

Land off Howlett Way,
Trimley St. Martin

Report to Inform a Habitats Regulations Assessment (HRA)

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1. Introduction

1.1. Background and Proposals

- 1.1.1. Aspect Ecology has been commissioned by Trinity College Cambridge to prepare a report to inform a Habitats Regulations Assessment (HRA) in respect of proposed redevelopment at land off Howlett Way, Trimley St. Martin, centred at grid reference SP 2770 3737 (see Plan 5309/HRA1).
- 1.1.2. The site has been allocated for residential development within the Felixstowe Peninsula Area Action Plan (adopted January 2017). The proposals are for the creation of up to 340 dwellings with open space, a new Early Years Facility, new roundabout access from Howlett Way, a foul water pumping station and associated landscaping.
- 1.1.3. The site is located within close proximity of Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar and the Deben Estuary SPA and Ramsar, whilst a number of other European designations are located within the wider vicinity of the site. As such, the proposals will need to be subject to a Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (as amended), setting out an assessment of effects on nearby European designations.
- 1.1.4. On this basis, the following report sets out information to inform a Habitats Regulations Assessment.

1.2. Site Overview

- 1.2.1. The site is located south of Howlett Way in Trimley St. Martin in south-east Suffolk. The site is bound to the north by Howlett Way and to the south by Church Lane, whilst to the west the site is bounded by the curtilages of existing residential dwellings along High Road. The eastern site boundary is demarcated by an offsite wooded belt. Within a wider context, the site is surrounded by existing residential development, arable fields and a network of roads.
- 1.2.2. The site itself is dominated by two arable fields and two smaller semi-improved grassland fields, along with associated hedgerows, tree lines, semi-improved grassland field margins and dry ditches at the field boundaries. Other habitats present include trees, scrub, tall ruderal vegetation, bare ground, amenity planting and two buildings. An offsite wooded belt is also present adjacent to the eastern site boundary.

1.3. Ecological Survey Work

- 1.3.1. This document is informed by ecological survey work undertaken at the site which will be submitted to inform a planning application in the form of an Ecological Appraisal Report¹. Ecological survey work undertaken includes:
 - Desk study including biological records obtained from Suffolk Biodiversity Information Service (SBIS);
 - Extended Phase 1 Habitat Surveys;
 - Bat Inspection Survey of trees and buildings;
 - Badger Survey; and
 - Reptile surveys.

¹ Aspect Ecology (March 2020) *Land off Howlett Way, Trimley St. Martin – Ecological Appraisal*

2. Legislation and Assessment Methodology

2.1. Legislation

2.1.1. All areas in England classified as Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), also known as European sites, receive statutory protection under the Conservation of Habitats and Species Regulations 2017 (the Regulations). These Regulations transpose into UK legislation the 'Habitats Directive' 1992 (92/43/EEC) and the 'Birds Directive' 2009 (2009/147/EC). National planning policy in the form of the National Planning Policy Framework (NPPF) explicitly sets out that listed or proposed Ramsar sites should be considered in the same way, as if they had been classified or designated as SACs or SPAs.

2.1.2. The Regulations impart a duty on Local Planning Authorities (competent authorities) to carefully consider whether any proposals may have a significant effect on a European designation, either alone or in combination with other plans or projects. In most circumstances, permission may only be given for a plan or project to proceed if it has been ascertained that it will not have an adverse effect on the integrity of any such designation.

2.2. Assessment Methodology

2.2.1. The approach to the formalised assessment of potential impacts arising on a European site from any proposals (termed plans or projects) is set out within the Regulations. Guidance on the process and procedures for assessment are contained in a number of documents, principally:

- National Planning Policy Framework (NPPF) and the accompanying ODPM/DEFRA Circular (ODPM 06/2005, DEFRA 01/2005);
- Managing Natura 2000 sites 'The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC'. April 2000;
- Assessment of plans and projects significantly affecting Natura 2000 sites. European Commission November 2001.

2.2.2. As set out within the above documents, the procedure for assessment is an ordered process following a number of key stages, as laid out within the chart (Figure 1) within ODPM circular 06/2005, reproduced at Appendix 5309/1 and discussed below.

2.2.3. As set out in box 1 of the flow chart, the first step is to identify whether the proposals are directly connected with or necessary to site management for conservation.

2.2.4. The proposals would not be concerned with the management of the European sites; hence, following the flow lines set out, the assessment procedure should follow on to a Stage 1 assessment to screen for likely significant effects (set out within box 2 of the flow chart).

Stage 1

2.2.5. In this stage it is necessary to examine if the proposals will result in any 'likely significant effect' on the internationally important features of the European sites, either alone or in combination with other plans or projects.

2.2.6. Where it is considered that plans or projects will result in no such 'likely significant effects', no further assessment is necessary, and permission should not be refused under the assessment.

- 2.2.7. If any 'likely significant effects' are identified or where it remains unclear whether effects will be significant the assessment procedure should follow on to Stage 2.

Stage 2 – Appropriate Assessment

- 2.2.8. Under the second stage, it is necessary to determine whether the proposals, either alone or in combination with other projects or plans, will result in any adverse effects on the integrity of the site as defined by the conservation objectives and status of the site. The precautionary principle should be applied, and the focus should be on objectively demonstrating, with supporting evidence, that there will be no adverse effects on the integrity of the European site. Where this is not the case, adverse effects must be assumed.
- 2.2.9. If it is considered that the proposal will not adversely affect the integrity of the site, permission can be granted. If this cannot be ascertained, or there is uncertainty, the assessment procedure should follow on to Stage 3.

Stage 3 onwards

- 2.2.10. Under Stages 3 and 4, it is necessary to assess if there are alternative solutions and whether there are imperative reasons of overriding public interest. If these tests are passed, authorisation may be granted subject to compensation measures being secured.

3. Information to Inform a Habitats Regulations Assessment

3.1. Stage 1 - Screening

<p>European designations that could be affected by the proposals</p>	<p>The following European designations are located within 20km of the site and considered as part of the Local Plan HRA (see Plan 5309/2):</p> <ul style="list-style-type: none"> • Stour and Orwell Estuary SPA/Ramsar (1.6km to south-west); • Deben Estuary SPA/Ramsar (3.5km to north-east); • Hamford Water SPA/SAC/Ramsar (8.0km to south); • Orfordness-Shingle Street SAC (8.3km to north-east); • Alde-ore Estuary SPA/Ramsar (8.3km to north-east); • Sandlings SPA (9.2km to north-east); • Alde-ore and Butley Estuaries SAC (11.5km north-east); and • Staverton Park and the Thicks, Wantisden SAC (14.8km north-east). <p>Following a review of the Suffolk Coastal Local Plan HRA, it is considered that Hamford Water SPA/SAC/Ramsar can be scoped out (in line with the approach in the Local Plan HRA). The HRA also states that for housing site allocations over 13km from a designation, no likely significant effects are anticipated. On this basis, the European designations to be considered in terms of potential effects are limited to:</p> <ul style="list-style-type: none"> • Stour and Orwell Estuary SPA/Ramsar (1.6km to south-west); • Deben Estuary SPA/Ramsar (3.5km to north-east); • Orfordness-Shingle Street SAC (8.3km to north-east); • Alde-ore Estuary SPA/Ramsar (8.3km to north-east); • Sandlings SPA (9.2km to north-east); and • Alde-ore and Butley Estuaries SAC (11.5km north-east). <p>Other designations scoped into the Local Plan HRA are considered sufficiently removed from the site such that adverse effects resulting from the proposed development are considered to be negligible.</p>
<p>Identification of potential impact pathways</p>	<p>The site has been allocated for residential development within the Felixstowe Peninsula Area Action Plan (adopted January 2017). Based on a review of the Suffolk Coastal Local Plan HRA, a single potential impact pathway has been identified in relation to housing site allocations and designations where these are located 1km-13km apart, namely recreational impacts. For housing allocations within 1km of the site, other impact pathways have also been identified including hydrological risks although this is not of relevance to this site.</p>

On this basis, further detail is set out below in relation to the identified designations and whether a likely significant effect may occur as a result of the proposed development.

Stour and Orwell Estuaries SPA/Ramsar

<p>European site interest features</p>	<p>Stour and Orwell SPA qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <ul style="list-style-type: none"> • <i>Avocet <i>Recurvisota avosetta</i></i> <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p>
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	<ul style="list-style-type: none"> • Redshank <i>Tringa totanus</i>, 2,588 individuals representing 2.0% of the wintering Great British – autumn passage population (5 year peak mean 1995/6-1999/2000); • Redshank, 3,687 individuals representing 2.8% of the wintering Great British population; • Dark-bellied Brent Goose <i>Branta bernicla bernicla</i>, 2,627 individuals representing 1.2% of the wintering Western Siberian - breeding population (5 year peak mean 1995/6-1999/2000); • Pintail <i>Anas acuta</i>, 741 individuals representing 1.2% of the wintering North-western European – non-breeding population (5 year peak mean 1995/6-1999/2000); • Grey Plover <i>Pluvialis squatarola</i>, 3,261 individuals representing 1.3% of the wintering Eastern Atlantic – non-breeding population (5 year peak mean 1995/6-1999/2000); • Knot <i>Calidris canutus</i>, 5,970 individuals representing 1.3% of the wintering Icelandic population (5 year peak mean 1995/6-1999/2000); • Dunlin <i>Calidris alpina alpina</i>, 19,114 individuals representing 1.4% of the Western European – non-breeding population (5 year peak mean 1995/6-1999/2000); and • Black-tailed Godwit <i>Limosa limosa islandica</i>, 2,559 individuals representing 7.3% of the wintering Iceland population (5 year peak mean 1995/6-1999/2000). <p>The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl.</p> <p>Stour and Orwell Ramsar qualifies under three criterion, namely:</p> <p>Ramsar criterion 2:</p> <ul style="list-style-type: none"> • Contains seven nationally scarce plants: stiff saltmarsh-grass <i>Puccinellia rupestris</i>; small cord-grass <i>Spartina maritima</i>; perennial glasswort <i>Sarcocornia perennis</i>; lax-flowered sea lavender <i>Limonium humile</i>; and the eelgrasses <i>Zostera angustifolia</i>, <i>Z. marina</i> and <i>Z. noltei</i>. • Contains five British Red Data Book invertebrates: the muscid fly <i>Phaonia fusca</i>; the horsefly <i>Haematopota grandis</i>; two spiders, <i>Arctosa fulvilineata</i> and <i>Baryphema duffeyi</i>; and the Endangered swollen spire snail <i>Mercuria confusa</i>. <p>Ramsar criterion 5:</p> <p>Assemblages of international importance: Species with peak counts in winter: 63,017 waterfowl (5 year peak mean 1998/99-2002/03)</p> <p>Ramsar criterion 6:</p> <p>Species/populations occurring at levels of international importance:</p> <ul style="list-style-type: none"> • Redshank • Dark-bellied Brent Goose • Pintail • Grey plover • Red knot <i>Calidris canutus islandica</i> • Dunlin • Black-tailed Godwit
<p>Conservation objectives of the European site</p>	<p>The conservation objectives for the SPA are to:</p>

	<p><i>“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:</i></p> <ul style="list-style-type: none"> • <i>The extent and distribution of the habitats of the qualifying features;</i> • <i>The structure and function of the habitats of the qualifying features;</i> • <i>The supporting processes on which the habitats of the qualifying features rely;</i> • <i>The population of each of the qualifying features; and</i> • <i>The distribution of the qualifying features within the site.”</i>
<p>Condition of European site</p>	<p>The most recent condition assessments for the three Site of Special Scientific Interest (SSSI) designations which underpin the European designation states the majority of units are in favourable or unfavourable - recovering condition. However, this is largely on the basis of habitats, and does not necessarily reflect the SPA interest.</p>
<p>Threats</p>	<p>A Site Improvement Plan (SIP) has been produced by Natural England in relation to Stour and Orwell Estuaries SPA (dated May 2015). This identifies prioritised issues (pressures or threats) affecting the designation:</p> <ol style="list-style-type: none"> 1) Coastal squeeze; 2) Public access/disturbance; 3) Changes in species distributions; 4) Invasive species; 5) Planning permission (cumulative effects); 6) Air pollution (atmospheric nitrogen deposition); 7) Inappropriate coastal management; and 8) Commercial fisheries.
<p>Screening of likely significant effects</p>	
<p>Recreational disturbance</p>	<p>The allocated development of the site could lead to an increase in 816 new residents (based on up to 340 dwellings supporting an occupation rate of 2.4). Given the proximity to the site, a portion of these new residents may use the estuary for recreation, which could result in the potential for disturbance to SPA qualifying species, particularly birds, primarily resulting from dogs that are allowed to roam off-lead into estuarine areas. However, although the site is located approximately 1.6km from the Stour and Orwell SPA and Ramsar, the shortest walking route to reach the site is substantially further at a distance of approximately 2.6km, Nevertheless, whilst the anticipated small number of visits arising from the proposed development is unlikely to result in any significant impact on the interest bird species alone, it is identified that there is the potential for in-combination effects, with the result being that small contributions in recreational effects from a number of allocated developments could have an overall adverse effect on breeding birds within the SPA, and thereby undermine the conservation objectives.</p>
<p>Conclusion – could the proposed development result in a likely significant effect?</p>	
<p>Alone</p>	
<p>No - any increase in recreational pressure from the proposed development alone would be minimal.</p>	
<p>In combination with other plans or projects</p> <p>Yes - Whilst predicted increases in recreational pressure arising from the proposed development are minimal, the site lies within the identified 13km zone of influence in regard to recreational effects and could contribute to a significant effect in-combination with other developments. As such, further assessment of potential for recreational disturbance is necessary and an Appropriate Assessment is required.</p>	

Deben Estuary SPA/Ramsar

<p>European site interest features</p>	<p>Deben Estuary SPA qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting nationally important numbers of the following species listed on Annex I of the Directive:</p> <ul style="list-style-type: none"> • Avocet. <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <ul style="list-style-type: none"> • Dark-bellied Geese <i>Branta bernicula bernicula</i>, 1,889 birds, representing 2.1% of the British and 1.1% of the north-west European population (5 year peak mean for the period 1988/89 - 1992/93). <p>Deben Estuary Ramsar qualifies under two criterion, namely:</p> <p>Ramsar criterion 2: Important population of the endangered Red Data Book mollusc <i>Vertigo augustior</i>.</p> <p>Ramsar criterion 6: International important wintering population of Dark-bellied Brent Goose.</p>
<p>Conservation objectives of the European site</p>	<p>The conservation objectives for the SPA are to:</p> <p><i>“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:</i></p> <ul style="list-style-type: none"> • <i>The extent and distribution of the habitats of the qualifying features;</i> • <i>The structure and function of the habitats of the qualifying features;</i> • <i>The supporting processes on which the habitats of the qualifying features rely;</i> • <i>The population of each of the qualifying features; and</i> • <i>The distribution of the qualifying features within the site.”</i>
<p>Condition of European site</p>	<p>The most recent condition assessments for the Site of Special Scientific Interest (SSSI) designation which underpins the European designation states the majority of units are in unfavourable - declining condition. However, this is largely on the basis of habitats, and does not necessarily reflect the SPA interest.</p>
<p>Threats</p>	<p>A Site Improvement Plan (SIP) has been produced by Natural England in relation to Deben Estuary SPA (dated May 2015). This identifies prioritised issues (pressures or threats) affecting the designation:</p> <ol style="list-style-type: none"> 1) Coastal squeeze; 2) Public access/disturbance; 3) Changes in species distributions; 4) Air pollution (atmospheric nitrogen deposition); 5) Water pollution; and 6) Commercial fisheries.
<p>Screening of likely significant effects</p>	
<p>Recreational disturbance</p>	<p>The allocated development of the site could lead to an increase in 816 new residents (based on up to 340 dwellings supporting an occupation rate of 2.4). Given the distance from the site, a portion of these new residents may use the estuary for recreation, which could result in the potential for disturbance to SPA qualifying species, particularly birds, primarily resulting from dogs that are allowed to roam off-lead into estuarine areas. However, at this distance (3.5km) the designation would only be regularly accessible via car. As such, the proportion of residents likely to be making any regular use of these designations for recreational purposes is somewhat reduced (with regular daily activity such as dog walking likely to not</p>

	<p>include the SPA) and therefore any increase in recreational pressure from the proposed development alone is likely to be minimal.</p> <p>Nevertheless, whilst the anticipated small number of visits arising from the proposed development is unlikely to result in any significant impact on the interest bird species alone, it is identified that there is the potential for in-combination effects, with the result being that small contributions in recreational effects from a number of allocated developments could have an overall adverse effect on breeding birds within the SPA, and thereby undermine the conservation objectives.</p>
Conclusion – could the proposed development result in a likely significant effect?	
Alone	
No - any increase in recreational pressure from the proposed development alone would be minimal.	
In combination with other plans or projects	
Yes - Whilst predicted increases in recreational pressure arising from the proposed development are minimal, the site lies within the identified 13km zone of influence in regard to recreational effects and could contribute to a significant effect in-combination with other developments. As such, further assessment of potential for recreational disturbance is necessary and an Appropriate Assessment is required.	

Orfordness-Shingle Street SAC

European site interest features	<p>Orfordness-Shingle Street SAC under Article 4(4) of the Directive (92/43/EEC) on this basis of the below Annex I habitats:</p> <p>Qualifying Annex I habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • 1150 Coastal Lagoons • 1210 Annual vegetation of drift lines • 1220 Perennial Vegetation of Stony Banks <p>Qualifying Annex I habitats, not a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • N/A <p>Qualifying Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • N/A <p>Qualifying Annex II species that are not a primary reason for site selection:</p> <ul style="list-style-type: none"> • N/A
Conservation objectives of the European site	<p>The conservation objectives of the SAC are to:</p> <p><i>“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;</i></p> <ul style="list-style-type: none"> • <i>The extent and distribution of qualifying natural habitats</i> • <i>The structure and function (including typical species) of qualifying natural habitats, and</i> • <i>The supporting processes on which qualifying natural habitats rely”</i>
Condition of European site	<p>The most recent condition assessments for the Site of Special Scientific Interest (SSSI) designation which underpins the European designation states that half of the units are in unfavourable - no change condition, with a third being in unfavourable – recovering condition and the remainder in favourable condition.</p>
Threats	<p>A Site Improvement Plan (SIP) has been produced by Natural England in relation to Orfordness-Shingle Street SAC (dated October 2014). This identifies prioritised issues (pressures or threats) affecting the designation:</p>

	<ol style="list-style-type: none"> 1) Hydrological changes; 2) Public access/disturbance; 3) Inappropriate coastal management; 4) Coastal squeeze; 5) Inappropriate pest control; 6) Changes in species distribution; 7) Invasive species; 8) Air pollution (atmospheric nitrogen pollution); and 9) Commercial fisheries.
Screening of likely significant effects	
Recreational disturbance	<p>The allocated development of the site could lead to an increase in 816 new residents (based on up to 340 dwellings supporting an occupation rate of 2.4). Given the distance from the site, a portion of these new residents may use the designation for recreation, which could result in the potential for disturbance to the SAC qualifying habitats. However, at this distance (8.3km) the designation would only be regularly accessible via car. As such, the proportion of residents likely to be making any regular use of these designations for recreational purposes is notably reduced and therefore any increase in recreational pressure from the proposed development alone is likely to be minimal.</p> <p>Nevertheless, whilst the anticipated small number of visits arising from the proposed development is unlikely to result in any significant impact on the habitat interest alone, it is identified that there is the potential for in-combination effects, with the result being that small contributions in recreational effects from a number of allocated developments could have an overall adverse effect on the interest habitats within the SAC, and thereby undermine the conservation objectives.</p>
Conclusion – could the proposed development result in a likely significant effect?	
Alone	
No - any increase in recreational pressure from the proposed development alone would be minimal.	
In combination with other plans or projects	
Yes - Whilst predicted increases in recreational pressure arising from the proposed development are particularly minimal, the site lies within the identified 13km zone of influence in regard to recreational effects and could contribute to a significant effect in-combination with other developments. As such, further assessment of potential for recreational disturbance is necessary and an Appropriate Assessment is required.	

Alde-ore Estuary SPA/Ramsar

European site interest features	<p>Alde-ore Estuary SPA qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting nationally important numbers of the following species listed on Annex I of the Directive:</p> <ul style="list-style-type: none"> • Marsh Harrier <i>Circus aeruginosus</i>; • Avocet; • Little Tern <i>Sterna albifrons</i>; • Sandwich Tern <i>Sterna sandvicensis</i>; and • Ruff <i>Philomachus pugnax</i>. <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <ul style="list-style-type: none"> • Lesser Black-backed Gull <i>Larus fuscus</i>, 14,070 individuals, representing 11.3% of the Western European/Mediterranean/Western African – breeding population (5 year peak mean 1994-1998); and
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	<ul style="list-style-type: none"> Redshank, 1,662 individuals representing 1.5% of the British population and 1.1% of the east Atlantic flyway population (5 year peak mean for the period 1989/90 - 1993/94). <p>Alde-ore Estuary Ramsar qualifies under three criterion, namely:</p> <p>Ramsar criterion 2: A number of nationally-scarce plant species and British Red Data Book invertebrates.</p> <p>Ramsar criterion 3: A notable assemblage of breeding and wintering wetland birds.</p> <p>Ramsar criterion 6: Internationally important wintering population of Lesser Black-backed Gull, Avocet and Redshank.</p>
<p>Conservation objectives of the European site</p>	<p>The conservation objectives of the SPA are to:</p> <p><i>“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;</i></p> <ul style="list-style-type: none"> <i>The extent and distribution of qualifying natural habitats</i> <i>The structure and function (including typical species) of qualifying natural habitats, and</i> <i>The supporting processes on which qualifying natural habitats rely”</i>
<p>Condition of European site</p>	<p>The most recent condition assessments for the Site of Special Scientific Interest (SSSI) designation which underpins the European designation states the approximately half of units are in favourable condition, with the remaining being in unfavourable - recovering and unfavourable – no change condition. However, this is largely on the basis of habitats, and does not necessarily reflect the SPA interest.</p>
<p>Threats</p>	<p>A Site Improvement Plan (SIP) has been produced by Natural England in relation to Alde-ore Estuary SPA (dated October 2014). This identifies prioritised issues (pressures or threats) affecting the designation:</p> <ol style="list-style-type: none"> 1) Hydrological changes; 2) Public access/disturbance; 3) Inappropriate coastal management; 4) Coastal squeeze; 5) Inappropriate pest control; 6) Changes in species distribution; 7) Invasive species; 8) Air pollution (atmospheric nitrogen pollution); and 9) Commercial fisheries.
<p>Screening of likely significant effects</p>	
<p>Recreational disturbance</p>	<p>The allocated development of the site could lead to an increase in 816 new residents (based on up to 340 dwellings supporting an occupation rate of 2.4). Given the distance from the site, a portion of these new residents may use the estuary for recreation, which could result in the potential for disturbance to SPA qualifying species, particularly birds, primarily resulting from dogs that are allowed to roam off-lead into estuarine areas. However, at this distance (8.3km) the designation would only be regularly accessible via car. As such, the proportion of residents likely to be making any regular use of these designations for recreational purposes is notably reduced (with regular daily activity such as dog walking likely to not include the SPA) and therefore any increase in recreational pressure from the proposed development alone is likely to be minimal.</p> <p>Nevertheless, whilst the anticipated small number of visits arising from the proposed development is unlikely to result in any significant impact on the interest bird species alone, it is identified that there is the potential for in-combination effects, with the result being that small contributions in recreational effects from a</p>

	number of allocated developments could have an overall adverse effect on breeding birds within the SPA, and thereby undermine the conservation objectives.
Conclusion – could the proposed development result in a likely significant effect?	
Alone	
No - any increase in recreational pressure from the proposed development alone would be minimal.	
In combination with other plans or projects	
Yes - Whilst predicted increases in recreational pressure arising from the proposed development are particularly minimal, the site lies within the identified 13km zone of influence in regard to recreational effects and could contribute to a significant effect in-combination with other developments. As such, further assessment of potential for recreational disturbance is necessary and an Appropriate Assessment is required.	

Sandlings SPA

European site interest features	<p>Sandlings SPA qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting nationally important numbers of the following species listed on Annex I of the Directive:</p> <ul style="list-style-type: none"> • Nightjar <i>Caprimulgus europaeus</i>; and • Woodlark <i>Lullula arborea</i>.
Conservation objectives of the European site	<p>The conservation objectives of the SPA are to:</p> <p><i>“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;</i></p> <ul style="list-style-type: none"> • <i>The extent and distribution of the habitats of the qualifying features</i> • <i>The structure and function of the habitats of the qualifying features</i> • <i>The supporting processes on which the habitats of the qualifying features rely</i> • <i>The population of each of the qualifying features, and,</i> • <i>The distribution of the qualifying features within the site”</i>
Condition of European site	<p>The most recent condition assessments for the Site of Special Scientific Interest (SSSI) designations which underpin the European designation states the vast majority of units are in unfavourable - recovering condition, with a single unit in unfavourable – declining condition. However, this is largely on the basis of habitats, and does not necessarily reflect the SPA interest.</p>
Threats	<p>A Site Improvement Plan (SIP) has been produced by Natural England in relation to Alde-ore Estuary SPA (dated May 2015). This identifies prioritised issues (pressures or threats) affecting the designation:</p> <ol style="list-style-type: none"> 1) Changes in species distribution; 2) Inappropriate scrub control; 3) Deer; 4) Air pollution (atmospheric nitrogen pollution); and 5) Public access/disturbance.
Screening of likely significant effects	
Recreational disturbance	<p>The allocated development of the site could lead to an increase in 816 new residents (based on up to 340 dwellings supporting an occupation rate of 2.4). Given the distance from the site, a portion of these new residents may use the designation for recreation, which could result in the potential for disturbance to SPA qualifying species, particularly birds, primarily resulting from dogs that are allowed to roam off-lead into estuarine areas. However, at this distance (9.2km) the designation would only be regularly accessible via car. As such, the proportion of residents likely to be making any regular use of these designations for recreational purposes is notably reduced (with regular daily activity such as dog walking likely to not include</p>

	<p>the SPA) and therefore any increase in recreational pressure from the proposed development alone is likely to be minimal.</p> <p>Nevertheless, whilst the anticipated small number of visits arising from the proposed development is unlikely to result in any significant impact on the interest bird species alone, it is identified that there is the potential for in-combination effects, with the result being that small contributions in recreational effects from a number of allocated developments could have an overall adverse effect on breeding birds within the SPA, and thereby undermine the conservation objectives.</p>
Conclusion – could the proposed development result in a likely significant effect?	
Alone	
No - any increase in recreational pressure from the proposed development alone would be minimal.	
In combination with other plans or projects	
Yes - Whilst predicted increases in recreational pressure arising from the proposed development are particularly minimal, the site lies within the identified 13km zone of influence in regard to recreational effects and could contribute to a significant effect in-combination with other developments. As such, further assessment of potential for recreational disturbance is necessary and an Appropriate Assessment is required.	

Alde-ore and Butley Estuaries SAC

European site interest features	<p>Alde-ore and Butley Estuaries SAC under Article 4(4) of the Directive (92/43/EEC) on this basis of the below Annex I habitats:</p> <p>Qualifying Annex I habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • 1130 Estuaries <p>Qualifying Annex I habitats, not a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • 1140 Mudflats and sandflats not covered by seawater at low tide • 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) <p>Qualifying Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • N/A <p>Qualifying Annex II species that are not a primary reason for site selection:</p> <ul style="list-style-type: none"> • N/A
Conservation objectives of the European site	<p>The conservation objectives of the SAC are to:</p> <p><i>“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;</i></p> <ul style="list-style-type: none"> • <i>The extent and distribution of qualifying natural habitats</i> • <i>The structure and function (including typical species) of qualifying natural habitats, and</i> • <i>The supporting processes on which qualifying natural habitats rely”</i>
Condition of European site	<p>The most recent condition assessments for the Site of Special Scientific Interest (SSSI) designation which underpins the European designation states that the majority of the units are in favourable condition, with a number in unfavourable – recovering condition.</p>
Threats	<p>A Site Improvement Plan (SIP) has been produced by Natural England in relation to Alde-ore and Butley SAC (dated October 2014). This identifies prioritised issues (pressures or threats) affecting the designation:</p> <p>1) Hydrological changes;</p>

	<ul style="list-style-type: none"> 2) Public access/disturbance; 3) Inappropriate coastal management; 4) Coastal squeeze; 5) Inappropriate pest control; 6) Changes in species distribution; 7) Invasive species; 8) Air pollution (atmospheric nitrogen pollution); and 9) Commercial fisheries.
Screening of likely significant effects	
Recreational disturbance	<p>The allocated development of the site could lead to an increase in 816 new residents (based on up to 340 dwellings supporting an occupation rate of 2.4). Given the distance from the site, a portion of these new residents may use the estuary for recreation, which could result in the potential for disturbance to SAC qualifying habitats. However, at this distance (11.5km) the designation would only be regularly accessible via car. As such, the proportion of residents likely to be making any regular use of these designations for recreational purposes is notably reduced and therefore any increase in recreational pressure from the proposed development alone is likely to be minimal.</p> <p>Nevertheless, the Site Improvement Plan for the designation does not identify any features sensitive to recreational pressure and raises no concern regarding public access/disturbance. On this basis, the designation has been excluded from the Suffolk HRA RAMS. On this basis, although the proposed development could result in small number of visits, it is unlikely to result in any significant impact on the habitat interest alone, either alone or in-combination with other projects.</p>
Conclusion – could the proposed development result in a likely significant effect?	
Alone	
No - the Site Improvement Plan for the designation does not identify any features sensitive to recreational pressure and raises no concern regarding public access/disturbance.	
In combination with other plans or projects	
No - the Site Improvement Plan for the designation does not identify any features sensitive to recreational pressure and raises no concern regarding public access/disturbance.	

3.2. Stage 2 – Appropriate Assessment

Stour and Orwell Estuaries SPA/Ramsar

<p>Do the proposals, in-combination with other relevant plans and projects have the potential to affect the integrity of the European designation, given the sites’ conservation objectives?</p>
<p>Development of the site could lead to an increase in 816 new residents (based on 340 dwellings supporting an occupation rate of 2.4). Given the proximity to the site, a proportion of these new residents may use the estuary for recreation, which could result in the potential for disturbance to interest species, particularly birds, primarily resulting from dogs that are allowed to roam off-lead into estuarine areas. However, although the site is located approximately 1.6km from the Stour and Orwell SPA and Ramsar, the shortest return walking route to and from the designation is substantially further at a distance of approximately 5.2km, whilst the shortest circular walk including the designation would measure approximately 7.8km. As such, residents would be unlikely to incorporate this route into any daily walking activity² and would typically drive to the site in order to make use of the site.</p> <p>From a review of OS mapping, the closest car park associated with the designation is the Suffolk Levington Car Park, located approximately 5.7km from the site and a 10.1km/11 minute drive. However, although this links to the Stour and Orwell Walk footpath, it is not possible to complete a circular walk within the</p>

² Research undertaken in respect of Thames Basin Heaths found that the route lengths of visitors measure on average between 1,2km and 4.9km, with dog walkers typically walking for 2.5km. Further detail is set out within the English Nature Research Report: Visitor Access Patterns on the Thames Basin Heaths (2005).

designation. Any circular walk incorporating this stretch of path would therefore need to include roads associated with Levington itself and therefore this route is unlikely to be particularly attractive/used frequently by dog walkers, particularly given the numerous alternative recreational opportunities are available within the nearer vicinity of the site through the use of the existing road and footpath network (see Plan 5309/HRA3). The next nearest car park associated with the designation is Bridge Wood car park (associated with Orwell Country Park), located approximately 9.3km from the site and an 11.6km/10 minute drive. However, visitor surveys undertaken of the Orwell Country Park in March 2015 identified most visitors lived within a few km of the country park, with 25% living within 3.56km of the site³. Further, none of the visitors originated from Trimley St. Martin⁴, such that new residents within Trimley St. Martin would be equally unlikely to visit Orwell Country Park.

New residents would have the option of using an alternative car park at Trimley Train Station which is located approximately 1.0km from the site and a 1.7km/3 minute drive. However, use of this car park would involve a 5.4km return journey via a shipping port in order to reach the designation and any walking route involving the SPA would be well beyond the distance of an average dog walk. On this basis, this route will not be frequently used, particularly given the numerous alternative recreational opportunities are available within the nearer vicinity of the site through the use of the existing road and footpath network (see Plan 5309/HRA3).

Whilst small number of visits arising from the proposed development is unlikely to result in any significant impact on the interest bird species alone, it is identified that there is the potential for in-combination effects and therefore mitigation will be required to offset these effects.

Given the proximity to the site and scale of development, a mitigation package is proposed, as detailed below.

Proposed avoidance and/or mitigation measures	
Contribution to Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)	<p>A strategic approach to mitigating in-combination effects of residential development is in place, named the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). Any development within the identified zone of influence around a number of Suffolk coastal designations (including Stour and Orwell Estuaries SPA/Ramsar) will be required to provide a financial contribution towards offsite visitor management measures including wardens, improved signage, education and monitoring. Based on the location of the site, it is understood that a per dwelling tariff of £121.89 will be required, which will equate to up to £41,442.60 for up to 340 dwellings.</p> <p>Natural England has issued advice which sets out that for developments of up to 50 units, a scheme can demonstrate no adverse effects on the Suffolk Coast designations subject to payment of the RAMS tariff. However, for schemes larger than 50 units, Natural England advises that additional mitigation measures may need to be considered.</p> <p>On this basis, given the scale of this development, it is necessary to consider additional measures to mitigate for the potential increase in recreational use of the Stour and Orwell Estuaries SPA/Ramsar, in addition to financial contributions to the Suffolk Coast RAMS, as set out below.</p>
Additional measures on top of contributions to Suffolk Coast RAMS (Open space provision and education)	<p>Given that the SPA is unlikely to be regularly accessed by foot, that nearby car parks are not ideally located and the numerous abundant options for daily dog walks in the immediate vicinity of the site, additional measures (on top of financial contributions as part of the HRA RAMS) need not be extensive in order to safeguard the designation. Nevertheless, the following will also be provided:</p> <p>The proposed development will incorporate several small areas of semi-natural public open space. This open space will be designed to provide high-quality,</p>

³ Sibbett, N. (2015) Visitor Survey for Orwell Country Park. Report by the Landscape Partnership for Ipswich Borough Council.

⁴ Sibbett, N. (2015) Visitor Survey for Orwell Country Park. Report by the Landscape Partnership for Ipswich Borough Council.

	<p>informal, semi-natural areas for new residents, including new planting and areas of wildflower grassland, in addition to a fenced dedicated dog off-lead area with dog waste bins. A commitment will also be made to the long-term maintenance and management of this open space provision, which could be secured through a suitably worded planning condition. The intention being that open space provision will be incorporated into routine daily dog walks, although in reality these areas would only contribute to a portion of a daily dog walk and therefore further measures are set out below.</p> <p>Three information boards will be provided at the site boundaries where dog walkers will exit the site which will promote the existing PRoW's within the near vicinity of the site. In this regard, a variety of suitable circular walks measuring 3.1km-4.3km have been highlighted at Plan 5309/HRA3, which will provide abundant opportunities for daily walks. Research undertaken in respect of Thames Basin Heaths SPA identified that non-SPA site visitors showed a preference for routes that are within easy walking distance of home, are waymarked, of varying lengths and include surfaced path⁵. The routes illustrated are therefore likely to be particularly attractive to residents. Furthermore, these routes comprise a mixture of off-road paths and tracks through open agricultural fields and wooded belts and past ponds, as well as along roads, and therefore provides a variety of options suitable for year-round use. The inclusion of a variety of habitats along a route is of particular importance and has been shown as a preference of walkers within research undertaken in respect of Thames Basin Heaths SPA.</p> <p>These routes, including a variety of habitats are likely to be attractive to new residents⁶. As set out above, the shortest circular route to include the designation is approximately 7.8km in length which would be too long for any regular use and therefore the alternatives set out at Plan 5309/HRA3 are more likely to be used by new residents.</p> <p>Information leaflets will also be provided in new homeowner packs which will highlight the sensitivities of the designation, measures to minimise adverse effects on the designation during any visits, highlight the location of the onsite information boards and reiterate the variety of PRoW's within the near vicinity of the site.</p>
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Conclusion – with the implementation of mitigation, will the proposals in-combination with other plans or projects avoid an adverse effect on integrity of a European designation?
<p>Yes.</p> <p>Following the implementation of mitigation including: financial contribution to Suffolk Coast RAMS; provision of onsite open space with a commitment to ongoing management; and signage and information regarding the sensitivities of the SPA/Ramsar, as well the PRoW network available in the vicinity of the site, any potential adverse effects on the integrity of the SPA as a result of recreational disturbance will be avoided, and the proposed development, alone and in-combination with other plans and projects, would not result in an adverse effect on integrity of Stour and Orwell Estuaries SPA/Ramsar in view of the site's conservation objectives.</p> <p>Therefore, it is considered that no further assessment is required and proceeding to Stage 3 is not necessary.</p>

Deben Estuary SPA/Ramsar

⁵ English Nature (May 2006) Thames Basin Heaths Special Protection Area: Mitigation Standard for Residential Development. Draft version.

⁶ English Nature (May 2006) Thames Basin Heaths Special Protection Area: Mitigation Standard for Residential Development. Draft version.

Do the proposals, in-combination with other relevant plans and projects have the potential to affect the integrity of the European designation, given the sites' conservation objectives?	
<p>Development of the site could lead to an increase in 816 new residents (based on 340 dwellings supporting an occupation rate of 2.4). Given the proximity to the site, a proportion of these new residents may use the estuary for recreation, which could result in the potential for disturbance to interest species, particularly birds, primarily resulting from dogs that are allowed to roam off-lead into estuarine areas. The site is located approximately 3.5km from the Deben Estuary SPA and Ramsar, although the shortest return walking route between the site and designation is substantially further at a distance of approximately 10.2km⁷. In any event, numerous alternative recreational opportunities are available within the nearer vicinity of the site through the use of the existing road and footpath network (as set out above, and on Plan 5309/HRA3). On this basis, any increase in recreational pressure from the proposed development alone will be nugatory.</p> <p>Whilst small number of visits arising from the proposed development is unlikely to result in any significant impact on the interest bird species alone, it is identified that there is the potential for in-combination effects and therefore mitigation will be required to offset these effects.</p> <p>As such, given the location of the site within the identified 13km zone of influence, a mitigation package is proposed, as detailed below.</p>	
Proposed avoidance and/or mitigation measures	
Contribution to Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)	The site is also located within the identified zone of influence for the Deben Estuary SPA/Ramsar and therefore a financial contribution will be required in line with the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The level of contribution required is set out above in relation to mitigation measures for the Stour and Orwell Estuaries SPA/Ramsar.
Additional measures on top of contributions to Suffolk Coast RAMS (Open space provision and education)	The proposed measures set out with regard to Stour and Orwell Estuaries SPA/Ramsar will also mitigate for any minimal in-combination effects on the Deben Estuary SPA/Ramsar, as a result of increased recreational use.

Conclusion – with the implementation of mitigation, will the proposals in-combination with other plans or projects avoid an adverse effect on integrity of a European designation?
<p>Yes.</p> <p>Following the implementation of mitigation set out in this document, potential adverse effects as a result of recreational disturbance will be avoided, and the proposed development, alone and in-combination with other plans and projects, would not result in an adverse effect on integrity of the Deben Estuary SPA/Ramsar in view of the site's conservation objectives.</p> <p>Therefore, it is considered that no further assessment is required and proceeding to Stage 3 is not necessary.</p>

Orfordness-Shingle Street SAC, Alde-ore Estuary SPA/Ramsar and Sandlings SPA

Do the proposals, in-combination with other relevant plans and projects have the potential to affect the integrity of the European designation, given the sites' conservation objectives?
<p>Development of the site could lead to an increase in 816 new residents (based on 340 dwellings supporting an occupation rate of 2.4). Given the distance from the site, a proportion of these new residents may use the Orfordness-Shingle Street SAC, Alde-ore Estuary SPA/Ramsar and/or Sandlings SPA which could result in the potential for disturbance to interest habitats/species. However, the site is located approximately 8.3km-11.5km from these designations such that these designations would only be regularly accessible via car. As such, the proportion of residents likely to be making any regular use of these designations for recreational purposes is notably reduced and highly unlikely to include any regular daily activity such as</p>

⁷ Lake, S., Petersen, C., Panter, C. & Liley, D. (2014) Deben Estuary Visitor Survey. Unpublished Report, Footprint Ecology / Deben Estuary Partnership.

dog walking (for the same reasons as discussed above). On this basis, any increase in recreational pressure from the proposed development alone is likely to be particularly minimal.

Whilst these very small number of visits arising from the proposed development is unlikely to result in any significant impact on the interest habitat/bird species alone, it is acknowledged that there is the potential for in-combination effects and therefore mitigation will be required to offset these effects.

As such, given the location of the site within the identified 13km zone of influence, a mitigation package is proposed, as detailed below.

Proposed avoidance and/or mitigation measures	
Contribution to Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)	The site is also located within the identified zone of influence for the Orfordness-Shingle Street SAC, Alde-ore Estuary SPA/Ramsar and Sandlings SPA and therefore a financial contribution will be required in line with the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The level of contribution required is set out above in relation to mitigation measures for the Stour and Orwell Estuaries SPA/Ramsar.
Additional measures on top of contributions to Suffolk Coast RAMS (Open space provision and education)	No additional measures are necessary to mitigate for in-combination effects of recreational use on these designations. Nevertheless, the proposed measures set out with regard to Stour and Orwell Estuaries SPA/Ramsar will also mitigate for any minimal in-combination effects on the Orfordness-Shingle Street SAC, Alde-ore Estuary SPA/Ramsar and Sandlings SPA, as a result of increased recreational use.

Conclusion – with the implementation of mitigation, will the proposals in-combination with other plans or projects avoid an adverse effect on integrity of a European designation?

Yes.

Following the implementation of mitigation set out in this document, potential adverse effects as a result of recreational disturbance will be avoided, and the proposed development, alone and in-combination with other plans and projects, would not result in an adverse effect on integrity of the Orfordness-Shingle Street SAC, Alde-ore Estuary SPA/Ramsar and Sandlings SPA in view of the site’s conservation objectives.

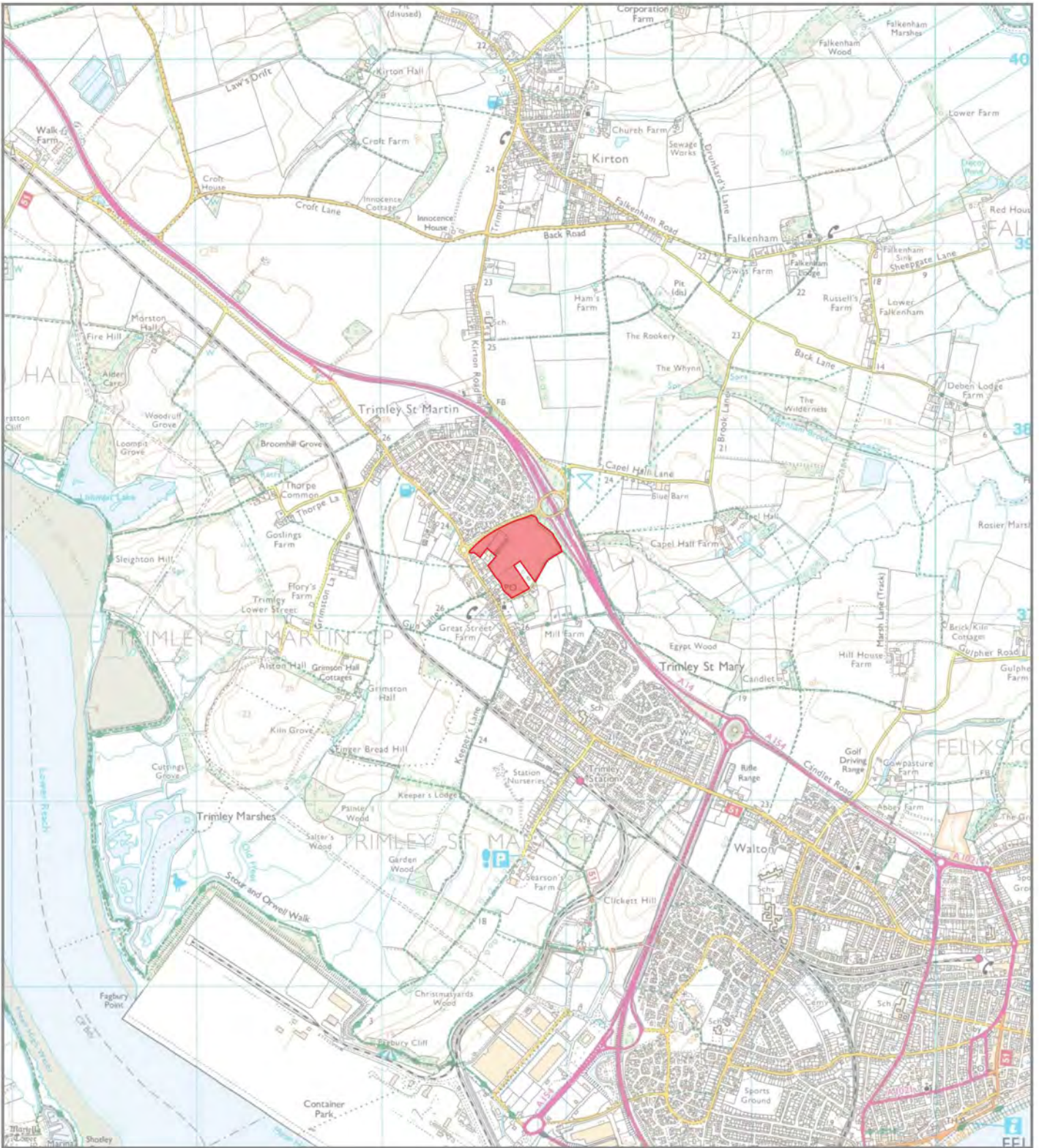
Therefore, it is considered that no further assessment is required and proceeding to Stage 3 is not necessary.

4. Summary

- 4.1.1. This document provides information to inform a Habitats Regulations Assessment of the proposed development, given the presence of a number of European designations within the site surrounds.
- 4.1.2. An initial assessment determined that the proposals do not relate to the management of the designations. A screening exercise has been undertaken to identify whether the proposed development could result in a likely significant effect on European designations, both alone and in-combination with other plans and projects.
- 4.1.3. The exercise concluded that no likely significant effect would occur in relation to the proposals alone.
- 4.1.4. In relation to cumulative effects, it is considered the cumulative impacts from all new residential developments within the Borough could generate a likely significant effect upon Stour and Orwell Estuaries SPA/Ramsar, Deben Estuary SPA/Ramsar, Orfordness-Shingle Street SAC, Alde-ore Estuary SPA/Ramsar and Sandlings SPA, albeit the contribution from the proposals itself is considered to be nugatory.
- 4.1.5. The Appropriate Assessment has concluded that, following the implementation of mitigation measures, in the form of a financial contribution to Suffolk Coast RAMS, and provision of onsite open space, as well the PRoW network available in the vicinity of the site, the proposed development would have no effect on the integrity of Stour and Orwell Estuaries SPA and Ramsar nor the other surrounding European designations either alone or in-combination with other plans and projects, and therefore no further assessment is required.

Plan 5309/HRA1:

Site Location



Key:

 Site Location

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Land off Howlett Way,
 Trimley St. Martin

Site Location TITLE

5309/HRA1 DRAWING NO.

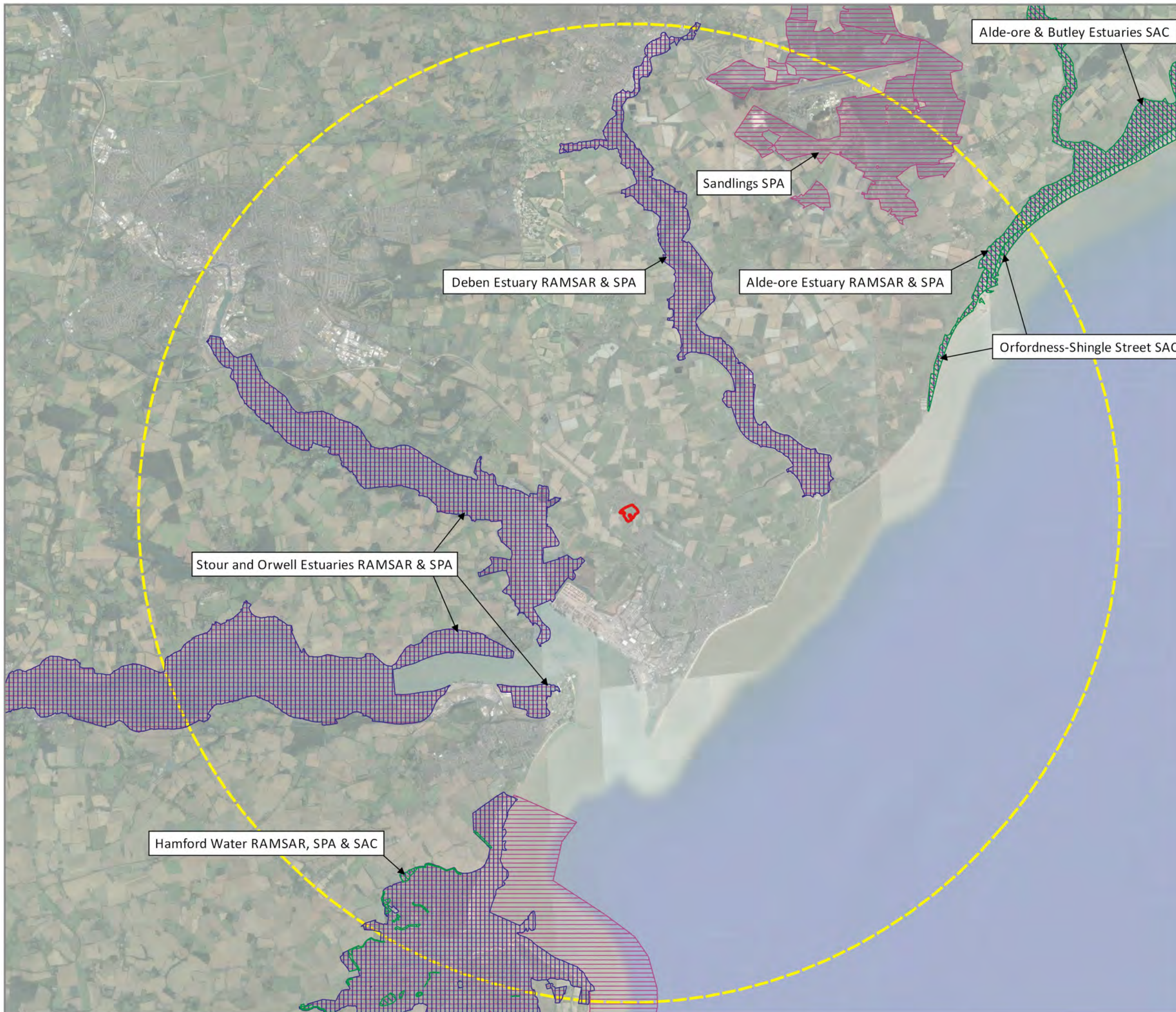
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April 2020 DATE



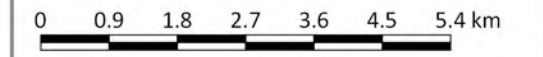
Plan 5309/HRA2:

Ecological Designations considered under the Local Plan HRA



Key:

-  Site Boundary
-  13km Buffer
-  RAMSAR
-  Special Area of Conservation (SAC)
-  Special Protection Area (SPA)



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Land off Howlett Way,
 Trimley St. Martin
 Ecological Designations considered
 under the Local Plan HRA

5309/HRA2

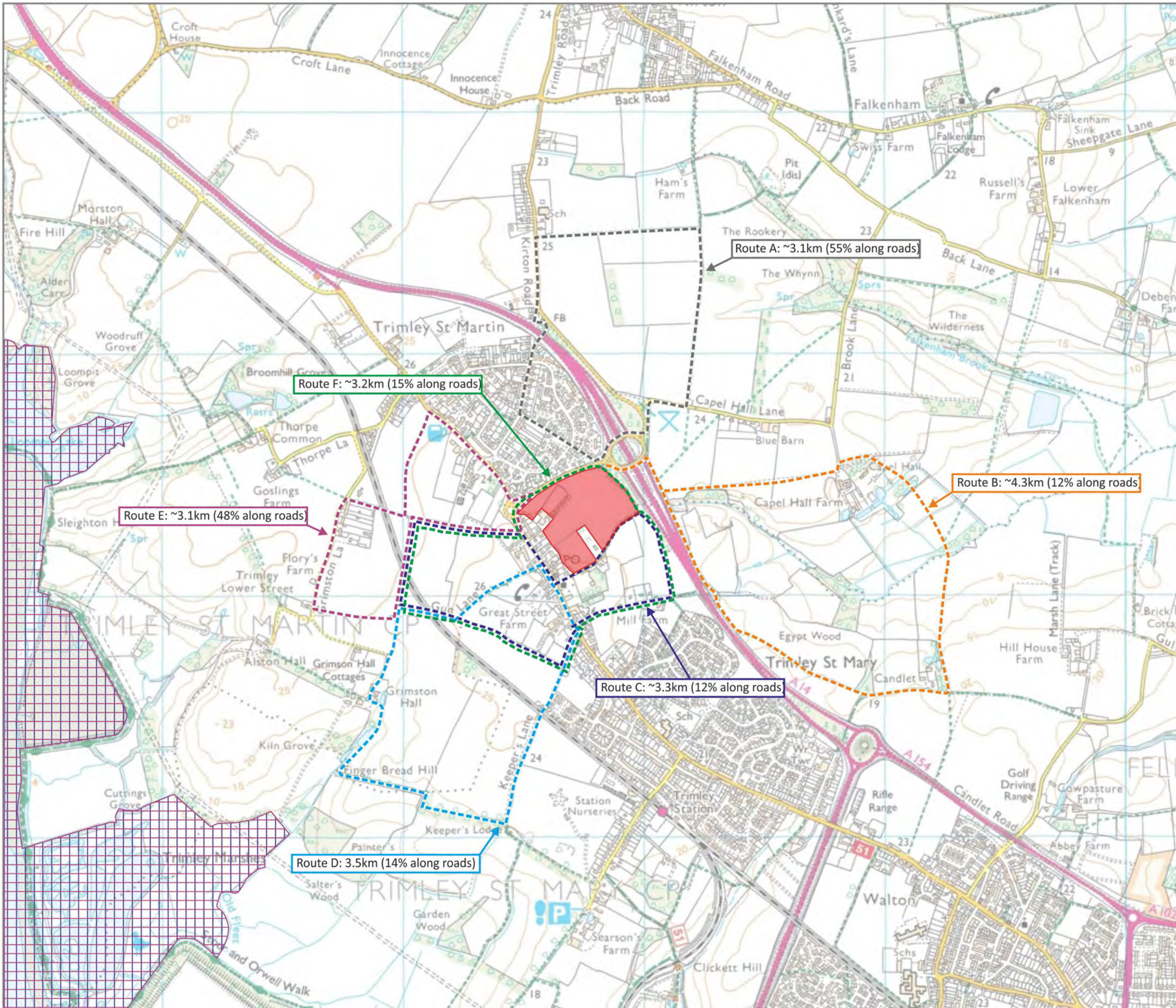


April 2020

PROJECT	
TITLE	
DRAWING NO.	
REV	
DATE	

Plan 5309/HRA3:

Walking Route Options



- Key:
-  Site Boundary
 -  Footpath Route Options
 -  Stour and Orwell Estuaries SPA/RAMSAR

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Land off Howlett Way,
 Trimley St. Martin
 Walking Route Options

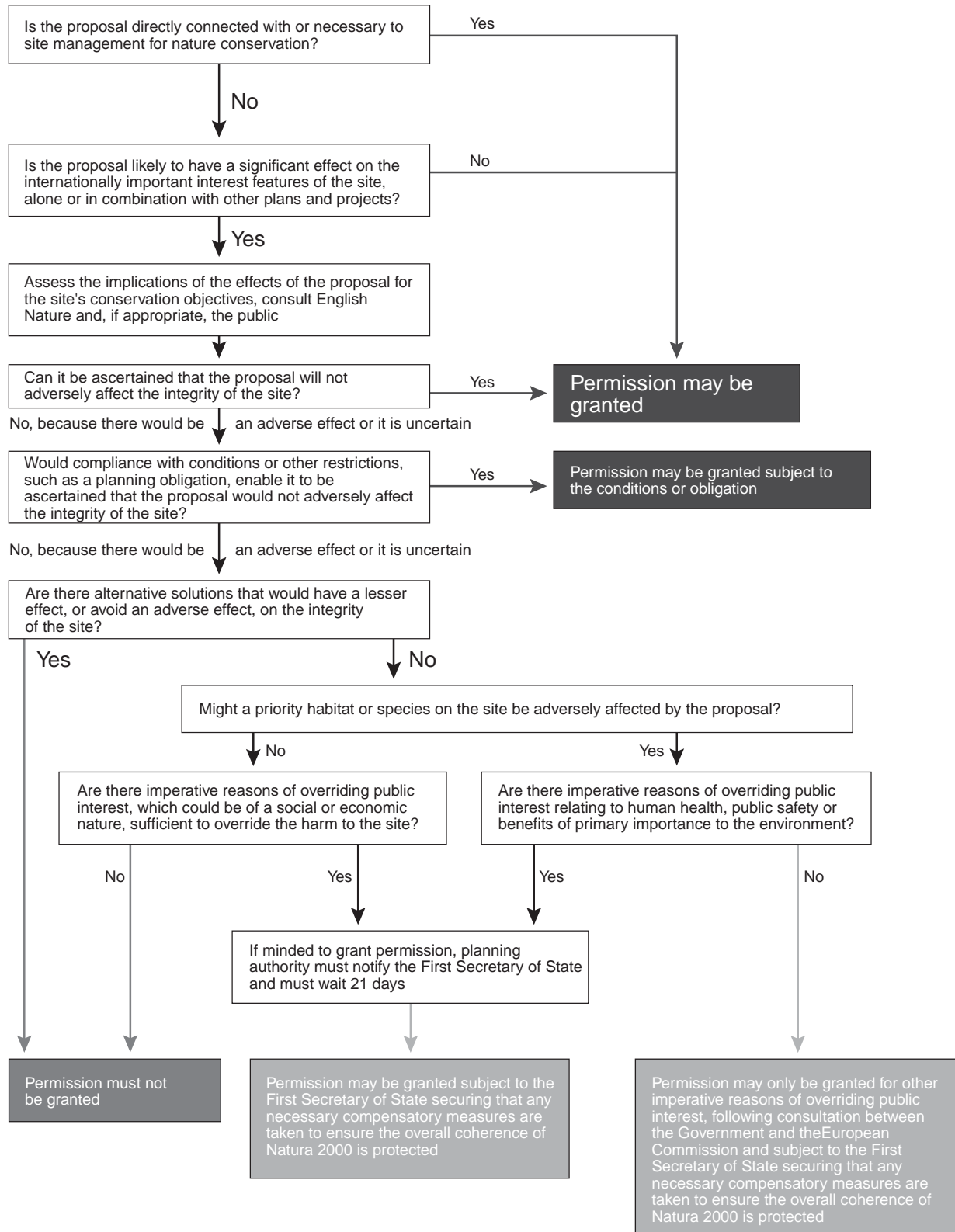
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DRAWING NO.	5309/HRA3
REV.	-
DATE	April 2020



Appendix 5309/1:

(Figure 1) within ODPM circular 06/2005

Figure 1: Consideration of development proposals affecting Internationally Designated Nature Conservation Sites



ecology • landscape planning • arboriculture

aspect

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