Stour Estuary.	<p>The Plan allocations are within an Impact Risk Zone as shown on Magic maps but residential development of this scale does not trigger consultation with Natural England with regard to any significant impacts on the designated features as discharges from mains sewer are unlikely to pose a risk at this location.</p> <p>Surface water discharge/drainage is unlikely to pose a risk at this location.</p> <p>It is therefore considered that this impact pathway can be screened out from further assessment. No significant effects from the Neighbourhood Plan impacts on water quantity or quality are considered likely either alone or in combination.</p>
Changes in air & noise pollution levels	It is considered that there is no pathway for development to result in pollution impacts as there are no roads within the Parish which are within 200m of a Habitats site.	N/A

3.5 Results of HRA Screening of Boxford Neighbourhood Plan Policies

The HRA Screening exercise explores whether there will be any Likely Significant Effect resulting from the Plan's policies. These Policies are:

- BOX 1- Housing Strategy for Boxford



- BOX 1A- Housing Allocation for 7 dwellings and new car park at Stone Street
- BOX 2- Housing Mix
- BOX 3- Rural Exception Sites
- BOX 4- Safety for vehicles, pedestrians, and cyclists
- BOX 5- Improving access and connectivity
- BOX 6- New Village Car park adjacent to the primary school
- BOX 7- The Design of New Development
- BOX 8- Historic Environment and Conservation Area
- BOX 9- Non-Designated Heritage Assets
- BOX 10- Boxford Historic Views
- BOX 11- The River Box Area of Local Landscape Sensitivity (ALLS)
- BOX 12- Important Public Scenic Views
- BOX 13- Protection and Enhancement of natural features
- BOX 14- Local Green Spaces
- BOX 15- Localised Flooding
- BOX 16- Environmental Design
- BOX17- Protection of Existing Village Services and Facilities
- BOX 18- Supporting new community infrastructure
- BOX 19- Support for small scale extensions to existing business

This section considers each policy in turn and the results of the screening exercise is recorded in Table 4.

Table 4: Summary of findings from the HRA screening

Policy	Will Policy have Likely Significant Effect on a Habitats Site?	Recommendations
<p>BOX 1- Housing Strategy for Boxford</p> <p>The Neighbourhood Plan will accommodate development commensurate with Boxford's classification within the settlement hierarchy as a Core Village and two Hamlets.</p> <p>New development in Boxford will be focused within the defined settlement boundaries of Boxford village, Stone Street and Calais Street. New developments of individual dwellings or small groups of houses, within the settlement boundary will be supported.</p>	<p>Yes, Category C</p>	<p>Residential development within the Plan Area could be within the ZoI for the Stour and Orwell Estuaries. A project level HRA Appropriate Assessment would therefore be required at application stage and mitigation secured to avoid AEOI in combination with other plans and projects .</p>



<p>New development outside of the defined settlement boundaries will not be supported except for specific purposes, for example, meeting a need for affordable housing, the conversion of an existing building, or is essential for the operation of agriculture horticulture, forestry or outdoor recreation.</p> <p>This plan makes a new allocation as follows: 1. Land at Stone Street Road 7 dwellings* *This site also provides for a village car park</p>		<p>The Land at Stone Street Road lies outside of the Zol for the Stour and Orwell Estuaries SPA and Ramsar and the scope of the Suffolk Coast RAMS</p>
<p>BOX 1A- Housing Allocation for 7 dwellings and new car park at Stone Street</p> <p>Land is allocated for 7 new dwellings and a new car park at Stone Street and will be developed in accordance with the following criteria:</p> <ul style="list-style-type: none"> a) Any planning permission granted will be subject to an agreement that both the housing and car parking is provided. b) Vehicular Access shall be from Stone Street Road c) Applications will be accompanied by a detailed heritage statement which addresses the issues of historic connections between the core of the village and the countryside and how this has been eroded. d) Layout to take account of the flood risk on the site. e) A new pedestrian link will be created to connect with the existing underpass under the A1071. f) Details of the layout of the car park will be provided as part of the application. g) Appropriate screen planting using predominantly native species of a type to be agreed on the northern, southern and eastern boundaries with a soft well landscaped edge on the northern boundary. h) Area to the east of the river within the floodplain to remain undeveloped and left open/nature area. <p>Whether a planning application is submitted in outline or in full, it should include full details of the proposed layout, scale and landscaping to show how the development would safeguard the setting of the Conservation Area.</p>	<p>No, Category A</p>	<p>As aforementioned, the area allocated for residential development is outside the Zone of Influence for recreational impacts on the Stour and Orwell Estuaries SPA and Ramsar and the scope of the Suffolk Coast RAMS.</p>
<p>BOX 2- Housing Mix</p> <p>A broad mix of housing that meets local needs and enables a mixed and inclusive community will be supported.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>



<p>The mix of new housing in Boxford will be provided in accordance with Option 2 of the AECOM Housing Needs Assessment produced in October 2020.</p> <p>Affordable Housing: The composition of affordable housing should be a broadly 50:50 split between 'Routes to home ownership' and 'Affordable Housing to rent' as follows:</p> <ul style="list-style-type: none"> • 'Routes to home ownership (50%)' <ul style="list-style-type: none"> o First Homes 5% o Shared Ownership 25% o Rent to Buy 20% • 'Affordable Housing to Rent' (50%) <p>The allocation of affordable housing will be made in accordance with the criteria contained within Babergh District Council's local connections policy. (See Policy BOX3)</p> <p>Dwelling Size: New developments should have a specific focus on providing smaller dwellings for families and to enable downsizing consistent with the findings of the AECOM Housing Needs Assessment. Particular support will be given to proposals that include the following:</p> <ul style="list-style-type: none"> • Smaller affordable homes (1-3 beds) • Bungalows to allow for down-sizing. 		
<p>BOX 3- Rural Exception Sites</p> <p>Proposals for the development of small-scale affordable housing schemes on sites outside of but immediately adjacent to the settlement boundary will be permitted on an exceptional basis where there is a proven local need and where such housing:</p> <ul style="list-style-type: none"> • Remains affordable and available in perpetuity • Is available for people identified as being in housing need by virtue of being unable to buy or rent properties in the parish at open market prices • Is offered in the first instance to people with a demonstrated local connection as identified in the Babergh Choice Based Lettings Scheme 2016 (or successor document). Where there is no local connection, a property should then be offered to those with a demonstrated need for affordable housing in neighbouring villages. <p>The occupation of this housing should be secured through a legal agreement attached to the planning consent for the housing.</p> <p>The development of such housing should be consistent with policies in this plan governing design, appearance, layout, amenity, highway safety, impacts on historic and natural environment and floodrisk.</p>	<p>Yes, Category C</p>	<p>Development within the Plan Area could be within the ZoI for the Stour and Orwell Estuaries and in these cases, project level HRA Appropriate Assessment would therefore be required and mitigation in line with the Suffolk Coast RAMS would need to be secured.</p>



<p>Proposals for housing of this kind should be accompanied by a detailed housing needs assessment which demonstrates that a local need exists, and that the accommodation proposed will contribute to meeting this proven need.</p>		
<p>BOX 4 Safety for vehicles, pedestrians, and cyclists Measures that would reduce congestion in the village centre and improve pedestrian safety on highways and at the following key junctions will be supported:</p> <ul style="list-style-type: none"> • Cox Hill and Ellis Street with Sand Hill • Church Street with Stone Street Road • Swan Street/Church Street/Broad Street • A1071 with Stone Street Road <p>Development proposals that would result in a substantial risk to highway safety or would increase congestion through the need for vehicles to make awkward manoeuvres, create instances of a mix of vehicle types sharing or intruding into pedestrian spaces or damage to vehicles and buildings will not be supported.</p> <p>Proposals to enhance key walkway routes (see Map 9) around the village used by pedestrians will be encouraged and developer contributions, appropriate to the scale and location of the proposed development should be used to enable these enhancements. Enhancement can take the form of new connections, improved surfaces and/or signage increasing connectivity between communities. Proposals that would be impede or adversely affect the safe use of these routes will be discouraged.</p> <p>Specific support is given to proposals that would result in improvements to The Croft (a footpath between the village centre, Homefields and the playing fields – See Map 8). Where new development takes place, opportunities should be taken to increase the health and wellbeing of residents through the creation of new footpath and cycle routes which connect to village services, the village centre and the existing Public Rights of Way Network into the surrounding countryside. These should form part of a safe, accessible, and coherent network in and around the parish.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>BOX 5 Improving access and connectivity Proposals that would promote a joined-up approach to the provision and use of public transport in Boxford will be encouraged.</p> <p>Particular support is given for measures that would enable greater use of public transport through provision of specific infrastructure and facilities at transport interchanges e.g., cycle parking and safe storage, access to car parking facilities and bus shelters. Measures that would improve the timing of bus routes to enable greater connectivity with rail</p>	<p>No, Category A</p>	<p>No specific recommendations</p>



<p>services appropriately timed for commuting and for education will be supported.</p> <p>Proposals that would result in the provision of electric charging points and infrastructure will be supported.</p>		
<p>BOX 6- New Village Car park adjacent to the primary school</p> <p>Approximately 0.3 hectares of land adjacent to Boxford CEV Primary School are allocated for a community car park to address traffic congestion and pedestrian safety issues caused by current levels of on street parking at peak times in Swan Street, Broad Street, Church Street and School Hills. Proposals for the car park should include:</p> <ul style="list-style-type: none"> • Suitable landscaping scheme around the perimeter • An appropriate and permeable surface to ensure that issues of flood risk are mitigated and that increased flood risk is not caused elsewhere. • A layout that will suitably accommodate bus and turning facilities. • Good pedestrian connections to the rest of the village • Proposals should ensure that the heritage impacts of any development on this site are considered carefully. <p>Any application should be accompanied by a detailed heritage statement that identifies any impacts including on the significance and setting of designated heritage impacts and mitigation, as appropriate.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>BOX 7- The Design of New Development</p> <p>The design of all new development in Boxford should reflect the parish's local distinctiveness and character and seek to enhance its quality.</p> <p>Consideration of Context</p> <p>All proposals for new development should respect the existing context of the proposed development and that of the immediate locality including the character of adjacent properties where this provides a positive contribution. Consideration should be given to the guidance contained within the specific Design Code for each of the three main character areas.</p> <p>Proposals for new housing development should be of a high standard of design and include the following, where appropriate:</p> <p>Materials</p> <p>a) High quality and sustainable local materials</p>	<p>No, Category A</p>	<p>No specific recommendations</p>



(e.g., red clay tiles, black slate roof tiles, red brick and yellow brick for elevations, timber framing, white render, flint walls)

- b) Detailing such as pargetting and porch detailing, low redbrick and hedging for boundary demarcation

Density and Building Heights

- c) provide for a density compatible with that in the appropriate character area,
- d) ensure the proposed heights of buildings are appropriate to the prevailing character of the area and do not impact upon the amenity of adjoining residents through overlooking.

Connections, Accessibility and Parking

- e) integrate with the existing footway network and prioritise the movement of pedestrians and cyclists
- f) avoid overdevelopment by ensuring that a residential plot can accommodate the needs of modern dwellings with usable garden space
- g) provide sufficient external amenity space for refuse and recycling storage accommodate parking consistent with the Suffolk Guidance for Parking 2019 or successor documents
- h) where garages are proposed ensure that they are of sufficient dimensions to accommodate an average sized car and allow for the opening of the car doors
- i) include built in crime reduction measures consistent with the guidance in Secure by Design12 to minimise the likelihood and fear of crime

Green Spaces and Landscaping

- j) include soft well landscaped soft boundary edges and where adjacent to open countryside or edge of settlement include a minimum 5m landscape strip
- k) minimise the loss of trees and hedgerows to enable necessary road access and visibility splays
- l) retain existing tree belts and hedgerows making a feature of them as part of the development
- m) include features to encourage and attract wildlife, create new habitats, provide a biodiversity net gain and enhance and extend existing wildlife corridors
- n) retain existing tree belts and hedgerows making a feature of them as part of the development

Proposals for outstanding contemporary or innovative designs which respects the character of the area and promotes the use of high-quality materials will be supported.



<p>High levels of sustainability or help raise the standard of design more generally in an area will be encouraged.</p>		
<p>BOX 8- Historic Environment and Conservation Area Proposals for development within the historic village centre and Conservation Area will be supported where they respect the historic character and appearance of the Conservation Area and protect the significance of listed buildings, protected trees and other heritage assets. The special character of the Conservation Area and its setting will be protected and reinforced. This will be achieved by:</p> <ul style="list-style-type: none"> a) Encouraging the retention and maintenance of buildings which contribute to the overall character of the Conservation Area, b) Ensuring that new development is sympathetic to the special qualities and character of the Conservation Area through the use of appropriate, high quality materials. c) Protecting the setting of the conservation area including views into or out of the area where it contributes to its character and appearance. d) Where new or reconfigured advertising signage is proposed, it should be sensitively designed with consideration given to its size, design, materials and siting to ensure that it does not detract from the character and appearance of the Conservation Area. e) Proposals seeking to enhance the streetscape through appropriate use of street furniture which preserves and enhances the area will be supported. 	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>BOX 9- Non-Designated Heritage Assets The following (as shown on Map 10 below) are heritage assets that are considered to be locally important to Boxford in terms of their architectural, historical or cultural significance and these will be treated as Non-Designated Heritage Assets.</p> <ul style="list-style-type: none"> a) The Sarsen boulders around the village b) The Village 'Pump' c) The Village Pump House d) The Village Sign e) Ashley House 	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>BOX 10- Boxford Historic Views The following are identified as views that contribute to the historic character of Boxford:</p> <ul style="list-style-type: none"> 1. Village Centre and Church Street 2. View along Swan Street looking north. 	<p>No, Category A</p>	<p>No specific recommendations</p>



<ol style="list-style-type: none"> 3. View along Swan Street from the north, looking south. 4. Broad Street looking west. 5. View of Broad Street from The Croft 6. View along Butcher’s Lane 7. View across rooftops to the Church from The Croft 8. Green entrance to the village at Sand Hill 9. Green entrance to the village at School Hill 10. 10.Green entrance to the village at Stone Street Road. 11. View looking south through Stone Street Hamlet 12. View at Calais Street crossroads. 13. View north-west along Ellis Street <p>Proposals for development that would be visible within or would affect an historic view should ensure that they respect and take account of the view concerned. Development that would have an unacceptable adverse impact upon the significance or character of the historic view that cannot be mitigated, will not be supported.</p>		
<p>BOX 11- The River Box Area of Local Landscape Sensitivity (ALLS)</p> <p>The visual, scenic, and undeveloped character of the River Box Area of Local Landscape Sensitivity (shown on Map 12 below and on the Policies Map) will be protected from development that may adversely affect its landscape character, its function as an important piece of green infrastructure and its contribution to the wider network of green spaces in the area.</p> <p>Development within the River Box Area of Local Landscape Sensitivity will only be supported provided that the proposal:</p> <ol style="list-style-type: none"> a) Conserves or enhances the special qualities of the landscape, b) is designed and sited to be sympathetic to the scenic beauty of the landscape setting. 	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>BOX 12- Important Public Scenic Views</p> <p>The following views and vistas (as shown on Map 13 below and the Policies Map) are identified as Important Public Scenic Views.</p> <ol style="list-style-type: none"> 1. From the A1071 looking north east towards the church tower, 2. From the A1071 north-north-east across the river valley towards Daking Avenue and Goodlands, with open countryside and Groton church beyond 3. From the public footpath near Cox Hill looking south west towards the church 4. From the public footpath at the end of Roylands looking south west across the river 	<p>No, Category A</p>	<p>No specific recommendations</p>



<p>valley to Stone Street hamlet, with Hagmore Green and the AONB beyond.</p> <ol style="list-style-type: none"> 5. From Hockley Hole public footpath looking east across the river valley and Stone Street to Roylands and Calais Street Hamlet. 6. From the public footpath north of the Playing Field looking south east into the river valley and the farming landscape beyond. 7. From the A1071 SE of Sand Hill looking NW across Station Field and Brookhall. 8. From the meadow at Primrose Wood along the river valley towards the church. 9. View from the footpath below Cox Hill House. 		
<p>BOX 13- Protection and Enhancement of natural features</p> <p>Sensitive natural features typical of the Rolling Valley Farmland or Ancient Rolling Farmlands Character Areas such as traditional orchard, grassland, deciduous woodland, wood pasture and parkland, will be protected from development that would have a significant adverse impact upon their character, appearance and wildlife value. Development proposals will be expected to protect and enhance existing ecological networks and wildlife corridors. Proposals should retain existing features of biodiversity value (including ponds, ancient woodlands, veteran trees, hedgerows, ancient field boundaries and verges) and where practical to do so provide a net gain in biodiversity, through for example:</p> <ol style="list-style-type: none"> a) the creation of new natural habitats. b) the planting of additional trees and hedgerows, the restoring, repairing, and connecting of fragmented biodiversity networks and habitats to create wildlife corridors. <p>Where loss or damage is unavoidable, the development shall provide for appropriate replacement planting on site together with a method statement for ongoing care and maintenance of that planting</p> <p>Where development proposals cause damage to identified natural features, wildlife corridors around the interruption will be constructed.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>BOX 14- Local Green Spaces</p> <p>The following areas are designated as Local Green Spaces (as shown on Map 15 below and the Policies Map).</p> <ol style="list-style-type: none"> a) Boxford Playing Fields b) Allotments c) Goodland’s Meadow d) Gunary Close e) The Spinney f) The Bowling Green g) Primrose Wood h) The Croft 	<p>No, Category A</p>	<p>Amend the text to refer to the Suffolk Coast RAMS and “the integrity of the Habitats (European) sites” as referred to in NPPF 2021.</p>



<ul style="list-style-type: none"> i) Churchyard j) Cemetery k) Stone Street Road Pasture l) Station Field m) Marsh Road n) Hagmore Green 		
<p>BOX 15- Localised Flooding</p> <p>All new development (including minor development) should use appropriate sustainable drainage systems (SuDS), wetland and water features to protect against pollution, provide drainage and wider amenity, recreational and biodiversity benefits.</p> <p>All development will be expected to demonstrate how it can mitigate its own flooding and drainage impacts, avoid the increase of flooding elsewhere and seek to achieve lower than greenfield run-off rates. Development will be directed away from areas of significant flood risk. Innovative design solutions that would meet these requirements will be supported.</p> <p>The following map (see LP) shows areas identified as at risk of flooding and proposals for new development which would increase the risk of flooding in these areas, which cannot be mitigated, will not be supported</p>	No, Category A	No specific recommendations
<p>BOX 16- Environmental Design</p> <p>Proposals for all forms of development that incorporate measures into new development that will help to offset or mitigate climate change whilst minimising visual impact will be encouraged.</p> <p>Support will be given to proposals that include (but are not limited to) one or more of the following technologies:</p> <ul style="list-style-type: none"> a) Grey water recycling and rainwater capture b) Air Source Heat pumps c) Green Roofs d) Permeable Pavements e) Solar panels (subject to design policies) f) Ground source heat pumps g) Passive ventilation 16 h) Thermal mass17 i) Layouts that take account of daylight, sunlight, wind and temperature j) Electric charging points k) Passive solar gain l) Include features that allow for increased energy efficiency performance and renewable energy provision. 	No, Category A	No specific recommendations
<p>BOX17- Protection of Existing Village Services and Facilities</p>	No, Category A	No specific recommendations



<p>Proposals, including changes of use, that would involve the potential loss of an existing community facility, (such as Church, Shop, Pub, Village Hall, School, GP or medical practice etc) will only be supported where an improved or equivalent facility can be located elsewhere in the parish at an equally convenient, safe and accessible location, or where there is no reasonable prospect of continued viable use and this can be sufficiently demonstrated through:</p> <ul style="list-style-type: none"> i. At least six months of marketing in appropriate publications for the permitted and similar uses, using an appropriate agent; and ii. Confirmation that it has been offered on a range of terms (including price) agreed to be reasonable on the advice of an independently qualified assessor. 		
<p>BOX 18- Supporting new community infrastructure</p> <p>Proposals that would result in the expansion of existing facilities will be supported.</p> <p>The provision of flexible and adaptable space (s) available for multi-uses e.g., health and social care services, new or improved school provision, and meeting spaces that would provide a better service to the community is encouraged.</p> <p>Particular support is given to proposals that would enable improved provision of off-road staff car parking and bus/parent drop-off facilities to serve Boxford Primary School.</p>	No, Category A	No specific recommendations

3.5.1 Recommendations

There are no impact pathways likely to result in Likely Significant Effects from the Plan alone.

However, there are recommendations for the housing related policies in this draft Neighbourhood Plan as they have been assigned to Category C due to predicted impacts from the Plan in combination with other plans and projects.

It is not considered sufficient to rely on a general policy aimed at protecting Habitats sites. Explicit caveats need to be included where there may be conflicts between a general policy to protect Habitats sites from development and another policy. However, this is embedded mitigation which cannot be considered at HRA screening stage; the CJEU People Over Wind v Coillte Teoranta C-323/17 ruling indicates that measures that have been added primarily to mitigate the effects on a Habitats site cannot be considered at the screening stage.

Further Stage 2 Appropriate Assessment is therefore required under the UK Conservation of Habitats and Species Regulations 2017 (as amended). The Boxford Neighbourhood Plan Pre-Submission Draft 2021 may only be made after having ascertained that it will not result in adverse effect on integrity(AEOI) of the Habitats Sites within scope of this assessment. Predicted recreational disturbance impacts in combination with other plans and projects are considered in Section 4 Appropriate Assessment. This stage is an iterative process as



measures can be incorporated in order to be able to ascertain that there is no significant adverse effect on the integrity, before re-screening and making a final assessment.



4. Appropriate Assessment and Considering the Integrity Test

4.1 Introduction to Appropriate Assessment

The Boxford Neighbourhood Plan Pre-Submission Draft 2021 is, without mitigation, predicted to result in Likely Significant Effect from the Plan in combination with other plans and projects. This is for a single impact pathway: Recreational disturbance from residential development.

The second stage of HRA is to undertake an 'Appropriate Assessment' of the implications of the plan (either alone or in combination with other plans or projects) and establish whether there may be an Adverse Effect on Integrity (AEOI) of any Habitats sites in view of their Conservation Objectives. The process undertaken for the Appropriate Assessment is set out in this Chapter.

The Appropriate Assessment should be undertaken by the competent authority and should assess all aspects of the Neighbourhood Plan which can by themselves, or in combination with other plans and projects, affect the sites' Conservation Objectives. The assessment must consider the implications for each qualifying feature of each potentially affected Habitats Site. Key vulnerabilities are set out in Appendix III and the Site Improvement Plans (SIPs) were used to obtain this information. Site Improvement Plans have been developed for each Habitats Site in England as part of the 'Improvement Programme for England's Natura 2000 sites (IPENS)'. The Site Improvement Plans provide a high level overview of the issues (both current and predicted) affecting the condition of the designation features of the site(s) and outlines the priority measures required to improve the condition of the features. These can be found at:

<http://publications.naturalengland.org.uk/category/5458594975711232>.

In order to identify potential in combination effects, other plans and projects which may affect the Habitats Sites need to be identified.

This should involve an 'Appropriate Assessment' of the implications of the Boxford Neighbourhood Plan Pre-Submission Draft, in relation to predicted recreational disturbance impacts, alone or in combination with other plans or projects, in order to establish whether there may be an *Adverse Effect on the Integrity* of any Habitats Sites in view of their Conservation Objectives.

This stage is to undertake objective scientific assessment of the implications of the Neighbourhood Plan on the Qualifying Features of the listed Habitats Sites using the best scientific knowledge in the field. It should apply the best available techniques and methods to assess the extent of the effects of the Neighbourhood Plan on the integrity of the Habitat Sites. The description of the site's integrity and the impact assessment should be based on the best possible indicators specific to the Habitat Sites' qualifying features, which can also be useful in monitoring the impact of the Neighbourhood Plan's implementation.

The Appropriate Assessment should assess all aspects of the Plan which can by themselves, or in combination with other plans and projects, affect the Conservation Objectives of one or more Habitats site. The assessment



must consider the implications for each qualifying feature of each potentially affected Habitats site. The focus of the appropriate assessment is therefore on the species and / or the habitats for which the Habitats site is designated.

The best scientific knowledge should be used when carrying out the Appropriate Assessment in order to enable the competent authority to conclude with certainty that there will be no *Adverse Effect on the Integrity* of any Habitats site.

It is important that the Appropriate Assessment provides a better understanding of potential effects and can therefore assist in the identification of mitigation measures where possible to avoid, reduce or cancel significant effects on Habitats sites which could be applied when undertaking the 'integrity test'. All mitigation measures built into the Plan can be taken into account. The Appropriate Assessment is an iterative process, re-assessing changes and new or different mitigation measures before making its final conclusion. It must be clear which mitigation measures are being relied upon in order to meet the integrity test.

The integrity test must apply the precautionary principle. However, plan assessments are less precise than project assessments, and so it is important for the assessment process to eliminate the prospect of adverse effects integrity insofar as it is possible, given the level of specificity of this Neighbourhood Plan.

Natural England should be formally consulted on this document.

4.2 Approach and Methodology of the Appropriate Assessment

The potential Likely Significant Effects considered at Screening Stage are now carried forward for consideration at Appropriate Assessment. The policies and their potential to have adverse effects on any Habitats site through a variety of impact pathways are now considered in more detail, for example habitat loss or deterioration, disturbance, direct and indirect effects; extent of the effects (habitat area, species numbers or areas of occurrence); importance and magnitude (e.g. considering the affected area or population in relation to the total area and population size).

Key vulnerabilities of each Habitats Site are set out in Appendix III using the relevant Site Improvement Plans. Site Improvement Plans have been developed for each Habitats (Natura 2000) Site in England as part of the 'Improvement Programme for England's Natura 2000 sites (IPENS)' but they do not include Ramsar sites. Each Site Improvement Plan provides a high-level overview of the issues (both current and predicted) affecting the condition of the Natura 2000 features on the site(s) and outlines the priority measures required to improve the condition of the features. These can be found at:

<http://publications.naturalengland.org.uk/category/6149691318206464>

Additional information is also provided for each site on the Designated Sites website and this information has been interrogated.

4.2.1 Use of Mitigation Measures

All mitigation measures built into the Boxford Neighbourhood Plan Pre-Submission Draft 2021 can now be taken into account at Stage 2 Appropriate Assessment.



At this stage, other policies of the Plan can be considered in order to mitigate some of the predicted Likely Significant Effects which have been identified. This stage is an iterative process as avoidance and reduction measures can be incorporated in order to be able to avoid the potential impacts identified in the Appropriate Assessment or reduce them to a level where they will no longer adversely affect the site's integrity.

Monitoring will be required as part of the Boxford Neighbourhood Plan Pre-Submission Draft 2021 where residual effects are identified.

4.2.2 Applying the Integrity Test

Following the Appropriate Assessment and the consideration of all mitigation measures, the competent authority needs to make a judgement on whether any of the policies will have an *Adverse Effect on Integrity* on any Habitats Site either alone or in combination with other plans and projects. This test incorporates the precautionary principle.

4.2.3 Embedding Mitigation

Babergh District Council, as the competent authority, should consider the manner in which the Boxford Neighbourhood Plan Pre-Submission Draft 2021 is to be implemented and any mitigation measures which could be relied upon when deciding whether it would have an Adverse Effect on Integrity, including when and how they can be embedded into the Neighbourhood Plan.

4.3 Stage 2 Appropriate Assessment for Boxford Neighbourhood Plan Regulation 14 Pre-submission Draft

The only impact pathway to consider from the Plan is recreational disturbance arising from residential development within the Zol for the Suffolk Coast RAMS.

The competent authority, in this case Babergh DC, therefore needs to apply the Integrity test to the Plan alone and it can now consider mitigation measures to assess if the Boxford Neighbourhood Plan Pre-Submission Draft 2021 can avoid AEOI on the Habitats sites screened in at Stage 1 HRA. These are Stour and Orwell Estuaries SPA and Ramsar site.

Once mitigation has been considered for impacts from the Plan alone, Babergh DC then needs to apply the Integrity test needs to the Plan in combination with other plans and projects and it can now consider mitigation measures to assess if the Boxford Neighbourhood Plan Pre-Submission Draft 2021 can avoid AEOI on the Habitats sites screened in at Stage 1 HRA. These are Stour and Orwell Estuaries SPA and Ramsar site.

4.3.1 Mitigation measures

As a precautionary approach is required in order to conclude that the Boxford Neighbourhood Plan Pre-Submission Draft 2021 will not lead to AEOI either alone or in combination, mitigation measures are necessary



and these need to be embedded in the Boxford Neighbourhood Plan Pre-Submission Draft 2021 to avoid impacts from the single pathway of recreational disturbance at the Stour and Orwell Estuaries SPA and Ramsar site from residential development (see Appendix IV).

Considering the potential impacts from the Boxford Neighbourhood Plan Pre-Submission Draft 2021 alone, this impact pathway is considered below with mitigation recommended.

4.3.2 Recreational disturbance from residential development

Wetland birds are vulnerable to disturbance, albeit some birds can become habituated to some kinds of disturbance, usually where the source of disturbance occurs in a predictable way. However, it will vary according to the species concerned.

At Screening stage, the following Habitats Sites were listed as having the potential for Likely Significant Effects as a result of recreational disturbance from residential development in combination with other plans and projects:

- Stour and Orwell Estuaries SPA and Ramsar

At Screening stage, the following Policies were listed as having the potential for Likely Significant Effects as a result of recreational disturbance:

- BOX 1- Housing Strategy for Boxford
- BOX 3- Rural Exception Sites

In 2016, Natural England identified the Suffolk coast as a priority for strategic and proactive planning engagement and mitigation. This was due to the high numbers of dwellings that were likely to come forward for each Local Plan alone and also in combination within the relevant Local Plans by 2038 to meet projected housing needs. The concern was the potential recreational impacts that these new residents could have upon the Habitats sites.

Natural England proposed a strategic approach to LPAs and recommended identifying the scale of the disturbance and implementing measures to mitigate impacts through the preparation of a Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS).

Based on existing evidence of visitor pressures, Natural England advised that the Councils should work together to prepare the Strategy. Natural England's advice was that the Local Plans must have a clear policy commitment to producing a Mitigation Strategy, with a clear timeframe for its completion. This should be by the time the Local Plan is adopted to ensure any developments coming forward as part of the plan have certainty that there are mitigation measures which can be implemented as soon as the Babergh and Mid Suffolk Joint Local Plan is live.

The Suffolk Coast RAMS partner LPAs agreed that a strategic solution to mitigate the impacts of recreational disturbance from Local Plans was a sensible approach to take the support of Natural England. As a consequence, the Suffolk Coast RAMS has been adopted by Babergh DC so this strategic approach to support the Local Plans and its implementation will deliver effective measures to avoid and mitigate for recreational disturbance from planned housing growth.



Natural England's advice to the LPAs included Annex 1 relating to the need for mitigation for recreational impacts for applications for more than 50 dwellings:

Annex 1 – Natural England's recommendations for larger scale residential developments within the Suffolk Coast RAMS zone of influence (50 units +, or equivalent, as a guide)

Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale. Such provisions can help minimise any predicted increase in recreational pressure to the Habitats Sites by containing the majority of recreation within and around the development site boundary away from European sites. We advise that the Suitable Accessible Natural Green Space (SANGS) guidance here can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. As a minimum, we advise that such provisions should include:

1. *High-quality, informal, semi-natural areas*
2. *Circular dog walking routes of 2.7 km within the site and/or with links to surrounding public rights of way (PRoW)*
3. *Dedicated 'dogs-off-lead' areas*
4. *Signage/information leaflets to householders to promote these areas for recreation*
5. *Dog waste bins*
6. *A commitment to the long term maintenance and management of these provisions*

Natural England's advice to the LPAs included Annex 2 relating to the need for mitigation for recreational impacts for applications for less than 50 dwellings:

Annex II – Natural England's recommendations for smaller scale residential developments within the 13 km Suffolk Coast RAMS zone of influence (0-49 units, or equivalent, as a guide) which are not within/directly adjacent to a European designated site Whilst the provision of well-designed open space/green infrastructure on site or contributions towards strategic green infrastructure in your district is to be welcomed for developments of this scale, we advise that consideration of 'off-site' measures (i.e. in and around the relevant European designated site(s)) is required as mitigation for predicted recreational disturbance impacts in these cases as a minimum. Such measures are to be delivered strategically through the Suffolk Coast RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from these developments in line with the Suffolk Coast RAMS.

It is therefore considered that residential development in Boxford may require mitigation to avoid adverse impacts on the integrity of the Habitats sites within scope through increased recreational pressure, when considered alone.

It is recommended that Policies BOX 1 and BOX 3 are amended to refer to this advice on proportionate financial contributions and greenspace for residential development of more than 50 units to avoid adverse effect on integrity on the Stour & Orwell Estuaries SPA and Ramsar site.



4.4 Other Plans & Projects

There are five relevant Plan level HRAs that have been carried out by Babergh DC or other organisations and these have been found, not to have an adverse effect on the integrity of Habitats sites being assessed in combination with other plans and projects. There are no Projects considered to be relevant to this section.

In the context of this HRA, as the Regulation 14 draft Boxford Neighbourhood Plan Pre-Submission Draft 2021 Neighbourhood Plan does allocate sites for development and as, without mitigation measures for predicted recreational impacts, there will be a likely significant effect in combination with other plans and projects.

Table 5: Other plans or projects considered for in combination effects

Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
Mid Suffolk District Council	Core Strategy Habitats Regulations Assessment (Appropriate Assessment) October 2007)	The HRA found no likely significant effects from the Plan on the Breckland SAC/SPA and Waveney and Little Ouse Valley Fens SAC.	It is considered that in combination likely significant effects are not predicted.
St Edmundsbury Borough Council	Core Strategy HRA screening (2010)	The HRA found no potential for in combination effects as no other current plans or projects that are likely to lead to significant effects on the Breckland SAC/SPA or the Waveney and Little Ouse Valley Fens SAC have been identified, or where impacts have been identified they have been adequately mitigated.	It is considered that in combination likely significant effects are not predicted
Babergh District Council	Habitat Regulations Assessment of Core Strategy 2011	The Core Strategy aims to minimise impacts on the Orwell and Stour estuaries, a European-designated site which supports species that	It is considered that in combination likely significant effects are not predicted.



Suffolk Coastal District Council	Habitats Regulations Assessment of the Suffolk Coastal District Local Plan at Final Draft Plan Stage (Dec 2018)	It is recommended that the Suffolk authorities should be mindful of the potential issue for impacts from air quality and plan for more detailed analysis of risks across the county, to inform the next plan reviews. This should include air quality modelling that incorporates a specific consideration of potential deposition rates within 200m of European sites.	Potential risk of traffic emissions to Habitats sites with features sensitive to air pollution. Recommendation that the Council commits to working with neighbouring authorities to gather more data to inform future Local Plan reviews.
Babergh District Council and Mid Suffolk District Councils	Babergh & Mid Suffolk Joint Local Plan Habitats Regulations Assessment including Appropriate Assessment (Place Services, June 2019)	Embedded mitigation measures for projects will need to be considered in project level HRA/AA reports and secured by way of any planning consent. The Babergh & Mid Suffolk Districts Joint Local Plan is not predicted to have any adverse effect on integrity (AEOI) on any Habitats Sites.	It is considered that in combination likely significant effects are not predicted.

Formal revised interim advice issued to Babergh District Council by Natural England (22 June 2017 Ref 218775) identified that, in combination with other plans and projects, all residential development within the 13km Zone of Influence (Zol) for the Suffolk Coast RAMS would, without mitigation, be likely to result in a significant effect on a number of Habitats Sites.

The housing policies allocate land within the zone of influence (Zol) for the Suffolk Coast RAMS and the development falls within the following development types:

- New dwellings of 1+ units (excludes replacement dwellings and extensions)
- Houses in Multiple Occupancy (HMOs)
- Student Accommodation
- Residential care homes and residential institutions (excludes nursing homes)
- Residential caravan sites (excludes holiday caravans and campsites)
- Gypsies, travellers and travelling show people plots

Babergh & Mid Suffolk District Councils are two of the 4 Local Planning Authorities (LPAs) which are partners are responsible for the delivery of the Suffolk Coast RAMS. This has identified a detailed programme of



strategic mitigation measures which are to be funded by developer contributions for residential development schemes as identified above.

4.5 Embedding mitigation into the Plan

Babergh District Council is committed to ensuring that new residential development and any associated recreational disturbance impacts on Habitats (European designated) sites is avoided and mitigated to demonstrate compliance with the Conservation of Habitats and Species Regulations 2017 (as amended).

Although there is some embedded mitigation in the Plan, there is a need for amendments to the text for housing policies. It is not sufficient to rely on a general policy aimed at protecting Habitats sites. Instead, explicit caveats need to be included where there may be conflicts between a general policy to protect Habitats sites from development and another policy.

Table 6: Results of embedding mitigation within the policy text of Boxford Neighbourhood Plan Pre-submission Draft 2021

Policy	Mitigation proposed	With proposed mitigation embedded in the policy text, can adverse effects on integrity of the identified Habitats Sites be avoided?
BOX 1- Housing Strategy for Boxford	Amend supporting text and strengthen Policy text to explicitly ensure that there will be no AEOI. Annex 1 and 2 advice on greenspace needs to be met and project level AA will be required at application stage.	No adverse effects on site integrity with mitigation embedded.
BOX 3- Rural Exception Sites	Amend supporting text and strengthen Policy text to explicitly ensure that there will be no AEOI. Annex 1 and 2 advice on greenspace needs to be met and project level AA will be required at application stage.	No adverse effects on site integrity with mitigation embedded.



4.6 Re-applying the integrity test

It can therefore be concluded that, with mitigation secured and implemented through the Suffolk Coast RAMS, there will be no adverse effect on integrity as a result of recreational disturbance from Boxford Neighbourhood Plan Pre-Submission Draft 2021 from the Plan in combination with other plans and projects.



5. Recommendations

The Habitats Sites that have been considered within this HRA are:

1. Stour and Orwell Estuaries SPA and
2. Stour and Orwell Estuaries Ramsar;

Potential impact pathways between the above Habitats Sites and the Boxford Neighbourhood Plan Pre-Submission Draft 2021 have been identified, considered and assessed for predicted recreational disturbance in combination with other plans and projects.

With regards to **recreational disturbance**, all residential development within the Plan area is predicted to result in additional recreational impacts from increased visitor pressure on the Stour and Orwell Estuaries SPA and Ramsar site. In 2016, Natural England proposed a strategic approach to LPAs and recommended identifying the scale of the disturbance and implementing measures to mitigate impacts through the preparation of a joint Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). This strategic mitigation scheme has now been adopted by Babergh DC (November 2019) to support the Babergh & Mid Suffolk Joint Local Plan and, any residential development coming forward, will thereby also support the Boxford Neighbourhood Plan Regulation 14 Pre-submission Draft.

This AA has recommended a number of wording amendments to the Boxford Neighbourhood Plan Regulation 14 Pre-submission Draft. These include the following types of changes:

- Recommended policy wording changes particularly with reference to Natural England's advice to LPAs in accordance with the Suffolk Coast RAMS
- Recommend strategic mitigation is required (e.g. Suffolk Coast RAMS) for residential policies which may include sites that fall within the 13km Zone of Influence as well as site-based mitigation.

Where policies do not identify specific locations, set a fixed level of development, or the potential for significant effects relates to the possibility of development coming forward in a particular location, or with particular characteristics is likely, the risks may be simply avoided with straightforward clarifications, which remove any uncertainty.

The recommendations to amend or add text to the policy include an explanation of how the policy should be implemented to avoid Adverse Effect on Integrity of the Stour & Orwell Estuaries SPA and Ramsar site. This does not exclude the need for project level HRA but enables a conclusion of no adverse effects on integrity at the Plan level, because the identified risks to Habitats sites have been removed. Project level HRA provides a means of checking for any further risks unforeseen at the Plan level, and for developing project specific mitigation measures in greater detail within a project level AA. Clarification to remove AEOI can be achieved by adding to the supporting text e.g. "strategic projects may require joint working by public bodies to ensure the requirements of Conservation of Habitats and Species Regulations 2017 (as amended) are met."

The recommendations from the Appropriate Assessment are precautionary, to ensure that the Boxford Neighbourhood Plan Pre-Submission Draft 2021 identifies clear mitigation needs and protects the Habitats sites from any project level impacts.



4. Conclusion

This Habitat Regulations Assessment, including Appropriate Assessment, considers the impacts arising from the Boxford Neighbourhood Plan Regulation 14 Pre-Submission Draft.

The HRA Screening stage identified that, without mitigation, further consideration was required at the Appropriate Assessment stage to determine whether the Boxford Neighbourhood Plan Regulation 14 Pre-Submission Draft, either alone or in-combination with other plans and projects, would adversely affect the integrity of Habitats sites as a result of various potential impact pathways, i.e.; recreational disturbance

In applying the HRA Test 2 –the integrity test at AA stage - based on the development type and proximity to Habitats (European) sites, mitigation needs to be embedded in the Plan in relation to residential developments of more than 50 dwellings to avoid impacts from recreational disturbance from the Plan *alone*..

The predicted *in combination effects* resulting from other plans or projects has also been assessed and avoidance and/or mitigation measures have been considered. Embedded mitigation measures for projects will need to be considered in project level HRA/AA reports and secured by way of a legal agreement attached to any planning consent. Therefore, there will be no need for further assessment for this Neighbourhood Plan.

Subject to Natural England's review, this HRA Screening Report including Appropriate Assessment concludes that the Boxford Neighbourhood Plan Pre-Submission Draft 2021 is not predicted, with mitigation secured, to result in any Adverse Effect on the Integrity of the Habitats sites in scope, either alone or in combination with other plans and projects.



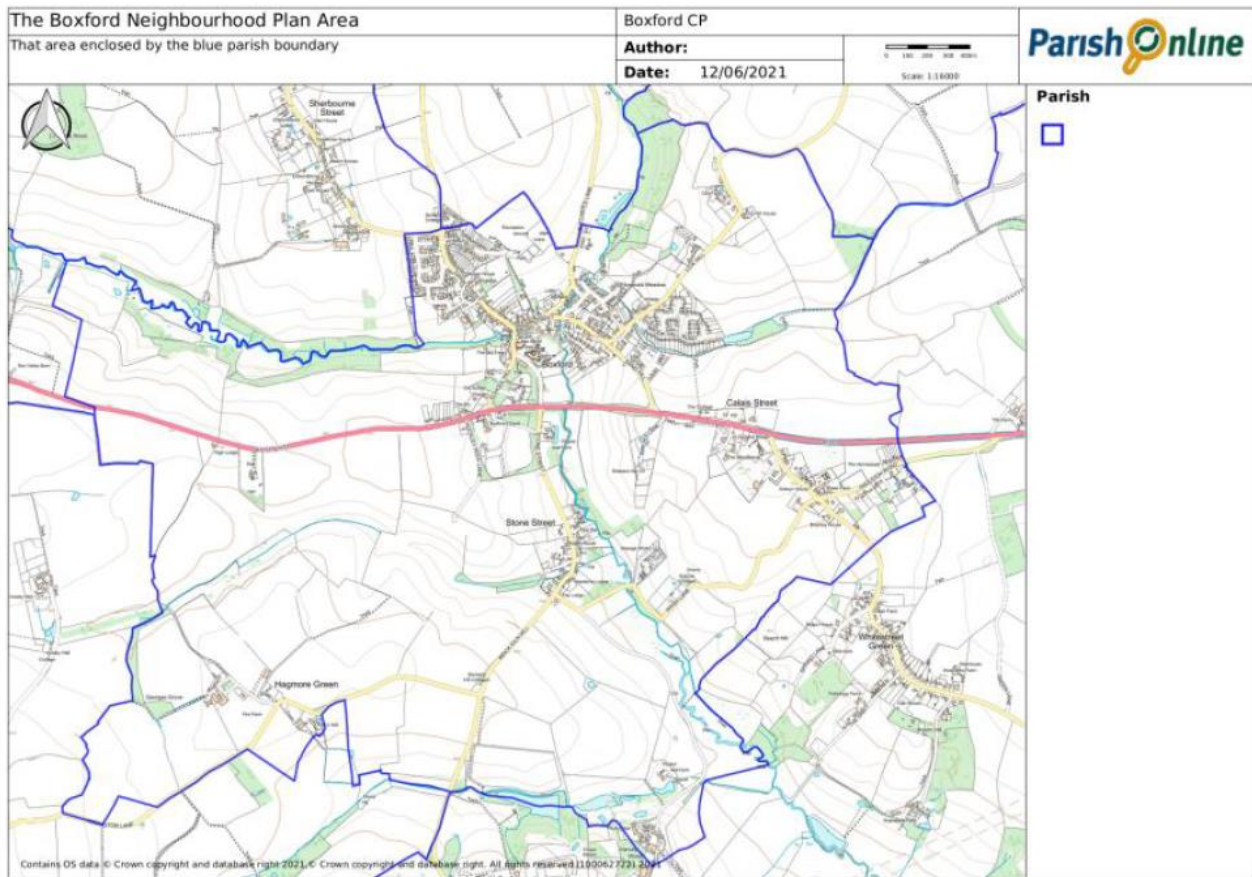
5. References

- Babergh and Mid Suffolk District Councils Joint Local Plan (2018)
- Natural England Conservation objectives for European Sites: East of England Website: <http://publications.naturalengland.org.uk/category/6581547796791296#content>
- Natural England Site Improvement Plans: East of England <http://publications.naturalengland.org.uk/category/4873023563759616>
- Place Services (June 2019) Babergh and Mid Suffolk District Councils Joint Local Plan Habitats Regulations Assessment including Appropriate Assessment
- Boxford Parish Council (2021) Boxford Neighbourhood Plan Pre-Submission Draft 2021 Neighbourhood Development Plan Regulation 14 Draft)
- Babergh & Mid Suffolk Water Cycle Study Final Report (JBA Consulting, October 2020) <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/WCS2020/BMSDC-WCS-Report-Oct20.pdf>



Appendix I

Boxford Neighbourhood Plan Area



Source: Boxford Neighbourhood Plan Pre-Submission Draft 2021 (Boxford Neighbourhood Plan Steering Group, July 2021)



Appendix II

Boxford Parish and Habitats Sites within 20km



Legend

- Boxford Parish
- 20km
- Special Area of Conservation
- Ramsar
- Special Protection Area

Client: Babergh District Council

Project:
Boxford Neighbourhood Plan,
pre-submission draft 2021
Habitats Regulation Assessment



Date: 09/08/21

Author: Zara Hanshaw



Appendix III

Characteristics of Habitats Sites

This appendix contains information about the Habitats Sites included in the scoping for this HRA. Information about each site's area, the site descriptions, qualifying features and pressures and threats are drawn from Natural England's Site Improvement Plans (SIPs) and the Standard Data Forms or Ramsar Information Sheets available from the JNCC website. Site conservation objectives are drawn from Natural England's website and are only available for SACs and SPAs. Supplementary Advice has also been added to describe the range of ecological attributes that are most likely to contribute to a site's overall integrity and key vulnerabilities to consider within Habitats Regulations assessments.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
The Stour and Orwell Estuaries <p>These estuaries straddle the eastern part of the Essex/Suffolk border in eastern England. The estuaries include extensive mud-flats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The mud-flats hold <i>Enteromorpha</i>, <i>Zostera</i> and <i>Salicornia</i> spp. The site also includes an area of low-lying grazing marsh at Shotley Marshes on the south side of the Orwell. In summer, the site supports important numbers of breeding Avocet <i>Recurvirostra avosetta</i>, while in winter they hold major concentrations of waterbirds, especially geese, ducks and waders. The geese also feed, and waders roost, in surrounding areas of agricultural land outside the SPA. The site has close ecological links with the Hamford Water and Mid-Essex Coast SPAs, lying to the south on the same coast.</p>				
Stour and Orwell Estuaries SPA EU Code: UK9009121	3676.92	Qualifying Species: Annex I species: Over winter: <ul style="list-style-type: none"> • Hen Harrier <i>Circus cyaneus</i> Over winter: <ul style="list-style-type: none"> • Black-tailed Godwit <i>Limosa limosa islandica</i> • Dunlin <i>Calidris alpina alpina</i> • Grey Plover <i>Pluvialis squatarola</i> • Pintail <i>Anas acuta</i> 	With regard to the individual species and/or assemblage of species for which the site has been classified ("the Qualifying Features" listed below); Avoid the deterioration of the Habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.	Coastal squeeze : Coastal defences are present along most of the Orwell coastline to mitigate for impacts from climate change, such as rising sea level. Unless changes are made to the management of the coastline, Habitats supporting qualifying SPA birds will be lost or degraded through coastal squeeze, sedimentation and reduced exposure. Public access/disturbance : Stour and Orwell Estuaries is subject to land- and water-based activities, including boating and water sports; walking; bait-digging; fishing; wildfowling; and



		<ul style="list-style-type: none"> • Redshank <i>Tringa totanus</i> • Ringed Plover <i>Charadrius hiaticula</i> • Shelduck <i>Tadorna tadorna</i> • Turnstone <i>Arenaria interpres</i> <p>Waterbird assemblages::</p> <ul style="list-style-type: none"> • Cormorant <i>Phalacrocorax carbo</i> • Pintail <i>Anas acuta</i> • Ringed Plover <i>Charadrius hiaticula</i> • Grey Plover <i>Pluvialis squatarola</i> • Dunlin <i>Calidris alpina alpina</i> • Black-tailed Godwit <i>Limosa limosa islandica</i> • Redshank <i>Tringa tetanus</i> • Shelduck <i>Tadorna tadorna</i> 	<p>Subject to natural change, to maintain or restore:</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 populations of the qualifying features;</p> <p>The distribution of the qualifying features within the site.</p>	<p>military overflight training. These activities are likely to impact Habitats supporting breeding and overwintering water birds. A better understanding of which species and Habitats are most susceptible; which types of activity are most disturbing; and which locations and times of year are most sensitive is required to ensure the Estuaries are appropriately managed.</p> <p>Changes in species distribution:</p> <p>Declines in the number of bird species present at Orwell coastline have occurred. This is likely to be the result of changes in population and distribution on an international scale, due to climate change.</p> <p>Invasive species:</p> <p>An increase in <i>Spartina anglica</i> may be affecting the growth of <i>Spartina maritima</i>, a key habitat feature for qualifying bird roosting and feeding areas of saltmarsh and mudflat.</p> <p>Planning permission- general:</p> <p>The issue of development in combination with other factors is not fully understood. To ensure</p>
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		<ul style="list-style-type: none"> • Great Crested Grebe <i>Podiceps cristatus</i> • Curlew <i>Numenius arquata</i> • Dark-bellied Brent Goose <i>Branta bernicla bernicla</i> • Wigeon <i>Anas Penelope</i> • Goldeneye <i>Bucephala clangula</i> • Oystercatcher <i>Haematopus ostralegus</i> • Lapwing <i>Vanellus vanellus</i> • Knot <i>Calidris canutus</i> • Turnstone <i>Arenaria interpres</i>. <p>Further information can be found via Natural England's Supplementary Advice.</p>		<p>management is appropriate to the SPA a better understanding of the sensitivities relating to each habitat, species and location to different types of development is required. Difficult issues highlighted by the SIP include; a) Assessing the cumulative effects of numerous, small and often 'non- standard' developments. b) Development outside the SPA boundary can have negative impacts, particularly on the estuaries' birds. c) Assessing the indirect, 'knock-on' effects of proposals. d) Pressure to relax planning conditions on existing developments.</p> <p>Air pollution- impact from atmospheric nitrogen deposition:</p> <p>Atmospheric nitrogen deposition exceeds the relevant critical loads for coastal dune Habitats used by breeding terns and hence there is a risk of harmful effects.</p> <p>Inappropriate coastal management:</p> <p>Due to the presence of existing hard sea defences, such as sea walls there is little scope for adaptation to rising sea levels. Any freshwater Habitats behind failing seawalls are likely to be inundated by</p>
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				<p>seawater, which would result in the loss of this habitat within the SPA.</p> <p>Fisheries- Commercial and estuarine:</p> <p>Commercial fishing activities can be very damaging to inshore marine Habitats and the bird species dependent on the communities they support. Any 'amber or green' categorised commercial fishing activities in Habitats Marine Sites are assessed by Kent and Essex Inshore Fisheries Conservation Authority (IFCA). This assessment takes into account any in-combination effects of amber activities and/or appropriate plans or projects.</p>
<p>Stour and Orwell Estuaries Ramsar site</p> <p>EU Code: UK11067</p>	3676.92	<p>Ramsar criterion 2</p> <p>Contains seven nationally scarce plants:</p> <ul style="list-style-type: none"> • Stiff saltmarsh-grass <i>Puccinellia rupestris</i> • Small cord-grass <i>Spartina maritime</i> 	None available.	<p>Similar to Stour and Orwell Estuaries SPA (See above).</p> <p>A key threat identified by RIS was erosion.</p> <p>Erosion:</p> <p>Natural coastal processes exacerbated by fixed sea defences, port development and maintenance dredging. Erosion is being tackled through sediment replacement for additional erosion that can be</p>



		<ul style="list-style-type: none"> • Perennial glasswort <i>Sarcocornia perennis</i> • Lax-flowered sea lavender <i>Limonium humile</i> • Eelgrasses <i>Zostera angustifolia</i>, <i>Z. marina</i> and <i>Z. noltei</i>. <p>Ramsar criterion 5</p> <p>Assemblages of international importance; species with peak counts in winter; 63,017 waterfowl.</p> <p>Ramsar criterion 6</p> <p>Species/ populations occurring at levels of international importance:</p> <p>Species with peak counts in spring/autumn:</p> <ul style="list-style-type: none"> • Common redshank , <i>Tringa totanus totanus</i> • Species with peak counts in winter: 		<p>attributed to port development and maintenance dredging. A realignment site has been created on-site to make up for the loss of habitat due to capital dredging. General background erosion has not been tackled although a Flood Management Strategy for the site is being produced.</p>
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- Dark-bellied brent goose, *Branta bernicla bernicla*
- Northern pintail , *Anas acuta*
- Grey plover , *Pluvialis squatarola*
- Red knot , *Calidris canutus islandica*
- Dunlin , *Calidris alpina alpina*
- Black-tailed godwit , *Limosa limosa islandica*
- Common redshank , *Tringa totanus tetanus*

Essex Estuaries

The Mid-Essex Coast comprises an extensive complex of estuaries and intertidal sand and silt flats, including several islands, shingle and shell beaches and extensive areas of saltmarsh. The proposed SPA follows the boundaries of five SSSIs: the Colne Estuary, the Blackwater Estuary, Dengie, the River Crouch Marshes and Foulness.



<p><u>Essex</u> <u>Estuaries</u> <u>SAC</u></p> <p>EU Code: UK0013690</p>	<p>46109.95</p>	<p>Qualifying habitats:</p> <ul style="list-style-type: none"> • Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks • Estuaries • Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats. • Salicornia and other annuals colonizing mud and sand; Glasswort and other annuals colonising mud and sand • Spartina swards (<i>Spartinion maritimae</i>); Cord-grass swards 	<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> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely 	<p>Coastal Squeeze:</p> <p>Coastal defences along much of the Essex coastline prevent intertidal habitats from shifting landward in response to rising sea levels. As a result, these habitats are being gradually degraded and reduced in extent, with knock-on effects on the waterbirds and other species they support. 'Managed realignment' schemes and additional intervention measures to create new areas of intertidal habitat and reduce erosion rates are being implemented but more will be needed to offset future losses. Grazing marshes in the area of the Mid Essex Coast SPAs are important for waterbirds and are also threatened by sea level rise because most are near or below mean high tide level, currently protected behind seawalls.</p> <p>Public access /disturbance:</p> <p>Breeding and overwintering waterbirds are susceptible to human disturbance from a range of land- and water-based activities - including boating and watersports, walking, bait-digging, fishing and wildfowling - as well as low-flying aircraft. Some</p>
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		<ul style="list-style-type: none"> • Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) • Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>) 		<p>activities, such as powerboating, may produce physical disturbance to habitats.</p> <p>Planning permission: general – Several of the issues affecting the Essex Estuaries and the management of disturbance effects on the sites are related to each other, and addressing them is likely to require an improved overview of the relative sensitivities of different habitats, species and locations to different types of development.</p> <p>Changes in species distributions:</p> <p>Declines have occurred in the numbers of some of the waterbird species using the Essex Estuaries SIP area but these may be due to changes in their distributions or population levels at a national or continental scale, possibly linked to climate change.</p> <p>Invasive species:</p> <p>An increase in Pacific oyster <i>Crassostrea gigas</i> settlement and colonisation within the European Marine Site (EMS) may result in areas of foreshore</p>
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				<p>being covered in such numbers as to make them difficult to access and utilise as feeding grounds for overwintering birds. Invasive common cord grass may adversely affect other species and habitats, including feeding and roosting areas of SPA bird species.</p> <p>Fishing:</p> <p>Recreational bait digging may impact waterbirds e.g. by reducing prey availability, or damaging the intertidal mudflats and sandflats and associated communities. The extent of the activity and potential impacts on site features are not currently well understood. Certain forms of commercial fishing, e.g. bottom towed fishing gear; can be very damaging to inshore marine habitats and the bird species dependent on the communities they support.</p> <p>Air Pollution- risk of atmospheric nitrogen deposition:</p> <p>Atmospheric nitrogen deposition exceeds the relevant critical loads for coastal dune habitats used by breeding terns and hence there is a risk of</p>
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				harmful effects. However, on the Essex estuaries declines in the numbers of breeding terns appear to be due mainly to erosion of a man-made cockle-shingle bank (at Foulness) and to disturbance (elsewhere), rather than to over-vegetation of breeding areas caused by nitrogen deposition.
<p>Colne Estuary</p> <p>Colne Estuary is a comparatively short and branching estuary, with five tidal arms which flow into the main river channel. The estuary has a narrow intertidal zone predominantly composed of flats of fine silt with mudflat communities typical of south-eastern estuaries. The estuary is of international importance for wintering Brent Geese and Black-tailed Godwit and of national importance for breeding Little Terns and five other species of wintering waders and wildfowl. The variety of habitats which include mudflat, saltmarsh, grazing marsh, sand and shingle spits, disused gravel pits and reedbeds, support outstanding assemblages of invertebrates and plants.</p>				
<p><u>Colne Estuary SPA</u></p> <p>EU code: UK9009243</p>	2701.43	<p>Qualifying species:</p> <ul style="list-style-type: none"> • Dark-bellied brent goose; <i>Branta bernicla bernicla</i> (Non-breeding) • Common pochard; <i>Aythya ferina</i> (Breeding) • Hen harrier; <i>Circus cyaneus</i> (Non-breeding) 	<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> <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features 	<p>Coastal Squeeze:</p> <p>Coastal defences along much of the Essex coastline prevent intertidal habitats from shifting landward in response to rising sea levels. As a result, these habitats are being gradually degraded and reduced in extent, with knock-on effects on the waterbirds and other species they support. 'Managed</p>



		<ul style="list-style-type: none"> • Ringed plover; <i>Charadrius hiaticula</i> (Breeding) • Common redshank; <i>Tringa totanus</i> (Non-breeding) • Little tern; <i>Sterna albifrons</i> (Breeding) • Waterbird assemblage 	<ul style="list-style-type: none"> • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site. 	<p>realignment' schemes and additional intervention measures to create new areas of intertidal habitat and reduce erosion rates are being implemented but more will be needed to offset future losses. Grazing marshes in the area of the Mid Essex Coast SPAs are important for waterbirds and are also threatened by sea level rise because most are near or below mean high tide level, currently protected behind seawalls.</p> <p>Public access /disturbance:</p> <p>Breeding and overwintering waterbirds are susceptible to human disturbance from a range of land- and water-based activities - including boating and watersports, walking, bait-digging, fishing and wildfowling - as well as low-flying aircraft. Some activities, such as powerboating, may produce physical disturbance to habitats.</p> <p>Planning permission- general:</p>
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				<p>Several of the issues affecting the Essex Estuaries and the management of disturbance effects on the sites are related to each other, and addressing them is likely to require an improved overview of the relative sensitivities of different habitats, species and locations to different types of development.</p> <p>Changes in species distributions:</p> <p>Declines have occurred in the numbers of some of the waterbird species using the Essex Estuaries SIP area but these may be due to changes in their distributions or population levels at a national or continental scale, possibly linked to climate change.</p> <p>Invasive species:</p> <p>An increase in Pacific oyster <i>Crassostrea gigas</i> settlement and colonisation within the European Marine Site (EMS) may result in areas of foreshore being covered in such numbers as to make them difficult to access and utilise as feeding grounds for</p>
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				<p>overwintering birds. Invasive common cord grass may adversely affect other species and habitats, including feeding and roosting areas of SPA bird species.</p> <p>Fishing:</p> <p>Recreational bait digging may impact waterbirds e.g. by reducing prey availability, or damaging the intertidal mudflats and sandflats and associated communities. The extent of the activity and potential impacts on site features are not currently well understood. Certain forms of commercial fishing, e.g. bottom towed fishing gear; can be very damaging to inshore marine habitats and the bird species dependent on the communities they support.</p> <p>Air Pollution- risk of atmospheric nitrogen deposition:</p> <p>Atmospheric nitrogen deposition exceeds the relevant critical loads for coastal dune habitats used</p>
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				by breeding terns and hence there is a risk of harmful effects. However, on the Essex estuaries declines in the numbers of breeding terns appear to be due mainly to erosion of a man-made cockle-shingle bank (at Foulness) and to disturbance (elsewhere), rather than to over-vegetation of breeding areas caused by nitrogen deposition.
<u>Colne Estuary Ramsar Site</u> EU Code: UK11015	2701.43	Ramsar criterion 1 The site is important due to the extent and diversity of saltmarsh present. This site, and the four other sites in the Mid-Essex Coast complex, includes a total of 3,237 ha, that represent 70% of the saltmarsh habitat in Essex and 7% of the total saltmarsh in Britain. Ramsar criterion 2 The site supports 12 species of nationally scarce plants and at least 38 British Red Data Book invertebrate species.	None available	N/A



		<p>Ramsar criterion 3</p> <p>This site supports full and representative sequences of saltmarsh plant communities covering the range of variation in Britain.</p> <p>Ramsar criterion 5</p> <p>Assemblages of international importance; species with peak counts in winter; 32041 waterfowl (5 year peak mean 1998/99-2002/2003)</p> <p>Ramsar criterion 6</p> <p>Qualifying Species/populations (as identified at designation):</p> <p>Species with peak counts in winter:</p>		
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		<ul style="list-style-type: none"> • Dark-bellied brent goose; <i>Branta bernicla bernicla</i>, • Common redshank; <i>Tringa totanus totanus</i>, <p>Species/populations identified subsequent to designation for possible future consideration under criterion 6.</p> <p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> • Black-tailed godwit ; <i>Limosa limosa islandica</i> 		
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Abberton Reservoir

Abberton Reservoir is a large water storage reservoir lying about four miles south of Colchester. In numerical terms, Abberton is the most important reservoir in Great Britain for wintering wildfowl. It owes this position to its proximity to the coast and to the strict protection given to the site. Most of the SSSI is statutorily protected by the Wild Birds (Abberton Reservoir Sanctuary) Order 1967.



<p>Abberton Reservoir SPA</p> <p>EU code: UK9009141</p>	<p>718.31</p>	<p>Qualifying species:</p> <ul style="list-style-type: none"> • A005 Podiceps cristatus; Great crested grebe (Non-breeding) • A017 Phalacrocorax carbo; Great cormorant (Breeding) • A036 Cygnus olor; Mute swan (Non-breeding) • A050 Anas penelope; Eurasian wigeon (Non-breeding) • A051 Anas strepera; Gadwall (Non-breeding) • A052 Anas crecca; Eurasian teal (Non-breeding) • A056 Anas clypeata; Northern shoveler (Non-breeding) • A059 Aythya ferina; Common pochard (Non-breeding) 	<p>For each individual species, maintain or restore as appropriate the size of the nonbreeding population at/to a size which is above the baseline for each species, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent The extent and distribution of the habitats of the qualifying features.</p> <p>Maintain the extent, distribution and availability of suitable breeding habitat which supports the feature in the nonbreeding/wintering period (moulting, roosting, loafing, feeding).</p> <p>Maintain or, where necessary, restore concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System (www.apis.ac.uk).</p>	<p>Siltation – high sediment load in reservoir inflow due to agricultural practices within catchment.</p> <p>Public access / disturbance – designated waterbirds are vulnerable to human disturbance but well controlled by Essex & Suffolk Water; occasional trespassing and disturbance by low flying aircraft.</p> <p>Planning permission: general – potential future threat to designated waterbirds if farmland providing supporting habitat close to the SPA were lost to development; requires further study.</p> <p>Changes in species distributions – unexplained decline in designated population of cormorant. Bird strike – death of designated mute swans and possibly other species from collision with overhead powerlines near reservoir.</p> <p>Water pollution – Water stored in the reservoir is high in nutrients (eutrophic) as it comes from intensively farmed catchment areas. Resulting algal blooms may include toxic blue-green algae that can kill wildfowl, though no significant mortality has been recorded. Historically, increased water from the</p>
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		<ul style="list-style-type: none"> • A061 Aythya fuligula; Tufted duck (Non-breeding) • A067 Bucephala clangula; Common goldeneye (Non-breeding) • A125 Fulica atra; Common coot (Non-breeding) • Waterbird assemblage <p>Further information can be found via Natural England's Supplementary Advice.</p>	<p>Maintain the safe passage of birds moving between roosting and feeding areas.</p> <p>Maintain management or other measures (whether within and/or outside the site boundary as appropriate) necessary to maintain the structure, function and/or the supporting processes associated with the feature and its supporting habitats.</p> <p>Maintain the availability of key prey species at preferred prey sizes.</p> <p>Maintain the availability of standing water at optimal depth.</p> <p>Where the supporting habitats of the SPA feature are dependent on surface water, maintain water quality and quantity at a standard which provides the necessary conditions to support the feature.</p> <p>Restrict the frequency, duration and/or intensity of disturbance of nesting, roosting, foraging, feeding, moulting</p>	<p>reservoir led to low water levels although no decrease in wildfowl was attributed to this.</p> <p>Currently the water level of the main, eastern section is being raised by 3 metres to increase storage capacity. As part of the level-raising scheme, the original concrete banks have been removed and the shoreline re-profiled, creating extensive new areas of shallow wetland habitat for the site's waterfowl.</p> <p>The Water Company has a consultative committee which addresses conservation issues at all its sites, and the Abberton Reserve Committee (involving Essex Wildlife Trust and EN) addresses local issues.</p> <p>Air Pollution: risk of atmospheric nitrogen deposition – The site is identified as at risk from air pollution as Nitrogen deposition levels exceed the site- relevant critical load for ecosystem protection. However, the site's Nitrogen load is likely to be dominated by levels in the water entering the reservoir (mainly from the distant Ouse catchment) rather than direct deposition.</p>
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			and/or loafing birds so that the feature is not significantly disturbed.	
Abberton Reservoir Ramsar EU code: UK11001	718.31	<p>Qualifying species:</p> <p>Supports 23787 waterfowl (5 year peak mean 1998/99-2002/2003) including the following internationally important waterbird assemblage:</p> <ul style="list-style-type: none"> • Gadwall, <i>Anas strepera strepera</i>; • Northern shoveler, <i>Anas clypeata</i>; • Eurasian wigeon, <i>Anas Penelope</i>; • Mute swan, <i>Cygnus olor</i> • Common pochard, <i>Aythya farina</i>; • Great cormorant, <i>Phalacrocorax carbo carbo</i>; • Eurasian teal, <i>Anas crecca</i>; 	N/A	Similar to Abberton Reservoir SPA (above).



		<ul style="list-style-type: none">• Tufted duck, <i>Aythya fuligula</i>;• Common coot, <i>Fulica atra atra</i>;• Pied avocet, <i>Recurvirostra avosetta</i>;• Ruff, <i>Philomachus pugnax</i>,• Black-tailed godwit, <i>Limosa limosa islandica</i>;• Spotted redshank, <i>Tringa erythropus</i>,• Common greenshank, <i>Tringa nebularia</i>,• Common goldeneye, <i>Bucephala clangula</i>		
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