

# **Habitats Regulation Assessment (Appropriate Assessment)**

for

Ipswich Borough Council  
**Proposed submission Core Strategy and  
Policies DPD Review**

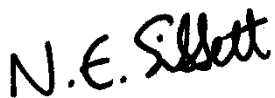
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## Quality control

### Appropriate Assessment

for

Ipswich Borough Council  
Proposed Submission Core Strategy and Policies DPD Review

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## Executive summary

This document is the Appropriate Assessment under the Conservation of Habitats and Species Regulations 2010, of Ipswich Borough Council's Proposed Submission Core Strategy and Policies DPD Review, which forms part of the Council's Local Plan. There are 20 Core Strategy policies and 29 Development Management policies within the plan.

The Appropriate Assessment in this report is carried out on behalf of Ipswich Borough Council to allow it to decide whether to give effect to the plan. The plan would not be sound if the Appropriate Assessment could not show that there was no adverse affect upon the integrity of nature conservation sites of European importance as recognised by their designation as Special Areas of Conservation and / or Special Protection Area. The Proposed Submission Core Strategy and Policies DPD Review is likely to be subject to an Examination in Public, and this Appropriate Assessment will also be open to scrutiny at that Examination.

Screening of 'Likely Significant Effect' identified that policy CS7 and related policies (CS2, CS10) were likely to have a significant effect, due to a potential increased recreational use of the Orwell Estuary, part of Stour and Orwell Estuaries SPA) and possibly to Deben Estuary SPA. Policies DM25 'Protection of Employment Land' and DM33 'Green Corridors' were also assessed, because those policies were previously assessed as part of the Draft Site Allocations and Policies document before moving over to the Core Strategy and Policies.

The appropriate assessment showed that Policy CS7, 'The Amount of Housing Required', and related policies would not have an adverse affect upon the integrity of European sites. Additional recreational impact causing disturbance to birds on the Stour and Orwell Estuaries SPA and causing disturbance or harm to European sites at greater distance would not occur, due to mitigation within the Proposed Submission Core Strategy and Policies DPD Review. The mitigation includes a new Country Park in the Ipswich northern fringe, visitor management plans for existing European sites, requiring major new developments to include on-site public open spaces and wildlife habitat, and others.

Policies DM25 'Protection of Employment Land' and DM33 'Green Corridors' were assessed as having no adverse affect upon the integrity of the Stour and Orwell Estuaries SPA. Other policies would not have any impact. The mitigation for policy CS7 and related policies was also satisfactory to mitigate any potential harm from the Proposed Submission Core Strategy and Policies DPD Review in combination with the Local Plan of Suffolk Coastal District Council and other plans or projects, and no in-combination adverse affect was identified.

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# 1 Introduction

## 1.1 The plan being considered

- 1.1.1 This document is the Appropriate Assessment under the Conservation of Habitats and Species Regulations 2010, of Ipswich Borough Council's Proposed Submission Core Strategy and Policies DPD Review as presented to Ipswich Borough Council's meeting on 18<sup>th</sup> November 2014. This forms part of the Ipswich Local Plan and covers three areas of policy.
- 1.1.2 Firstly, it sets out a strategic vision and objectives to guide the development of the town. Secondly it promotes the spatial strategy for the development of the town over the next fifteen years through strategic policies, and thirdly it provides a suite of policies to control, manage and guide development across the Borough.
- 1.1.3 The Proposed Submission Core Strategy and Policies DPD Review sets out the strategy for the future development of Ipswich to 2031. It indicates broadly how and where the Borough will accommodate development to meet local needs identified in the Ipswich Community Strategy and through local evidence. It also explains how it will ensure this is done in a sustainable way. It contains detailed policies to enable the management of development in Ipswich.
- 1.1.4 An Appropriate Assessment of the Ipswich Borough Council Core Strategy and Policies DPD was undertaken in 2009, and updated in November 2010 for the Focussed Review at that time, was carried out by The Landscape Partnership.
- 1.1.5 An Appropriate Assessment of the Draft Ipswich Borough Council Core Strategy and Policies DPD was carried out by The Landscape Partnership in January 2014. The Draft plan and Appropriate Assessment were subsequently open to public consultation. The Proposed Submission Core Strategy and Policies DPD Review was then updated as a result of the consultation. This Appropriate Assessment is based on the January 2014 Appropriate Assessment, updated to account for consultees' comments and changes to the Core Strategy.

## 1.2 Appropriate Assessment requirement

- 1.2.1 The Appropriate Assessment process is required under the Conservation of Habitats and Species Regulations 2010. These regulations are often abbreviated to, simply, the 'Habitats Regulations'.
- 1.2.2 Regulation 102 states that
- (1) Where a land use plan—
    - (a) is likely to have a significant effect on a European site in Great Britain or a European offshore marine site (either alone or in combination with other plans or projects), and
    - (b) is not directly connected with or necessary to the management of the site,the plan-making authority for that plan shall, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.
  - (2) The plan-making authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.
  - (3) They shall also, if they consider it appropriate, take the opinion of the general public, and if they do so, they shall take such steps for that purpose as they consider appropriate.
  - (4) In the light of the conclusions of the assessment, and subject to regulation 103 (considerations of overriding public interest), the plan-making authority or, in the case of a regional spatial strategy, the Secretary of State shall give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

(5) A plan-making authority shall provide such information as the Secretary of State or the Welsh Ministers may reasonably require for the purposes of the discharge of the obligations of the Secretary of State or the Welsh Ministers under this Part.

(6) This regulation does not apply in relation to a site which is—

(a) a European site by reason of regulation 10(1)(c); or

(b) a European offshore marine site by reason of regulation 15(c) of the 2007 Regulations (site protected in accordance with Article 5(4) of the Habitats Directive).

1.2.3 The plan-making authority, as defined under the Regulations, is Ipswich Borough Council.

1.2.4 The Proposed Submission Core Strategy and Policies DPD Review is likely to be subject to an Examination in Public, and the Appropriate Assessment process will also be open to scrutiny at that Examination.

### **1.3 Appropriate Assessment process**

1.3.1 The Appropriate Assessment process involves a number of steps, which are set out sequentially below.

#### ***Likely significant effect***

1.3.2 The Council, in consultation with Natural England should decide whether or not the plan is likely to have a significant effect on any European site. This is a 'coarse filter' and any effect, large or small, positive or negative, should be considered.

#### ***Connected to management of the site***

1.3.3 The Council should decide whether the plan is connected to the nature conservation management of European sites. Invariably, for a development plan document, this is not the case.

#### ***Screening***

1.3.4 The combination of decisions on likely significant effect and connections to management is often called 'screening'. If the plan is likely to have a significant effect, and is not connected to the management of the site, an Appropriate Assessment is required.

#### ***Scoping***

1.3.5 The whole plan must be assessed, but a 'scoping' exercise helps decide which parts of the plan have potential to give rise to significant effects and therefore where assessment should be prioritised. Natural England is an important consultee in this process. The implementation of both screening and scoping process is described in Section 3 below.

#### ***Consultations***

1.3.6 Natural England is a statutory consultee, and so should be consulted at the draft plan stage. The public may also be consulted if it is considered appropriate, for example if the appropriate assessment is likely to result in significant changes to the plan.

#### ***Iterations and revision***

1.3.7 The process is iterative; the conclusions of the first assessment may result in changes to the plan, and so a revision of the assessment would be required. If the revised assessment suggests further plan changes, the iteration will continue.

1.3.8 Iterative revisions typically continue until it can be ascertained that the plan will not have an adverse effect on the integrity of any European site.

1.3.9 There are further provisions for rare cases where over-riding public interest may mean that a land-use plan may be put into effect, notwithstanding a negative assessment, where there are no alternatives to development, but these provisions are not expected to be routinely used.

***Guidance and good practice***

- 1.3.10 This report has taken account of published guidance and good practice including: Department for Communities and Local Government, 2006, *Planning for the Protection of European Sites: Appropriate Assessment under The Conservation (Natural Habitats &c.) (Amendment) (England and Wales) Regulations 2006: Guidance for Regional Spatial Strategies and Local Development Documents*; Office of the Deputy Prime Minister (ODPM), Circular 06/2005, Department for Environment Food and Rural Affairs Circular 01/2005, *Biodiversity and Geological Conservation: Statutory obligations and their impact within the planning system*; and Royal Society for the Protection of Birds, 2007, *The Appropriate Assessment of Spatial Plans in England: A guide to why, when and how to do it*.

**1.4 European sites**

- 1.4.1 European sites, often known as Natura 2000 sites across Europe, are those legally registered as Special Protection Areas (for bird sites) and Special Areas of Conservation (for species other than birds, and habitats). These are usually abbreviated as SPA and SAC respectively. Wetlands of International Importance, designated under the Ramsar Convention, are usually abbreviated as Ramsar sites.
- 1.4.2 Although the Appropriate Assessment process only legally applies to European sites, Government Policy in NPPF<sup>1</sup> is to apply the same protection to potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites. The use of the term 'European site' or 'European sites' in this report includes all those sites to which Government policy applies.
- 1.4.3 As the interest features of the Ramsar sites are usually very similar to the interest features of the SPA and / or SAC designations, both geographically and ecologically, the assessment below, for clarity does not always repeat Ramsar site names. The assessment does however consider Ramsar sites fully, and if an assessment for a Ramsar site was found to differ from that for the respective SPA / SAC, this would be clearly identified.

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<sup>1</sup> National Planning Policy Framework (March 2012). Department of Communities and Local Government.



## 2 European sites potentially affected

### 2.1 Sites within the Local Plan area

2.1.1 All European sites within the Local Plan area are potentially affected. There is one site within Ipswich Borough which is designated as SPA and as a Ramsar site, with much overlap between designations. The site location is shown in Figure 01.

2.1.2 Appendix 1 gives details of the European site within Ipswich Borough (downloaded from Natural England's publications website on 4<sup>th</sup> December 2014), and Appendix 2 gives Natural England's Conservation Objectives for the European site from the same source.

#### ***Stour and Orwell Estuaries SPA***

2.1.3 The Stour and Orwell Estuaries is a wetland of international importance, comprising extensive mudflats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. It provides habitats for an important assemblage of wetland birds in the non-breeding season and supports internationally important numbers of wintering and passage wildfowl and waders.

#### ***Stour and Orwell Estuaries Ramsar site***

2.1.4 In addition to the internationally important bird interest as set out above, the Ramsar site also supports several nationally scarce plant species and British Red Data Book invertebrates.

### 2.2 Sites outside the Local Plan area

2.2.1 European sites in neighbouring Districts are also potentially affected by development within Ipswich Borough.

2.2.2 European sites in the vicinity are large and in some instances overlap Local Authority boundaries, so are listed below without reference to specific Districts/Boroughs. A 15km radius from the boundary of Ipswich Borough was chosen as the 'area of search' within which European sites potentially affected by development in the Local Plan were identified. Sites are shown in Figure 01. Appendix 3 gives details of the European sites within a 15km radius from the boundary of Ipswich Borough (downloaded from Natural England's publications website on 4<sup>th</sup> December 2014), and Appendix 4 gives Natural England's Conservation Objectives for these sites from the same source. Appendix 5 gives the site plan for Hamford Water candidate SAC as it is not yet available in GIS form for inclusion on Figure 01.

2.2.3 European sites within the 15km radius are;

#### ***Hamford Water candidate SAC***

2.2.4 Hamford Water is a large, shallow estuarine basin comprising tidal creeks, islands, intertidal mud, sand flats and saltmarshes. Above the saltmarsh there is unimproved and improved grassland (including grazing marsh), scrub, woodland, hedges, ditches, ponds and reedbeds. The SAC encompasses those areas where Fisher's Estuarine Moth's food plant hog's fennel (*Peucedanum officinale*) grows and where there is an abundance of the grasses required by the species for egg laying. Fisher's Estuarine Moth *Gortyna borelli lunata* has a localised population distribution in the UK, due to its specific habitat requirements and is only found in two areas, the north Essex coast and the north Kent Coast. Hamford Water supports the majority of the Essex population and is the most important UK site for this species, supporting approximately 70% of the population. The SAC is small in size, in comparison to the SPA.

#### ***Hamford Water SPA and Ramsar site***

2.2.5 Hamford Water SPA and Ramsar site is an estuary and saltmarsh system which supports a great number of breeding and wintering birds.

#### ***Deben Estuary SPA / Ramsar***

2.2.6 The Deben Estuary is designated as SPA and as Ramsar. The estuary supports a highly complex mosaic of habitat types including mudflats, lower and upper saltmarsh, swamp and

scrub. The composition of the mosaic varies with substrate, frequency and duration of tidal inundation, exposure, location and management.

- 2.2.7 The SPA designation is based on large numbers of wintering Avocet and Dark-bellied Brent geese, whereas the Ramsar designation also includes a wider range of migrating and wintering birds, flora, and fauna including the rare snail *Vertigo angustifolia*.

#### **Sandlings SPA**

- 2.2.8 Sandlings SPA contains heathland and conifer plantation which support nightjar and woodlark.

#### **Staverton Park and the Thicks SAC**

- 2.2.9 This site is representative of old acidophilous oak woods in the eastern part of its range, and its ancient oaks *Quercus* spp. have rich invertebrate and epiphytic lichen assemblages. Despite being in the most 'continental' part of southern Britain, the epiphytic lichen flora of this site includes rare and Atlantic species, such as *Haemotomma elatinum*, *Lecidea cinnabarina*, *Thelotrema lepadinum*, *Graphis elegans* and *Stenocybe septata*. Part of the site includes an area of old holly *Ilex aquifolium* trees that are probably the largest in Britain. The site has a very well-documented history and good conservation of woodland structure and function.

#### **Alde-Ore Estuary SPA / Ramsar**

- 2.2.10 Alde-Ore Estuary SPA is an estuary with extensive areas of saltmarsh and shingle habitats, which supports a large number of wintering and breeding bird species.

- 2.2.11 The Ramsar site, with the same boundaries as the SPA, comprises the estuary complex of the rivers Alde, Butley and Ore, including Havergate Island and Orfordness. There are a variety of habitats including, intertidal mudflats, saltmarsh, vegetated shingle (including the second-largest and best-preserved area in Britain at Orfordness), saline lagoons and grazing marsh. The Orfordness/Shingle Street landform is unique within Britain in combining a shingle spit with a cusped foreland. The site supports nationally-scarce plants, British Red Data Book invertebrates, and notable assemblages of breeding and wintering wetland birds.

#### **Alde, Ore and Butley Estuaries SAC**

- 2.2.12 This estuary, made up of three rivers, is the only bar-built estuary in the UK with a shingle bar. This bar has been extending rapidly along the coast since 1530, pushing the mouth of the estuary progressively south-westwards. It is relatively wide and shallow, with extensive intertidal mudflats on both sides of the channel in its upper reaches and saltmarsh accreting along its fringes. The Alde subsequently becomes the south-west flowing River Ore, which is narrower and deeper with stronger currents. The smaller Butley River, which has extensive areas of saltmarsh and a reedbed community bordering intertidal mudflats, flows into the Ore shortly after the latter divides around Havergate Island. There is a range of littoral sediment and rock biotopes (the latter on sea defences) that are of high diversity and species richness for estuaries in eastern England. Water quality is excellent throughout. The area is relatively natural, being largely undeveloped by man and with very limited industrial activity. The estuary contains large areas of shallow water over subtidal sediments, and extensive mudflats and saltmarshes exposed at low water. Its diverse and species-rich intertidal sand and mudflat biotopes grade naturally along many lengths of the shore into vegetated or dynamic shingle habitat, saltmarsh, grassland and reedbed.

#### **Orfordness – Shingle Street SAC**

- 2.2.13 Orfordness – Shingle Street SAC contains coastal lagoons, annual vegetation of drift lines and perennial vegetation of stony banks.

- 2.2.14 The lagoons at this site have developed in the shingle bank adjacent to the shore at the mouth of the Ore estuary. The salinity of the lagoons is maintained by percolation through the shingle, although at high tides sea water can overtop the shingle bank. The fauna of these lagoons includes typical lagoon species, such as the cockle *Cerastoderma glaucum*, the ostracod

*Cyprideis torosa* and the gastropods *Littorina saxatilis tenebrosa* and *Hydrobia ventrosa*. The nationally rare starlet sea anemone *Nematostella vectensis* is also found at the site.

2.2.15 Orfordness is an extensive shingle spit some 15 km in length and is one of two sites representing Annual vegetation of drift lines on the east coast of England. The drift-line community is widespread on the site and comprises sea beet *Beta vulgaris* ssp. *maritima* and orache *Atriplex* spp. in a strip 2-5 m wide.

2.2.16 The spit supports some of the largest and most natural sequences in the UK of shingle vegetation affected by salt spray. The southern end of the spit has a particularly fine series of undisturbed ridges, with zonation of communities determined by the ridge pattern. Pioneer communities with sea pea *Lathyrus japonicus* and false oat-grass *Arrhenatherum elatius* grassland occur. Locally these are nutrient-enriched by the presence of a gull colony; elsewhere they support rich lichen communities. The northern part of Orfordness has suffered considerable damage from defence-related activities but a restoration programme for the shingle vegetation is underway.

## 2.3 Other relevant plans or projects affecting these sites

2.3.1 In addition to a potential effect from the Ipswich Local Plan, the European sites may also be affected by a number of plans or projects, including Local Plans of other neighbouring Local Authorities, existing developments and proposed developments, management carried out by land managers with the consent of Natural England, projects of statutory agencies and utility companies such as projects affecting the water environment, and third party effects such as recreation, etc.

2.3.2 In the context of this Appropriate Assessment screening, the most relevant other plans or projects to be considered are

- Suffolk Coastal District Local Plan - Core Strategy and Development Management Policies
- Babergh District Council Local Plan - Core Strategy and Policies
- Mid Suffolk District Council Local Plan – Core Strategy

2.3.3 These plans are considered as part of this Appropriate Assessment screening.

## 2.4 Alternative considered by Ipswich Borough Council

2.4.1 As part of the Sustainability Assessment process, Ipswich Borough Council considered a strategic alternative relating to meeting housing need later in the plan period which would see the residual need for around 4,000 dwellings met through increasing densities in place of looking to meet the need in adjoining authority areas. This would mean nearly doubling housing densities on sites or parts of sites anticipated to come forward after 2019/20). The Sustainability Appraisal (a separate report accompanying the DPD) has identified a number of issues with this alternative; for example it concluded that increasing housing densities may result in less open space provision so it is possible that the alternative would have led to greater impacts on the SPA. Increasing housing density also relies greatly on assumptions about economic conditions changing so that it becomes viable. Increasing housing densities is not an option which Ipswich Borough Council will pursue.

2.4.2 Alternatives are not required to be assessed in the Appropriate Assessment unless a plan or project intends to be permitted despite an adverse effect upon integrity of a European site. The alternative has not been fully assessed in this report, although the conclusions of the SA suggest that the alternative might require greater mitigation needs to prevent adverse effect upon European sites should it have been pursued.

### **3 Likely significant effects**

#### **3.1 Connected with the management of European sites**

- 3.1.1 It is considered that the Ipswich Borough Proposed Submission Core Strategy and Policies DPD Review is not necessary for, or connected with, the nature conservation management of any European sites.

#### **3.2 Criteria for screening of individual policies**

- 3.2.1 The screening of individual policies is a process to determine which, if any, of the individual policies requires individual assessment. For example, some of the proposed policies might each have a direct or indirect effect upon an international site, whilst other individual policies may have no effect. Criteria are set to determine which individual policies may have an effect. Effects from a combination of policies are also considered.
- 3.2.2 The criteria for determining if an individual policy, or a combination of policies, would have a likely significant effect, and require assessment, are based on the characteristics of the relevant European site and the objectives set by Natural England. The main factors to consider are
- Development on or close to the European site destroying part or all of the site, or changing the ecological functioning of the site (e.g. disrupting water flows or migration routes, or providing damaging levels of air pollution)
  - Increased public recreation, causing disturbance to birds, damage to vegetation, increased littering / flytipping, or leading to management compromises (e.g. grazing being restricted).
  - Reduction in water levels or flow, from increased water demand in the District requiring greater water abstraction
  - Reduction of water quality, from increased discharges of sewage and surface water drainage, or from pollution incidents, either during, or after, construction
- 3.2.3 Development on or close to the European site is a location-dependent factor, but the other factors may affect a European site at some distance from development.

#### **3.3 Screening of individual policies**

- 3.3.1 The table in Appendix 6 lists each policy, with a brief explanation of the policy, and assessed whether the policy is likely to have a significant effect on any European site. Changes in the policies since the Draft stage have been considered as part of this screening.
- 3.3.2 The conclusion drawn from the table in Appendix 6 is that Policy CS7, 'The Amount of Housing Required', is likely to have a significant effect on one or more European sites. Whilst Policy CS2 'The location and nature of development' and Policy CS10 'Ipswich Garden Suburb' are not likely to have a significant effect in themselves, they are considered together with Policy CS7.
- 3.3.3 Policies DM25 'Protection of Employment Land' and DM33 'Green Corridors' were previously in the Draft Site Allocations and Policies Development Plan Document as policies DM36 and DM33 but now have been moved to the Proposed Submission Core Strategy and Policies DPD. These were assessed in the Appropriate Assessment of the Draft Site Allocations and Policies Development Plan Document. These policies are similarly assessed here.

#### **3.4 Screening of the whole Plan**

- 3.4.1 Policies in this Plan do not have cumulative effects on European sites and the whole plan has no greater likely significant effect than that resulting from Policy CS7 alone.

#### **3.5 Screening of the Plan in combination with other plans**

- 3.5.1 An Appropriate Assessment of the Suffolk Coastal District Council Local Plan Core Strategy and Development Management Policies document adopted in July 2013 has shown that it would not have an adverse effect upon the integrity of any European site, alone or in combination with

the Ipswich Borough Local Plan. Mitigation to prevent an adverse effect from the Suffolk Coastal Local Plan includes joint working with Ipswich Borough to provide a Country Park and visitor management plans. It is theoretically possible that changes to the Ipswich Borough Proposed Submission Core Strategy and Policies DPD Review, since the Suffolk Coastal District Council Local Plan Core Strategy and Development Management Policies document was adopted in July 2013, may have an in-combination effect and so need to be assessed.

3.5.2 A Habitats Regulations screening for the Babergh District Council Core Strategy submission draft was published in September 2011. It concluded that the proposals for development within Babergh District were unlikely to have a significant effect on any European site, even though a large residential development was proposed at Brantham close to the Stour and Orwell Estuaries SPA. An addendum in June 2012 assesses subsequent changes to the Core Strategy and comes to a similar conclusion. It is not likely that there will be a significant in-combination effect due to the scale and location of proposed development within the Babergh Local Plan.

3.5.3 The Mid Suffolk Core Strategy underwent a Focussed Review in 2012. The Inspector at Examination in Public agreed that an Appropriate Assessment of the Plan was not necessary because the Reviewed Core Strategy would not have a likely significant effect upon any European site. It is not likely that there will be a significant in-combination effect due to the scale and location of proposed development within the Mid Suffolk Local Plan.

### **3.6 Conclusion of screening ('likely significant effect')**

3.6.1 It is concluded that the Ipswich Borough Council Proposed Submission Strategy and Policies DPD Review is likely to have a significant effect on European sites, particularly with respect to 'The Amount of Housing Required' (Policy CS7) and related policies (CS2, CS10). This conclusion is made for the Plan alone, and in combination with the Suffolk Coastal adopted Core Strategy and Policies Local Plan document. An Appropriate Assessment of the Plan is therefore necessary.

## **4 Methods of assessing European site visitor increases from an increased human population**

### **4.1 Introduction**

4.1.1 This Section discusses the increased population arising from proposed housing in Ipswich Borough and in Suffolk Coastal District to take into account cumulative impacts.

4.1.2 Assessment of the impact on European sites of proposed new housing some distance away is not straightforward; for example there are no generic guidelines on impacts, distance thresholds, etc. The potential impacts of housing at a distance are briefly introduced in Section 4 above. In this Section, the methods of assessing an increased human population near European sites are discussed.

4.1.3 The existing human population can cause impacts on European sites through disturbance of birds and other fauna, trampling damage to habitat, litter, fires, and interference with management works (e.g. theft of equipment or causing a reluctance to graze when people have free access). Natural England currently monitors the Sites of Special Scientific Interest which form the European sites. If human impacts are currently adverse we would expect those sites, or parts of those sites, to be recorded as being in unfavourable condition even if the cause of the unfavourable condition is not known. Existing condition assessments are discussed in Section 5.2 below.

#### ***The amount of housing proposed in Ipswich Borough***

4.1.4 The Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review contains proposals for 13,550 new dwelling units to be provided in Ipswich between 2011 and 2031 focused primarily within the central Ipswich 'IP-One' area, Ipswich Garden Suburb and within and adjacent to identified district centres (these areas are identified on the key diagram). The proposals comprise 546 dwellings completed between 2011 and 2014, 561 dwellings under construction, 1346 dwellings with planning permission but not constructed by April 2014, 512 dwellings with a resolution to grant planning permission, and 10,585 new dwellings in allocations, broad locations or windfall sites to 2031. Of the 10,585 new dwellings, 5,851 will be windfall sites and 4,734 will be allocated by the Borough.

#### ***The amount of housing proposed in Suffolk Coastal District***

4.1.5 The Suffolk Coastal District Local Plan Core Strategy and Development Management Policies (July 2013), contains proposals for 7,900 new dwellings, comprising 1,480 dwellings with planning permission, 230 new dwellings on identified brownfield potential sites within existing physical limits boundaries, 80 dwellings previously allocated, an estimated windfall of 850 dwellings, and 5,260 new allocations on greenfield land. This gives an average annual requirement of 465 new dwellings per year between 2010 and 2027.

4.1.6 The total amount of the housing proposed within the Suffolk Coastal District Local Plan Core Strategy and Development Management Policies is given in its table 3.3, as 2,320 dwellings in the Eastern Ipswich plan area, 1,760 new dwellings in Felixstowe Walton and the Trimleys, and 3,510 in the remainder of Suffolk Coastal District.

#### ***The use of three visitor typologies – tourist, day trips or local greenspace users***

4.1.7 There are three typologies of visitors to European sites which can be used, where data is consistent with these typologies.

4.1.8 The first typology is the use of European greenspace by tourists staying overnight in the area, for example on short breaks or longer holidays. It is considered that the holiday use of Ipswich or Suffolk Coastal is not altered greatly by the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review, as no major increase in tourist facilities is proposed, and assuming that housing development will not increase or decrease tourist use of European sites.

- 4.1.9 The second typology is the 'day trip' to European sites, often including visits to towns or other tourist facilities within the day. European sites might be visited for the enjoyment of nature (e.g. visitors to Walberswick National Nature Reserve), used as recreational sites (e.g. the shingle beaches within SACs) or simply as a backdrop to walks within a beautiful landscape. 'Day trips' can include people travelling from substantial distances away.
- 4.1.10 There is a limited amount of data regarding the quantity of visitors to European sites. A survey within the Suffolk Coast and Heaths AONB in 2004 provides useful data which can be used to predict increases in visitor numbers from new housing. The impacts of these extra visitors are hard to predict. One study, however, has looked at the impact of recreational disturbance on birds in the Stour and Orwell Estuaries SPA, which gives good evidence of impacts. This is discussed in Section 4.3 below, which concentrates on 'day trips' only.
- 4.1.11 The third typology is the use by people of European sites close to their homes for recreation or other activities. These visits tend to treat the European sites simply as convenient local greenspace. An example might be someone living near an estuary walking or driving a short distance to take a dog for a walk. This is discussed in section 5.6 below, regarding specific sites close to areas of new development.
- 4.1.12 Further studies of visitors to the South Sandlings, and to the Deben Estuary at / near Waldringfield have been made available and include European sites within the influence of the Core Strategy. Natural England has published a national survey of People and the Natural Environment. These are discussed in Sections 4.5 and 4.7.
- 4.1.13 These typologies, using appropriate data, may be used to predict any change in visitors to European sites based on changes in numbers of people in each typology. The change in visitor numbers can be assessed to determine if that change would have an adverse affect upon the integrity of the European site.

#### ***Identifying the origin of visitors***

- 4.1.14 Where data exists, the origin of visitors to European sites compared to the total number of people at that point of origin can be used to predict change in visitors; if the total number of people at a point of origin changes, the number of visitors from that point of origin may change proportionately.

## **4.2 Existing condition assessments of European sites**

- 4.2.1 Natural England has a programme of monitoring Sites of Special Scientific Interest (SSSIs) to assess their condition against the objectives set for each site. The condition of the European sites is therefore referable to the condition of the component SSSIs. As some sites are very large, they are divided into 'units' for monitoring; units may vary in interest feature and/or management from other units on the site.
- 4.2.2 The condition assessments for the relevant component SSSIs (Section 2 above) were downloaded from Natural England's website<sup>2</sup> on 11<sup>th</sup> April 2011. The nineteen SSSIs are divided into around 400 units, each of which has been monitored at least once.
- 4.2.3 The outcome of monitoring is a judgement of unit condition into one of a number of categories, such as favourable, unfavourable recovering, unfavourable no change, unfavourable declining or destroyed. Favourable or unfavourable recovering conditions mean that its habitats and species are being conserved. If a unit is found to be in an unfavourable condition, this means there is a current lack of appropriate management, or that there are damaging impacts (which may be outside of the control of the owner) which need to be addressed<sup>3</sup>.
- 4.2.4 Of the 400 or so SSSI units, nine were assessed as in unfavourable condition for reasons of public access / disturbance. Four of these SSSI units were within Minsmere – Walberswick Heath and Marshes SSSI, (units 84, 85, 86, 110), two units were within Leiston – Aldeburgh SSSI, and three were within Alde-Ore Estuary SSSI. These units are all shingle beaches where

<sup>2</sup> [www.naturalengland.org.uk](http://www.naturalengland.org.uk)

<sup>3</sup> Natural England (2009) SSSI condition assessment A guide for owners and occupiers

human impact on vegetation is monitored. In 2009, nine units were also recorded as being in unfavourable condition but this comprised eight units at Minsmere – Walberswick SSSI and one unit at Pakefield to Easton Bavents; four of the Minsmere – Walberswick SSSI units and the at Pakefield to Easton Bavents have recovered due to management action but new damage has been recorded at Alde-Ore Estuary SSSI and Leiston – Aldeburgh SSSI. However, the SPA qualifying feature of Leiston – Aldeburgh SSSI is not shingle beach, so the public access there is not harming the European site.

- 4.2.5 The unfavourable condition of the relevant SSSI units is considered to be an existing adverse affect on the integrity of the respective European sites.
- 4.2.6 It is interesting to note that there were no estuary or coastal SSSIs where disturbance to birds from human recreation is recorded as a reason for unfavourable no change or unfavourable declining condition. The condition assessment for unit 3 of the Orwell Estuary SSSI is favourable despite the large current public access from Orwell Country Park. However, Natural England has commented that it does not routinely monitor disturbance to birds on Sites of Special Scientific Interest, and recreational impacts may therefore not be included as a reason for non-favourability in condition assessments.
- 4.2.7 Most units on the Stour Estuary SSSI were recorded in 2009 as unfavourable because of 'coastal squeeze', although the comments at that time suggested that there was a 'possible contribution from recreational disturbance'. Coastal squeeze occurs where the normal processes of coastal erosion are interrupted; the normal erosion of the seaward side of saltmarsh and mudflat continues but the normal erosion of dry land to form new saltmarsh and mudflat is prevented; the natural landward progression of saltmarsh and mudflat therefore does not occur and instead the areas of these habitats shrink. In 2010, nine of the ten units were assessed as in favourable condition and the possible recreational disturbance was no longer mentioned. Research shows that the amount of disturbance on the Stour Estuary SSSI from visitors is significantly less than that in the Orwell Estuary SSSI<sup>4</sup>.
- 4.2.8 Natural England's website at <http://designatedsites.naturalengland.org.uk/SiteSearch.aspx> was visited on 2nd December 2014 to check whether condition assessments had been updated for Stour Estuary SSSI and Orwell Estuary SSSI. The condition assessments had not been updated since 2010.

### **4.3 Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data.**

- 4.3.1 This section looks at the group of people classified as 'day visitors' in the three typologies described in section 4.1 above (i.e. those travelling a significant distance to a destination for recreation on an occasional basis, rather than a local and/or regular use of a place close to home. The survey locations were situated in such places that the majority of people would be day visitors rather than routine users of convenient local greenspace.
- 4.3.2 There is little information available regarding the destinations of Suffolk Coastal and Ipswich residents for their recreation. However, in 2004 the Suffolk Coast and Heaths Unit commissioned East of England Tourist Board to carry out a visitor survey of the AONB (EETB 2004<sup>5</sup>). A snap-shot survey was carried out in summer 2004 by questionnaires of visitors across the AONB.
- 4.3.3 The survey found that 55% of visitors to the AONB were 'day visitors' (page 9 of the research). The exact number of people visiting the AONB was not measured, but the proportion of visitors from each location of origin can be identified. The raw data has been obtained from East of England Tourism. A GIS analysis on those 430 'day visitors' who provided a postcode identified the proportion of those who originated from various places as listed in Table 2 below.

<sup>4</sup> Ravenscroft, Parker, Vonk and Wright 2007 *Disturbance to waterbirds wintering in the Stour-Orwell Estuaries SPA* Commissioned by Suffolk Coast and Heaths Unit.

<sup>5</sup> EETB (2004) Suffolk Coast and Heaths Area of Outstanding Natural Beauty. Visitor Research 2004. Available from <http://www.suffolkcoastandheaths.org/uploads/SCH%20AONB%20Visitor%20Research%20Report%202004.pdf>



- 4.3.4 It is considered that 'day visitors' are people living near the AONB; these people are unlikely to book a significant amount of overnight accommodation. 'Day visitors' is therefore the best measure of potential impact to sites across the whole AONB.
- 4.3.5 Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment.

**Table 1. Proportion of day visitors to Suffolk Coast and Heaths AONB from location of origin (data from EETB 2004 as re-analysed)**

Origin of day visitors to AONB	Number of day visitors (total day visitors in survey = 430)	Percentage of total AONB day visitors (estimate)
Ipswich Borough, plus adjoining Pinewood ward (Babergh district)	50	11.6%
Eastern Ipswich plan area within Suffolk Coastal (Rushmere, Kesgrave and Martlesham wards)	29	6.7%
Felixstowe, Walton and the Trimleys	19	4%
Remainder of Suffolk Coastal District	114	26.5%
Shotley	1	0.2%
<b>Total of these origins</b>	<b>213</b>	<b>49.5%</b>

- 4.3.6 The increase in population is related to the increase in housing available. The Office for National Statistics (ONS) published estimates of population at mid-2010 for Local Authorities in June 2011 as provided in Appendix 7<sup>6</sup>. For Ipswich, the projections in population growth suggest that there will be an average of 1.7 net additional people into the Borough per new dwelling. This seems low, but is realistic considering the proportion of flats planned, an increase in the student population, and taking into account the continued decline in the average number of people per household in Ipswich, and ongoing national decline in average household size. This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy. There is a trend towards a lower occupancy level per house caused by an increase in split households, an ageing population and second homes. For Suffolk Coastal, the population projection suggests an average of 1.8 net additional people per new dwelling.
- 4.3.7 This Appropriate Assessment therefore uses an average population increase of 1.7 new people per new dwelling in Ipswich Borough, and 1.8 new people per new dwelling in Suffolk Coastal District.
- 4.3.8 The proportionate growth in population in new housing development in Ipswich and Suffolk Coastal and elsewhere can be calculated by looking at the existing population, the predicted net increase in people, and therefore the proportionate increase. Table 2 shows the projected increase in population for each of the study areas under consideration.

<sup>6</sup> Available from [www.suffolkobservatory.info](http://www.suffolkobservatory.info)

**Table 2. The estimated numerical increase in population for new housing.**

Town / area	Proposed new housing units	Estimated net increase in people*
Ipswich Borough	13,550	23,035
Eastern Ipswich plan area	2,320	4,176
Felixstowe, Walton and the Trimleys	1,760	3,168
Remainder of Suffolk Coastal District	3,510	6,318
<b>Totals</b>	<b>21,140</b>	<b>36,697</b>

\* based on population projections

4.3.9 Table 3 shows the proportionate increase in population for these areas of new housing. It is important to look at the increases of each development in combination, as well as individually, as each impact might be individually too small to give rise to a significant impact, but in combination could have an adverse affect.

**Table 3. The proportionate increase in population for areas of new housing.**

Town / area	Existing population size	Estimated increase in people (Table 2)	Estimated % increase in local population (estimated increase / existing)
Ipswich Borough, plus adjoining Pinewood ward (Babergh district)	132,013	23,035	17.4%
Eastern Ipswich plan area	20,014	4,176	20.9%
Felixstowe, Walton and the Trimleys	33,735	3,168	9.4%
Remainder of Suffolk Coastal District	68,251	6,318	9.3%
<b>Totals</b>	<b>254,013</b>	<b>36,697</b>	<b>14.4%</b>

4.3.10 The data in Tables 2 and 3 above can be used to calculate the extra number of people visiting European sites within the Suffolk Coast and Heaths AONB, subject to the following assumptions;

- the pattern of day visits to sites by the new residents is similar to that of the existing population;
- the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey;
- an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity;
- the relative proportions of day visitors and overnight visitors does not change; and
- the summer snapshot survey is typical of visitors all year round.

4.3.11 The percentage increase of total visitors to European sites in the AONB is calculated, rather than a numeric increase, because the total number of visitors is not known. The percentage increase in total visitors to European sites takes into account the ratio of day visitors to overnight visitors (i.e. holiday makers), the proportion of visitors from each point of origin, and the increase of people in each point of origin. This can be expressed by the calculation (%day visitors) x (%from point of origin) x (%increase at point of origin).

4.3.12 Table 4 below calculates the increase in total visitors to the AONB based on the calculation above, for each point of origin and for the total. For clarity of calculation, percentages are given as a proportion of 1 e.g. 55% is shown as 0.55. To reduce rounding errors, the total for column D is calculated from the totals for columns B and C.

**Table 4. Predicted increase in total visitors to Suffolk Coast and Heath AONB.**

Origin of day visitors to AONB	(A) proportion of total AONB day visitors (estimate) from Table 1 expressed as a fraction of 1	(B) proportion of total AONB visitors (A x 0.55)	(C) increase in local population from table 3 expressed as a fraction of 1	(D) The overall increase of all visitors to the AONB (B) x (C)
Ipswich Borough, plus adjoining Pinewood ward (Babergh district)	0.116	0.064	0.174	0.011
Eastern Ipswich plan area	0.067	0.037	0.209	0.007
Felixstowe, Walton and the Trimleys	0.04	0.022	0.094	0.002
Remainder of Suffolk Coastal District	0.265	0.146	0.093	0.014
<b>Totals</b>	<b>0.488</b>	<b>0.269</b>	<b>0.131</b>	<b>0.035</b>

4.3.13 Table 5 below shows the Table 4 column D data alone, given as a percentage increase in total visitors to the AONB.

**Table 5. The predicted percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal**

Place of origin	The predicted proportionate increase in visitors to the AONB from each place of origin
Ipswich Borough, plus adjoining Pinewood ward (Babergh district)	1.1%
Eastern Ipswich plan area	0.7%
Felixstowe, Walton and the Trimleys	0.2%
Remainder of Suffolk Coastal District	1.4%
<b>Totals</b>	<b>3.5%</b>

- 4.3.14 Table 5 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 3.5%. The numbers in Table 5 do not add exactly to 3.5% due to rounding earlier in the calculations. The increase in visitors can be apportioned as 1.1% for Ipswich Borough and 2.4% for Suffolk Coastal District.
- 4.3.15 To allow for assumptions about people's behaviour patterns, the 3.5% increase in total visitors to the AONB is best considered as an approximation, with the likely figure considered to be perhaps somewhere in the range of 3% - 5%.
- 4.3.16 The calculations of increased visitors to European sites are complex. Superficially, one would expect that an 13% increase in the combined population of Ipswich Borough and Suffolk Coastal District to cause a 13% increase in visitors to European sites in the Suffolk Coast and Heaths AONB. In reality, a 13% increase in population will result in a proportionate increase from only those visitors who come from Ipswich Borough and Suffolk Coastal District. Visitor numbers from elsewhere are unchanged, so the increase in the total number of visitors will be significantly less.
- 4.3.17 Data presented in the Appropriate Assessment shows that about half (55%) of visitors to the Suffolk Coast and Heaths AONB were local people on a day trip, with the remainder being holiday makers staying in tourist accommodation. Of the locals on a day trip, about half (49.5%) were from Ipswich Borough and Suffolk Coastal District, with the remainder from elsewhere, for example, from Norwich or Bury St Edmunds. Combining these figures, half the visitors being on day trips, and half of these day trip visitors being from Ipswich Borough and Suffolk Coastal District, the calculation is that roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB.
- 4.3.18 With roughly around one-quarter of the day trips coming from residents in Ipswich Borough and Suffolk Coastal, those day trips are predicted to rise in proportion with the predicted 13% population increase i.e. the number of day trips from Ipswich Borough and Suffolk Coastal are expected to rise by 13% in the period 2013 – 2031. However, other sources of visitors (holidaymakers or day trips from elsewhere) will not rise accordingly, so the total visits from all sources is calculated to rise by around 3 - 5%. Figure 1, which is drawn to relative scale, is a bar chart where the length of the bar represents the number of visitors in each group. It shows the effect of the 13% increase in day trips from Ipswich Borough / Suffolk Coastal District in relation to the total visits from all sources.
- 4.3.19 There are a number of assumptions made regarding these calculations and people's behaviour, including
- 'New' people in the Borough / District will have the same visiting pattern as 'existing' people
  - Visits by holiday makers will not be affected by any increased use by local visitors
  - Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors
- 4.3.20 The separate breakdown of visits into 'day-trippers' and 'holidaymakers' was undertaken in the school summer holiday period when a greater proportion of 'holidaymakers' may have been present compared to other months
- 4.3.21 To allow for these assumptions, the approximate 3.5% increase in total visitors to the AONB is given as a range of 3% - 5%.
- 4.3.22 **It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 3% - 5% as a result of the Ipswich Borough Council and Suffolk Coastal District Council Core Strategies combined.**

- 4.3.23 Not all the European sites under assessment are within the Suffolk Coast and Heaths AONB, specifically the sites in Tendring District which are Hamford Water SPA, Hamford Water Ramsar site, and Hamford Water candidate SAC. The amount of visits to these sites from Suffolk Coastal District and Ipswich Borough was not surveyed in the 2004 AONB study. It is considered that the greater distances to these sites from Ipswich / Suffolk Coastal, compared to sites with the Suffolk Coast and Heaths AONB, means that the expected number of visits from Ipswich / Suffolk Coastal to the Essex sites is likely to be much less than to sites in Suffolk. The Essex sites are closer to other towns such as Harwich and Colchester, and the influence of those towns is considered to be much more dominant.

#### **4.4 Impact on European sites in Colchester and Tendring Districts, Essex**

- 4.4.1 A report of visitor monitoring on Natura 2000 sites in Colchester and Tendring, Essex<sup>7</sup>, was also considered. It showed that only a tiny proportion of visitors to European sites travelled from Ipswich or Suffolk Coastal. However, the sample sizes were so small that it is considered that the results may not have been meaningful.

#### **4.5 Calculations to predict additional visitors to European sites in the south Sandlings using 2010 visitor survey data**

- 4.5.1 A visitor survey was commissioned by a consortium led by Suffolk Wildlife Trust and Forestry Commission, and funded by the Haven Gateway Partnership. The survey was carried out in winter 2009/10 and summer 2010 by Footprint Ecology. Their final report was published on 10<sup>th</sup> February 2011<sup>8</sup> and the use of this report is gratefully acknowledged. It is considered that the visitor survey and data analysis were generally carried out to high standards. The report is referred to as the 2010 South Sandlings Visitor Survey in the remainder of this report.
- 4.5.2 The 2010 South Sandlings Visitor Survey took place in an area east and north-east of Woodbridge, encompassing Tunstall Forest, Rendlesham Forest and surrounding areas. The study included Sandlings SPA (comprising Sandlings Forest SSSI, Blaxhall Heath SSSI, Sutton and Hollesley Heaths SSSI and Tunstall Common SSSI), Staverton Park and the Thicks SAC, , and small parts of Alde-Ore Estuary (SPA, SAC, Ramsar) and Deben Estuary (SPA, Ramsar). Visitors at a number of points within the study area were counted and many were asked a number of questions about their visit, including where they had come from, where they went on their visit, what they did, how they arrived on site for their visit, and why they had chosen that place to visit.
- 4.5.3 Key messages from the 2010 South Sandlings Visitor Survey are
- 53% of total visitors entered the study area at just three points; the forest opposite Sutton Heath Estate (housing associated with MoD Woodbridge including some open market housing), Sutton Heath car park, and Iken.
  - Visitors were not spread out evenly across the study area; there were 'hotspots' of visitors at Sutton Heath and in Rendlesham Forest at Tangham visitor centre; there were also spots of activity concentrated at the Rendlesham Forest runway car park and by the B1084, and in the north of Tunstall Forest at Tunstall Heath and Blaxhall Common. Heaths were used disproportionately more by visitors compared to equivalent areas of forestry plantation.
  - In the study area there were 16 formal car parks providing a total of 261 spaces, and 106 locations used for informal parking providing 256 parking spaces. The density of visitors within the sites was closely related to the location of car parks; the visitor hotspots were close to the bigger and formal car parks; other spots of activity were close to small and/or informal car parks.

<sup>7</sup> Habitat Regulations Assessment Survey and Monitoring. Year 1 Interim Report December 2010. Colchester Borough Council.

<sup>8</sup> Cruickshanks K, Liley D and Hoskin R (2011) Suffolk Sandlings Living Landscape Project Visitor Survey Report. Footprint Ecology / Suffolk Wildlife Trust.

- 19% of visitors in summer and 6% of visitors in winter were tourists.
- 63% of visitors had dogs with them; the proportion being slightly higher in the winter than in summer
- Dog walking was undertaken by 52.8% of people interviewed; walking, exercise, family outings and cycling were undertaken by the majority of other visitors.
- 80% of all visitors arrived by car, and 17% of all visitors walked across the road from the Sutton Heath Estate into the adjacent forest.
- Half of all visitors who arrived on foot lived within 420m of the access point, and half of all visitors who arrive by car live less than 8km away. Over 75% of dog walkers lived within 10km of the access point.
- The number of houses within 5km of a site had a positive relationship with the number of visitors entering; the more houses there were, the more visitors there were.
- Most people stayed for 1 – 2 hours.
- 64% of visitors visited the sites at least weekly, and over half of these visited daily.
- Over half the visitors also said that they would visit coastal and estuary sites in the area
- There was a higher density of nightjar nests in the areas with the lowest category of visitor numbers, but no clear relationship between nest density across all categories of visitor numbers; for example the areas with the highest category of visitor numbers had more nightjar nests than those with an intermediate number of visitors.
- Public access had no apparent effect on the current distribution of woodlark nests in the Forest or on heaths.
- For non-SPA species, Dartford warbler nest density was negatively correlated to visitor numbers, but there was no apparent relationship between visitor numbers and silver-studded blue butterflies or ant-lion.

- 4.5.4 These key messages are extracted from the 2010 South Sandlings Visitor Survey, which gives much more detail.
- 4.5.5 The 2010 South Sandlings Visitor Survey contains good data on the location of the home of visitors to the study area within 0.5km distance bands from access points (normally car parks) to recreational sites. The survey also used postcode data to identify the number of existing dwellings within each distance bands. These are shown on Figures 6 and 7 of the 2010 South Sandlings Visitor Survey report. This data may be used to model changes in the number of visitors as the number of dwellings in each distance band changes.
- 4.5.6 It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double. The proposed dwelling numbers can therefore be added to existing dwelling numbers in each distance band and used to calculate the increase in visitors for each distance band and the total overall increase in visitors.
- 4.5.7 The distribution of proposed housing is not precisely specified within the Core Strategies. For this assessment, the distribution of the proposed housing allocation as it relates to access points within the South Sandlings study area is considered to be as shown in table 6 below.

**Table 6. Approximate distribution of proposed housing allocations from Sandlings access points**

Location	no. of proposed new dwellings	Approximate or nominal distance of housing from South Sandlings study area access points /km
Ipswich Borough	13,550	13.5 - 14
Eastern plan area	2320	4.5 - 5
Felixstowe Walton and Trimleys	1760	12 – 12.5
rest of Suffolk Coastal*	700	4.5 - 5
rest of Suffolk Coastal*	700	9.5 - 10
rest of Suffolk Coastal*	700	14.5 - 15
rest of Suffolk Coastal*	700	19.5 - 20
rest of Suffolk Coastal*	710	24.5 – 25
* 3510 dwellings nominally allocated to five distance bands across the District.		

- 4.5.8 The South Sandlings Visitor Survey data for the number of visitors, and the existing number of houses, within 0.5km distance bands up to 50km from access points to sites within the study area were kindly supplied by Steve Aylward of Suffolk Wildlife Trust (the commissioning group's project manager) and Footprint Ecology. The use of this data is gratefully acknowledged.
- 4.5.9 For each distance band up to 50km from the study area access points, Table 7 shows the existing housing numbers and visitor numbers supplied from the South Sandlings Visitor Survey. The proposed housing numbers are also listed, using the distribution given above. For clarity, the distribution of proposed housing within distance bands has been highlighted; there is no change to numbers in other bands. The increase in visitors is calculated by multiplying the existing visitors in each distance band by the proportionate increase in housing. The proportionate increase in housing is calculated by dividing the proposed housing numbers (existing number plus proposed new dwellings) by existing housing numbers.
- 4.5.10 To illustrate the calculations, if a distance band had 8 recorded visitors from 100 existing dwellings, and 50 new dwellings were proposed within a Core Strategy, then the proportionate increase in housing is  $(100+50)/100 = 1.5$ . The predicted number of new visitors is therefore  $8 \text{ people} \times (100+50)/100$ , giving a predicted number of 12 visitors.

**Table 7. Predicted increase in visitor numbers to South Sandlings study area calculated as the number of existing visitors multiplied by the proportionate increase in dwellings (proposed / existing) within each distance band**

Distance from access point (km)	Approximate Location of existing towns in relation to distance from access points	Number of existing dwellings	Number of visitors recorded in the survey	Number of existing and proposed dwellings	Number of predicted visitors on re-survey
0 – 0.5	Sutton Heath estate	495	71	495	71
0.5 - 1		305	12	305	12
1 – 1.5		802	26	802	26

Distance from access point (km)	Approximate Location of existing towns in relation to distance from access points	Number of existing dwellings	Number of visitors recorded in the survey	Number of existing and proposed dwellings	Number of predicted visitors on re-survey
1.5 - 2	Rendlesham Melton Woodbridge	1936	55	1936	55
2 - 2.5		2211	45	2211	45
2.5 - 3		2024	29	2024	29
3 - 3.5		1812	44	1812	44
3.5 - 4		1471	21	1471	21
4 - 4.5		716	8	716	8
4.5 - 5	SCDC eastern plan area	653	6	3673	33.7
5 - 5.5		2164	12	2164	12
5.5 - 6		2269	7	2269	7
6 - 6.5	Saxmundham Martlesham	1558	7	1558	7
6.5 - 7		2488	16	2488	16
7 - 7.5		2826	11	2826	11
7.5 - 8		3361	13	3361	13
8 - 8.5		2657	7	2657	7
8.5 - 9		1765	7	1765	7
9 - 9.5		1187	2	1187	2
9.5 - 10		1304	2	2004	3.1
10 - 10.5		1884	4	1884	4
10.5 - 11		2376	5	2376	5
11 - 11.5	Framlingham, Felixstowe, eastern Ipswich	5574	11	5574	11
11.5 - 12		7065	8	7065	8
12 - 12.5		9048	14	10808	16.7
12.5 - 13		9848	7	9848	7
13 - 13.5		8119	7	8119	7
13.5 - 14	central Ipswich	6020	7	19570	22.7
14 - 14.5		6001	1	6001	1
14.5 - 15		7289	5	7989	5.5
15 - 15.5		6961	2	6961	2
15.5 - 16		4716	2	4716	2
16 - 16.5	western Ipswich	6573	3	6573	3
16.5 - 17		5199	4	5199	4
17 - 17.5		5488	2	5488	2
17.5 - 18		4601	3	4601	3
18 - 18.5		2140	0	2140	0
18.5 - 19		2831	1	2831	1
19 - 19.5		1421	0	1421	0
19.5 - 20		1516	2	2216	2.9
20 - 20.5		1870	0	1870	0
20.5 - 21		1738	0	1738	0
21 - 21.5		2076	2	2076	2
21.5 - 22		1746	0	1746	0



Distance from access point (km)	Approximate Location of existing towns in relation to distance from access points	Number of existing dwellings	Number of visitors recorded in the survey	Number of existing and proposed dwellings	Number of predicted visitors on re-survey
22 - 22.5		1545	0	1545	0
22.5 - 23		2483	0	2483	0
23 - 23.5		2409	0	2409	0
23.5 - 24		2229	1	2229	1
24 - 24.5		2287	0	2287	0
24.5 - 25		1517	1	2217	1.5
25 - 25.5		3455	0	3455	0
25.5 - 26		4038	1	4038	1
26 - 26.5		4762	0	4762	0
26.5 - 27		4622	1	4622	1
27 - 27.5		5637	0	5637	0
27.5 - 28		5694	1	5694	1
28 - 28.5		4392	2	4392	2
28.5 - 29		2613	0	2613	0
29 - 29.5		2684	0	2684	0
29.5 - 30		3004	0	3004	0
30 - 30.5		2807	0	2807	0
30.5 - 31		1549	0	1549	0
31 - 31.5		1853	0	1853	0
31.5 - 32		1931	0	1931	0
32 - 32.5		4916	0	4916	0
32.5 - 33		7166	1	7166	1
33 - 33.5		9392	0	9392	0
33.5 - 34		7896	0	7896	0
34 - 34.5		6345	2	6345	2
34.5 - 35		7947	1	7947	1
35 - 35.5		12714	3	12714	3
35.5 - 36		11523	1	11523	1
36 - 36.5		10084	0	10084	0
36.5 - 37		10980	0	10980	0
37 - 37.5		10937	2	10937	2
37.5 - 38		12992	0	12992	0
38 - 38.5		11420	1	11420	1
38.5 - 39		6578	0	6578	0
39 - 39.5		7071	1	7071	1
39.5 - 40		7930	1	7930	1
40 - 40.5		8830	0	8830	0
40.5 - 41		10081	0	10081	0
41 - 41.5		8352	1	8352	1
41.5 - 42		8429	0	8429	0
42 - 42.5		6388	1	6388	1
42.5 - 43		5502	0	5502	0
43 - 43.5		5197	1	5197	1
43.5 - 44		2623	0	2623	0

Distance from access point (km)	Approximate Location of existing towns in relation to distance from access points	Number of existing dwellings	Number of visitors recorded in the survey	Number of existing and proposed dwellings	Number of predicted visitors on re-survey
44 - 44.5		3550	0	3550	0
44.5 - 45		5576	0	5576	0
45 - 45.5		4676	0	4676	0
45.5 - 46		4839	0	4839	0
46 - 46.5		3465	0	3465	0
46.5 - 47		6665	1	6665	1
47 - 47.5		8176	1	8176	1
47.5 - 48		6198	1	6198	1
48 - 48.5		8790	0	8790	0
48.5 - 49		6508	0	6508	0
49 - 49.5		5118	0	5118	0
49.5 - 50		4319	0	4319	0
<b>Totals</b>			<b>517</b>		<b>566.1</b>

4.5.11 For those distance bands with significant housing allocations, the change in visitor numbers is large. For example, the allocation of 13,550 dwellings for Ipswich Borough Council at a nominal distance of 13.5km - 14km from the study area increases the number of visitors from that distance band from 7 to 22.7. Similarly, the allocation of 2,320 dwellings for the Eastern Ipswich plan area, plus 700 further allocations for the 'rest of Suffolk Coastal', increases the number of visitors from the 4.5km - 5km distance band from 6 to 33.7. However, for some distance bands there is no change in visitor numbers.

4.5.12 The total existing visitor number identified in the survey is 517, according to the data received from the South Sandlings Visitor Survey. The predicted number of visitors, following implementation of housing as allocated within the Ipswich and Suffolk Coastal Core Strategies, is 566.1. These are nominal figures based on visitor samples, so the absolute number is of less relevance than the overall change. A change from 517 to 562.3 is **an increase of visitors of 9.5%** (562.3/517).

#### ***Assumptions and limitations***

4.5.13 There are a number of assumptions and limitations to the model of predicted visitor change, including

- All new housing in Ipswich is based in the centre of the town
- the pattern of day visits to sites by the new residents is similar to that of the existing population;
- an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity; so the predictions may be an over-estimate;
- the number of holiday-makers does not change as a result of the Core Strategies housing allocations;
- the results of the summer and winter surveys are typical of visitors all year round
- the calculations do not take account of declining household size when calculating visitor numbers but assume that the number of people per dwelling remains constant;

- changes to the nominal distribution of housing allocations; a re-distribution of housing between distance bands would give higher or lower predicted numbers.

4.5.14 These assumptions are such that the predicted 9.5% increase in visitors is not considered to be precise. It would be reasonable to assume that the increase in visitors to European sites in the South Sandlings study area could be in the range of 6% - 12% as a result of the Ipswich Borough Council and Suffolk Coastal District Council Core Strategy proposals.

4.5.15 **It is concluded, in absence of mitigation, it is not possible to ascertain no adverse affect upon the integrity of European sites due to visitor increases to European sites in the surrounds of Ipswich.** However, mitigation is included within the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review as discussed below.

## 4.6 Impact on specific sites

4.6.1 This section discusses the third typology in Section 5.1 above, which is the use by people of European sites close to their homes for recreation or other activities. The predicted general increase of visitors to European sites across the area is not necessarily a uniform increase to all sites. It is likely that European sites close to new development (i.e. within walking distance or a short cycle ride, bus trip or drive away) is likely to be used as convenient local greenspace, with routine activities such as recreational dog walking or play undertaken. The Stour and Orwell Estuaries SPA / Ramsar site is the primary European site to which this applies for this assessment, with Deben Estuary SPA also assessed.

4.6.2 Studies in Dorset, carried out to investigate the impact of development on European sites there<sup>9</sup>, have demonstrated that the average distance walked on heaths by walkers with or without dogs, was 2.2km. Of the people who walked to the site, 75% had walked less than 500m to reach the heath, and 89% had walked less than 1km. Half the people who arrived at the site by car came from up to 3.7km away and most who arrived by car had come from up to 8km away.

4.6.3 The 2010 South Sandlings Visitor Survey showed that half of all visitors who arrived on foot lived within 420m of the access point, and 75% of visitors walked 500m or less to reach the access point. The median distance travelled to reach the access point by car was less than 8km away. Over 75% of dog walkers lived within 10km of the access point. These data are reasonably consistent with the Dorset studies.

4.6.4 These studies indicate that housing development is likely to result in people living in that new housing walking to any European site within 1km, and driving to any European site within 8km, for walking or other recreation where facilities such as open access or rights of way exist. Car parks were necessary for those people arriving by car.

4.6.5 The new housing provisions within Ipswich Borough are therefore likely to result in an increase in visitor recreation on European sites within 1km (for people walking) and 8km (for people driving to a car parking location). This would be a greater increase than that increase on day trips to the AONB generally, as regular visits to places near home tend to be much more frequent (e.g. for daily dog walking) than visits to attractive sites at some distance. It is therefore necessary to identify European sites within the 1km and 8km distances of proposed housing allocations, and assess whether any increase in visitors is likely to occur there. To assess if an increase in visitors is likely to occur, the proportionate increase in population in those distance bands can be looked at, the provision of alternative sites for recreation needs to be taken into account, and the availability of the European sites for access needs to be identified.

4.6.6 The cumulative impacts of several developments are considered in Sections 5.3 and 5.5 above, and only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur whilst considering specific site impact. Distance bands are in reality the distance that people travel, rather than straight-

<sup>9</sup> Clarke, R., Liley, D., Underhill-Day, J. & Rose, R. 2005. Visitor Access patterns on the Dorset heathlands. *English Nature Research Reports*, No. 683

line distances. Obstructions to travel, such as railways or rivers with no crossing points therefore reduce the straight-line distance from which people will not travel to a European site.

4.6.7 The Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review has 'proposed major housing' in its Key Diagram within the IP-One area, well over 1km from the Stour and Orwell Estuaries SPA / Ramsar and with no direct walking route due to the presence of docks. There is also a 'strategic housing allocation' on the far side (north) of Ipswich which is a considerable distance from the SPA / Ramsar site where no walking route is likely. No significant use of the SPA / Ramsar site is expected to occur by people walking from 'proposed major housing' or from 'strategic housing allocations'. An access point to the Stour and Orwell Estuaries SPA / Ramsar site is within 8km of 'proposed major housing' and from 'strategic housing allocations', with Orwell Country Park providing this access point. It is possible that there may be additional visitor pressure on the Stour and Orwell Estuaries SPA / Ramsar site arising from people driving to the estuary from the proposed residential development.

4.6.8 There is a car park at Martlesham Church (OS grid reference TM261469) which is open to the public and has a footpath link to Deben Estuary SSSI. The car park is the nearest part of the Deben SPA accessible from the Ipswich Garden Suburb and is approximately 8.3km in a straight line from the nearest part of the housing allocation at Ipswich Garden Suburb, just over the 8km threshold for most people to drive. It is not impossible that occasionally a resident of Ipswich Garden Suburb might visit the car park at Martlesham, and in the absence of mitigation there is a small possibility that visitor numbers might increase to a level which disturbs birds more than the present situation. In the absence of mitigation it is difficult ascertain no adverse effect on the Deben Estuary SPA.

4.6.9 **It is concluded, in absence of mitigation, it is not possible to ascertain no adverse affect upon the integrity of Stour and Orwell Estuaries SPA / Ramsar site due to visitor increases at Orwell Country Park**, or upon Deben Estuary SPA due to visitor increases using Martlesham Church car park. However, mitigation is embedded within the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review as discussed below.

## 4.7 Other visitor surveys, comparison of visitor surveys and calculations of impact

### *Comparison of AONB and South Sandlings impacts*

4.7.1 The calculations in Section 5.3 for visitors to the Suffolk Coast and Heaths AONB, and in 5.5 for visitors to the South Sandlings result in different figures for increases in visits. For the Suffolk Coast and Heaths AONB, the increase in visitors to European sites is estimated at 2 – 5 %, whereas for the South Sandlings the increase is 6 – 12%. The differences may be due to the baseline research being different, or simply because the AONB is a much larger area with much of it at a greater distance from population centres and strategic allocations compared to the South Sandlings. Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB.

4.7.2 Both surveys contain various assumptions about the visitor behaviour, and both are based on sample surveys; neither should calculations be treated as precision forecasting tools. It would not be appropriate to choose either calculation of visitor increase as taking precedence over the other, nor to take an average of the two calculations to provide one overall prediction. In this assessment, both calculations are considered to be reasonable and useful indicators of increases in visitors for their respective areas.

### *Deben Estuary Visitor Survey report, July 2011*

4.7.3 A Deben Estuary Visitor Survey report was made available in July 2011 by 'No Adastral New Town', a campaign group. The report gives details of a visitor survey carried out in April and May 2011 to provide detailed local information on recreational activities in the Waldringfield area (including Martlesham church car park and Hemley). The visitor survey methodology used a similar but reduced methodology to the South Sandlings Visitor Survey. Although the

methodology and report have some fundamental problems (for example it is unclear if all survey points were surveyed simultaneously, people at Waldringfield may have been double-counted at the car park and beach, and some data looks anomalous), the results have some consistency with the South Sandlings Visitor survey and so are helpful.

- 4.7.4 The average size of groups of people was similar, and the proportion of people walking with or without dogs is similar between the Deben Estuary and South Sandlings surveys. The proportion of dog walkers compared to walkers without dogs was however much less in the Deben Estuary survey. The overall proportion of people who travelled by car was very similar in both surveys, although people tended to stay longer on the Deben Estuary perhaps because of the pub at Waldringfield.
- 4.7.5 The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings. This is a key point because wintering birds are vulnerable to disturbance in the estuary, yet visitor numbers are lowest in winter according to the Deben Estuary survey.
- 4.7.6 The distances people travelled to reach the survey points on the Deben Estuary survey are very different to the distances people travelled to the South Sandlings. For example, the arithmetic mean of the distance travelled on foot to the Deben Estuary survey points was 3.8km, with a number of people recorded as walking to the survey area from Ipswich, Woodbridge and from even further away such as Trimley St Mary near Felixstowe. The South Sandlings in comparison used medians to work out where most people came from, with a median distance of 400m travelled on foot to an access point to the South Sandlings.
- 4.7.7 The Deben Estuary survey did not question people about their walks, for example where they went or how far they went. Data on estuary-side walks is absent; whether people simply walked a short distance along the beach at Waldringfield, walked a circular route along the estuary returning inland, or other route, is not known. The number of people walking away from the busy beach area at Waldringfield is not known. Fifteen groups of people out of 510 groups were interviewed across the 16 days of interviews at Manor Farm, away from car parks and a point on one circular walk from Waldringfield car park, suggesting that few people walk that particular circular route.
- 4.7.8 The Deben Estuary visitor survey is helpful in pointing out the activities which visitors carry out, (primarily walking, sailing, outing with family, pub, dog walking) and giving a general picture of the survey area, but does not have the data or analysis to predict changes in visitor numbers.

#### ***Natural England national visitor survey***

- 4.7.9 Natural England has published the results of a 2010 / 2011 national visitor survey<sup>10</sup> which gives a national picture of visitor use of the countryside, urban greenspaces and the sea coast. The findings included
- Just over half of visits to the natural environment were taken to the countryside (53%), while 37% were to green spaces within towns and cities. In total, 11% of visits were taken in coastal locations of which seven per cent were taken to a green space in a seaside town and four per cent to another coastal location.
  - While parks in towns and cities continued to be the most visited location, representing 22% of all visits (558 million visits), these visits decreased from the levels recorded in 2009/10 when 24% of all visits were taken to this type of location (679 million visits). Forests and woodlands received 13 per cent of all visits, an increased share from 11% in 2010.
  - Two-thirds of visits (66%) were taken within two miles (3.2km) of the respondents home (or other start point e.g. their workplace or holiday accommodation) highlighting the importance of accessible green space that is close to home.

<sup>10</sup> Natural England (2011) Monitor of Engagement with the Natural Environment: The national survey on people and the natural environment Annual Report from the 2010-11 survey NECR083

- Visits to coastal areas were more likely to be taken by car, while the majority of countryside visits were taken on foot by people living locally in rural or urban fringe areas.
- The average visit to the natural environment lasted for just under 2 hours (1 hour 58 minutes). This finding is not significantly different from that found in the 2009/10 survey.
- Around half of all visits (51%) involved walking with a dog.
- The average group size was 2.4 people.
- The largest proportion of visits involved walking (63%). A car or van was used in 30% of visits and public transport was used for only 2% of visits.
- The vast majority of visits involving a journey of less than one mile were taken on foot (92%) while 79% of visits where the journey was 5 miles or more featured a car or van as the main mode of transport used. Urban locations were most likely to have been visited on foot (67%). Seaside resorts or towns and other coastal areas were the type of place most likely to involve travelling by car (40% and 45% respectively).
- 82% of all journeys to a greenspace were under 8km.

4.7.10 The report shows reasonable consistency with the local surveys; most people travelled by foot to their greenspace, and most journeys were under a mile (1.6km). This is considered likely to reflect the routine use of convenient local greenspace by most people most of the time, with occasional visits at greater distance. Most people travelled less than 8km to a greenspace, consistent with the Dorset studies and South Sandlings visitor survey.

#### ***Further Dorset studies***

4.7.11 A study of visitors to heaths and the sea coast in Dorset in 2008<sup>11</sup> unsurprisingly found that the closer their home location is to a greenspace, the more likely they are to visit it. All greenspace types, except coastal, showed a rapid decline in the proportion of respondents who visit them as the distance increases to around 5 km. There was a negative relationship between the mean number of visits per respondent to a particular greenspace and the distance from that greenspace to their home postcode, with a steeper decline in the number of visits within the first 3 km and then a plateau thereafter. This was observed across all of the greenspace types. This confirms that those respondents living close to a greenspace sites tend to visit them more frequently than those who live further away.

4.7.12 Comparing greenspace types, the "catchment" is smallest for parks and gardens with 50 % of visits to them made by respondents living within approximately 1 km, while for other non-coastal sites, including heathland, this value is 1.5 to 2 km. A greater visitation to urban rather than rural heaths may reflect the lower size and availability of greenspace alternatives in urban areas and small/no access to gardens in urban areas.

4.7.13 This report, part 1 of which is downloadable from the internet, contains no comparisons of people's use of heaths and greenspaces. Part 2 of the report, which is hard to source but has been summarised in a Council report<sup>12</sup>, says that the area of greenspace within the vicinity did not affect the amount of visits to a heath, but the number of greenspaces within the vicinity did – the more choice of greenspaces there were, the fewer people visited heaths

<sup>11</sup> Liley, D., Sharp, J. & Clarke, R. T. (2008). Access Patterns in South-east Dorset. Dorset Household Survey and Predictions of Visitor Use of Potential Greenspace Sites. Dorset Heathlands Development Plan Document. Unpublished report, Footprint Ecology

<sup>12</sup> <http://www.eastdorsetdc.gov.uk/democracy/docstore/0904/090424155344-a66bf96d-279a-4f50-918f-002361845217.pdf>, accessed on 5<sup>th</sup> August 2011

## **5 Water resources and water quality**

### **5.1 Introduction**

- 5.1.1 Public response to consultations has raised concerns regarding water availability for the housing allocations, and potential problems with surface water run-off and sewage treatment.

### **5.2 Water resources**

- 5.2.1 The Haven Gateway Water Cycle Study Stage 2 Report (2009) concluded that water supply companies were confident that they had sufficient resources to supply the demands of the region over the forthcoming period and had plans in place to be able to realise these resources.
- 5.2.2 This report included as assessment of the environmental impacts of water abstraction.

### **5.3 Water quality**

- 5.3.1 A number of the treatment facilities within the Haven Gateway area were stated in the Haven Gateway Water Cycle Study Stage 2 Report (2009) to be at, or will reach capacity, with the projected growth, and therefore will require increases to their permitted discharge, together with potential extensions to and upgrades of the facilities. Growth cannot take place until the treatment works have sufficient capacity.
- 5.3.2 Increases in discharge from sewage treatment works would need to be accommodated within the receiving watercourses without adverse impacts. There are areas within the region where treatment improvements will be required to avoid any increase in pollution loads within the receiving water bodies. This will occur before housing growth significantly increases.
- 5.3.3 Surface water run-off needs to be considered on a case by case basis, and there is no evidence at a strategic level that there would be any run-off into European sites. For example, a planning application would need to demonstrate that drainage is satisfactory, perhaps using a combination of traditional piped drainage and Sustainable Drainage Schemes.

### **5.4 Conclusion for water quality and water resources**

- 5.4.1 Water availability and water quality issues related to the Proposed Submission Core Strategy and Policies are therefore considered to have no likely significant effect on European sites.

## **6 Assessment of Policies DM25 and DM33**

### **6.1 Appropriate Assessment of DM25 'Protection of Employment Land'.**

- 6.1.1 Employment Areas are defined on the policies map and the IP-One inset policies map. This policy relates to the protection of the town's main existing and proposed employment areas for such uses. Established employment areas were previously identified in a separate policy DM36 which Natural England advised should be subject to screening under the Habitats Regulations. All the existing employment areas have been reviewed and boundaries amended where appropriate. New employment areas have been designated at Ipswich Business Park north of Whitton Lane and Airport Farm Kennels south of Ravenswood.
- 6.1.2 Existing employment areas are not thought to have any current impacts upon European sites; for example condition assessments by Natural England do not record any such reasons for the small percentage of sites in the vicinity of Ipswich which are recorded as unfavourable.
- 6.1.3 Impacts from employment land could potentially include
- Increased risk of airborne emissions causing air pollution, arising from industrial processes such as manufacturing
  - Increased risk of water discharge causing water pollution, arising from industrial processes such as manufacturing
  - Increased noise and light causing disturbance to birds on the Stour and Orwell Estuary
- 6.1.4 No developments likely to produce harmful amounts of air pollution or water pollution are specifically allocated. The location of the employment areas, within a dense urban environment, indicates that polluting industries are unlikely to be permitted. In the event of a planning application for such a development, discharges to air or water would be subject to scrutiny and if there was doubt a project Appropriate Assessment would be needed. Discharges to air or water would also need Environment Agency's consent, with Appropriate Assessment part of that decision-making process.
- 6.1.5 Proposed new areas for employment land, within or adjacent to existing employment areas, or new sites, are all separated sufficiently from the Stour and Orwell estuaries that no noise or lighting impact is likely to occur.
- 6.1.6 Employment sites generally have a lower impact on European sites than does housing, as employment sites generally do not generate recreational impacts at distance as a result of an increased human population
- 6.1.7 It is considered that Policy DM25 would not adversely affect the integrity of Stour and Orwell Estuaries SPA.

### **6.2 Appropriate Assessment of DM33 'Green Corridors'**

- 6.2.1 DM33 states that 'The Council will seek to establish and enhance green corridors within the Borough and linking to adjacent open spaces and walking, cycling or riding routes. Green corridors are identified broadly on Plan 6 [of the DPD]'. Within the defined green corridors, development would only be permitted where it would maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions. The Council will seek to establish attractive green links and to provide for public access wherever safe and practicable'.
- 6.2.2 One green corridor is adjacent to The Stour and Orwell Estuaries SPA. This is entirely in the location of Orwell Country Park, which is already managed for public access and nature conservation. It is considered that Policy DM33 is unlikely to alter the public access, amenity, recreational and green transport functions of this area bearing in mind its current use.
- 6.2.3 It is considered that Policy DM33 would not adversely affect the integrity of Stour and Orwell Estuaries SPA.



## 7 Mitigation

### 7.1 Mitigation aims and objectives

7.1.1 The principle of mitigation remains as that described in the 2009 Appropriate Assessment of the Core Strategy current at that time, which is to reduce demand for visits to the European sites at risk of impact, and to manage existing sites with a specific high risk to re-distribute visitors from sensitive areas.

7.1.2 Detailed aims of such mitigation are

- To prevent a damaging increase in visitor number to all European sites across the Suffolk Coast and Heaths AONB
- To prevent an increase in visitor numbers to specific parts of European sites likely to be particularly affected – Orwell Estuary at Orwell Country Park and to a lesser extent the Deben Estuary SPA via use of the car park at Martlesham Church.

7.1.3 Detailed objectives are

- To provide new locations for countryside recreation, especially dog walking, for residents of existing and proposed housing, as a preferred alternative to visiting European sites
- To improve visitor infrastructure and management, including wardening, on existing sites to reduce the impact of increased visitors

### 7.2 Mitigation for strategic allocations in Ipswich affecting the Orwell Estuary at Orwell Country Park

7.2.1 The Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review contains several measures to mitigate for any possible harm caused by an increased human population arising from the new housing resulting in increased disturbance to birds at Orwell Country Park.

7.2.2 Policy CS16 'Green Infrastructure, Sport and Recreation' contains five sub-policies which reduce the motivation for residents of proposed housing to visit the Stour and Orwell Estuaries SPA / Ramsar site for regular visits. These are

*b. requiring major new developments to include on-site public open spaces and wildlife habitat. On-site provision must create a network or corridor with existing green infrastructure where such an ecological network exists beyond the site boundaries;*

7.2.3 Sub-policy 'b' provides on-site open spaces so that residents have the opportunity to access convenient local greenspace for frequent activities such as dog walking, and there is much less motivation to regularly travel to Orwell Country Park.

*d. working with partners to prepare and implement management plans for green spaces, including visitor management plans for key parts of European sites within the Suffolk Coast and Heaths AONB to be completed by 2015, and a plan for Orwell Country Park that will result in a reduced impact upon birds in the Orwell Estuary;*

7.2.4 Sub-policy 'd' includes a plan for Orwell Country Park which results in reduced visitor impact. No details are given, but further details are given in the Site Allocations Local Plan Document accompanying the Core Strategy possibly including a new visitor centre and new visitor routes avoiding the estuary shore. The Core Strategy stage is not the appropriate place to give these details, but there is reassurance that the Council commits to the appropriate actions.

*e. supporting the Greenways Project in working with communities and volunteers to manage green corridors in Ipswich;*

7.2.5 Improvement of green corridors provides improved opportunities for residents of existing and proposed housing to access convenient local greenspace for frequent activities such as dog walking, and there is much less motivation to regularly travel to Orwell Country Park.

*g. working with partners to improve green infrastructure provision and link radial ecological networks green corridors with a publicly accessible green rim around Ipswich;*

7.2.6 Again, this sub-policy provides improved opportunities for residents of existing and proposed housing to access convenient local greenspace for frequent activities such as dog walking, and there is much less motivation to regularly travel to Orwell Country Park.

*h. working with partners to ensure the provision of a new country park and visitor centre within the Ipswich Garden Suburb, and an extension to Orwell Country Park and possible provision of a visitor centre there subject to assessing its impacts on the Special Protection Area.*

7.2.7 Sub-policy 'h' provides a new country park, which will in particular provide improved opportunities for residents of existing and proposed housing in the north of Ipswich (and beyond) to access convenient local greenspace for frequent activities such as dog walking, and there is much less motivation to regularly travel to Orwell Country Park. There is an allocated site for the Country Park of 24.5 hectares on the Ipswich Local Plan Policies Map which accompanies the Core Strategy.

7.2.8 Policy CS10 specifies the Country Park, as well as 40ha of other Public Open Space in Ipswich Garden Suburb. Policy CS17 'Delivering Infrastructure' provides mechanisms for providing the Country Park and other green infrastructure.

7.2.9 Policy DM31 'The Natural Environment' states that proposals which would lead to an adverse effect on the integrity of a European protected site will not be permitted unless imperative reasons of over-riding public interest exist in line with the provisions of the European Habitats Directive. Policies CS4 'Protecting our assets', DM26 'Protection of amenity' and DM29 'Provision of New Public Open Space, Sport and Recreation Facilities' also contain some protection for European sites (see Appendix 6).

7.2.10 **It is therefore ascertained that there would be no adverse affect upon the integrity of Stour and Orwell Estuaries SPA / Ramsar site from relevant housing policies within the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review.**

### **7.3 Mitigation for the cumulative impact of housing in Ipswich and in Suffolk Coastal**

7.3.1 Mitigation for an increase in visitors to European sites is based on providing alternative recreational choices for residents (existing and proposed) of the whole of Ipswich Borough and Suffolk Coastal District, and managing visitors on existing European sites. Alternative recreation options should be located at convenient points for many users, and offer facilities sufficient to attract some people from European sites.

7.3.2 A new Country Park or similar high-quality provision is proposed in Policy CS10 'Ipswich Garden Suburb Policy' and in CS16 'Green Infrastructure, Sport and Recreation' in Ipswich Garden Suburb. This would provide an alternative to European sites and therefore attract existing and proposed residents of Ipswich and Suffolk Coastal District who might otherwise visit a European site. A new Country Park has been under discussion for some time, and was suggested by the Haven Gateway Green Infrastructure Project<sup>13</sup> independently of this Appropriate Assessment, in order to provide strategic green space for the population of greater Ipswich, particularly the northern part of the Borough.

7.3.3 The new Country Park or similar high-quality provision should be free to enter, contain areas for dog walking, children's play, and possibly more formal recreation such as orienteering, events such as country fairs, and a ranger service. A mixture of habitats including grassland, woodland and open water would make it more attractive and would also provide opportunities for delivery of BAP targets.

<sup>13</sup> available at <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/evidence/studies/default.htm>

- 7.3.4 Information within the South Suffolk Visitor Survey suggest that a car park (preferably free) is essential, and that visitors would be likely to appreciate a café, toilets, a shop, a staffed information point, wildlife viewing areas, bins and benches, marked routes, children's facilities, and shelter for bad weather days. Provision of substantial areas where dogs may be let off leads would be important to attract dog-walkers away from European sites.
- 7.3.5 The three ex-Suffolk County Council country parks (some recently divested to others) currently attract a considerable number of people; in 2009/10 Brandon Country Park (13ha with access to over 1,000ha of forest) attracted 175,000 visitors, Clare Country Park (13ha) attracted 180,000 people, and Knettishall Heath (158ha) attracted 75,000 people<sup>14</sup>. This demonstrates that country parks successfully attract recreational users, many of whom would otherwise have used other sites for recreation. It is therefore reasonable to assert that a new Country Park would also attract a large number of visitors.
- 7.3.6 It is expected that the new Country Park will form a substantial part of the mitigation requirements for development within both Ipswich Borough and Suffolk Coastal District. However, evidence from the Stour and Orwell Estuaries SPA disturbance report<sup>15</sup> discussed in Section 4 above, and studies of heathland in Dorset (see Section 4 above) indicate that there may still be some residual disturbance of birds, probably caused by local people engaging in low-key recreational activities on European sites near their homes, such as dog-walking. These people would not necessarily always be attracted to Country Parks. This residual disturbance would be an impact referable in particular to the aggregation of smaller provisions across Suffolk Coastal District as well as to people driving out of Ipswich.
- 7.3.7 Visitor management on European sites within the Suffolk Coast and Heaths AONB requires the provision of wardening and visitor management measures, guided by a visitor management plan, to manage and monitor recreational access and birds on designated sites. The designated sites include the Deben Estuary SPA/Ramsar and Sandlings SPA. These measures would be co-ordinated across the Coast & Heaths Area, and are likely to require a capital works programme, and on-site wardening. The programme would include
- identifying key sites where visitor pressure is currently, or close to, causing harm
  - identifying the origin of visitors to those identified key sites
  - writing and implementing a visitor management plan for key sites without such a plan, or revising existing plans, to reduce visitor impact. Reduction in visitor impact might mean changes to visitor infrastructure (e.g. car parks, paths), new or revised interpretation, wardening, provision of alternative recreation opportunities in less sensitive locations, etc, bylaws, identification of parts of sites where recreation will not be encouraged, etc.
  - A monitoring programme, to determine visitor numbers and allow the impact of the visitor numbers to be identified, throughout time. The impact of visitor numbers may be difficult to determine and would rely on specialist studies as well as Natural England's programme of SSSI Condition assessment.
- 7.3.8 Ipswich Borough Council commits to progressing the programme, with sub-policy d of Policy CS16 as shown below.
- d. working with partners to prepare and implement management plans for green spaces, including visitor management plans for key parts of European sites within the Suffolk Coast and Heaths AONB to be completed by 2015, and a plan for Orwell Country Park that will result in a reduced impact upon birds in the Orwell Estuary;*
- 7.3.9 **It is therefore ascertained that there would be no adverse affect upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core**

<sup>14</sup> Suffolk County Council (January 2011) The future of country parks and recreation sites in Suffolk. Brandon Country Park. Clare Country Park. Knettishall Heath Country Park.

<sup>15</sup> Ravenscroft, Parker, Vonk and Wright 2007 *Disturbance to waterbirds wintering in the Stour-Orwell Estuaries SPA* Commissioned by Suffolk Coast and Heaths Unit

**Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.**

## **7.4 Mitigation for strategic allocations in Ipswich affecting the Deben Estuary at Martlesham**

**7.4.1** The car park at Martlesham Church (OS grid reference TM261469) which is open to the public and has a footpath link to Deben Estuary SSSI is approximately 8.3km in a straight line from the nearest part of the housing allocation at Ipswich Garden Suburb, just over the 8km threshold for most people to drive. Whilst it is not impossible that occasionally a resident of Ipswich Garden Suburb might visit the car park at Martlesham, there will be a minimum 24.5 hectare Country Park within the Ipswich Garden Suburb (see 6.1 and 6.2 above). It is considered that the vast majority of residents of Ipswich Garden Suburb who engage in countryside recreation would regularly use the proposed new Country Park. Residents of other areas in Ipswich may also use the proposed new Country Park. This would ensure that an increase of visitors to the Deben Estuary, via the car park at Martlesham Church, would be very limited and no adverse effect on the integrity of Deben Estuary SPA is predicted.

**7.4.2** **It is therefore ascertained that there would be no adverse affect upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.**

## 8 Consultations

### 8.1 Consultation on 'Likely Significant Effect'

- 8.1.1 Natural England (statutory consultee) and Suffolk Wildlife Trust (interested body) were consulted on the Likely Significant Effect stage of the process. Both organisations were sent the report by The Landscape Partnership (November 2013) *Appropriate Assessment screening for Ipswich Borough Council Draft Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD* on 13<sup>th</sup> November 2013.
- 8.1.2 Suffolk Wildlife Trust responded on 19<sup>th</sup> December 2013 and requested clarification for the relationship of the assessment with the assessment for the Draft Site Allocations Local Plan document being carried out simultaneously. Clarification was given on 6<sup>th</sup> January 2013. Correspondence is given in Appendix 8.

### 8.2 Consultation on the Appropriate Assessment

- 8.2.1 The Appropriate Assessment of the Draft Core Strategies and Policies DPD Focussed Review was published with the Local Plan documents for consultation with the public, stakeholders and statutory bodies, from 13<sup>th</sup> January 2014 to 13<sup>th</sup> March 2014.
- 8.2.2 Comments were received from the Environment Agency. It agreed with *'the comment under para. 5.3.1 based on the Haven Gateway Water Cycle Study 2 Report 2009 that 'Growth cannot take place until the treatment works have sufficient capacity.' This strengthens the case for a proper pre-application water assessment to be carried out'*. No comments were received from other consultees on the Appropriate Assessment of the Draft Core Strategy and Policies DPD Focussed Review.

## **9 Summary Conclusions of the Appropriate Assessment**

### **9.1 Policy CS7 and related policies**

9.1.1 The Appropriate Assessment was primarily focussed upon Policy CS7 (and related policies such as CS10). It is ascertained that there would be no adverse affect upon the integrity of European sites from policy CS7 and related policies in the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review.

9.1.2 Policies DM25 'Protection of Employment Land' and DM33 'Green Corridors' were also assessed and found to have no adverse affect upon the integrity of any European site.

### **9.2 All other policies**

9.2.1 All other policies in the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review document are not likely to have a significant effect on any European site.

### **9.3 Interactions between policies in this plan**

9.3.1 Policies have initially been assessed individually. Interactions between policies have been fully considered and no further assessment or changes to conclusions are required.

### **9.4 In combination with plans from others**

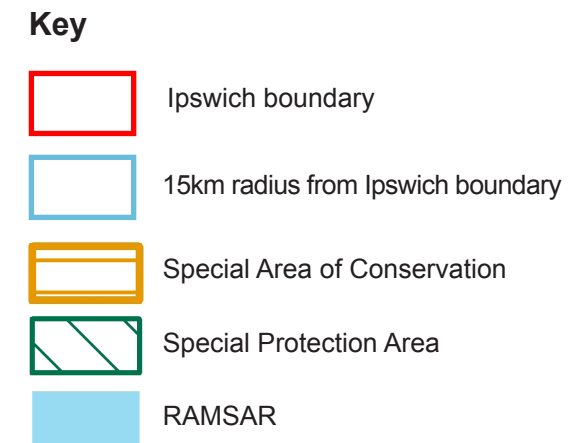
9.4.1 It is considered that one plan may have an effect in combination, which is the Suffolk Coastal District Core Strategy and Policies. All the above conclusions take into account any in combination effects. No other plans are considered to have an effect in combination.

### **9.5 Final conclusion**

9.5.1 It is ascertained that there would be no adverse affect upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review.

***Figure 1***





E13882 Ipswich Local Plan AA

## Designations Sites

**Figure 01**

Scale 1:200,000

October 2013



## ***Appendix 1***

## EC Directive 79/409 on the Conservation of Wild Birds

### Special Protection Area (SPA)

**Name:** Stour and Orwell Estuaries

**Unitary Authority/County:** Essex, Suffolk.

**Site description:** The Stour and Orwell estuaries straddle the eastern part of the Essex/Suffolk border in eastern England. The SPA is coincident with Cattawade Marshes Site of Special Scientific Interest (SSSI), Orwell Estuary SSSI and Stour Estuary SSSI. The estuaries include extensive mud-flats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The mud-flats hold *Enteromorpha*, *Zostera* and *Salicornia* spp. The site also includes areas of low-lying grazing marsh at Shotley Marshes on the south side of the Orwell and at Cattawade Marshes at the head of the Stour. Trimley Marshes on the north side of the Orwell includes several shallow freshwater pools, as well as areas of grazing marsh, and is managed as a nature reserve by the Suffolk Wildlife Trust. In summer, the site supports important numbers of breeding avocet *Recurvirostra avosetta*, while in winter it holds major concentrations of waterbirds, especially geese, ducks and waders. The geese also feed, and some 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.

**Size of SPA:** The SPA covers an area of 3,676.92 ha.

#### Qualifying species:

The site qualifies under **article 4.1** of the Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain populations of the following species listed in Annex I in any season:

Annex 1 species	Count and season	Period	% of GB population
Avocet <i>Recurvirostra avosetta</i>	21 pairs - breeding	5 year peak mean 1996 – 2000	3.6%

The site qualifies under **article 4.2** of the Directive (79/409/EEC) as it is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed in Annex I) in any season:

Migratory species	Count and season	Period	% of subspecies/population
Redshank <i>Tringa totanus</i>	2,588 individuals – autumn passage	5 year peak mean 1995/96 – 1999/2000	2.0% <i>britannica</i>
Dark-bellied brent goose <i>Branta bernicla bernicla</i>	2,627 individuals - wintering	5 year peak mean 1995/96 – 1999/2000	1.2% <i>bernicla</i> , Western Siberia (breeding)
Pintail <i>Anas acuta</i>	741 individuals - wintering	5 year peak mean 1995/96 – 1999/2000	1.2% Northwestern Europe (non-breeding)
Grey plover <i>Pluvialis squatarola</i>	3,261 individuals - wintering	5 year peak mean 1995/96 – 1999/2000	1.3% Eastern Atlantic (non- breeding)
Knot <i>Calidris canutus</i> <i>islandica</i>	5,970 individuals - wintering	5 year peak mean 1995/96 – 1999/2000	1.3% <i>islandica</i>
Dunlin <i>Calidris alpina alpina</i>	19,114 individuals - wintering	5 year peak mean 1995/96 – 1999/2000	1.4% <i>alpina</i> , Western Europe (non-breeding)
Black-tailed godwit <i>Limosa limosa islandica</i>	2,559 individuals - wintering	5 year peak mean 1995/96 – 1999/2000	7.3% <i>islandica</i>
Redshank <i>Tringa totanus</i>	3,687 individuals - wintering	5 year peak mean 1995/96 – 1999/2000	2.8% <i>britannica</i>

Bird counts from: Wetland Bird Survey (WeBS) database.

#### Assemblage qualification:

The site qualifies under **article 4.2** of the Directive (79/409/EEC) as it is used regularly by over 20,000 waterbirds (waterbirds as defined by the Ramsar Convention) in any season:

In the non-breeding season, the area regularly supports 63,017 individual waterbirds (5 year peak mean 1993/94 - 1997/98), including great crested grebe *Podiceps cristatus*, cormorant *Phalacrocorax carbo*, dark-bellied brent goose *Branta bernicla bernicla*, shelduck *Tadorna tadorna*, wigeon *Anas penelope*, gadwall *Anas strepera*, pintail *Anas acuta*, goldeneye *Bucephala clangula*, ringed plover *Charadrius hiaticula*, grey plover *Pluvialis squatarola*, lapwing *Vanellus vanellus*, knot *Calidris canutus islandica*, dunlin *Calidris alpina alpina*, black-tailed godwit *Limosa limosa islandica*, curlew *Numenius arquata*, redshank *Tringa totanus* and turnstone *Arenaria interpres*.

**Non-qualifying species of interest:** The SPA/Ramsar site as a whole, including the proposed extensions, is used by non-breeding marsh harrier *Circus aeruginosus*, hen harrier *Circus cyaneus*, merlin *Falco columbarius*, peregrine *Falco peregrinus*, short-eared owl *Asio flammeus* and kingfisher *Alcedo atthis* (all species listed in Annex I of the EC Birds Directive) in numbers of less than European importance (less than 1% GB population). It also supports breeding common tern *Sterna hirundo*, little tern *Sterna albifrons* and kingfisher (all listed in Annex I) in numbers of less than European importance.

#### Status of SPA:

- 1) Stour and Orwell Estuaries was classified as a Special Protection Area on 13 July 1994.
- 2) Extensions to the Stour and Orwell Estuaries SPA were classified on 19 May 2005.

## ***Appendix 2***



## European Site Conservation Objectives for Stour and Orwell Estuaries Special Protection Area Site Code: UK9009121

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;**

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

### Qualifying Features:

A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)

A054 *Anas acuta*; Northern pintail (Non-breeding)

A132 *Recurvirostra avosetta*; Pied avocet (Breeding)

A141 *Pluvialis squatarola*; Grey plover (Non-breeding)

A143 *Calidris canutus*; Red knot (Non-breeding)

A149 *Calidris alpina alpina*; Dunlin (Non-breeding)

A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)

A162 *Tringa totanus*; Common redshank (Non-breeding)

Waterbird assemblage

## This is a European Marine Site

This SPA is a part of the Stour and Orwell Estuaries European Marine Site (EMS). These Conservation Objectives should be used in conjunction with the Regulation 35 Conservation Advice document for the EMS. For further details about this please visit the Natural England website at:

<http://www.naturalengland.org.uk/ourwork/marine/protectandmanage/mpa/europeansites.aspx> or contact Natural England's enquiry service at [enquiries@naturalengland.org.uk](mailto:enquiries@naturalengland.org.uk) or by phone on 0845 600 3078.

## Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive, and the prevention of deterioration of habitats and significant disturbance of its qualifying features required under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

**Publication date:** 30 June 2014 (Version 2). This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014. Previous references to additional features identified in the 2001 UK SPA Review have also been removed.

## ***Appendix 3***



**EC Directive 79/409 on the Conservation of Wild Birds:  
Special Protection Areas**

**Alde-Ore Estuary (Suffolk)**

The Alde-Ore Estuary proposed Special Protection Area (pSPA) is situated on the east coast of Suffolk between Aldeburgh in the north and Bawdsey in the south. The site comprises the estuary complex of the rivers Alde, Butley and Ore, including Havergate Island and Orfordness. The variety of habitats important for breeding and wintering birds includes vegetated shingle, intertidal mudflats, semi-improved grazing marsh, saltmarsh and saline lagoons.

The site includes the entire Alde-Ore Estuary SSSI, notified in 1985 (revised in 1992 under the Wildlife and Countryside Act, 1981). The Alde-Ore Estuary SSSI includes the Orfordness-Havergate NNR, the English Nature owned part of which has already been designated as Orfordness-Havergate SPA.

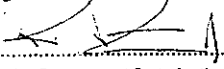
The site qualifies under Article 4.1 of the EC Birds Directive by sustaining nationally important numbers of the following Annex 1 species, marsh harrier *Circus aeruginosus* (breeding), avocet *Recurvirostra avosetta* (wintering and breeding) ruff *Philomachus pugnax* (wintering), sandwich tern *Sterna sandvicensis* (breeding) and little tern *Sterna albifrons* (breeding). Further Annex 1 species winter on site, including, bittern *Botaurus stellaris*, Bewick's Swan *Cygnus columbianus*, hen harrier *Circus cyaneus*, golden plover *Pluvialis apricaria*, and short-eared owl *Asio flammeus*. Mediterranean gull *Larus melanocephalus*, common tern *Sterna hirundo* and Arctic tern *Sterna paradisaea* breed on Havergate Island.

The site qualifies under Article 4.2 of the Directive by regularly supporting internationally important numbers of two migratory species. The Orfordness colony of breeding lesser black-backed gull *Larus fuscus graellsii*, represented in 1995, 12% of the British population and 8% of the world population of the *graellsii* race. The five year wintering peak mean 1989/90 to 1993/94 for redshank *Tringa totanus*, was 1,662 birds, representing 1.5 % of the British population and 1.1% of the east Atlantic flyway population.

The site supports over 1% of the British wintering population of the following (calculated from five year winter peak means 1989/90 to 1993/94), shelduck *Tadorna tadorna*, wigeon *Anas penelope*, teal *Anas crecca*, black-tailed godwit *Limosa limosa*. In addition, the site supports over 1% of the British breeding population of, Gadwall *Anas strepera*, shoveler *Anas clypeata* and herring gull *Larus argentatus*.

The site also supports a notable assemblage of breeding and wintering wetland birds, in addition to the species mentioned above. Breeding species include, oystercatcher *Haematopus ostralegus*, ringed plover *Charadrius hiaticula*, lapwing *Vanellus vanellus* (also winter) black headed gull *Larus ridibundus* and barn owl *Tyto alba*. Wintering species include, cormorant *Phalacrocorax carbo*, European white-fronted goose *Anser albifrons albifrons*, brent goose *Branta bernicla*, pintail *Anas acuta*, grey plover *Pluvialis squatarola*, dunlin *Calidris alpina* and curlew *Numenius arquata*.

This citation / map relates to a site entered in:  
the Register of European sites for Great Britain  
Register reference number UK9609112  
Date of registration 25 AUG 1998

Signed   
on behalf of the Secretary of State for the Environment

SPA Citation  
January 1996

# EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

## Citation for Special Area of Conservation (SAC)

**Name:** Alde, Ore and Butley Estuaries

**Unitary Authority/County:** Suffolk

**SAC status:** Designated on 1 April 2005

**Grid reference:** TM444509

**SAC EU code:** UK0030076

**Area (ha):** 1561.53

**Component SSSI:** Alde-Ore Estuary SSSI

### Site description:

This estuary, made up of three rivers, is the only bar-built estuary in the UK with a shingle bar. This bar has been extending rapidly along the coast since 1530, pushing the mouth of the estuary progressively south-westwards. The eastwards-running Alde River originally entered the sea at Aldeburgh, but now turns south along the inner side of the Orfordness shingle spit. It is relatively wide and shallow, with extensive intertidal mudflats on both sides of the channel in its upper reaches and saltmarsh accreting along its fringes. The Alde subsequently becomes the south-west flowing River Ore, which is narrower and deeper with stronger currents.

The smaller Butley River has extensive areas of saltmarsh and a reedbed community bordering intertidal mudflats. It flows into the Ore shortly after the latter divides around Havergate Island. The mouth of the River Ore is still moving south as the Orfordness shingle spit continues to grow through longshore drift from the north. There is a range of littoral sediment and rock biotopes (the latter on sea defences) that are of high diversity and species richness for estuaries in eastern England. Water quality is excellent throughout. The area is relatively natural, being largely undeveloped by man and with very limited industrial activity. The estuary contains large areas of shallow water over subtidal sediments, and extensive mudflats and saltmarshes exposed at low water. Its diverse and species-rich intertidal sand and mudflat biotopes grade naturally along many lengths of the shore into vegetated or dynamic shingle habitat, saltmarsh, grassland and reedbed.

The adjacent shingle and lagoon habitats are designated separately as the Orfordness-Shingle Street SAC.

**Qualifying habitats:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)
- Estuaries
- Mudflats and sandflats not covered by seawater at low tide. (Intertidal mudflats and sandflats)

This citation relates to a site entered in the Register of European Sites for Great Britain.

Register reference number: UK0030076

Date of registration: 14 June 2005

Signed: *Trevor Salmon*

On behalf of the Secretary of State for Environment,  
Food and Rural Affairs

**EC Directive 79/409 on the Conservation of Wild Birds:  
Special Protection Area**

**The Deben Estuary (Suffolk)**

The Deben Estuary Special Protection Area (SP A) extends for about 18km from the mouth of the estuary at Felixstowe, on the east coast of Suffolk to near the tidal limit above Wilford Bridge. It is a relatively narrow and sheltered estuary with a limited amount of freshwater input and intertidal areas constrained by sea walls. Saltmarsh and intertidal mud flats occupy the majority of the site but there are also areas of reedswamp, unimproved neutral grassland and scrub. The estuary is largely surrounded by agricultural land.

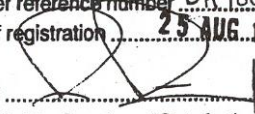
The boundary of the SPA is coincident with the Deben Estuary SSSI, notified in 1991, and overlaps with the Ferry Cliff, and Sutton and Ramsholt Cliff geological SSSIs. The site includes all land above mean low water mark up to an inland boundary that follows variable features such as the upper limit of wetland habitat or the sea wall.

The site qualifies under Article 4.1 of the EC Birds Directive by regularly supporting nationally important numbers of avocet *Recurvirostra avosetta*, an Annex 1 species. The five year winter peak mean for the period 1988/89 to 1992/93 was 57 birds, representing 11.4% of the British population. Further Annex 1 species wintering on the site include golden plover *Pluvialis apricaria*, hen harrier *Circus cyaneus* and short-eared owl *Asio flammeus*.

The site qualifies under Article 4.2 of the Directive by regularly supporting internationally important numbers of dark-bellied geese, *Branta bernicula bernicula*, a regularly occurring migratory species. The five year winter peak mean for the period 1988/89 to 1992/93 was 1,889 birds, representing 2.1% of the British and 1.1% of the north-west European population. In addition the site supports nationally important numbers of the following migratory waterfowl (figures are five year winter peak means for the period 1988/89 to 1992/93): 1,046 shelduck *Tadorna tadorna* (1.4% of the British population); 252 grey plover *Pluvialis squatarola* (1.2% of British); 143 black-tailed godwit *Limosa limosa* (2.9% of British); and 1,454 redshank *Tringa totanus* (1.9% of British).

The site also supports a notable assemblage of breeding and wintering wetland birds in addition to the species mentioned above. Breeding species include shelduck, gadwall *Anas strepera*, teal *A. crecca*, shoveler *A. clypeata*, redshank, oystercatcher *Haematopus ostralegus*, ringed plover *Charadrius hiaticula* and snipe *Gallinago gallinago*. Wintering species include cormorant *Phalacrocorax carbo*, teal, pintail *Anas acuta*, wigeon *A. penelope*, goldeneye *Bucephala clangula*, coot *Fulica atra*, oystercatcher, ringed plover, dunlin *Calidris alpina*, snipe, curlew *Numenius arquata*, turnstone *Areneria interpres* and twite *Carduelis flavirostris*. The estuary is more important for many species of waterfowl in years when severe weather reduces food resources available on the continent.

SPA Citation  
March 1996

This citation / map relates to a site entered in  
the Register of European sites for Great Britain.  
Register reference number UK9009261  
Date of registration 25 AUG 1996  
Signed   
on behalf of the Secretary of State for the Environment

## Reasons for recommendation as a candidate Special Area of Conservation

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Area name: Hamford Water

Administrative area: Essex

Component SSSI: Hamford Water

This area has been recommended as a candidate Special Area of Conservation (cSAC) because it contains species which are rare or threatened within a European context. The SSSI citation describes the special interests for which the site was notified in the British context. The interests for which the site was selected as SSSI may differ from the interests selected in a European context.

The species for which the area has been recommended as a candidate SAC is listed below. The reasons for their selection are listed, together with a brief description of the habitats and species as they typically occur across the UK. This area contains the interests described although it may not contain all the typical features.

The area is considered to have a high diversity of habitats/species of European importance.

### Interest(s) submitted to the European Commission

#### European priority interest(s):

1. Fisher's estuarine moth *Gortyna borelii lunata*

- **for which this is considered to be one of the best areas in the United Kingdom.**

*Gortyna borelii lunata* has a localised population distribution in the UK, due to its specific habitat requirements and is only found in two areas, the north Essex coast and the north Kent Coast.

Hamford Water supports the majority of the Essex population and is the most important UK site for this species, supporting approximately 70% of the population.

Hamford Water is a large, shallow estuarine basin comprising tidal creeks, islands, intertidal mud, sand flats and saltmarshes. Above the saltmarsh there is unimproved and improved grassland (including grazing marsh), scrub, woodland, hedges, ditches, ponds and reedbeds. The site encompasses those areas where the moth's food plant hog's fennel (*Peucedanum officinale*) grows and where there is an abundance of the grasses required by the species for egg laying.

#### For agency use only:

Date issued: \_\_\_\_\_

Reference number or date of  
map: \_\_\_\_\_

## **EC Directive 79/409 on the conservation of wild birds: Special Protection Area**

### **Hamford Water (Essex)**

Hamford Water is a large, shallow estuarine basin comprising tidal creeks and islands, intertidal mud and sand flats, and saltmarshes.

The flats are a small, locally sheltered area of medium to low level clay and silt flats. In places, particularly on the seaward side, the London Clay bedrock is exposed, and this area with soft recent muds provides contrasting substrates for inter-tidal algae and invertebrates. The saltmarsh fringe is of varying width outside the sea wall around most of Hamford Water, and the islands, notably Horsey, Skippers, Hedge-End and Garnham's, have substantial saltmarsh on their margins or, locally, within their breached sea walls.

The site qualifies under Article 4.1 by regularly supporting, in summer, a nationally important breeding population of little terns *Sterna albifrons*. An average of 35 pairs was present during the five-year period 1986-90, representing 1% of the British breeding population.

Hamford Water also qualifies under Article 4.1 by regularly supporting a nationally important wintering population of avocet *Recurvirostra avosetta*. During the five-year period 1986/87 to 1990/91, an average peak count of 99 birds was recorded, representing 7% of the British wintering population.

The site qualifies under Article 4.2 by supporting internationally or nationally important wintering populations of the following six species of migratory waterfowl (average peak counts for the five-year winter period 1986/87 to 1990/91): 5,650 dark-bellied brent geese *Branta bernicla bernicla* (2% of the Western European and 4% of the British wintering population); 1,580 black-tailed godwit *Limosa limosa* (2% of East Atlantic Flyway population, 33% of British); 1,240 redshank *Tringa totanus* (1% of North West population, 2% of British); 620 ringed plover *Charadrius hiaticula* (1% of EAF, 3% of British); 840 shelduck *Tadorna tadorna* (1% of British); 3,630 teal *Anas crecca* (2% of British); and 1,080 grey plover *Pluvialis squatarola* (2% of British).

During severe winter weather elsewhere, Hamford Water can assume even greater national and international importance as wildfowl and waders from many other areas arrive, attracted by the relatively mild climate, compared with continental European areas, and the abundant food resources available.

SPA Citation  
July 1992

# EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

## Citation for Special Area of Conservation (SAC)

**Name:** Orfordness – Shingle Street

**Unitary Authority/County:** Suffolk

**SAC status:** Designated on 1 April 2005

**Grid reference:** TM440486

**SAC EU code:** UK0014780

**Area (ha):** Suffolk

**Component SSSI:** Alde-Ore Estuary SSSI

### Site description:

Orfordness is an extensive shingle structure consisting of a foreland, a 15 km-long spit and a series of recurves running from north to south. It supports some of the largest and most natural sequences in the UK of shingle vegetation affected by salt spray. The southern end has a particularly fine series of undisturbed ridges, with zonation of communities determined by the ridge pattern. Pioneer communities with sea pea *Lathyrus japonicus* and false oat-grass *Arrhenatherum elatius* grassland occur. Locally these are nutrient-enriched by the presence of a gull colony; elsewhere they support rich lichen communities.

Drift-line vegetation occurs on the sheltered, western side of the spit, at the transition from shingle to saltmarsh, as well as on the exposed eastern coast. The drift-line community is widespread and comprises sea beet *Beta vulgaris* ssp. *maritima* and orache *Atriplex* spp.

The site also includes a series of percolation lagoons that have developed in the shingle bank adjacent to the shore at the mouth of the Ore estuary. The salinity of the lagoons is maintained by percolation through the shingle, although at high tides sea water can overtop the shingle bank. The fauna of these lagoons includes typical lagoon species, such as the cockle *Cerastoderma glaucum*, the ostracod *Cyprideis torosa* and the gastropods *Littorina saxatilis tenebrosa* and *Hydrobia ventrosa*. The nationally rare starlet sea anemone *Nematostella vectensis* is also found at the site.

The adjacent estuarine and intertidal habitats are designated separately as the Alde, Ore and Butley Estuaries SAC.

**Qualifying habitats:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Annual vegetation of drift lines
- Coastal lagoons\*
- Perennial vegetation of stony banks. (Coastal shingle vegetation outside the reach of waves)

Annex I priority habitats are denoted by an asterisk (\*).

This citation relates to a site entered in the Register of European Sites for Great Britain.

Register reference number: UK0014780

Date of registration: 14 June 2005

Signed: *Trevor Salmon*

On behalf of the Secretary of State for Environment, Food and Rural Affairs

## EC Directive 79/409 on the Conservation of Wild Birds

### Citation for Special Protection Area (SPA)

**Name:** Sandlings

**Unitary Authority/County:** Suffolk

**Consultation proposal:** All or parts of Blaxhall Heath Site of Special Scientific Interest (SSSI), Leiston - Aldeburgh SSSI, Sandlings Forest SSSI, Snape Warren SSSI, Sutton & Hollesley Heaths SSSI and Tunstall Common SSSI have been recommended as a Special Protection Area because of their European ornithological importance. In particular, for their breeding populations of Nightjars *Caprimulgus europaeus* and Woodlarks *Lullula arborea*.

**Site description:** The Sandlings SPA lies near the Suffolk Coast between the Deben Estuary and Leiston. In the 19<sup>th</sup> century, the area was dominated by heathland developed on glacial sandy soils. During the 20<sup>th</sup> century, large areas of heath were planted with blocks of commercial conifer forest and others were converted to arable agriculture. Lack of traditional management has resulted in the remnant areas of heath being subject to successional changes, with the consequent spread of bracken, shrubs and trees, although recent conservation management work is resulting in their restoration. The heaths support both acid grassland and heather-dominated plant communities, with dependant invertebrate and bird communities of conservation value. Woodlark *Lullula arborea* and Nightjar *Caprimulgus europaeus* have also adapted to breeding in the large conifer forest blocks, using areas that have recently been felled and recent plantation, as well as areas managed as open ground.

**Size of SPA:** The SPA covers an area of 3,391.80 ha.

#### Qualifying species:

The site qualifies under **article 4.1** of the Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain populations of the following species listed in Annex I in any season:

Annex 1 species	Count and Season	Period	% of GB population
Nightjar <i>Caprimulgus europaeus</i>	109 males - breeding	Count as a 1992	3.2% GB
Woodlark <i>Lullula arborea</i>	154 pairs - breeding	Count as at 1997	10.3% GB

Bird figures from:

Morris, A., Burges, D., Fuller, R.J., Evans, A.D. & Smith, K.W. 1994. The status and distribution of nightjars *Caprimulgus europaeus* in Britain in 1992. A report to the British Trust for Ornithology. *Bird Study* **41**: 181-191.

Wotton, S.R. & Gillings, S. 2000. The status of breeding woodlarks in Britain in 1997. *Bird Study* **47**: 212-224.

#### Status of SPA

Sandlings was classified as a Special Protection Area on 10 August 2001.

# EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

## Citation for Special Area of Conservation (SAC)

**Name:** Staverton Park and The Thicks, Wantisden  
**Unitary Authority/County:** Suffolk  
**SAC status:** Designated on 1 April 2005  
**Grid reference:** TM356509  
**SAC EU code:** UK0012741  
**Area (ha):** 81.45  
**Component SSSI:** Staverton Park and The Thicks, Wantisden SSSI

### Site description:

This site is representative of old oak *Quercus* spp. woods, and its ancient oaks have rich invertebrate and epiphytic lichen assemblages. Despite being in the most 'continental' part of southern Britain, the epiphytic lichen flora of this site includes rare and Atlantic species, such as *Haemotomma elatinum*, *Lecidea cinnabarina*, *Thelotrema lepadinum*, *Graphis elegans* and *Stenocybe septata*. Part of the site includes an area of old holly *Ilex aquifolium* trees that are probably the largest in Britain. The site has a very well-documented history and good conservation of woodland structure and function.

**Qualifying habitats:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Old acidophilous oak woods with *Quercus robur* on sandy plains. (Dry oak-dominated woodland)

This citation relates to a site entered in the Register of European Sites for Great Britain.

Register reference number: UK0012741

Date of registration: 14 June 2005

Signed: *Trevor Salmon*

On behalf of the Secretary of State for Environment,  
Food and Rural Affairs



## ***Appendix 4***



## European Site Conservation Objectives for Alde, Ore and Butley Estuaries Special Area of Conservation Site Code: UK0030076

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;**

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

### **Qualifying Features:**

H1130. Estuaries

H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats

H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

## Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the “Habitats Regulations”) and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a ‘Habitats Regulations Assessment’, including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features as required by the provisions of Article 6(1) and 6(2) of the Directive.

These Conservation Objectives are set for each habitat or species of a [Special Area of Conservation \(SAC\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term ‘favourable conservation status’ is defined in Article 1 of the Habitats Directive.

**Publication date:** 30 June 2014 – version 2. This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England’s Strategic Standard on European Site Conservation Objectives 2014.



## European Site Conservation Objectives for Alde–Ore Estuary Special Protection Area Site Code: UK9009112

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;**

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

### Qualifying Features:

- A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)
- A132 *Recurvirostra avosetta*; Pied avocet (Non-breeding)
- A132 *Recurvirostra avosetta*; Pied avocet (Breeding)
- A151 *Philomachus pugnax*; Ruff (Non-breeding)
- A162 *Tringa totanus*; Common redshank (Non-breeding)
- A183 *Larus fuscus*; Lesser black-backed gull (Breeding)
- A191 *Sterna sandvicensis*; Sandwich tern (Breeding)
- A195 *Sterna albifrons*; Little tern (Breeding)

## This is a European Marine Site

This SPA is a part of the Alde Ore & Butley European Marine Site (EMS). These Conservation Objectives should be used in conjunction with the Regulation 35 Conservation Advice document for the EMS. For further details about this please visit the Natural England website at:

<http://www.naturalengland.org.uk/ourwork/marine/protectandmanage/mpa/europeansites.aspx> or contact Natural England's enquiry service at [enquiries@naturalengland.org.uk](mailto:enquiries@naturalengland.org.uk) or by phone on 0845 600 3078.

## Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive, and the prevention of deterioration of habitats and significant disturbance of its qualifying features required under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

**Publication date:** 30 June 2014 (Version 2). This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014. Previous references to additional features identified in the 2001 UK SPA Review have also been removed.



## European Site Conservation Objectives for Deben Estuary Special Protection Area Site Code: UK9009261

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;**

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

### **Qualifying Features:**

A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)

A132 *Recurvirostra avosetta*; Pied avocet (Non-breeding)

## This is a European Marine Site

This SPA is a part of the Deben Estuary European Marine Site (EMS). These Conservation Objectives should be used in conjunction with the Regulation 35 Conservation Advice document for the EMS. For further details about this please visit the Natural England website at:

<http://www.naturalengland.org.uk/ourwork/marine/protectandmanage/mpa/europeansites.aspx> or contact Natural England's enquiry service at [enquiries@naturalengland.org.uk](mailto:enquiries@naturalengland.org.uk) or by phone on 0845 600 3078.

## Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive, and the prevention of deterioration of habitats and significant disturbance of its qualifying features required under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

**Publication date:** 30 June 2014 (Version 2). This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014. Previous references to additional features identified in the 2001 UK SPA Review have also been removed.



## European Site Conservation Objectives for Hamford Water Special Protection Area Site Code: UK9009131

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;**

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

### **Qualifying Features:**

- A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)
- A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
- A052 *Anas crecca*; Eurasian teal (Non-breeding)
- A132 *Recurvirostra avosetta*; Pied avocet (Non-breeding)
- A137 *Charadrius hiaticula*; Ringed plover (Non-breeding)
- A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
- A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
- A162 *Tringa totanus*; Common redshank (Non-breeding)
- A195 *Sterna albifrons*; Little tern (Breeding)



## This is a European Marine Site

This SPA is a part of the Hamford Water European Marine Site (EMS). These Conservation Objectives should be used in conjunction with the Regulation 35 Conservation Advice document for the EMS. For further details about this please visit the Natural England website at:

<http://www.naturalengland.org.uk/ourwork/marine/protectandmanage/mpa/europeansites.aspx> or contact Natural England's enquiry service at [enquiries@naturalengland.org.uk](mailto:enquiries@naturalengland.org.uk) or by phone on 0845 600 3078.

## Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive, and the prevention of deterioration of habitats and significant disturbance of its qualifying features required under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

**Publication date:** 30 June 2014 (Version 2). This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014. Previous references to additional features identified in the 2001 UK SPA Review have also been removed.



## **European Site Conservation Objectives for Hamford Water candidate Special Area of Conservation Site code: UK0030377**

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;**

- **The extent and distribution of the habitats of qualifying species**
- **The structure and function of the habitats of qualifying species**
- **The supporting processes on which the habitats of qualifying species rely**
- **The populations of qualifying species, and,**
- **The distribution of qualifying species within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

### **Qualifying Features:**

S4035. *Gortyna borellii lunata*; Fisher's estuarine moth

## **This site is currently a candidate Special Area of Conservation**

Candidate Special Areas of Conservation (cSACs) are sites that have been submitted to the European Commission by Government, but have not yet been formally adopted.

### **Explanatory Notes: European Site Conservation Objectives**

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the “Habitats Regulations”) and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a ‘Habitats Regulations Assessment’, including an Appropriate Assessment, under the relevant parts of this legislation.

Candidate SACs are European Sites and the provisions of the Habitats Regulations apply to them.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features as required by the provisions of Article 6(1) and 6(2) of the Directive.

These Conservation Objectives are set for each habitat or species of a [Special Area of Conservation \(SAC\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term ‘favourable conservation status’ is defined in Article 1 of the Habitats Directive.

**Publication date:** 30 August 2014 – version 1.



## European Site Conservation Objectives for Orfordness – Shingle Street Special Area of Conservation Site Code: UK0014780

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;**

- **The extent and distribution of qualifying natural habitats**
- **The structure and function (including typical species) of qualifying natural habitats, and**
- **The supporting processes on which qualifying natural habitats rely**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

### **Qualifying Features:**

H1150. Coastal lagoons\*

H1210. Annual vegetation of drift lines

H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves

\* denotes a priority natural habitat or species (supporting explanatory text on following page)

## This is a European Marine Site

This site is a part of the Alde Ore & Butley European Marine Site. These conservation objectives should be used in conjunction with the Regulation 35 Conservation Advice Package, for further details please contact Natural England's enquiry service at [enquiries@naturalengland.org.uk](mailto:enquiries@naturalengland.org.uk), or by phone on 0845 600 3078, or visit the Natural England website at:

<http://www.naturalengland.org.uk/ourwork/marine/protectandmanage/mpa/europeansites.aspx>

### \* Priority natural habitats or species

Some of the natural habitats and species listed in the Habitats Directive and for which SACs have been selected are considered to be particular priorities for conservation at a European scale and are subject to special provisions in the Directive and the Habitats Regulations. These priority natural habitats and species are denoted by an asterisk (\*) in Annex I and II of the Directive. The term 'priority' is also used in other contexts, for example with reference to particular habitats or species that are prioritised in UK Biodiversity Action Plans. It is important to note however that these are not necessarily the priority natural habitats or species within the meaning of the Habitats Directive or the Habitats Regulations.

## Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment', including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features as required by the provisions of Article 6(1) and 6(2) of the Directive.

These Conservation Objectives are set for each habitat or species of a [Special Area of Conservation \(SAC\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive.

**Publication date:** 30 June 2014 – version 2. This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014.



## European Site Conservation Objectives for Sandlings Special Protection Area Site Code: UK9020286

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;**

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

### **Qualifying Features:**

A224 *Caprimulgus europaeus*; European nightjar (Breeding)

A246 *Lullula arborea*; Woodlark (Breeding)

## Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the “Habitats Regulations”) and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a ‘Habitats Regulations Assessment’ including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive, and the prevention of deterioration of habitats and significant disturbance of its qualifying features required under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

**Publication date:** 30 June 2014 (Version 2). This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England’s Strategic Standard on European Site Conservation Objectives 2014. Previous references to additional features identified in the 2001 UK SPA Review have also been removed.



## European Site Conservation Objectives for Staverton Park and The Thicks, Waintisden Special Area of Conservation Site Code: UK0012741

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;**

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

### **Qualifying Features:**

H9190. Old acidophilous oak woods with *Quercus robur* on sandy plains; Dry oak-dominated woodland

\* denotes a priority natural habitat or species (supporting explanatory text on following page)



### \* Priority natural habitats or species

Some of the natural habitats and species listed in the Habitats Directive and for which SACs have been selected are considered to be particular priorities for conservation at a European scale and are subject to special provisions in the Directive and the Habitats Regulations. These priority natural habitats and species are denoted by an asterisk (\*) in Annex I and II of the Directive. The term 'priority' is also used in other contexts, for example with reference to particular habitats or species that are prioritised in UK Biodiversity Action Plans. It is important to note however that these are not necessarily the priority natural habitats or species within the meaning of the Habitats Directive or the Habitats Regulations.

### Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment', including an Appropriate Assessment, under the relevant parts of this legislation.

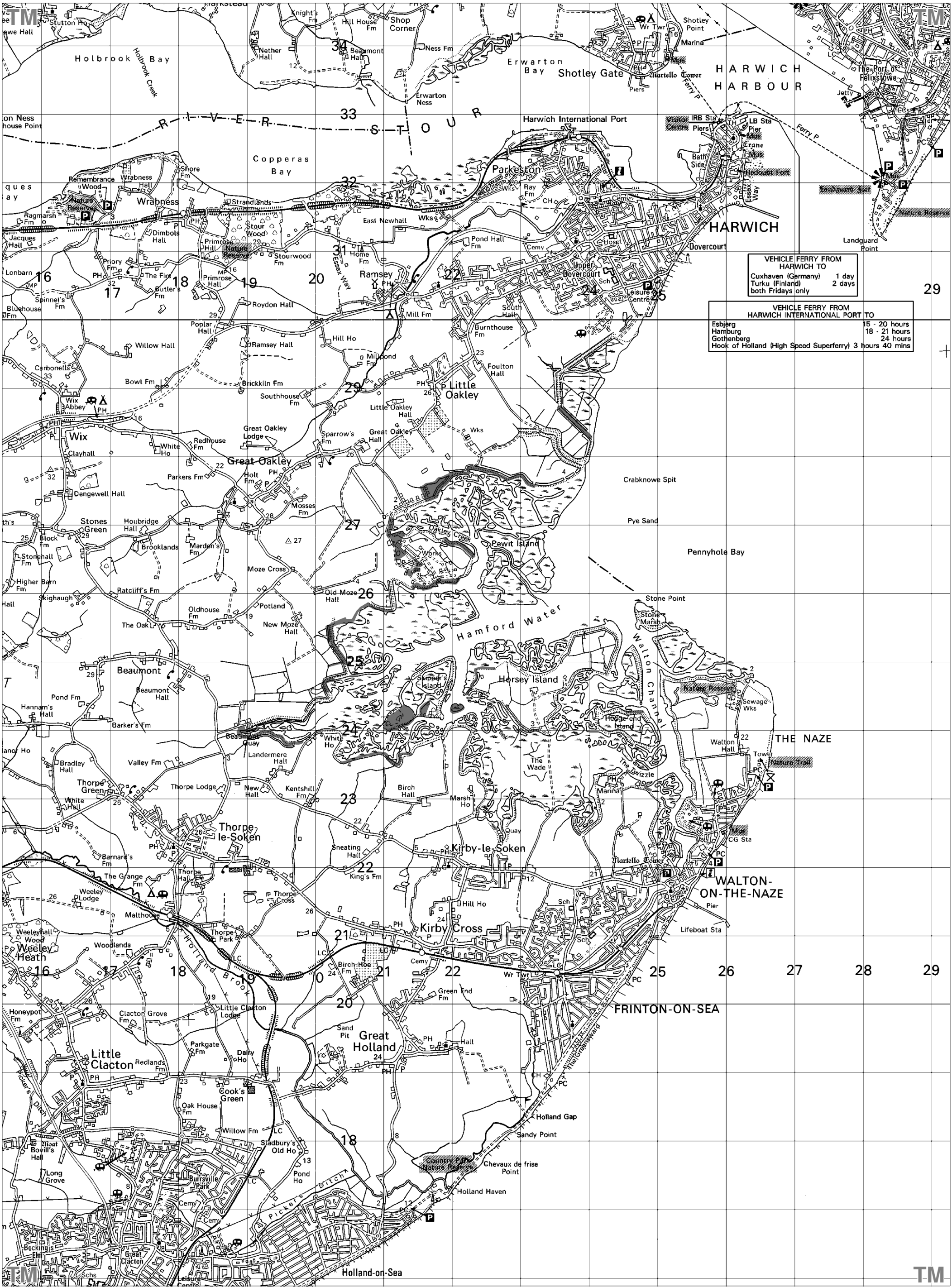
These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features as required by the provisions of Article 6(1) and 6(2) of the Directive.

These Conservation Objectives are set for each habitat or species of a [Special Area of Conservation \(SAC\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive.

**Publication date:** 30 June 2014 – version 2. This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014.

## ***Appendix 5***





VEHICLE FERRY FROM  
HARWICH TO  
Cuxhaven (Germany) 1 day  
Turku (Finland) 2 days  
both Fridays only

VEHICLE FERRY FROM HARWICH INTERNATIONAL PORT TO	
Esbjerg	15 - 20 hours
Hamburg	18 - 21 hours
Gothenburg	24 hours
Hook of Holland (High Speed Superferry)	3 hours 40 mins

candidate Special Area of Conservation

**Hamford Water**  
Essex

candidate Special Area of Conservation  
50.35 Hectares

This map relates to a site entered in the Register of European Sites for Great Britain.  
Register reference number: UK0030377  
Date of registration: 26 September 2013  
Signed: *L. Hughes*

On behalf of the Secretary of State for Environment, Food and Rural Affairs.

EU Site Code:  
UK0030377  
Version Number:  
1  
Longitude:  
1° 13' 25" E  
Latitude:  
51° 54' 9" N  
Projection:  
British National Grid  
Area of SAC:  
50.35 Hectares

Theme ID:  
1475892  
Grid Ref:  
TM217276  
Version:  
20130926  
Plotted:  
24/09/2013  
PlotID:  
1833

Scale 1:50000 at A3

Map 1 of 1  
0 2500 5000 7500ft.  
0 3km  
Grid North

Candidate Special Area of Conservation Directive 92/43/EEC  
Submitted to the EC by the Secretary of State for Environment, Food and Rural Affairs. Date: 26 September 2013  
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NATURAL  
ENGLAND

## ***Appendix 6***

### Screening of Ipswich Local Plan Proposed Submission Core Strategy and Policies

Policy	Brief description	Likely to have a significant effect?	Reason
<b>Core Strategy</b>			
<b>Strategic Spatial Approach</b>			
Policy CS1: Sustainable Development - Climate Change	A comprehensive approach will be taken to tackling climate change and its implications.	No	This will not in itself affect any European sites. It will have general environmental benefits.
Policy CS2: The Location and Nature of Development	The location of residential and office development is centred primarily on the town centre and the north of the Borough, and secondly on the town's district centres; employment development is proposed for existing employment areas.	No	The locations of development are at sufficient distance that immediate land-take or changes to ecological functioning are unlikely to affect any European site. Recreational or other off-site impacts are unlikely to be caused by employment development, with any proposals which may cause air or water pollution emissions being closely regulated by Environment Agency. The scale of housing development is addressed separately.
Policy CS3: IP-One Area Action Plan	Preparation of an Area Action Plan for central Ipswich	No	Preparing a plan will not in itself affect any European site and the location of development is at some distance from a European site.
Policy CS4: Protecting our Assets	The Council is committed to protecting and enhancing the Borough's built, historical, natural and geological assets.	No	The policy protects natural assets, including European sites, from harmful development.
Policy CS5: Improving Accessibility	Development should minimise the need to travel and enable access on foot, by bicycle and by public transport.	No	This will not in itself affect any European sites. It will have general environmental benefits.

Policy CS6: The Ipswich Policy Area	Ipswich Borough Council recognises the importance of joint working and the coordination of planning policies around the fringes of Ipswich	No	This will not in itself affect any European sites; it may improve co-ordination between neighbouring authorities.
<b>Live</b>			
Policy CS7: The Amount of New Housing Required	The Council will allocate land to provide for at least an additional 5,434 dwellings (January 2014 - 5,909 dwellings) net to be provided in the Borough, with 4,734 to be provided 2031. In relation to meeting need for a further 5,851 dwellings the Council will rely on windfall sites (Jan 2014 - 4,611 dwellings) and will work with neighbouring local authorities to address housing need later in the plan period.	Yes	The large number of new dwellings will lead to a larger human population within Ipswich, which could have effects upon European sites some distance away.
Policy CS8: Housing Type and Tenure	The Council will plan for a mix of dwelling types to be provided.	No	This will not in itself affect any European sites
Policy CS9: Previously Developed Land Target	The Council will focus development on previously developed land first while recognising that greenfield land will need to be developed to meet its objectively assessed housing need and forecasted jobs growth.	No	This will not in itself affect any European sites – the location of development and amount of development are not prescribed in this policy but in other plans. Previously developed land is not found close to the European site within Ipswich.



Policy CS10: Ipswich Garden Suburb (January 2014 - Ipswich Northern Fringe)	Land at the Northern Fringe of Ipswich will form a key component of the supply of housing land in Ipswich during the plan period.	Yes	<p>The location of development is at sufficient distance that immediate land-take or changes to ecological functioning is unlikely to affect any European site. The scale of development may have an effect due to recreational impacts on European sites at some distance, and is addressed with policy CS7.</p> <p>A minimum of 24.5ha Country Park is specified to be provided at an early stage of the development, as is 40ha of other public open space, and this will provide an alternative to recreation on European sites.</p>
Policy CS11: Gypsy and Traveller Accommodation	Provision will be found within the Ipswich Policy Area for additional permanent pitches for Gypsies and Travellers.	No	No sites are allocated in this Plan document (although one or more sites may be allocated in the Site Allocations Plan) and the scale of the development is such that it is unlikely to affect any European sites
Policy CS12: Affordable Housing	All new developments meeting certain criteria are required to include provision for affordable housing.	No	This will not in itself affect any European sites
<b>Work</b>			
Policy CS13: Planning for Jobs Growth	The Council will promote sustainable economic growth in the Ipswich Policy Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of in the region of 12,500 jobs between 2011 and 2031 by allocating land in various areas to be defined by Site Allocation Plan / Area Action Plans and in Nacton Road.	No	This will not in itself affect any European sites because no known impacts are caused by any existing employment areas; new employment development is likely to be within existing employment areas.
Policy CS14: Retail Development	The Council will promote high quality investment and development in Ipswich Central Shopping Area.	No	This will not in itself affect any European sites

<b>Learn</b>			
Policy CS15: Education Provision	Supports existing facilities and recognises the need for more facilities.	No	This will not in itself affect any European sites
<b>Play</b>			



<p>Policy CS16: Green Infrastructure, Sport and Recreation</p>	<p>The Council will safeguard, protect, and enhance biodiversity and the environment. Includes (in summary):</p> <ul style="list-style-type: none"> <li>a) all developments to contribute to provision of open space</li> <li>b) major new developments to include on-site public open spaces and wildlife habitat.</li> <li>c) supporting proposals or activities that protect, enhance or extend open spaces and sport and recreation facilities;</li> <li>d) working with partners to prepare and implement visitor management plans for key parts of European sites within the Suffolk Coast and Heaths AONB to be completed by 2015, and a plan for Orwell Country Park that will result in a reduced impact upon birds in the Orwell Estuary;</li> <li>e) supporting the Greenways Project;</li> <li>f) support the enhancement of canopy cover and ecological networks;</li> <li>g) working with partners to improve green infrastructure provision;</li> <li>h) working with partners to ensure the provision of a new country park in the urban fringe of north eastern Ipswich (see Policy CS10);</li> <li>i) promoting improved access to existing facilities where appropriate; and</li> <li>j) reviewing the town's estate of sports facilities to consider how they can best meet the needs of a growing population.</li> </ul>	<p>No</p>	<p>The policy contains significant measures to safeguard European sites from recreational impacts, such as provision and management of open spaces, a plan for Orwell Country Park to reduce visitor impact upon the Orwell Estuary (part of Stour and Orwell Estuaries SPA), and a new Country Park in the Ipswich northern fringe. Management plans for key parts of European sites is also included, to reduce impacts on those sites.</p> <p>Any significant effect is likely to be beneficial to European sites. Policy CS16 is directly connected with and necessary for the management of European sites, under the Conservation of Habitats and Species Regulations 2010 (Regulation 102(1)).</p>
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<b>Infrastructure</b>			
Policy CS17: Delivering Infrastructure	The Council will require all developments to meet the on- and off-site infrastructure requirements needed to support the development and mitigate the impact of the development on the existing community and environment. This includes a new Country Park.	No	This will not in itself affect any European sites; the policy provides mitigation for recreational impacts to European sites by providing a mechanism for a Country Park to be created as well as other infrastructure.
Policy CS18: Strategic Flood Defence	The Council will continue to work with partners to implement the Ipswich Flood Defence Management Strategy as a key piece of infrastructure needed to support regeneration in Ipswich.	No	This will not in itself affect any European sites; the flood defence study has previously been agreed and is not reliant on the Local Plan.
Policy CS19: Provision of Health Services	Policies for the existing Heath Road hospital site, the redundant St Clement's hospital site and possible need for future GP or other facilities.	No	This will not in itself affect any European sites due to the scale and location of the proposals.
Policy CS20: Key Transport Proposals	The Council supports the Travel Ipswich scheme, which will improve bus station provision, passenger information, shuttle bus provision and pedestrian links. The Council also supports the completion of the upgrading of the Felixstowe to Nuneaton rail line.	No	This will not in itself affect any European sites.
<b>Development Management Policies</b>			
Policy DM1: Sustainable Design and Construction	All new residential and non-residential buildings shall be required to achieve a high standard of environmental sustainability.	No	This will not in itself affect any European sites and will reduce the general environmental impacts of development compared to the absence of this policy.

Policy DM2: Decentralised Renewable or Low Carbon Energy	All new build development of 10 or more dwellings or in excess of 1,000 sq. m of other residential or non-residential floorspace shall provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources	No	This will not in itself affect any European sites and will reduce the general environmental impacts of development compared to the absence of this policy.
Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments	Garden and/or balcony sizes for new dwellings	No	This will not in itself affect any European sites
Policy DM4: Development and Flood Risk	Development will not be flooded, will not cause flood risk and will use sustainable drainage.	No	This will not in itself affect any European sites
Policy DM5: Design and Character	The Council will require all new development to be well designed and sustainable.	No	This will not in itself affect any European sites
Policy DM6: Tall Buildings	Planning permission for tall buildings will be granted within the arc of land to the south-west of the town centre in the vicinity of Civic Drive and the Northern Quays of the Waterfront.	No	This will not in itself affect any European sites
Policy DM7: Public Art	Policy has been deleted	N/A	
Policy DM8: Heritage Assets and Conservation	The Council will seek to protect and enhance listed buildings and Conservation Areas. Protection of Archaeology.	No	This will not in itself affect any European sites
Policy DM9: Buildings of Townscape Interest	There is a presumption in favour of retaining and repairing buildings of local townscape interest.	No	This will not in itself affect any European sites
Policy DM10: Protection of Trees and Hedgerows	The Council will protect and ensure the care of trees and increase canopy cover in the interests of amenity and biodiversity.	No	This will not in itself affect any European sites
Policy DM11: Ipswich Skyline	Policy has been deleted	N/A	

Policy DM12: Extensions to Dwelling houses and Provision of Ancillary Buildings	Extension to, or development within the curtilage of a dwelling house	No	This will not in itself affect any European sites
Policy DM13: Small Scale Infill and Backland Residential Development	Proposals for small scale residential development involving infill, backland or severance plots will not be permitted unless certain criteria are met.	No	This will not in itself affect any European sites
Policy DM14: The Subdivision of Family Dwellings	Development involving the conversion of houses into flats, bedsits or houses in multiple occupation will be permitted if certain criteria are met.	No	This will not in itself affect any European sites – the scale of this type of development is expected to be small-scale in comparison to the overall amount of new housing proposed, so there would be no significant amount of increased population as a result of this policy.
Policy DM15: Travel Demand Management	Policy has been deleted	N/A	
Policy DM16: Sustainable Transport Modes	Policy has been deleted	N/A	
Policy DM17: Transport and Access in New Developments	Measures to reduce car use and promote cycling and public transport; no impacts on rights of way or road network	No	This will not in itself affect any European sites
Policy DM18: Car and Cycle Parking	Standards for provision of car and cycle parking spaces.	No	This will not in itself affect any European sites
Policy DM19: Cycle Parking	This policy has been deleted	N/A	
Policy DM20: The Central Shopping Area	The Council will support the town's vitality and viability by promoting and enhancing appropriate development in the Central Shopping Area.	No	This will not in itself affect any European sites
Policy DM21: District and Local Centres	The Council will support the retention and provision of local shops and community facilities within defined District and Local Centres.	No	This will not in itself affect any European sites

Policy DM22: Town Centre Uses Outside the Central Shopping Area	Within the Town Centre but outside the Central Shopping Area, the development of non-retail town centre uses, including leisure, recreation, culture and tourism uses, will be permitted	No	This will not in itself affect any European sites
Policy DM23: Retail Proposals outside Defined Centres	Retail proposals for more than 200 sq. m net floorspace in locations outside defined centres will only be permitted if the proposal can be demonstrated to be acceptable.	No	This will not in itself affect any European sites
Policy DM24: Affordable Housing	Affordable housing provision will be required in accordance with Core Policy CS12.	No	This will not in itself affect any European sites
Policy DM25: Protection of Employment Land	Sites and premises used and/or allocated for employment uses and defined Employment Areas will be safeguarded for employment.	Possibly	This policy was previously assessed as part of the Draft Site Allocations and Policies Local Plan Document and is similarly assessed again.
Policy DM26: Protection of Amenity	Development which could lead to significant adverse effects on the amenity or environment of neighbouring uses will not be permitted.  Development which could itself be significantly adversely affected by the conduct of established or potentially noisy or polluting uses nearby will not be permitted	No	This will not in itself affect any European sites. The policy protects natural assets, including European sites, from harmful development.
Policy DM27: Non-residential Uses in Residential Areas	Non-residential uses in residential areas will be permitted where the proposed development meets certain criteria.	No	This will not in itself affect any European sites
Policy DM28: Protection of Open Space, Sport and Recreation Facilities	Development involving the loss of open space, sports or recreation facilities will only be permitted if the lost facility is surplus or replaced.	No	This will not in itself affect any European sites

Policy DM29: Provision of New Public Open Space, Sport and Recreation Facilities	<p>All residential developments, and non-residential developments of 1,000 sq. m floorspace or more, will be required to provide and/or contribute to public open spaces and sport and recreation facilities.</p> <p>In all major developments (10 dwellings or 1,000 sq. m non-residential development or more), at least 10% of the site area, or 15% in high density developments, should consist of on-site green space (useable by the public in relation to residential schemes)</p>	No	This will not in itself affect any European sites. The policy contains measures to safeguard European sites from recreational impacts by providing alternative areas for public recreation.
Policy DM30: The Density of Residential Development	The density of new housing development in Ipswich is described.	No	This will not in itself affect any European sites. The total amount of new housing is more important than density (see policy CS7)
Policy DM31: Conserving Local Natural and Geological Interest	Measures for biodiversity enhancement, protection for European sites, SSSIs, other sites, habitats and species. Establish and enhance an ecological network.	No	This will ensure no adverse effect upon the integrity of European sites at planning application stage.
Policy DM32: Protection and Provision of Community Facilities	The Council will work with partners to ensure that a range of local community facilities is made available and retained to meet local needs.	No	This will not in itself affect any European sites
Policy DM33: Green Corridors	The Council will seek to establish and enhance green corridors	Possibly	This policy was previously assessed as part of the Draft Site Allocations and Policies Local Plan Document and is similarly assessed again for completeness.
Policy DM34: Countryside	Criteria for development within the countryside	No	This will not in itself affect any European sites.

## ***Appendix 7***

## New ONS population estimates for Suffolk published: June 30, 2011

The Office for National Statistics (ONS) published estimates of population at mid-2010 for Local Authorities in June 2011.

### Key facts:

- The population of the whole of Suffolk at mid-2010 is now 719.5K, up 5.5K over the preceding estimate for mid-2009.
- Suffolk's rate of growth since 2001 is 7.4%, faster than England but not as fast as the Region or our neighbouring Counties.
- Ipswich continues to be the District in Suffolk with the largest population due to a large surplus of births over deaths and substantial moves from elsewhere in this Country.
- Growth across Suffolk during mid-2009 to mid-2010 has varied. The populations of Babergh and Waveney have again declined, whereas the other Districts have grown, by over 1,000 in the case of Forest Heath, Ipswich and St Edmundsbury.

### Comment

- Forest Heath remains one of the fastest growing districts in the Country with an increase in population of nearly 15% since 2001. During this period, ONS has twice improved its methodology for allocating international migrants to each district with the outcome being monitored by both the County and District Council to see whether it is producing realistic estimates for Forest Heath. Although there is compelling evidence to support growth in the population (Electoral Register, house building, release of 400 ex-military homes to civilians) the components of this year's population increase that ONS has identified do not make any sense. Over the past year ONS believes there has been a reduction in the number of military personnel, 900 people have moved in from elsewhere in the Country and another 900 have moved there from abroad. Who the international movers are is in doubt as this flow includes military families yet the US records show little change.
- The impact of the recession is now apparent as the net number of people moving within this Country into Suffolk was at its lowest during mid-2008 to mid-2009.

### Why these estimates are important for Suffolk County Council

- These estimates are used to calculate performance indicators where the denominator involves the population
- ONS will be revising these estimates later this year for comparison with the Census.

The table below summarises the changes. By including the Council's estimate of dwelling stock we can demonstrate how growth in Forest Heath compares with the rest of Suffolk.

Area	Total population @ mid-2001	Total population @ mid-2009 published June 2010	Total population @ mid-2010 published June 2011	Change in total population mid-2001 to mid-2010	Dwelling stock increase April 2001 to April 2010	Ratio of increases: population to dwelling stock
SUFFOLK	669,900	714,000	719,500	49,600	28,200	1.8
Babergh	83,500	85,800	85,600	2,000	2,600	0.8
Forest Heath	56,100	62,200	64,300	8,200	2,900	2.8
Ipswich	117,200	126,600	128,300	11,100	6,600	1.7
Mid Suffolk	87,000	94,200	95,000	8,000	4,300	1.8
St Edmundsbury	98,300	103,500	104,500	6,200	3,900	1.6
Suffolk Coastal	115,200	124,100	124,300	9,000	4,900	1.8
Waveney	112,500	117,700	117,500	5,000	3,000	1.7

All figures rounded independently

#### Point to note

The figures only refer to people who live in this Country for a year or more who are, according to the UN definition, residents.



## ***Appendix 8***

**Nick Sibbett**

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**From:** Nick Sibbett  
**Sent:** 06 January 2014 09:37  
**To:** 'James Meyer'  
**Subject:** RE: Ipswich Borough Council - Core Strategy Review and Site Allocations

Hi James, thanks for your email.

I found two sites in the Site Allocations which might have likely significant effect, which were the Country Park, and an allocation for dock expansion next to the SPA. All the other allocations were sufficiently far that there were no individual allocations which would affect the SPA, although cumulatively they could do. I am looking at the cumulative impact within the Core Strategy only to avoid duplication, on the basis that if the Core Strategy fails then the Site Allocations would also fail. Hope this clarification on process helps.

best regards

Nick

**Nick Sibbett**  
Principal Ecologist

**The Landscape Partnership**

Please note our new address.

The Granary, Sun Wharf, Deben Road, Woodbridge, Suffolk. IP12 1AZ  
t: 01394 380 509 w: [thelandscapepartnership.com](http://thelandscapepartnership.com)

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**From:** James Meyer [mailto:JamesM@suffolkwildlifetrust.org]  
**Sent:** 19 December 2013 17:33  
**To:** Nick Sibbett  
**Subject:** RE: Ipswich Borough Council - Core Strategy Review and Site Allocations

Hi Nick,

Thanks for this and apologies for taking so long to get back to you. If its not too late we had the following comments on the screening you have done for the Ipswich BC Core Strategy Review and Site Allocations documents:

- For the Core Strategy review document we'd agree with your screening.
- For the Site Allocations document whilst we'd agree with you screening policies DM44 and DM46 in to the AA, we'd query why the policies for the allocation of individual sites have all been screened out? As I understand it the cumulative impact (particularly through recreational disturbance) of the individual site allocation policies would in principle be assessed through the relevant strategic housing allocation policy in the Core Strategy. However, would assessing the individual site allocations enable you to determine the contribution each site (or combinations of sites) would make to the level of impact? Or is it IBC's intention that all residential development will contribute to strategic mitigation (i.e. the provision of new 'country park' facilities)? If the latter is the case I can understand why individual sites would be screened out.

Hope that makes sense!

06/01/2014

Kind regards

James

**James Meyer**  
**Conservation Planner**

---

**From:** Nick Sibbett [mailto:nick.sibbett@tlp.uk.com]  
**Sent:** 13 November 2013 17:06  
**To:** Simone Bullion; James Meyer  
**Cc:** Robert Hobbs  
**Subject:** Ipswich Borough Council - Site Allocations

Dear Simone and James,

On behalf of Ipswich Borough Council I request your advice regarding the Conservation of Habitats and Species Regulations 2010 'likely significant effect', for the Ipswich Draft Site Allocations and Policies. The Local Plan document and our 'likely significant effect' report are attached.

I look forward to hearing from you in due course.

Best regards

Nick

**Nick Sibbett**  
Principal Ecologist

**The Landscape Partnership**  
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t: 01394 380 509 w: [thelandscapepartnership.com](http://thelandscapepartnership.com)

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**Suffolk Wildlife Trust, Brooke House**  
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**01473 890089**

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consent to this.