

# Habitats Regulations Assessment addendum

for

Pre-Submission modifications to the Ipswich  
Borough Council Core Strategy and Policies  
DPD Review (Proposed Submission stage)

September 2015

# Issue

## Quality control

### Habitats Regulations Assessment addendum

for

### Pre-Submission modifications to the Ipswich Borough Council Core Strategy and Policies DPD Review (Proposed Submission stage)

Prepared by:

Signature:



Name: Nick Sibbett

Title: Principal Ecologist

Date: 24 September 2015

Approved by:

Signature:



Name: Dr Jo Parmenter

Title: Director

Date: 24 September 2015

Client:

Ipswich Borough Council  
Grafton House  
15 – 17 Russell Road  
Ipswich IP1 2DE  
planningandregeneration@ipswich.gov.uk

This report is BS 42020 compliant and prepared in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Professional Guidance Series No. 9 *Ecological Report Writing* and Code of Professional Conduct.

The Landscape Partnership Ltd is a practice of Chartered Landscape Architects, Chartered Town Planners and Chartered Environmentalists, registered with the Landscape Institute and a member of the Institute of Environmental Management & Assessment & the Arboricultural Association.

The Landscape Partnership Limited  
Registered Office:  
Greenwood House  
15a St Cuthberts Street  
Bedford  
MK40 3JG.  
01234 261315  
Registered in England No 2709001

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## Non-technical summary

The Landscape Partnership was commissioned by Ipswich Borough Council to undertake a Habitats Regulations Assessment of pre-submission modifications to the Proposed Submission Core Strategy and Policies Development Plan Document Review which had been open to consultation from Friday 12th December 2014 to Thursday 5th March 2015.

All pre-submission main modifications and pre-submission additional modifications to 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 and it is concluded that there is no change to the Appropriate Assessment (December 2014) submitted for consultation alongside the Proposed Submission Core Strategy and Policies Development Plan Document Review consultation.

# 1 Introduction

## 1.1 The plan being assessed

- 1.1.1 The Ipswich Borough Council Core Strategy and Policies Development Plan Document (DPD) and Proposals Map were formally adopted by the Council on 14 December 2011. An Appropriate Assessment accompanied the Development Plan Document. The Adoption process followed the publication of a report on 24 November 2011 by an Independent Inspector who found the Submission Core Strategy document 'sound'.
- 1.1.2 The Government introduced a national policy document called the National Planning Policy Framework (NPPF) in March 2012 and abolished the East of England Plan (2008) in January 2013. As a result, Ipswich Borough Council consulted on a draft focused review of the Core Strategy and Policies Development Plan Document (DPD) between 13th January and 10th March 2014. Comments received have been summarised and responded to. Comments received from this consultation have informed the preparation of a proposed submission version of the plan. The Proposed Submission Core Strategy and Policies DPD is now a full review, following legal advice, as the changes proposed in the focused review went beyond the scope of focused changes.
- 1.1.3 As per the focused review, the Proposed Submission Core Strategy and Policies DPD Review seeks to:
- extend the plan period from 2027 to 2031;
  - identify the objectively assessed housing need for the Borough equivalent to 677 dwellings per year between 2011 and 2031;
  - allocate the entire Northern Fringe area (now known as the Ipswich Garden Suburb) for approximately 3,500 dwellings and infrastructure provision;
  - set a target of in the region of 12,500 jobs to be delivered in the Borough between 2011 and 2031; and
  - identify the infrastructure required to deliver development.
- 1.1.4 It also updates and rationalises the development management policies to take account of the Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD, which allocates sites for development and identifies sites or areas for protection across the whole of the Borough.
- 1.1.5 The Proposed Submission Core Strategy and Policies Development Plan Document Review consultation was open from Friday 12th December 2014 to Thursday 5th March 2015. Following that consultation, the Council has proposed some Pre-Submission Main Modifications and Pre-Submission Additional Modifications. The modifications result from both consideration of representations received during the Proposed Submission consultation and editorial updates to reflect, for example, changes to national policy. Main Modifications are substantive changes, which alter the meaning of a policy or strategy (e.g. rewording policies to change their meaning, adding new sites or deleting existing ones). Additional Modifications are minor textual and grammar corrections; re-phrasing or limited new text to add clarity; or updates to figures and references, which are necessary due to alterations which have been made elsewhere or for which new information has come to light.
- 1.1.6 The purpose of this report is to provide an addendum update to the Appropriate Assessment (December 2014) submitted for consultation alongside the Proposed Submission Core Strategy and Policies Development Plan Document Review consultation, with respect to the relevant pre-submission modifications to the plan. The Pre-Submission Main Modifications will be consulted upon prior to Submission of the plan however it is not necessary to consult upon the Additional Modifications as these represent factual or clarification amendments.

## 1.2 Appropriate Assessment requirement

1.2.1 Assessment of the Development Plan Document is required under the Conservation of Habitats and Species Regulations 2010 as amended. The 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 or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site,

the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.

(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 specify.

(3) They must also, if they consider it appropriate, take the opinion of the general public, and if they do so, they must 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 must 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 must provide such information as the appropriate authority may reasonably require for the purposes of the discharge of the obligations of the appropriate authority under this chapter.

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

(a) a European site by reason of regulation 8(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 and the appropriate nature conservation body is Natural England.

1.2.4 The Habitats Regulations 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 under Regulation 102. This Assessment focuses on assessing impacts of the Pre-Submission Main Modifications and Additional Modifications, as an addendum to the December 2014 Appropriate Assessment of the Proposed Submission Core Strategy and Policies Development Plan Document Review.

## 1.3 Habitats Regulations Assessment process

1.3.1 The process to complete the Habitats Regulations Assessment involves a number of steps.

### *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.

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

- 1.3.3 The Council should decide whether the plan is connected to the nature conservation management of the European sites. Invariably, for this type of plan, 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 the significant effects and therefore where assessment should be prioritised. Natural England is an important consultee in this process.

***Consultations***

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

***Iterations and revision***

- 1.3.7 The process is iterative; the conclusions of an initial 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 It is normally expected that iterative revisions will continue until it can be ascertained that the plan will not have an adverse affect on the integrity of any European site.

**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 except 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 Ramsar sites.
- 1.4.3 As the Ramsar sites largely are similar to 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 would vary for a Ramsar site compared to the respective SPA / SAC, this would be identified.
- 1.4.4 European Marine Site (EMS) is a term that is often used for a SPA or SAC that includes marine components (i.e. land/habitats up to 12 nautical miles out to sea and below the Mean High Water Mark). A European Marine Site does not have a statutory designation of its own but is designated for the same reasons as the relevant SPA or SAC, and because of this they are not always listed as a site in their own right, to save duplication. For the purpose of this document, a EMS is referred to as an Inshore SPA (or SAC) with Marine Components and it will be made clear if an SPA/SAC has marine components.

**1.5 Impacts in combination with other Land-use Plans**

- 1.5.1 It is considered that the Pre-Submission Main Modifications and additional updates and amendments are sufficiently small that there would be no effects in combination with other Land-use Plans by others.

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<sup>1</sup> National Planning Policy Framework, 2012.

## **1.6 Reporting standards**

- 1.6.1 This report was prepared in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Technical Guidance Series 'Guidelines for Ecological Report Writing' and its Code of Professional Conduct.
- 1.6.2 This report was written in compliance with British Standard 42020:2013 'Biodiversity — Code of practice for planning and development'.



## 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. Non-marine 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.

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 borellii 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 Habitats Regulations Assessment addendum for the Pre-Submission Main Modifications and Additional Modifications, the most relevant other plan or project to be considered is the Ipswich Borough Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document.
- 2.3.3 This plan is considered as part of this Habitats Regulations Assessment addendum.

### **3 Appropriate Assessment**

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

- 3.1.1 All Pre-Submission Main Modifications and Additional Modifications are listed in Appendix 5 and assessed for likely significant effect. The assessment comprised a consideration of the modifications to determine if the modification introduced a likely significant effect not previously existing or if it changed a previously assessed likely significant effect on a European site.
- 3.1.2 The Pre-Submission modifications are generally irrelevant in terms of impacts to European sites. For example, many modifications consider detailed changes to building design. Modifications to policies CS10, CS17 and DM31 explain / clarify the securing of mitigation for housing growth across Ipswich Borough and Suffolk Coastal District but do not alter the previous assessment.
- 3.1.3 There is one Pre-Submission Main Modification which was identified in Appendix 5 as potentially having a likely significant effect. This was a modification to policy CS7 'The Amount of Housing Required'. The modification was an amendment to the figures in the policy and accompanying tables to reflect the updating of the baseline from April 2014 to 1st April 2015. The potential likely significant effect was identified because the modification could potentially change the amount and location of housing required and therefore change the impact of housing growth on European sites.

#### **3.2 Consideration of Pre-Submission Main Modification for Policy CS7 'The amount of housing required'**

- 3.2.1 The Pre-Submission Main Modification to Policy CS7 was an amendment to the figures in the policy and accompanying tables to reflect the updating of the baseline from April 2014 to 1st April 2015. There are revised Tables 2, 3 and 4 which accompany the policy and also some consequent amendments to explanatory text.
- 3.2.2 The amended housing figures show that in the year to 1<sup>st</sup> April 2015, there has been construction of some housing, with some planning permissions at the beginning of the year having been implemented. Other planning permissions for housing have been given within the year, some of which remain to be fully implemented. The amount of housing within each of the categories in table 2 has been adjusted to reflect these changes. The total housing requirement over the plan period remains at 13,550 new dwellings from 2011 to 2031, with the number outstanding as at April 2015 shown in the modified CS7 Table 2. Tables 3 and 4 have similar consequential changes.
- 3.2.3 The Pre-Submission Main Modification is consistent with the implementation of housing growth within the Proposed Submission Core Strategy and Policies DPD Review. There are no new strategic allocations or other changes which would change the conclusion of the Appropriate Assessment (December 2014) of the Proposed Submission Core Strategy and Policies DPD Review made available at consultation stage.
- 3.2.4 It is concluded that the Pre-Submission Main Modification for Policy CS7 has no likely significant effect upon any European site and does not alter the conclusions of the December 2014 Appropriate Assessment.

#### **3.3 Consultations**

- 3.3.1 Three consultation responses were received on the December 2014 Appropriate Assessment accompanying the Core Strategy consultation. These are given in Appendix 6.
- 3.3.2 Natural England asked for the plan to be changed to where necessary individual developments to be subject to project level Habitats Regulations Assessment linking back to elements of mitigation identified at the strategic level. Policies CS34 and DM31 provide protection to European sites, including the need for Habitats Regulations Assessments for proposals. These Habitats Regulations Assessments at proposal level would naturally be guided by and where appropriate link back to strategic level mitigation. The plan does not require change, however Natural England's comment is noted and will be relevant to planning application HRAs.

- 3.3.3 Northern Fringe Protection Group and Save our Country Spaces were both concerned that there may be a scenario where the Ipswich Garden Suburb country park cannot be secured. Some pre-submission modifications are proposed to the Core Strategy to clarify the securing of mitigation measures. In particular pre-submission modifications have been proposed to policy CS17 to provide a 'hook' for securing developer contributions related to the mitigation measures identified through the Appropriate Assessment of the Core Strategy. A mitigation strategy or similar would set out the mechanism for securing such contributions, and prior to this being in place the delivery of the country park and other measures will be sought through the planning application process. It is considered that no further changes are required.

## **4 Summary Conclusions of the Assessment**

### **4.1 Policy CS7 Pre-Submission Main Modification**

4.1.1 The Pre-Submission Main Modification of Policy CS7 was found to demonstrate implementation of housing growth in the period April 2014 to 1<sup>st</sup> April 2015, but with no changes to the housing growth within the plan period the modification would have no likely significant effect. It is concluded that there is no change to the Appropriate Assessment (December 2014) submitted for consultation alongside the Proposed Submission Core Strategy and Policies Development Plan Document Review consultation, with respect to this modification to the plan.

### **4.2 All other main modifications and additional modifications**

4.2.1 All other Pre-Submission Main Modifications and Additional Modifications to 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.

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

4.3.1 Pre-Submission Modifications were initially assessed individually. Interactions between policies have been fully considered and no further assessment or changes to conclusions are required.

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

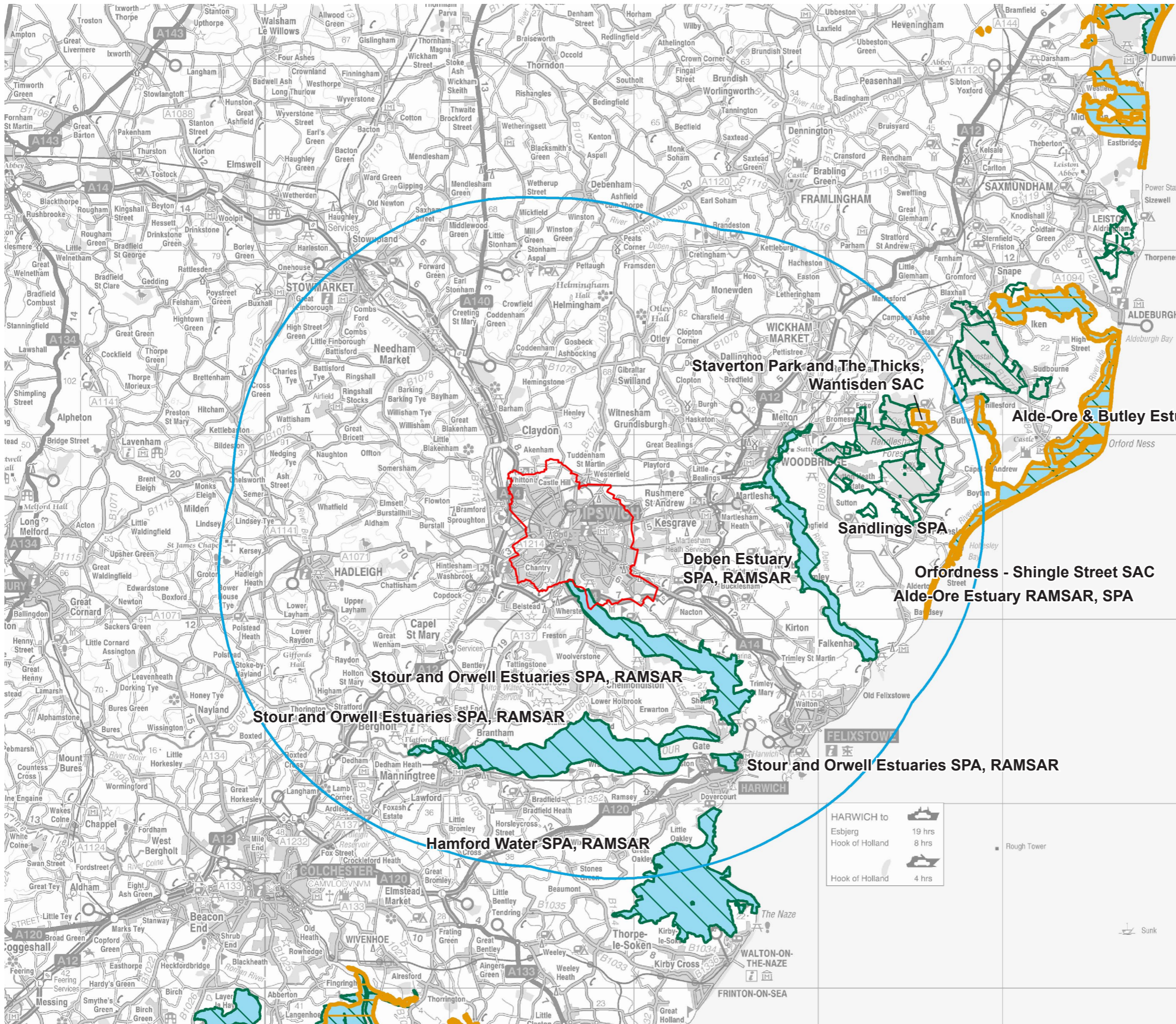
4.4.1 It is considered that one plan may have an effect in combination with these pre-submission modifications, which is the Ipswich Borough Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. All the above conclusions take into account any in combination effects. No other plans are considered to have an effect in combination.

### **4.5 Final conclusion**

All Pre-Submission Main Modifications and Additional Modifications to 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 and it is concluded that there is no change to the conclusions of the Appropriate Assessment (December 2014) submitted for consultation alongside the Proposed Submission Core Strategy and Policies Development Plan Document Review consultation.

***Figures***





**Key**

- Ipswich boundary
- 15km radius from Ipswich boundary
- Special Area of Conservation
- Special Protection Area
- RAMSAR

**Staverton Park and The Thicks, Wantisden SAC**

**Alde-Ore & Butley Estuaries SAC**

**Sandlings SPA**

**Deben Estuary SPA, RAMSAR**

**Orfordness - Shingle Street SAC  
Alde-Ore Estuary RAMSAR, SPA**

**Stour and Orwell Estuaries SPA, RAMSAR**

**Stour and Orwell Estuaries SPA, RAMSAR**

**Stour and Orwell Estuaries SPA, RAMSAR**

**Hamford Water SPA, RAMSAR**

HARWICH to		19 hrs
Esbjerg		8 hrs
Hook of Holland		4 hrs

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.

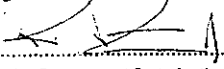
The site qualifies under Article 4.1 of the EC Birds Directive by sustaining nationally important numbers of the following Annex 1 species, marsh harrier *Circus aeruginosus* (breeding), avocet *Recurvirostra avosetta* (wintering and breeding) ruff *Philomachus pugnax* (wintering), sandwich tern *Sterna 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 abifrons 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 UK900912  
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 1999  
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.

<b>For agency use only:</b>
<b>Date issued:</b> _____
<b>Reference number or date of map:</b> _____

## **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: *Trew 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, Waitisden 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***

## Assessment of likely significant effect upon European sites

### Pre-Submission Main Modifications for Public Consultation

Main Modifications are substantive changes, which alter the meaning of a policy or strategy (e.g. rewording policies to change their meaning, adding new sites or deleting existing ones). New text added is shown underlined, deleted text is shown ~~struck through~~.

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
<b>CHAPTER 8</b>			
CS1 Sustainable Development – Climate Change	Amend i a) Requiring building and infrastructure design to incorporate water <del>conservation, capture, recycling and</del> efficiency measures and sustainable drainage systems (SuDS); and	For consistency with new optional requirement for water use which has been introduced through the Building Regulations.	No
CS2 The Location and Nature of Development	Add reference to community development support to clause a.: a) Focusing new residential ... of the town's district centres, <u>and supporting community development</u> ;	To ensure that major developments, whether high or lower density schemes, provide support for community development to promote wellbeing and social inclusion.	No
CS2 The Location and Nature of Development	Remove 'prior' from sentence relating to the sustainable urban extension (below clause h.): ... is planned subject to the <del>prior</del> provision of ...	For consistency with CS10, Chapter 10 and the Ipswich Garden Suburb Supplementary Planning Document.	No
CS4 Protecting our Assets	Set out a strategic approach to the historic environment: Amend sentence 1: replace <del>historical</del> with <u>heritage</u>	To fully reflect NPPF, and ensure that all aspects of the historic environment are	No

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	Amend sentence three to read: “The Council will also conserve and enhance heritage assets within the Borough through its development management policies, <u>the use of planning obligations to secure the enhancement and promotion of the significance of any heritage asset, the maintenance of a list of buildings and other heritage assets of local importance, and taking steps to reduce the number of heritage assets at risk</u> ”.	addressed, as the draft policy only referred to conservation areas.	
CS4 Protecting our Assets	Amend clause (a) to read ‘...sites, <u>and protected and priority species;</u> ’	To ensure compliance with the Biodiversity Duty.	No
CS6 The Ipswich Policy Area	Amend final paragraph as follows: ‘The preparation of joint or aligned development plan documents is to be explored <del>later in the plan period,</del> to ensure ...’	To clarify that joint work would begin sooner within the plan period.	No
CS7 The Amount of Housing Required	Amend the figures in the policy and accompanying tables to reflect the updating of the baseline to 1 <sup>st</sup> April 2015:  ‘... The Council will allocate land to provide for at least an additional <del>5,434,429</del> <u>5,429</u> dwellings net in the Borough, with a lower amount of <del>4,734,629</del> expected by 2031 to ...’  ‘... To meet the remaining requirement of <del>5,851,578</del> dwellings to 2031, the Council ...’  Revised Tables 2, 3 and 4 are attached at the end of this schedule.	To ensure that the plan submitted is up to date.	Yes

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>Make consequent amendments to explanatory text:</p> <p>8.80 Table 2 shows that, as a result of housing completions between 2011 and <del>2014</del><u>2015</u>, <del>13,004</del><u>12,473</u> dwellings remain to be delivered between <del>2014</del><u>2015</u> and 2031 in order to meet the requirement.</p> <p>8.81 ... are capable of delivering the housing requirement in the ten years to <del>2024</del><u>2025</u>. The ...</p>		
CS10 Ipswich Garden Suburb	<p>Amendments to reflect the current position:</p> <p>‘The site, identified on the policies map, consists of 195ha of land which will be developed <u>comprehensively</u> as a garden suburb ...’</p> <p><del>‘A prerequisite for any development being granted planning permission in the garden Suburb will be the preparation by the Council of a supplementary planning document providing a development brief to:</del></p> <p><u>A supplementary planning document has been prepared to:</u></p> <ul style="list-style-type: none"> <li>a. guide ...</li> <li>b. amplify ...</li> <li>c. etc.</li> </ul> <p><u>Development proposals will be required to demonstrate that they are in accordance with the SPD. They should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet</u></p>	To align closely with the Ipswich Garden Suburb SPD and ensure that development follows the guidance set out within it.	No

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<u>the overall vision for the comprehensive development of the area as set out in the SPD.'</u>		
CS10 Ipswich Garden Suburb/paragraph 8.108	<p>Insert new text to paragraph 8.108:            'The infrastructure requirements at the Garden Suburb will be significant and include new roads ecological networks and green corridors, new public transport routes and services, green infrastructure such as allotments and sports facilities, new schools, new recreation provision, healthcare provision and local shopping facilities. This infrastructure can also deliver benefits to the existing communities in the area and help to sustain them. <u>A comprehensive and coordinated approach to the development of the Garden Suburb is required to ensure the proper planning and delivery of this infrastructure. The Council will consider using its compulsory purchase powers, where necessary, to enable comprehensive development and infrastructure delivery to take place.</u> The detailed infrastructure requirements of the development of approximately 3,500 dwellings at the Garden Suburb and trigger points for the delivery of the items of infrastructure are identified in Table 8B in Chapter 10 of the Core Strategy. Prior to development on the Ipswich School Playing Fields site, replacement sports facilities will be required to be first provided in accordance with policy DM28. The site for replacement playing fields is allocated to the west of Tuddenham Road and north of the railway line.'</p>	To clarify the Council's options in relation to ensuring the Garden Suburb is delivered.	No. The new text further secures the ecological networks which were included as part of the mitigation for housing growth across the combined Ipswich Borough and Suffolk Coastal Districts.

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
CS11 Gypsy and Traveller Accommodation	<p>Amend clause (a) to 'where possible preferably, within 1km of basic services including the public transport network.'</p> <p>Add in clauses a) to c) of Site Allocations Policy SP4:</p> <p>'Provision will be found within the Ipswich Policy Area for additional permanent pitches to meet the need as identified through the Gypsy and Travellers Accommodation Assessment.</p> <p><u>Applications for the provision of permanent pitches will be considered against the following criteria:</u></p> <ul style="list-style-type: none"> <li>a) <u>The existing level of local provision and need for sites;</u></li> <li>b) <u>The availability (or lack) of alternative accommodation for the applicants; and</u></li> <li>c) <u>Other personal circumstances of the applicant, including the proposed occupants, must meet the definition of Gypsy or Traveller.</u></li> </ul> <p>Site for additional ...'</p>	<p>To address concern that if this were not possible a site could still be acceptable.</p> <p>To avoid confusion from having two policies in two plans.</p>	No
CS13 Planning for jobs growth	<p>Amend to clarify that the job figure relates to the Borough:</p> <p>'It will encourage the provision of <del>in the region</del> <u>approximately 12,500 jobs in the Borough</u> between 2011 and 2031...'</p>	<p>For clarity and to respond to comments which suggested it is not clear which geographic area the jobs figure relates to.</p>	No

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
CS17 Infrastructure	<p>Amend policy to clarify that the direct provision of infrastructure by developers is allowed as mitigation for impacts (as an alternative to a commuted sum or CIL payment only). Add the following to the end of paragraph 2: <u>'...CIL charge, or other mechanism as agreed with the Council.'</u></p> <p>Add to end of policy <u>'The Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment can be addressed, including for any measures not classified as infrastructure.'</u></p>	<p>For clarity and to ensure infrastructure is provided.</p> <p>To ensure that CS17 would enable contributions for HRA mitigation measures, including those that might not be classed as infrastructure, to be secured.</p>	<p>No. The modification clarifies how HRA mitigation measures will be achieved.</p>
CS17 / new 8.183	<p>Insert new paragraph 8.183 relating to the above: <u>'The Habitats Regulations Assessment identifies a range of measures to ensure that potential impacts of increased recreational disturbance within Special Protection Areas and Special Areas of Conservation within and outside of Ipswich Borough are mitigated. This relates to mitigating the cumulative effect of housing growth across Ipswich Borough, in combination with housing growth in Suffolk Coastal district. The measures include the provision of the Country Park or similar high quality provision to the north of Ipswich, delivering parts b, d, e, g and h of policy CS16, production and implementation of visitor management plans at key sites and a monitoring programme to assess visitor impact over time. The Council is considering the production of a mitigation strategy which would specify the measures required and how these should be delivered and funded.'</u></p>	<p>To explain the reason for specific reference to HRA mitigation in the policy.</p>	<p>No. The modification provides further explanation on the mitigation required for housing growth</p>

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
CS20 Key Transport Proposals	<p>Amend policy to add reference to proposals in policy SP15 of Site Allocations DPD:  <u>'The Council will support further measures to facilitate cycling and walking in the Borough, as detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.'</u></p> <p>Add explanatory text to paragraph 8.208</p> <p><u>'Detailed proposals, including those for the Star Lane gyratory and additional infrastructure for pedestrians and cyclists, are included in ...'</u></p>	For clarity and completeness.	No
<b>CHAPTER 9</b>			
DM1 Sustainable Design and Construction	<p>Amend to reflect Government's position on Code for Sustainable Homes, zero carbon dwellings and allowable solutions as follows:</p> <p>New development shall be required to achieve a high standard of environmental sustainability. This will be achieved by the following standards:</p> <p>a. <del>— New build residential development should achieve a minimum of Level 4 of the Code for Sustainable Homes standard or equivalent;</del></p>	<p>To reflect withdrawal of Code for Sustainable Homes, introduction of optional water standards and powers for requiring energy efficiency standards (see Ministerial Statement March 2015).</p> <p>To also reflect the Government's statement contained within the Fixing the Foundations paper (HM Treasury, July 2015) which states that:          'The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy</p>	No



Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p><u>a. New build residential development should achieve reductions in CO<sub>2</sub> emissions of 19% below the Target Emission Rate of the 2013 Building Regulations (Part L);</u></p> <p><u>b. New build residential development should meet water efficiency standards of 110 litres/person/day;</u></p> <p><del>b.c.</del> Conversions and changes of use of existing buildings providing new residential dwellings should achieve a minimum of BREEAM Domestic Refurbishment Very Good standard or equivalent;</p> <p><del>e.d.</del> New build non-residential development of 500m<sup>2</sup> and above for the whole development should achieve a minimum of BREEAM Very Good standard or equivalent;</p> <p><del>e.e.</del> Conversions and changes of use to non-residential uses with an internal floor area of 500m<sup>2</sup> and above should achieve a minimum of BREEAM Very Good standard or equivalent.</p> <p>9.5 The National Planning Policy Framework sets out how local planning can best support the achievement of sustainable development. Specifically it requires that local planning authorities plan with a presumption in favour of sustainable development. The aim of local planning authorities should be to adopt proactive strategies to mitigate and adapt to climate change and a move towards a low carbon future. <u>The National Planning Policy Framework states that w</u>hen</p>	<p>efficiency standards, but will keep energy efficiency standards under review, recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.'</p> <p>Note: The Planning and Energy Act 2008 allows planning authorities to require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations (Section 1(c)). Regulation 43 of the Deregulation Act 2015 sets out a provision for this to not apply to residential development, however this requires commencement via secondary legislation which has so far not been put in place.</p>	

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>setting local requirements for a building's sustainability, local authorities should do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally prescribed standards. <del>The Government has further reiterated its commitment to reducing carbon emissions from new development, and that all new homes will be required to be zero carbon from 2016 through its current Housing Standards Review<sup>4</sup> and also proposes requiring non-residential developments to be zero carbon from 2019.</del> <u>Under the 2008 Planning and Energy Act local planning authorities may require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. In accordance with the provisions of the March 2015 Ministerial Statement<sup>1</sup>, the Council will expect new build residential development to achieve a 19% improvement in energy efficiency over the 2013 Target Emission Rate. This is equivalent to meeting the energy requirements of level 4 of the withdrawn Code for Sustainable Homes.</u></p> <p>9.6 A zero carbon home, as currently defined through the zero carbon buildings programme, is one where there are no carbon emissions resulting from the regulated energy</p>		

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>requirements of the home (i.e. heating, lighting, hot water and fixed appliances but not plug-in appliances). It is proposed that this can be achieved through fabric energy efficiency measures, on-site or off-site renewable or low carbon energy generation or through financial contributions to carbon abatement measures established as part of the 'allowable solutions' programme. It is intended that as part of this mix, all new homes must meet energy efficiency standards equivalent to at least Level 4 of the Code for Sustainable Homes, which will be regulated through amendments to the Building Regulations<sup>2</sup>. These proposed amendments to the Building Regulations equate to reductions in carbon emissions of around 20% above current (2013) requirements. <u>The Government had until recently been proposing to introduce zero carbon homes which would have been achieved through a requirement to meet level 4 of the Code for Sustainable Homes along with 'allowable solutions' (a range of measures including further fabric energy efficiency measures, on or off-site renewable/low carbon energy generation and/or financial contributions to carbon abatement measures). However, the Government has recently announced that it does not intend to proceed with the allowable solutions scheme or with the proposed increased energy efficiency requirement, but state that energy efficiency measures will be kept under review.</u> <sup>2</sup></p>		

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p data-bbox="371 477 1162 823">9.7 The Code for Sustainable Homes (CfSH) sets out nine categories against which a home can be rated. Energy efficiency and water efficiency categories have their own minimum standards that must be achieved at every level of the CfSH, recognising their importance to the sustainability of any home. Other categories include better management of surface water run-off, waste management (including construction waste and encouraging household recycling), pollution and management of the home, all of which contribute to the sustainable performance of homes.</p> <p data-bbox="371 927 1162 1214">9.8 The Council considers the CfSH to be a particularly appropriate tool to assess sustainability of new residential developments in that it is a nationally accredited system that considers a wide range of sustainability criteria in addition to energy and CO2 emissions, and in particular water use. Similar benefits apply to the use of the BREEAM system of assessment for multi-residential uses (e.g. care homes, sheltered housing, student accommodation) and for non-residential uses.</p> <p data-bbox="371 1278 1162 1394">9.9 Through the Housing Standards Review, referred to above, in addition to securing delivery of the zero carbon homes programme, the Government also intends to replace all elements of the Code for Sustainable Homes</p>		

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>with updated Building Regulations and powers for planning authorities to require more stringent 'optional' requirements through planning policies where these can be justified on the basis of need. The optional requirements are proposed to cover the accessibility (for example for the elderly and disabled) and water efficiency. The Government is also proposing a nationally described space standard through the Housing Standards Review (as referred to alongside policy DM30).</p> <p>9.10 Whilst it is clear that much of the drive for carbon reduction in new homes and non-domestic buildings will be handled under the Building Regulations, the Council nevertheless considers it appropriate to have a planning policy requiring new development to achieve sustainability improvements beyond the requirements of Building Regulations both to support the carbon reduction agenda and to ensure the achievement of a more holistic approach to sustainable development through the achievement of the much wider range of environmental and social benefits that these schemes provide for.</p> <p>9.11 The policy provides for some flexibility in exceptional circumstances where it can be clearly demonstrated that achieving the required <del>rating</del> <u>standard</u> for the type and scale of development in question would either be not feasible or</p>		

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>not viable in the light of such considerations as site constraints, other planning requirements, other development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower CfSH or BREEAM rating <u>or lower energy efficiency standards</u> being achieved having regard to other merits of the scheme in terms of sustainability and urban design. Development will still need to meet the requirements of the Building Regulations in force at the time.</p> <p>9.13 <u>In relation to BREEAM requirements,</u> tThe policy will be implemented through a requirement for the submission of Design Stage Assessments and Post Construction Reviews, carried out by a qualified CfSH or BREEAM assessor (as appropriate), for all planning applications for qualifying development. It will be expected that planning applications also be accompanied by a sustainability statement that explains and illustrates how sustainability considerations have influenced scheme design.</p> <p><u>Through the Housing Standards Review the Government has introduced powers for planning authorities to require 'optional' standards for water efficiency. The East Anglian area is identified as an area of 'severe water stress' and lowering water demand is identified as one of a range of measures to balance supply and demand in the Anglian Water Resources Management Plan 2015. The optional requirement, which requires development to meet water efficiency standards of 110 litres/person/day (compared to Building Regulations</u></p>		

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p><u>requirements of 125 litres/person/day) is set out in Part G of the Building Regulations<sup>3</sup>.</u></p> <p>9.14 Where appropriate, mitigation measures shall be secured by condition to ensure that any pollution through air, noise, dust or vibration during the construction phase of development will not be detrimental to the amenity of neighbouring uses. Relevant policy guidance in respect of neighbouring amenity can be found in DM26.</p> <p><u><sup>1</sup> Planning Update March 2015 (Ministerial Statement)</u></p> <p><u><sup>2</sup> Fixing the Foundations – Creating a More Prosperous Nation (HM Treasury, July 2015)</u></p> <p><u><sup>3</sup> 2010 Building Regulations: Sanitation, Hot Water Safety and Water Efficiency – Approved Document (2015 Edition)</u></p> <p><u><sup>4</sup> <del>Housing Standards Review – Technical Consultation (Department for Communities and Local Government, 2014)</del></u>  <u><del>Next steps to zero carbon homes – Allowable Solutions (Department for Communities and Local Government, 2014)</del></u></p>		
DM5 Design and Character	Amend Part e. of DM5 as follows: ‘Protecting and enhancing the special character and distinctiveness of Ipswich, including significant views that are recognised as being important and worth protecting , <u>the setting of any nearby listed buildings</u> , and helping to reinforce the attractive physical characteristics of local	For completeness.	No

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	neighbourhoods and the visual appearance of the immediate street scene'		
DM5 Design and Character	<p>Add to end of policy DM5:  <u>In new residential development of 10 or more dwellings, 35% of new dwellings will be required to be built to Building Regulations standard M4(2). Where affordable housing is provided a proportion of dwellings are required to be built to Building Regulations standard M4(3) as part of the affordable housing provision. The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable.</u></p> <p>The following text to be amended accordingly in 9.43:  In an era of rapid social, economic, environmental and technological change, buildings need to be designed to be adaptable to respond in a sustainable manner to the changing needs of occupiers. This is the 'long-life, loose-fit' principle. <del>It could be achieved using the lifetime homes principle to ensure that homes can meet families' changing needs over time.</del> For commercial buildings, it could mean ensuring that a building designed as an office for one organisation is physically capable of being subdivided, should future patterns of demand change.</p> <p>Insert new paragraphs after 9.43:</p>	To reflect the introduction of new optional standards for accessible and adaptable dwellings and wheelchair user dwellings.	No



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	<p><u>In 2015, the Government introduced new 'optional' Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings. These optional standards can only be required through a planning policy requirement. The national Planning Practice Guidance states that 'Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements.'</u></p> <p><u>The 2014 Suffolk Housing Survey indicates that 10% of Ipswich residents live in a home which has been adapted in some way for accessibility purposes. The results indicate that a further 3% of Ipswich residents currently require adaptations to their dwellings. Since 2007 almost 1,600 adaptations have been carried out on the Council's housing stock. The number and proportion of elderly residents in the Borough is predicted to increase over future years, potentially further increasing the need for dwellings to be accessible and adaptable.</u></p> <p>Delete:  9.51 ... The Council also encourages new housing to be built to the Lifetime Homes standard, which makes it easier for people to remain in their own homes as their mobility</p>		

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	<del>needs change, through encouraging homes to be built in a way in which rooms can be used flexibly over time.</del>		
DM6 Tall Buildings	Amend clause j. to read: 'the effect of the building in terms of its silhouette and impact on strategic views, with particular reference to conservation areas, <u>listed buildings and other heritage assets</u> , and the wooded skyline visible from and towards central Ipswich.'	For clarity.	No
DM8 Heritage Assets and Conservation	<p>Amend the policy as follows:</p> <p>Part a. <del>Listed Buildings</del> Re-label as <u>Designated and Undesignated Assets</u> Amend the first paragraph of Part a. to remove the word historical ('... adversely affect its <del>historical</del> significance.')</p> <p>Add a third paragraph to Part a. as follows: <u>The Council will resist the demolition or partial demolition of both designated and undesignated heritage assets as outlined in paragraph 133 of the National Planning Policy Framework.</u></p> <p>Add a fourth paragraph to Part a. as follows: <u>The Council will seek to preserve Scheduled Monuments, scheduled parks and gardens and other remains of national importance and their settings, in a manner appropriate to their significance.</u></p> <p>Part b Conservation Areas</p>	To ensure the policy is effective and consistent with national policy.	No

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	<p>Amend point (i) of Part b. to read: the building/structure does not <u>make a positive contribution to the significance</u> of the conservation area.</p> <p>Part c. Archaeology</p> <p><del>Within the Area of Archaeological Importance defined on the policies map, Development will not be permitted which may disturb remains below ground, unless the proposal is supported by an appropriate archaeological assessment of the archaeological significance of the site and, if necessary, a programme of archaeological work—<u>investigation</u> in accordance with that assessment.</del></p> <p>Planning permission will not be granted if the remains identified are of sufficient importance to be preserved in situ and cannot be so preserved in the context of the development proposed, taking account of the necessary construction techniques to be used.</p> <p><del>In all other circumstances where planning permission is to be granted, the Council may impose a condition allowing an appropriate contractor to monitor the works under archaeological supervision and control during the necessary stages of construction.</del></p> <p><del>In locations outside of the Area of Archaeological Importance, where it becomes apparent through a planning application that there is an overriding case for archaeological remains found to be preserved in situ, then the requirements for the above sites within the Area of</del></p>		

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	<p><del>Archaeological Importance will apply. Where <u>archaeological potential is identified but</u> there is no overriding case for any remains to be preserved in situ, development which would destroy or disturb potential remains will be permitted, subject to an appropriate programme of archaeological investigation, and recording <del>being undertaken prior to the commencement of development,</del> <u>reporting and archiving.</u></del></p> <p>Add a heading of <u>Climate Change</u> above the final policy paragraph.</p> <p><i>(See also minor changes to the explanatory text to DM8 in the additional modifications table.)</i></p>		
DM10 Protection of Trees and Hedgerows	<p>Clarify that clause (b) relates to applications for works to trees through adding the following text:  '<u>In relation to applications for works to trees, only granting...</u>'</p>	For clarity	No
DM12 Extensions to Dwellinghouses and the Provision of Ancillary Buildings	<p>Amend annex policy to be more explicit in relation to extensions:</p> <p>... development that would provide for a residential annex will <del>only</del> be permitted where this:</p> <p>e. <u>is an extension that</u> would be subordinate in scale to the main residence and capable of being integrated into the main dwellinghouse once the dependency need has ceased;</p>	To clarify the policy.	No

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DM18 Car and Cycle Parking	Amend car parking policy to refer to adopted standards: The Council will require <del>minimum</del> <u>adopted</u> standards of ....	To reflect the Council's adoption on 10 <sup>th</sup> February 2015 of the Suffolk Parking Standards.	No
DM20 The Central Shopping Area and DM21 District and Local Centres	Include reference to betting shops and payday loan shops alongside references to A2-A5:  '... A2-A5 uses, <u>betting shops and payday loan shops</u> will be ...'	Betting shops and payday loans shops were previously A2 and would have been included in calculations of A2-A5 frontage. They are now Sui Generis uses and need particular reference within the policy. This does not change the meaning of the policy at the time it was consulted upon.	No
DM24 Affordable Housing	Amend clause a. as follows: a. Is designed and built to at least the same standard as the market housing, <del>including the appropriate level of the Code for Sustainable Homes at the time;</del>	To align with changes to the Code and Policy DM1.	No
DM25 / 9.149	Add additional criteria to DM25 relating specifically to starter homes: <u>In the case of Starter Homes, these would only be permitted where:</u> a) <u>there is no demand for continued use of the site for employment or commercial purposes as demonstrated by a marketing programme;</u> b) <u>where the site is allocated for employment or commercial uses it is demonstrated that there is no reasonable prospect of the site being used for the allocated use, or other uses as detailed under the terms of criteria a-e above, during plan period; and</u>	Whilst the Government has provided policy in the form of the Ministerial Statement dated 2 <sup>nd</sup> March 2015 and within the updated Planning Practice Guidance, it is considered important to include criteria within the Local Plan to ensure the policy does not undermine other policies within the Plan, particularly in relation to delivery of employment and commercial development. In particular, due to the constrained nature of the Borough boundary, the loss of employment land which has a prospect of being used for	No

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	<p>c) <u>housing would be compatible with existing and planned surrounding uses.</u></p> <p>New paragraph for supporting text:  <u>On 2<sup>nd</sup> March 2015 the Government introduced its Starter Homes policy<sup>1</sup>. Under this policy opportunities should be sought for provision of starter homes on 'commercial and industrial land that is either underused or unviable in its current or former use, and which has not currently been identified for housing.' Updates to the Planning Practice Guidance identify the circumstances in which starter homes should be supported. However, for clarity of how this policy should operate alongside DM25, and to ensure consistency with the approach in both the National Planning Policy Framework and other policies of the Local Plan in relation to economic growth, it is considered appropriate to establish a clear set of criteria on how such applications will be considered.</u></p> <p><u>1 Written statement to Parliament – Starter Homes (Department of Communities and Local Government, March 2015)</u></p>	<p>such purposes during the plan period would undermine the Council's efforts to meet the requirements of paragraph 20 of the NPPF which states 'To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century.' The proposed policy wording ensures the Council's approach to Starter Homes is in accordance with the economic policies of the NPPF as well as the Starter Homes policy.</p>	
DM25 / 9.152	<p>Add to the end of 9.152:  <u>'Where compatible with adjacent uses, waste facilities could come forward on land within employment areas.'</u></p>	<p>To ensure compliance with the Suffolk Minerals and Waste Plans.</p>	<p>No. Although waste facilities in principle could have a likely</p>

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			significant effect on a European site, the existing / proposed employment areas are not assessed as having a likely significant effect. An unforeseeable plan which unexpectedly comes forward would be subject to its own HRA if necessary.
DM29 Provision of New Open Spaces, Sport and Recreation Facilities	<p>Re-write policy DM29 as follows:</p> <p><u>The Council will ensure that public open spaces and sport and recreation facilities are provided through new developments to meet the needs of their occupiers and, where appropriate, contributions are provided to strategic accessible natural greenspace.</u></p>	<p>To ensure compliance with CIL Regulations 122-124, which came into force in April 2015.</p> <p>Also need to reflect possibility of securing developer funding for strategic accessible natural greenspace provision / green rim, including possibly outside Borough.</p>	No

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	<p><u>In all new residential developments of 15 dwellings or more (or on sites of 0.5ha or more), at least 10% of the site area, or 15% in high density residential developments, should consist of on-site green space that is usable by the public, which will contribute to meeting the overall requirement. Where possible, public green spaces should be well overlooked, and the provision within large-scale developments should be distributed throughout the site.</u></p> <p><u>These developments would also be expected to mitigate their own impact through the provision of the various open space and facility typologies identified in Appendix 6. Where applying the quantity standards based on a population forecast of the development would exceed the Council's minimum size threshold for the typology, there will be a presumption in favour of on-site provision. Where this is not practicable or the Council prefers enhancement opportunities at existing facilities, then an in lieu contribution to new or existing off-site provision should be secured through a planning obligation.</u></p> <p><u>Where the quantity standard for a typology would not meet the minimum size threshold, a qualitative assessment of existing provision within the Appendix 6 accessibility standard distance from the site (480m or 720m) should be made to determine whether an enhancement opportunity exists. Where a reasonable improvement can be identified,</u></p>		



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	<p><u>a contribution should be secured where this would be necessary to make the development acceptable.</u></p> <p><u>The effect of on-site provision or off-site enhancements on development viability will also be a consideration, although the resultant provision to account for this must not be at a level that the development would not be deemed sustainable in either social or environmental terms.</u></p> <p><u>One-for-one replacement dwellings will be exempt from the requirements of the policy, because they are likely to have a minimal impact on the overall requirement. In addition, standards for children's and young people's facilities will be not be applied to elderly persons' accommodation and nursing homes.</u></p> <p><u>For non-residential developments of 1,000 sq. m floor space or more, the provision of or a contribution to public open spaces and outdoor sports facilities will be negotiated on a case-by-case basis.</u></p> <p>Re-write the reasoned justification as follows:</p> <p><u>9.172 The policy outlines that at least 10% of the site area of all qualifying developments must consist of public green space, which shall include soft landscaping and tree planting to facilitate sustainable urban drainage and enhance the climate change resilience, appearance and biodiversity</u></p>		

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	<p><u>value of the development. In high density residential developments (defined in Policy DM30), the green space requirement will be a minimum of 15% of the site area, to compensate for the more limited amenity space in these developments and to provide an attractive setting for the buildings. The 10%/15% requirement will also contribute to the amenity green space and/or natural and semi natural green space standards as outlined in Appendix 6. It is expected that amenity green spaces in particular would be located on generally flat land in order to maximise their use. Where provision is distributed throughout large-scale developments, it is important that it adequately meets the intended use.</u></p> <p><u>9.173 Where possible, green spaces should provide for wildlife habitats designed and located so as to create a link with existing ecological networks and/or green corridors, which may include the proposed green rim around Ipswich for sites on the edge of the Borough. All planting proposals should be accompanied by an appropriate management plan. Within IP-One, the provision of a public civic space may be considered in lieu of green space where this makes a positive contribution to the townscape.</u></p> <p><u>9.174 The policy makes provision for instances where it is not practicable to include a type of open space or facility on-site. This will include factors where its provision would compromise other standards in this Plan, such as meeting</u></p>		

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	<p><u>the density requirements of Policy DM30 or the minimum garden sizes of Policy DM3.</u></p> <p><u>New para: Accessible natural greenspace is defined by Natural England as places where human control and activities are not intensive so that a feeling of naturalness is allowed to predominate. There is no local standard for the provision of strategic accessible natural green space ('ANG') per person or dwelling. However, the mapping of existing provision against the 'Nature Nearby' standards has identified areas of deficit, particularly across north west Ipswich. The Council will aim to address these deficits where it can be achieved through also meeting the local standards for natural and semi-natural greenspace.</u></p> <p><u>9.175 The Council's Public Open Space Supplementary Planning Document (SPD) will provide guidance on population forecasts from new developments and outline the minimum size standard for each Appendix 6 typology. The document will also indicate per square metre capital and maintenance costs for each typology where these are to be provided and/or maintained by the Council, and to guide in lieu contributions for new off-site provision. Where a contribution is secured to enhance an existing area of open space or facility, this sum will be based on the works required and in proportion to the scale of the development.</u></p>		

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	<p><u>9.176 The quality standards for the various typologies are identified by the Ipswich Open Space, Sport and Recreation Study, Play Strategy, Allotment Strategy and Open Space and Biodiversity Policy/Strategy, and any subsequent updates to these. Furthermore, the need for formal sports provision is currently being updated by the production of the Indoor Sports Facility Strategy and the Playing Pitch Strategy.</u></p> <p><u>9.177 New commercial development may create a demand for amenity green space and/or sports facilities. Therefore, specific needs will be considered in the context of each application with the quantity standards in Appendix 6 applied on the basis of the total number of full-time equivalent employees.</u></p>		
9.181 / 9.182 (DM30)	<p>Amend to include new nationally described space standards:</p> <p><del>9.181 In order to ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will encourage developers to exceed minimum floorspace areas used by the former English Partnerships in its own developments (Quality Standards 2007) (gross internal floor area).</del></p> <p><del>9.182 These are as follows;</del></p> <ul style="list-style-type: none"> <li><del>• at least 51 sq m for a 1 bed/2 person dwelling</del></li> </ul>	Nationally described space standards were introduced in March 2015 and the recent update to the Planning Practice Guidance states that planning authorities should only refer to these.	No

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	<ul style="list-style-type: none"> <li>• at least 66 sq m for a 2 bed/3 person dwelling</li> <li>• at least 77 sq m for a 2 bed/4 person dwelling</li> <li>• at least 93 sq m for a 3 bed/5 person dwelling and</li> <li>• at least 106 sq m for a 4 bed/6 person dwelling.</li> </ul> <p>9.183 The Government, through the Housing Standards Review, is currently proposing a set of national space standards. In relation to the standards set out above these would generally require larger floor areas where two storey 1 or 2 bed dwellings are proposed and where three storey 3 or 4 bed dwellings are proposed and could become a requirement through the adoption of planning policy to that effect.</p> <p><u>9.181 In order to ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will encourage developers to meet the Nationally Described Space Standards as set out in Technical Housing Standards – Nationally Described Space Standard (Communities and Local Government, 2015).</u></p>		
DM31 / 9.187	9.187....'Assessments under the Habitats Directive have been undertaken in relation to the production of the <u>Core Strategy and Policies DPD Review and the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD.</u>	For clarification that, whilst not specified under CS17 other than in relation to the country park and strategic green infrastructure, developer funding may be	No. This provides a mechanism to provide

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	<u>Mitigation measures have been identified and in some instances developer contributions may be sought in relation to these and/or additional mitigation measures identified through assessments at planning application stage.'</u>	sought to mitigate impact(s) upon European protected site(s).	funding for mitigation for the impact of housing growth.
DM31 / 9.188 / 9.189	<p>Amend paragraph 4 of the policy:</p> <p><del>'The Council will seek to</del> <u>Development will be required to conserve and enhance the nature conservation...</u></p> <p><del>'...and County Geodiversity Sites identified on the policies map, and Suffolk Biodiversity Action Plan protected and priority species and habitats, by ...,'</del></p> <p>Add new sentence to the end <u>'Enhancements for protected sites and protected and priority species will be expected where possible.'</u></p> <p>Add to 9.188 <u>'Many species are protected through specific legislation including the Wildlife and Countryside Act 1981 (as amended). England's priority species and habitats are those which are included on the list produced under Section 41 of the Natural Environment and Rural Communities Act 2006. Suffolk's priority species and habitats are identified in the Suffolk Biodiversity Action Plan.'</u></p> <p>Add to 9.189: <u>The British Standard Guidance 'Biodiversity: Code of Practice for Planning and Development (BS42020)' provides</u></p>	To comply with the Biodiversity Duty and for clarity.	No

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<u>an approach to dealing with biodiversity issues in development.</u>		
DM32	Remove 'to non-community uses' from paragraph 2.	Loss of one community use for another may still result in the loss of a valued facility.	No
DM33	Amend 1 <sup>st</sup> sentence of paragraph 4 as follows: <del>'Within the defined green corridors, development will only be permitted where it would maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions.'</del> <u>'Development within the green corridors identified on Plan 6 will be expected to maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions'.</u>	To clarify that the policy does not imply that development within the corridors would not be supported.	No
DM34 Countryside	Amend reference to the AONB: In the case of the AONB, major development will only be permitted in exceptional circumstances in accordance with NPPF paragraph 116. <u>The landscape and scenic beauty of the AONB should be conserved.</u>  Proposals for development in the countryside should: a. Maintain ...; b. <del>Conserve the landscape and scenic beauty of the AONB;</del>	To ensure that development outside the AONB would not impact upon it.	No
DM34 Countryside	Amend clause f. 'f. In the case of new housing, be a dwelling: i) required for the efficient operation of an existing rural enterprise which	To fully reflect NPPF paragraph 55.	No

Policy / paragraph	Pre-Submission Main modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>cannot be met nearby; ii) <u>required to secure the future of a heritage asset; iii) which re-uses a disused building and enhances the immediate setting; or iv) of exceptional and innovative design.</u></p> <p>Add additional sentence:  <u>'Proposals for residential development of more than one dwelling would be considered in the context of criteria a to e above.'</u></p>		

**Tables 2, 3 and 4 in relation to pre-submission main modifications to policy CS7 The Amount of New Housing Required**

**TABLE 2 HOUSING LAND SUPPLY AND REQUIREMENT AT APRIL ~~2014~~2015**

		Number of dwellings	Discounted Numbers	Cumulative
1	Dwellings completed between 2011 and <del>2014</del> 2015	546 <u>1,077*</u>	-	546 <u>1,077</u>
2	Dwellings under construction	<del>561</del> <u>704</u>	-	4,107 <u>1,781</u>



3	Dwellings with planning permission	1,496 <u>820</u>	1,346 <u>738</u>	2,453 <u>2,519</u>
4	Dwellings with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement)	569 <u>916</u>	512 <u>824</u>	2,965 <u>3,343</u>
5	Number of dwellings required on new site allocations, in a broad location and on windfall sites to 2031	<del>10,585</del> <u>10,207</u>		13,550

## TABLE NOTES

The discounted numbers in the table allow 10% slippage for planning permissions that may not be implemented.

*Line 1: Actual numbers of dwellings built between 1<sup>st</sup> April 2011 and 31<sup>st</sup> March ~~2014~~2015. \* Includes 120 Assisted Living dwellings.*

*Line 2: Dwellings under construction at 31<sup>st</sup> March ~~2014~~2015 - assumed that all will be completed over the plan period.*

*Line 3: Other dwellings with planning permission at 31<sup>st</sup> March ~~2014~~2015 - assumed that 10% of these will not be completed.*

*Line 4: Dwellings with a resolution to grant planning permission from the Council's Planning and Development Committee but which are awaiting completion of a Section 106 Agreement before planning permission is issued, at 31<sup>st</sup> March ~~2014~~2015 - assumed that 10% of these will not be completed.*

*Line 5: To reach the local target of 13,550 dwellings by 2031 together with windfall sites, further land will need to be allocated within the Borough, and other locations within the Ipswich Policy Area identified with neighbouring authorities later in the plan period, for at least ~~10,585~~10,207 new homes.*

**TABLE 3 ESTIMATED HOUSING DELIVERY FOR ~~2014~~2015-2031 EXCLUDING CURRENT PERMISSIONS AS AT 1<sup>ST</sup> APRIL ~~2014~~2015**

Area of Ipswich	%age (dwellings) Previously developed land	Total Additional dwellings 2015-2031
IP-One	100%	<del>932</del> <u>1,122</u>
Rest of built up area	<del>70.1%</del> <u>75.2%</u>	<del>1,002 (PDL: 702)</del> <u>807 (PDL: 607)</u>
Ipswich Garden Suburb (see policy CS10)	0%	<del>2,800</del> <u>2,700</u>
<b>Total 2015-2031 (excluding windfall and broad locations)</b>	<del>34.8%</del> <u>37.4%</u>	<del>4,734 (PDL: 1,634)</del> <b><u>4,629 (PDL: 1,729)</u></b>
Small windfall sites (fewer than 10 dwellings) 2016-2031	90%	900 (PDL: 810)

Large windfall sites (10 or more dwellings) 2021-2031	90%	900 (PDL: 810)
Residual need later in plan period	0%	4,051 <u>3,778</u>
<b>Total 2015-2031</b>	<b>30.7% <u>32.8%</u></b>	<b>10,585 (PDL: 3,254)</b> <del>10,007 (PDL: 3,254)</del>

**TABLE 4 ESTIMATED HOUSING DELIVERY AND PREVIOUSLY DEVELOPED LAND (PDL) TRAJECTORY (INCLUDING SITES WITH PLANNING PERMISSION AND UNDER CONSTRUCTION BUT NOT INCLUDING WINDFALL SITES)**

Time period	2001- 2011	2011- <del>2014</del> 2015	<del>2014</del> 2015 -2031
Housing Delivery	6,903	546 <u>1,077*</u>	7,153 <u>6,904</u>
PDL%	94.5%	<del>73%</del> <u>79%</u>	<del>53.9%</del> <u>52.3%</u>

### Pre-submission Additional Modifications – not for public consultation

Additional modifications are minor textual and grammar corrections; re-phrasing or limited new text to add clarity; or updates to figures and references, which are necessary due to alterations which have been made elsewhere or for which new information has come to light.

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
Throughout	Change references to English Heritage to Historic England.	To reflect change in title.	No
Throughout	Change references to the Highways Agency to Highways England.	To reflect change in title.	No
<b>CHAPTER 1</b>			
Diagram 1 Context for the Ipswich Local Plan	Add reference to Ipswich Central's 'Ipswich Vision'.	For completeness – the Council signed up to the vision in July 2015.	No
<b>CHAPTER 2</b>			
2.1	Amend second sentence as follows: 'The national approach to planning policy matters is set out <u>principally</u> in the National Planning Policy Framework (NPPF), <u>but also within documents covering specific topics such as the Marine Policy Statement and Planning Policy for Travellers Sites.</u> '	To clarify that there are other national planning policy documents.	No
<b>CHAPTER 5</b>			
5.7	Amend the sentence to read: ' <del>Ipswich has</del> Partners have agreed a <u>Greater Ipswich</u> City Deal with the ....'	For accuracy.	No
<b>CHAPTER 6</b>			

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
6.17	Amend final sentence to read ' <u>Alongside the focus on the central area, the delivery of a significant number of homes through a sustainable urban extension on greenfield land at the Ipswich Garden Suburb will also occur during the plan period.</u> '	To clarify that the Ipswich Garden Suburb development represents a significant part of the housing growth set out in the Plan.	No
New paragraph to be inserted between existing paragraphs 6.18 and 6.19	' <u>In July 2015 a non-statutory document entitled 'The Vision for Ipswich: East Anglia's Waterfront Town' was published by partners – University Campus Suffolk, New Anglia Local Enterprise Partnership, Suffolk County Council, Ipswich Central, Ipswich Borough Council, Ben Gummer MP and the Ipswich Chamber of Commerce. This Vision brings together the aspirations of the partners on a range of issues and identifies a series of actions for the next few years. Some of these are relevant to the Local Plan and others are not, because they relate to matters beyond the remit of the planning system (e.g. starting works on the I-Am Project around the Museum on High Street). The two documents (the statutory 'Local Plan' and the 'Vision for Ipswich') are considered to complement each other in a helpful way.</u> '	For completeness.	No
<b>CHAPTER 8</b>			
CS1 SUSTAINABLE DEVELOPMENT – CLIMATE CHANGE			
CS1/para 8.13	Delete:  <del>The Government continues to work towards the target of achieving zero carbon homes by 2016. A zero carbon home is currently defined as one that delivers zero net carbon over a year from all 'regulated' energy uses which includes heating, hot water, lighting and fixed appliances. The</del>	To reflect the Government's statement contained within the Fixing the Foundations paper (HM Treasury, July 2015) which states that:  'The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p><del>Government is proposing to implement this through setting greater minimum standards for energy efficiency in the Building Regulations which would operate in tandem with 'allowable solutions' whereby developers can select to either incorporate greater efficiencies in the building's fabric, deliver on- or off-site renewable energy or provide a financial contribution to renewable energy projects elsewhere, or provide a mix of these measures. Ipswich is planning for high levels of housing and employment growth by 2031. This represents a vital opportunity to ensure that this significant addition to the building stock of the Borough minimises its impacts on climate change. Non-residential buildings also offer the opportunity to save emissions and the Government maintains a commitment for non-residential development to be carbon neutral by 2019.</del></p>	<p>2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under review, recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.'</p> <p>An explanation to this effect is proposed to be incorporated in revised supporting text to DM1.</p>	
CS1/para 8.14	<p>Amend as follows: Policy DM1 in Part C of this document provides more detail as to how sustainable buildings can be delivered in Ipswich through the <del>Code for Sustainable Homes standards for energy and water use</del> for residential development, and BREEAM ratings for non-residential development, <del>in advance of any further Government measures</del>. The Plan is not prescriptive about how developers should achieve these targets. There is a significant amount of existing advice available about sustainable construction.</p>	<p>To reflect the Government's statement contained within the Fixing the Foundations paper as referred to above.</p>	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
CS1/para 8.16	<p>Amend as follows:</p> <p>'The National Planning Policy Framework states that Local Authorities should recognise that it is the responsibility of all communities to contribute to energy generation from renewable or low carbon sources, and that they should have a positive strategy to promote energy from renewable and low carbon sources. The Planning and Energy Act 2008 also allows local planning authorities to adopt policies which require developers to meet a proportion of their energy requirements from renewable or low carbon sources, and this is taken forward through policy DM2. The National Planning Policy Framework requires local planning authorities to support the move to a low carbon future and when setting any local requirements for a building's sustainability, to do so in a way consistent with the Government's zero carbon buildings policy and adopted nationally described standards. Policies should be designed to maximise renewable and low carbon energy generation whilst addressing any adverse impacts satisfactorily, including cumulative landscape and visual impacts. Implementation of this policy will help to make a significant impact on reducing carbon emissions because buildings are a major source of emissions in Ipswich, <del>in advance of the zero carbon buildings programme taking effect.</del> Funding streams such as the Feed in Tariff and Renewable Heat Incentive will be promoted to increase the addition of micro-generation equipment on private properties and Borough</p>	To reflect the Government's statement contained within the Fixing the Foundations paper as referred to above.	No



Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>owned properties will also be equipped with micro-generation equipment where possible.'</p> <p>Add new sentence after '...programme taking effect. <del>Once the zero carbon dwellings and zero carbon buildings programmes are in place the Council will reconsider the relevance of the requirements of Policy DM2.</del></p>		
<b>CS2 THE LOCATION AND NATURE OF DEVELOPMENT</b>			
CS2/para 8.31	Amend 2024 to 2025 'Later in the plan period after <del>2024</del> 2025, the ...'	To reflect the updated baseline to 1 <sup>st</sup> April 2015.	No
CS2/para 8.34	<p>Include reference to numbers of District Centres:</p> <p>'... in the key diagram are as follows <u>(with reference numbers for cross reference to the policies map): ...</u></p>	For ease of cross reference.	No
<b>CS4 PROTECTING OUR ASSETS</b>			
CS4/para 8.42	<p>There are now 20 County Wildlife Sites within the Borough. The 20 sites are:</p> <p>Bourne Bridge Grassland, Alderman Canal, Holywells Park &amp; Canal, Landseer Park Carr, Pipers Vale, Ransomes Industrial Park Road Verges, River Gipping (Ipswich), River Orwell (Ipswich), Rushmere Heath, Stoke Park Wood, Volvo / Raeburn Road Site, Ashground Covert and Alder Carr, Wharfedale Road (Ipswich), Ransomes Europark Heathland, Bourne Park Reedbed, Braziers Wood &amp; Meadow / Pond Hall Carr, Bridge Wood, Chantry Park</p>	To reflect the current situation.	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>Beech Water &amp; Meadow, Dales Road Woodland, Christchurch Park</p> <p>Amend fifth bullet point as follows: <del>1920</del> County Wildlife Sites</p> <p>Amend penultimate bullet as follows: An area of archaeological importance for <del>its Anglo-Saxon remains in central Ipswich remains of all periods in the historic core,</del> <u>particularly Anglo-Saxon deposits</u>; and</p>		
CS4/paras 8.45 and 8.50	<p>Add Water Framework Directive to the list of legislation and brief explanation of the Council's responsibilities to 8.50 as follows:</p> <p><u>'The Anglian River Basin Management Plan sets out measures which aim to achieve the water body status objectives and wider objectives of the European Water Framework Directive. The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003 require all public bodies, in exercising their functions so far as affecting a river basin district, have regard to the river basin management plan for that district.'</u></p>	For clarity	No
CS4/para 8.46	<p>Para 8.46 to be amended as follows (insert after 'first listed buildings ...':</p> <p><u>This framework of legislation, guidance and policy currently provides comprehensive protection for the assets. Considering first listed buildings, the council will:</u></p>	For clarity	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<ul style="list-style-type: none"> <li>• <u>Conserve and enhance the significance of the Borough's heritage assets, their setting and wider townscape in accordance with policy DM8;</u></li> <li>• <u>Require new development to contribute to local distinctiveness , built form and scale of heritage assets through the use of appropriate design and materials;</u></li> <li>• <u>Require proposals to demonstrate a clear understanding of the significance of the asset and its wider context, and the potential impact of the development on the heritage asset and its context;</u></li> <li>• <u>Keep under review potential buildings and structures for statutory protection; and</u></li> <li>• <u>Prepare and review entries for the joint Suffolk LPA Buildings at Risk register.</u></li> </ul>		
CS4/para 8.52	<p>Add new sentence to the end:  <u>'There are also large areas of Inshore Marine Special Protection Area extending eastwards from the Suffolk and Essex Coast, which form part of the marine protected area identified in the East Inshore and East Offshore Marine Plan.'</u></p>	To acknowledge these areas of SPA.	No
CS4/para 8.53	<p>Delete: <del>National policy obviates the need for a local policy on this matter.</del>  Add to end of paragraph: <u>'An Urban Archaeological Database for Ipswich is to be prepared. The Council will prepare a supplementary planning document to summarise information from the Ipswich Urban Archaeological Database and set out archaeological considerations for new developments.'</u></p>	For clarity	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
CS4/para 8.55	Amend the second sentence of para 8.55 to read – ‘Whilst registration offers no additional statutory protection, <u>they are designated heritage assets of considerable significance and</u> an important material consideration in development management.’	For clarity	No
<b>CS6 THE IPSWICH POLICY AREA</b>			
CS6/para 8.68	Add to end of paragraph ‘ <u>The boundary is currently being reviewed and it is possible that a wider Ipswich Policy Area will be more appropriate. Any new boundary would need to be given statutory weight through the production of future Local Plans.</u> ’	To clarify that the boundary is currently being reviewed.	No
<b>CS10 IPSWICH GARDEN SUBURB</b>			
CS10/para 8.102	Amend as follows: ‘ <del>The Council needs to meet the full, objectively assessed needs for housing in the Borough (National Planning Policy Framework paragraph 47)</del> ’ ‘ <u>Paragraph 47 of the National Planning Policy Framework states that local planning authorities should ‘ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out within this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.</u> ’	To address concerns that paragraph 47 was not being correctly referred to.	No
<b>CS12 AFFORDABLE HOUSING</b>			
CS12	Add new paragraph to explain how ‘by total floorspace’ will be calculated, as follows:	To clarify how the policy will be applied.	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<u>'The affordable housing floorspace requirement will be calculated by applying the relevant percentage to the total floorspace of dwellings to be provided.'</u>		
CS13 PLANNING FOR JOBS GROWTH			
CS13/para 8.137	Amend reference to Plan for Growth to read Strategic Economic Plan. '... Local Enterprise Partnership <del>Plan for Growth</del> <u>Strategic Economic Plan.</u> '	The LEP's draft Plan for Growth was superseded by the Strategic Economic Plan.	No
CS18 STRATEGIC FLOOD DEFENCE			
CS18/para 8.186	Amend 8.186 to read, '... unlikely to be in place until <u>the end of 2017.</u> '	For accuracy	No
CS18/para 8.188	Add to end of paragraph: ' <u>As Ipswich Borough Council falls within a neighbouring reporting area, any climate change mitigation measures should reference policy CC1 within the East Offshore and East Inshore Marine Plans.</u> '	For completeness	No
CS20 KEY TRANSPORT PROPOSALS			
CS20/para 8.201	Add reference to geographical coverage of Travel Ipswich.  '... continues to support the Travel Ipswich scheme, <u>which covers the urban area of Ipswich.</u> More details ...'	For clarity	No
CS20/para 8.209	Add reference to Wet Dock Crossing feasibility study funding after first sentence:	For completeness.	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<u>'In March 2015 the New Anglia Local Enterprise obtained funding in order to carry out a feasibility study for the Wet Dock Crossing.'</u>		
<b>CHAPTER 9</b>			
DM1 SUSTAINABLE DESIGN AND CONSTRUCTION			
DM1 Sustainable Design and Construction	Refer to the Housing Quality Mark <u>'The Building Research Establishment is introducing a Home Quality Mark which is five star rating demonstrating a home's performance in terms of a number of factors including energy use, running costs, air quality, noise, accessibility to amenities, fast and secure internet access and the ease of use of the home by the occupants. The Council encourages applicants to consider achieving a high rating under the Housing Quality Mark.'</u>	To reflect the introduction of the Home Quality Mark	No
DM2 DECENTRALISED RENEWABLE OR LOW CARBON ENERGY			
DM2/paras 9.15, 9.16, 9.18	Amend as follows:  9.15 This policy gives effect to Core Strategy policy CS1, which sets a target for achieving renewable or low carbon energy sources in major development. It builds on national policy in the National Planning Policy Framework <u>which states that planning plays a key role in supporting the delivery of renewable and low carbon energy. with the aim being of contributing to the Government's zero carbon economy.</u>	To reflect withdrawal of Code for Sustainable Homes and withdrawal of allowable solutions and 2016 energy efficiency standards (see Ministerial Statement March 2015 and Fixing the Foundations, July 2015).	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>9.16 Given the acknowledged vulnerability of the region to the effects of climate change and the projected levels of development Ipswich will be required to accommodate, the Council considers it reasonable to require new developments above the given threshold to provide a minimum of 15% of energy demand from renewable or low carbon sources. <u>The Planning and Energy Act 2008 allows planning authorities to require a proportion of energy used in development in their area to be energy from renewable or low carbon sources in the locality of the development.</u> <del>to help achieve national targets of zero carbon homes by 2016 (public sector buildings by 2018 and non-residential buildings by 2019).</del><sup>3</sup></p> <p>9.18 The policy also provides for some flexibility where it can be clearly demonstrated that achieving the required percentage provision of renewable or low-carbon energy would not be either technically feasible or financially viable in the light of such considerations as site constraints, other planning requirements, development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower percentage provision being achieved where the introduction of additional energy efficiency measures (i.e. additional to those required under <del>the relevant Code for Sustainable Homes</del> or BREEAM requirements as set out in policy DM1 such as passive house design or other inbuilt energy efficiency</p>		

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>measures) to achieve an equivalent reduction in carbon emissions.</p> <p><del>‡The Government is currently looking at the definition of what zero carbon is.</del></p>		
<b>DM3 PROVISION OF PRIVATE OUTDOOR AMENITY SPACE IN NEW AND EXISTING DEVELOPMENTS</b>			
DM3/para 9.22	<p>Replace 'rear' with 'private'.</p> <p>'It is considered that a suitably designed 75 sq. m <del>rear</del>private garden should be ...'</p>	For consistency with DM3 which now refers to private garden space rather than rear garden space.	No
<b>DM8 HERITAGE ASSETS AND CONSERVATION</b>			
DM8/para 9.73	<p>Amend text:</p> <p><u>'The settlement of Ipswich has developed through Saxon, Medieval and later periods, leaving a legacy of history below ground which tells the complex story of the town's evolution. To ensure that this invaluable and irreplaceable historical, cultural and educational resource is not lost or damaged, the planning process must ensure that development proposals respect archaeologically important sites.'</u> The NPPF sets out specific requirements for assets with archaeological interest. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, developers will be required to submit an appropriate desk based assessment and, where necessary, a field evaluation (<u>which could include geophysical survey, building survey and trenched evaluation</u>) <u>at an appropriate stage prior to determination of an application.</u> Scheduled Monuments are designated by the</p>	For accuracy	No



Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>Secretary of State and the records held by <del>English Heritage</del> <u>Historic England</u> who develop policies to protect them. Suffolk County Council Archaeology Service holds the Historic Environment Record for Ipswich and is consulted on planning applications that could affect archaeology. <u>Early consultation with relevant agencies is encouraged well in advance of seeking planning permission, in order that assessment and recording requirements can be discussed. This helps make the application process simpler and reduces the risk of heritage assets presenting an obstacle to delivery at a later stage. Where there is no overriding case for preservation in situ, an appropriate programme of work to record and promote understanding of remains which would be affected by development could include some or all of further evaluation, upfront excavation, and/or monitoring and control of contractor's groundworks, with appropriate curation and publication of results.</u></p>		
DM8/para 9.74	<p>Attention is drawn to the policies maps, which show the Area of Archaeological Importance of the Anglo-Saxon and Medieval town, aspects of which are internationally recognised. Beyond this area, the Borough includes parts of the wider landscape of the Gipping Valley and Orwell Estuary, and there are Prehistoric, Roman, Anglo-Saxon and other period archaeological sites within its boundaries. <del>The County Council strongly encourages applicants to contact the archaeological service well in advance of seeking planning permission, in order that assessment and recording requirements can be discussed. This helps make the</del></p>	For accuracy	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	<p>application process simpler and reduces the risk of heritage assets presenting an obstacle to delivery at a later stage. For information, the Area of Archaeological Importance is also shown on Plan 4.' <u>The Area of Archaeological Importance is defined from evidence of buried archaeology, historic maps and information, standing structures and visual elements of the historic landscape and it highlights the area known or likely to have the most complex and sensitive archaeological deposits. This helps to alert applicants and planning officers to the likely requirements for archaeological investigation, protection and recording to be placed on development, on potentially even the smallest scale below-ground works.</u></p>		
<b>DM9 BUILDINGS OF TOWNSCAPE INTEREST</b>			
DM9/para 9.75	<p>Amend the first sentence of para 9.75 to read: The Council acknowledges the townscape importance of buildings <u>and structures</u> of local interest which have no other statutory protection, and encourages their retention and upkeep.</p>	For completeness	No
<b>DM10 PROTECTION OF TREES AND HEDGEROWS</b>			
DM10 Protection of Trees and Hedgerows	<p>Amend 'heath' to 'health' in clause g.  '... to ensure the <del>heath</del><u>health</u> and safety of each specimen ...'</p>	To correct a typographical error.	No
<b>DM13 SMALL SCALE INFILL AND BACKLAND RESIDENTIAL DEVELOPMENTS</b>			
DM13/para 9.90	Needs to refer to existing or future occupiers.	For clarity.	No.

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
	'... and the quality of life of its <u>existing and future</u> inhabitants.'		
<b>DM17 TRANSPORT AND ACCESS IN NEW DEVELOPMENTS</b>			
DM17/para 9.97	Delete reference to Ipswich Transport Strategy.  '...In accordance with the <del>Ipswich Transport Strategy 2007</del> and the Suffolk Local Transport Plan ...'	Superseded by Local Transport Plan 3.	No.
DM17/para 9.99	Add to the end of 9.99:  <u>'The Public Rights of Way network is more than just a means of reducing vehicular traffic. In addition to connecting areas and providing opportunities for physical recreation and social interaction, it provides vital access to services, facilities and the natural environment. In this sense it is a major recreational resource, economic asset and means of promoting mental and physical health. These benefits must be taken into account in the design of development along with the contributions it might make to sustainable routes and open space provision. Development which may affect Rights of Way will not be permitted unless it can demonstrate how it protects or enhances the network. Where development cannot avoid detriment to the Rights of Way Network, it should demonstrate how suitable alternative provision will be made.'</u>	To ensure Objective 6 is realised in relation to the Rights of Way network.	No
<b>DM20 THE CENTRAL SHOPPING AREA</b>			

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
DM20/para 9.114	Add to the end of the paragraph: <u>'The Town and Country Planning General Permitted Development Order 2015 introduced new permitted development rights for existing A1 units however the policy remains relevant due to size limitations contained within the new Order.'</u>	To acknowledge the recent changes to the General Permitted Development Order whereby change of use from A1-A3 is now PD but only for units under 150sqm and A1-A2 is also PD.	No
<b>DM21 DISTRICT AND LOCAL CENTRES</b>			
DM21, clause b.	Delete ' <del>Of this 40%</del> ' in clause b. <del>'Of this 40%, n</del> No more than 20% ...'	To clarify that restriction to 20% A5 uses is 20% of the total frontage.	No
DM21	Delete the reference to prominent position (clause c. i.) (and renumber subsequent clauses). <del>'i. the unit does not occupy a prominent position in the Centre;</del> ii. <u>i</u> satisfactory vehicular access ...  Qualify c. iii. to indicate that this requirement would only apply to a vacant A1 unit. <u>'iii. in the case of a vacant unit, the unit has suffered from ...'</u>	For clarity in relation to community uses in district centres.	No
DM21/9.123	Include reference to numbers of Local Centres:  <u>'The local centres are listed below (with reference numbers for cross reference to the policies map): ...'</u>	For ease of cross reference.	No.

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
DM21/para 9.129	<p>Add explanatory text to the end of para 9.129 about accessibility (clause f.) outside district and local centres meaning particularly for those without use of a car:</p> <p><u>'Accessible under clause f of policy DM21 relates to community facilities being accessible by a range of transport modes including for those without a car.'</u></p>	For clarity	No.
<b>DM28 PROTECTION OF OPEN SPACES, SPORT AND RECREATION FACILITIES</b>			
DM28 Protection of Open Spaces, Sport and Recreation Facilities	<p>Amendment to clause a. of policy:</p> <p>a. ... , as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 and subsequent update <del>as a result of the Council's Open Space and Biodiversity Policy;</del> or</p>	The Council may commission other updates from time to time as well as the Open Space and Biodiversity Policy, which may also be relevant.	No
<b>DM33 GREEN CORRIDORS</b>			
DM33 Green Corridors and/or Plan 6	Add green rim elements with the borough boundary to Plan 6.	To clarify the location of the green rim	No
<b>CHAPTER 11 KEY TARGETS ASSOCIATED WITH PART B</b>			
Chapter 11 Objective 6	<p>Add to indicators:</p> <p><u>'Mode of travel to work to major employers'</u> and <u>'Mode of travel to work (census)'</u> and delete <del>'Children travelling to school — mode of travel usually used'</del>.</p>	<p>Travel to school is no longer monitored.</p> <p>Mode of travel to major employers is monitored annually by Suffolk County Council. Whilst Census data is only collected every ten years, it will show long term trends.</p>	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
Chapter 11 Objective 8	<p>Change the wording of the second indicator to read – ‘Number of buildings on the <u>Suffolk Buildings at Risk</u> register.’</p> <p>Add further indicator as follows:  ‘<u>Number of buildings and conservation areas on Historic England Heritage Assets at Risk register.</u>’</p> <p>Add Targets as follows:  ‘<u>A decrease in the number of Ipswich buildings at risk on the Suffolk Buildings at Risk register or no net increase in Ipswich buildings at risk</u>’  ‘<u>A decrease in Heritage Assets at risk on the Historic England register or no net increase in Heritage Assets at risk</u>’</p>	To better monitor impacts on the historic environment.	No
<b>APPENDICES</b>			
APPENDIX 5 Activities or services relevant to each planning standard charge heading	<p>Add sentence :  ‘The broad categories of infrastructure to be included in the standard charge are as follows <del>and detailed further in Appendix 5;</del> <u>This does not constitute a precursor to a CIL Regulation 123 List.</u>’</p>	For clarity	No
APPENDIX 6 Ipswich standards for the provision of open space, sport and	<p>Parks and Gardens <del>4.42ha</del> <u>1.16ha</u> per 1,000 population  Amenity Green Space <del>0.6ha</del> <u>0.48ha</u> per 100 population</p>	For accuracy to reflect the evidence.	No

Policy / paragraph	Pre-submission Additional modification	Reason	A new likely significant effect or change to a previously assessed likely significant effect on a European site?
recreation facilities			
<b>MAPS AND PLANS</b>			
Policies Map	Amend Ipswich Garden Suburb allocation – where the link through to Tuddenham Road is shown, the allocation should be shown as a narrower width.	The adjacent plot to the north east now has planning permission for a bungalow.	No
Policies Map	Amend policy reference against countryside designation to read DM34	For clarity	No
Plan 2 Flood Risk	Update to August 2015 to reflect new information received on the areas at risk of flooding (no change in the areas affected within Ipswich).	For clarity.	No
Plan 3 Conservation Areas	Add the Marlborough Road conservation area.	For completeness	No
Plan 6 Green Corridors	Add the indicative Green Rim to link to policy DM33 k.	For clarity	No

# ***Appendix 6***



5618	Natural England (Mr John Jackson) [1413]	Proposed Submission Core Strategy - Appropriate Assessment	OBJECT	<p>Further to our earlier comments, we are satisfied that the Appropriate Assessment for the Core Strategy now addresses our concerns in relation to increases in visitors to Orwell Country Park and Pond Hall Farm. IBC has also committed to carrying out a study into visitor use and bird disturbance around Bridge Wood and Pond Hall, which will provide a baseline and will be used to inform visitor management measures at the park. Where necessary we would expect individual developments to be subject to project level Habitats Regulations Assessment linking back to elements of mitigation identified at the strategic level.</p>	<p>Where necessary we would expect individual developments to be subject to project level Habitats Regulations Assessment linking back to elements of mitigation identified at the strategic level.</p>	<p>The supporting text to policy DM31 refers to the potential requirement for projects to be subject to Appropriate Assessment. Proposed amendments to CS17 under the Pre-Submission Main Modifications clarify that contributions may be sought for mitigation measures identified in the HRA.</p>
5482	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Proposed Submission Core Strategy - Appropriate Assessment	OBJECT	<p>The Appropriate Assessment ignores the change in Table 8B which states that completion of initial works at the Country Park is dependent on the occupation of 500 dwellings at Henley Gate. If fewer houses are developed at Henley Gate there is no mechanism to secure delivery of the Country Park. The Habitats Regulations Assessment submitted for the CBRE planning application states that the Country Park should be in place in advance of occupation of the first dwelling.</p>	<p>The Appropriate Assessment needs to be revised to take account of the change to Table 8B.</p>	<p>The triggers in Table 8B are indicative. The HRA conclusions reflect the policy requirement for the Country Park to be delivered.</p>

5724	Save Our Country Spaces (Mrs Barbara Robinson ) [978]	Proposed Submission Core Strategy - Appropriate Assessment	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The Appropriate Assessment ignores the change in Table 8B which states that completion of initial works at the Country Park is dependent on the occupation of 500 dwellings at Henley Gate. If fewer houses are developed or Henley Gate does not come forward in a timely manner there is no mechanism to secure delivery of the Country Park. The Habitats Regulations Assessment submitted for the CBRE planning application states that the Country Park should be in place in advance of occupation of the first dwelling.	The Appropriate Assessment needs to be revised to take account of the change to Table 8B.	The triggers in Table 8B are indicative. The HRA conclusions reflect the policy requirement for the Country Park to be delivered.
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