



Stradbroke Neighbourhood Plan 2024-2044

Habitats Regulations Assessment Screening Report

Babergh & Mid Suffolk District Councils

Final report

Prepared by LUC

June 2026

Version	Status	Prepared	Checked	Approved	Date
1	Draft HRA Screening Report	J. Blake E. Mayhead	O. Dunham	K. Nicholls	05.06.2026
2	Final HRA Screening Report	J. Blake E. Mayhead	O. Dunham	K. Nicholls	10.06.2026



Land Use Consultants Limited

Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. Printed on 100% recycled paper

Contents

Chapter 1	5
Introduction	
The requirement to undertake Habitats Regulations Assessment of development plans	5
Stages of Habitat Regulation Assessment	7
Requirements of the Habitat Regulations	7
Typical stages	8
Case law changes	10
Structure of this report	13
 Chapter 2	 14
Stradbroke Neighbourhood Plan	
Vision and Objectives	14
Policies	15
 Chapter 3	 17
Methodology	
Screening Assessment	17
Identifying European sites that may be affected and their conservation objectives	17
Assessment of 'likely significant effects' of the plan	19
Interpretation of 'likely significant effects'	20
Mitigation provided by the plan	21
Assessment of potential in-combination effects	21
 Chapter 4	 23
Screening Assessment	
HRA Screening of Policies	23
Potential Impact Pathways	27
Screening conclusion	36

Chapter 5 **38**

Conclusion and next steps

Next steps 38

Appendix A **40**

Map of European Sites within 20 km of Stradbroke Neighbourhood Plan Area

Appendix B **44**

Attributes of European Sites

Alde-Ore and Butley Estuaries SAC	44
Alde-Ore Estuary SPA	46
Alde-Ore Estuary Ramsar site	47
Broads SAC	49
Broadlands SPA	53
Broadland Ramsar site	55
Dew's Pond SAC	56
Minsmere to Walberswick Heaths and Marshes SAC	57
Minsmere-Walberswick SPA	58
Minsmere-Walberswick Ramsar site	61
Redgrave and South Lopham Fens Ramsar site	62
Sandlings SPA	63
Waveney and Little Ouse Valley Fens SAC	64

References **67**

Chapter 1

Introduction

1.1 LUC has been commissioned by Babergh and Mid Suffolk District Councils ('the Councils') to carry out Habitat Regulations Assessment (HRA) Screening of the Stradbroke Neighbourhood Plan Review, which is being prepared to replace the current Neighbourhood Plan. The Neighbourhood Plan is being prepared by Stradbroke Parish Council in accordance with the requirements of the Government's Neighbourhood Planning Regulations and will cover the period 2024-2044. This HRA Screening Report relates to the Regulation 14 Pre-Submission Draft of the Stradbroke Neighbourhood Plan Review (March 2026), referred to hereafter as 'the Neighbourhood Plan Review'.

The requirement to undertake Habitats Regulations Assessment of development plans

1.2 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007 [See reference 1]; the currently applicable version is the Habitats Regulations 2017 [See reference 2], as amended. Neighbourhood Plans, once 'made' (adopted), become part of the statutory development plan therefore an HRA is required by law to be carried out by the 'competent authority' (the Councils). The Councils can commission consultants to undertake HRA work on their behalf and this (the work documented in this report) is then reported to and considered by the Councils as the 'competent authority'. The Councils will consider this work and would usually only progress a Plan if it considers that the Plan will not adversely affect the integrity [See reference 3] of any 'European site', as defined below (the exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated; see paragraph 1.14). The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance (PPG) [See reference 4].

1.3 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). These were classified under European Union (EU) legislation but, since 1 January 2021, are protected in the UK by the Habitats Regulations 2017 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and

species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive [\[See reference 5\]](#)) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Before EU exit day, designation of SACs also had regard to the coherence of the 'Natura 2000' network of European sites. After EU exit day, regard is had to the importance of such sites for the coherence of the UK's 'national site network'.
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive [\[See reference 6\]](#)), and for regularly occurring migratory species not listed in Annex I.

1.4 The term 'European sites' has been commonly used in HRA to refer to 'Natura 2000' sites [\[See reference 7\]](#) and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper [\[See reference 8\]](#) on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network';
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations; and
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

1.5 Although Ramsar sites do not form part of the new national site network, Government guidance [\[See reference 9\]](#) states that:

"Any proposals affecting the following sites would also require an HRA because these are protected by government policy:

- Proposed SACs
- Potential SPAs
- Ramsar sites – wetlands of international importance (both listed and proposed)
- Areas secured as sites compensating for damage to a European site."

1.6 Furthermore, the NPPF [See reference 10] and practice guidance [See reference 11] currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

1.7 For simplicity, this report uses the term ‘European site’ to refer to all types of designated site for which Government guidance [See reference 12] requires an HRA.

1.8 The overall purpose of an HRA is to conclude whether or not a proposal or policy, or whole development plan would adversely affect the integrity of the European site in question. This is judged in terms of the implications of the plan for a site’s ‘qualifying features’ (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of Habitat Regulation Assessment

1.9 The HRA of development plans is undertaken in stages (as described below) and should conclude whether or not a proposal would adversely affect the integrity of the European site in question.

1.10 LUC has been commissioned by Babergh and Mid Suffolk District Councils to carry out HRA work on the Councils’ behalf, and the outputs will be reported to and considered by the Councils as the competent authority.

1.11 The HRA also requires close working with Natural England as the statutory nature conservation body [See reference 13] in order to obtain the necessary information, agree the process, outcomes and mitigation proposals. The Environment Agency, while not a statutory consultee for the HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities.

Requirements of the Habitat Regulations

1.12 In assessing the effects of a Plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the ‘Habitats Regulations’), there are potentially two tests to be applied by the competent authority:

a 'Significance Test', followed, if necessary, by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, proceed to Step 2.
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects (the 'Significance Test'). [These two steps are undertaken as part of Stage 1: Screening, shown below in the 'Typical stages' section.] If yes, proceed to Step 3.
- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the European site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public. [This step is undertaken during Stage 2: Appropriate Assessment, described in the 'Typical stages' section below.]
- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the land use plan only after having ascertained that the plan would not adversely affect the integrity of a European site. [This step follows Stage 2 where a finding of 'no adverse effect' is concluded. If it cannot be it proceeds to Step 5 as part of Stage 3 of the HRA process.]
- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a European site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for 'imperative reasons of overriding public interest' (IROPI). [This step is undertaken during Stage 3: Assessment where no alternatives exist and adverse impacts remain considering mitigation, described in the 'Typical stages' section overleaf.]

Typical stages

1.13 The section below summarises the stages and associated tasks and outcomes typically involved in carrying out a full HRA of a development plan, based on various guidance documents [See reference 14] [See reference 15] [See reference 16]. This report presents the methodology and findings of Stage 1: Screening.

Stage 1: Screening (the ‘Significance Test’)

Tasks

- Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites.
- Identification of potentially affected European sites and their conservation objectives [\[See reference 17\]](#).
- Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction (‘mitigation’) measures [\[See reference 18\]](#).

Outcome

- Where effects are unlikely, prepare a ‘finding of no significant effect report’.
- Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

Stage 2: Appropriate Assessment (the ‘Integrity Test’)

Task

- Information gathering (development plan and data on European sites [\[See reference 19\]](#)).
- Impact prediction.
- Evaluation of development plan impacts in view of conservation objectives of European sites.
- Where impacts are considered to directly or indirectly affect qualifying features of European sites, identify how these effects will be avoided or reduced (‘mitigation’).

Outcome

- Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided or reduced, including the mechanisms and timescale for these mitigation measures.

- If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.

Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation

Task

- Identify 'imperative reasons of overriding public interest' (IROPI).
- Demonstrate no alternatives exist.
- Identify potential compensatory measures.

Outcome

- This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.14 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid or reduce effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

Case law changes

1.15 This HRA is being prepared in accordance with relevant case law findings, including most notably the 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

1.16 The People over Wind, Peter Sweetman v Coillte Teoranta (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the Screening stage. The precise wording of the ruling is as follows:

"Article 6(3)... must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of

the implications, for a site concerned, of a plan or project, it is not appropriate, at the Screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.”

1.17 In light of the above, the HRA Screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Neighbourhood Plan Review could result in likely significant effects on European sites, with any such measures are to be considered at the Appropriate Assessment stage as relevant.

1.18 This HRA also fully considers the *Holohan v An Bord Pleanala* (November 2018) judgment which stated that:

“Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘appropriate assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.”

1.19 In undertaking this HRA, LUC will (where necessary) fully consider the potential effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and/or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, will also be fully considered where needed.

1.20 Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat will be considered where needed in the HRA, in line with the High Court judgment in *RSPB and others v Secretary of State and London Ashford Airport Ltd* [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

“There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a

protected site is to be ignored. The indirect effect was still protected. Although the question of its legal status was mooted, I am satisfied... that while no particular legal status attaches to FLL, the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice.”

1.21 In addition to this, the HRA will take into consideration the ‘Wealden’ judgment from the Court of Justice for the European Union.

1.22 Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

1.23 In light of this judgment, the HRA will therefore, where needed, consider traffic growth based on the effects of development from the Neighbourhood Plan Review in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

1.24 The HRA also takes into account the Grace and Sweetman (July 2018) judgment from the CJEU which stated that:

“There is a distinction to be drawn between protective measures forming part of a project and intended avoid or reduce any direct adverse effects that may be caused by the project in order to ensure that the project does not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project”

“As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future”

“A mitigation strategy may only be taken into account at AA (a.6(3)) where the competent authority is “sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area””

“Otherwise it falls to be considered to be a compensatory measure to be considered under a.6(4) only where there are “imperative reasons of overriding public interest””

1.25 Therefore, if an Appropriate Assessment of the Neighbourhood Plan Review is required, it will only consider the existence of measures to avoid or reduce its direct adverse effects (mitigation) if the expected benefits of those measures are beyond reasonable doubt at the time of the assessment.

Structure of this report

1.26 This chapter (Chapter 1) has described the background to the production of the Stradbroke Neighbourhood Plan Review and the requirement to undertake HRA. The remainder of the report is structured as follows:

- Chapter 2: Stradbroke Neighbourhood Plan Review – summarises the content of the Pre-Submission Draft document, which is the subject of this report.
- Chapter 3: Method – sets out the approach and the specific tasks undertaken during the Screening stage of the HRA.
- Chapter 4: Screening Assessment – describes the findings of the Screening stage of the HRA.
- Chapter 5: Conclusions and Next Steps – summarises the HRA Screening conclusions for the Stradbroke Neighbourhood Plan Review and describes the next steps to be undertaken.

Chapter 2

Stradbroke Neighbourhood Plan

Vision and Objectives

2.1 The overarching vision for Stradbroke for the period up to 2044 is:

“Stradbroke's vision is to be a core village that works for the needs of its residents and surrounding villages by providing good quality housing, educational facilities, business and local retail opportunities. It will achieve this through phased growth of these services, and necessary infrastructure to support that growth. The NPPF principles of sustainable development will govern how to achieve this growth in a planned manner.”

2.2 The vision is supported by 12 objectives that fall under two themes: Place and People. Each objective has informed and guided the content of the policies within the Neighbourhood Plan Review. The objectives are as follows:

Place

1. Infrastructure and Services: Support the community of Stradbroke with first rate infrastructure that includes an expanded range of utilities, improved highways, telecom and internet services.
2. Built Environment: Allocate sites for development that retain the historic crossroads shape and character of the village and manage parking and traffic issues.
3. Transport and Movement: Mitigate and manage critical highway pinch points and reduce travel by car or lorry within the village by improving internal connectivity and alternative travel options.
4. Business: Support the vitality of retail facilities to both provide employment generating opportunities and contribute to the welfare of the community.
5. Design: Ensure development respects the historical build pattern and style whilst also encouraging design for the future through innovation.

6. Environment: Reduce the drivers of climate change as much as possible from a social, economic and environmental perspective with the ambition to be carbon neutral during the lifetime of the plan.

People

7. Education: Support the growing and changing needs of education for all ages and in particular, provide for the needs of the local primary and secondary schools.
8. Health: Expand the range of health care services available to local residents, as well as addressing the residential and care needs of the community as it ages.
9. Sport and Leisure: Deliver facilities that promote leisure and recreation facilities for all ages and abilities.
10. Community: Increase community self-sufficiency and resilience by expanding the retail base and range of village community services.
11. Housing: Provide homes that meet the changing needs of Stradbroke in terms of affordability, size, type and tenure that will allow families and single people to settle, grow and continue to live in the village.
12. Transport: Achieve improved transport to services at distance, especially educational services for post-16 students.

Policies

2.3 The 15 policies within the Stradbroke Neighbourhood Plan are as follows:

- Policy STRAD1: Development Strategy and Principles
- Policy STRAD2: Land South of Mill Road
- Policy STRAD3: Land North of Laxfield Road (Strawberry Field)
- Policy STRAD4: Land at Grove Farm
- Policy STRAD5: Land off Laxfield Road (adjacent Strawberry Field)
- Policy STRAD6: Historic Environment & Design
- Policy STRAD7: Housing Mix
- Policy STRAD8: Utilities Provision
- Policy STRAD9: Flood Mitigation

- Policy STRAD10: Education & Health Infrastructure
- Policy STRAD11: Highways & Pedestrian Movement
- Policy STRAD12: Parking Provision
- Policy STRAD13: Local Green Spaces
- Policy STRAD14: Light Pollution
- Policy STRAD15: Retail Provision

2.4 The Neighbourhood Plan allocates four sites under Policies STRAD2-5 for new housing development (as summarised in Policy STRAD1):

- STRAD2: Land South of Mill Road – 4 hectares for approximately 80 dwellings. This site has planning permission.
- STRAD3: Land north of Laxfield Road – 1.9 hectares for approximately 28 dwellings. This site has planning permission.
- STRAD4: Land at Grove Farm – 3 hectares for approximately 45 dwellings. This site has planning permission.
- STRAD5: Land off Laxfield Road (Adjacent Strawberry Field) – 3.23 hectares for approximately 60 dwellings. This site does not have planning permission.

Chapter 3

Methodology

Screening Assessment

3.1 HRA Screening of the Stradbroke Neighbourhood Plan Review has been undertaken in line with current available guidance and has sought to meet the requirements of the Habitats Regulations. The tasks that have been undertaken during the Screening stage of the HRA are described in detail below and the conclusions are presented in the next chapter.

3.2 The purpose of the Screening stage is to:

- Identify all aspects of the plan that would have no effect on a European site. These can be eliminated from further consideration in respect of this and other plans.
- Identify all aspects of the plan that would not be likely to have a significant effect on a European site (i.e. would have some effect because of links/connectivity but the effect is not significant), either alone or in combination with other aspects of the same plan or other plans or projects. These do not require 'Appropriate Assessment'.
- Identify those aspects of the plan where it is not possible to rule out the risk of significant effects on a European site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require Appropriate Assessment.

Identifying European sites that may be affected and their conservation objectives

3.3 As a first step in identifying European sites that could potentially be affected by a development, it is established practice in HRA to consider sites within the area covered by the plan, and other sites that may be affected beyond this area.

3.4 A distance of 20 km from the boundary of the plan area was used in the first instance to identify European sites with the potential to be affected by the proposals within the Neighbourhood Plan Review. Consideration was then given to whether any more distant European site may be connected to the plan area via effects pathways, for example through hydrological links or recreational visits by residents. The 20km

distance has been agreed with Natural England for HRAs in this region [\[See reference 20\]](#). In line with HRA requirements, the application of a 20km buffer is considered a highly precautionary distance with relation to potential impacts to the surrounding area.

3.5 The European sites identified for inclusion in the HRA on the basis of being within 20km of Stradbroke Parish are:

- Alde-Ore and Butley Estuaries SAC (approximately 19km away).
- Alde-Ore Estuary SPA and Ramsar site (approximately 19km away).
- Dew's Pond SAC (approximately 11km away).
- Minsmere to Walberswick Heaths and Marshes SAC (approximately 17km away).
- Minsmere-Walberswick SPA and Ramsar site (approximately 17km away).
- Redgrave and South Lopham Fens Ramsar site (approximately 16km away).
- Sandlings SPA (approximately 18km away).
- Waveney and Little Ouse Valley Fens SAC (approximately 16km away).

3.6 The Broads SAC and Broadland SPA and Ramsar site have distant hydrological connectivity to the plan area, via the River Waveney, and so have been considered in the assessment of water quality/quantity effects despite being outside of the 20 km buffer.

3.7 The locations of these sites are illustrated in Figure A.1 in Appendix A.

3.8 Detailed information about the listed European sites is provided in Appendix B, described with reference to Standard Data Forms for the SPAs and SACs and Natural England's Site Improvement Plans [\[See reference 21\]](#). Natural England's conservation objectives [\[See reference 22\]](#) for the sites have also been reviewed. These state that site integrity must be maintained or restored by maintaining or restoring the habitats of qualifying features, the supporting processes on which they rely, and populations of qualifying species.

Functionally linked habitats

3.9 The assessment also takes into account areas that may be functionally linked to the European sites. The term 'functional linkage' can be used to refer to the role or 'function' that land or other habitats beyond the boundary of a European site might fulfil in supporting the species populations for which the site was designated or

classified. Such an area is therefore ‘linked’ to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status.

3.10 While the boundary of a European site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. Sometimes, the mobility of qualifying species is considerable and may extend so far from the key habitat that forms the SAC or SPA that it would be entirely impractical to attempt to designate or classify all of the land or sea that may conceivably be used by the species. HRA therefore considers whether any qualifying species of nearby (or linked) European sites make use of functionally linked habitats, and the impacts that could affect those habitats.

3.11 European sites susceptible to the indirect effects of habitat loss are restricted to those sites with mobile qualifying species that rely on offsite habitat. This is the case for the following European sites within 20km of the Neighbourhood Plan area:

- Alde-Ore Estuary SPA and Ramsar site (birds);
- Dew’s Pond SAC (amphibians);
- Minsmere-Walberswick SPA and Ramsar site (birds, invertebrates);
- Redgrave and South Lopham Fens Ramsar site (invertebrates); and
- Sandlings SPA (birds).

3.12 Further consideration is given within the screening of impacts as to the potential for functionally linked land used by these species to occur within the Neighbourhood Plan area.

Assessment of ‘likely significant effects’ of the plan

3.13 As required under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 **[See reference 23]** (as amended), an assessment has been undertaken of the ‘likely significant effects’ of the plan. The assessment has been prepared in order to identify which policies or site allocations would be likely to have a significant effect on European sites. The Screening assessment has been conducted without taking mitigation into account, in accordance with the ‘People over Wind’ judgment.

3.14 If the potential for policies to have likely significant effects is identified, consideration would then be given to the potential for the development proposed to result in significant effects associated with:

- Physical loss or damage to habitat;
- Non-physical disturbance (noise, vibration and light pollution);
- Air pollution (vehicle emissions and dust);
- Recreational pressure; and
- Changes to hydrology, including water quantity and quality.

3.15 This thematic/impact category approach allows for consideration to be given to the cumulative effects of policies and any site allocations, rather than focussing exclusively on individual developments provided for by the plan.

3.16 A Screening assessment was undertaken (Chapter 4), to document consideration of the potential for likely significant effects resulting from each policy (including site allocations) in the Neighbourhood Plan. A risk-based approach involving the application of the precautionary principle was adopted in the assessment, such that a conclusion of 'no significant effect' would only be reached where it was considered unlikely, based on current knowledge and the information available, that a policy would have a significant effect on the integrity of a European site.

Interpretation of 'likely significant effects'

3.17 Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan.

3.18 In the Waddenzee case [\[See reference 24\]](#), the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (paragraph 44). An effect should be considered 'significant', "if it undermines the conservation objectives" (paragraph 48). Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (paragraph 47).

3.19 A relevant opinion delivered to the Court of Justice of the European Union commented that:

“The requirement that an effect in question be ‘significant’ exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.”

3.20 This opinion (the ‘Sweetman’ case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered ‘trivial’ or de minimis; referring to such cases as those “that have no appreciable effect on the site”. In practice such effects could be screened out as having no likely significant effect – they would be ‘insignificant’.

3.21 The HRA Screening assessment therefore considers whether the policies in the Stradbroke Neighbourhood Plan Review could have likely significant effects either alone or in combination.

Mitigation provided by the plan

3.22 Some of the potential effects of a plan could be mitigated through the implementation of other policies in the plan itself, such as the provision of green infrastructure within new developments (which could help mitigate increased pressure from recreation activities at European sites). Nevertheless, in accordance with the ‘People over Wind’ judgment, avoidance and mitigation measures cannot be relied upon at the Screening stage, and therefore, where such measures exist, they will be considered at the Appropriate Assessment stage for impacts and policies where likely significant effects, either alone or in-combination, cannot be ruled out.

Assessment of potential in-combination effects

3.23 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where “a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site”. Therefore, where likely insignificant effects are identified for the plan alone, it is necessary to consider whether these may become significant effects in combination with other plans or projects.

3.24 Where the plan is likely to have an effect on its own (due to impact pathways being present), but it is not likely to be significant, the in-combination assessment at Screening stage needs to determine whether there may also be the same types of effect from other plans or projects that could combine with the plan to produce a significant effect. If so, this likely significant effect arising from the plan in combination with other plans or projects, would then need to be considered through the Appropriate Assessment stage to determine if the impact pathway would have an adverse effect on integrity of the relevant European site. Where the Screening assessment has concluded that there is no impact pathway between development proposed in the plan and the conditions necessary to maintain qualifying features of a European site, then there will be no in-combination effects to assess at the Screening or Appropriate Assessment stage. This approach accords with recent guidance on HRA [\[See reference 25\]](#).

3.25 If impact pathways are found to exist for a particular effect but it is not likely to be significant from the plan alone, the in-combination assessment will identify which other plans and programmes could result in the same impact on the same European site. This will focus on planned growth (including housing, employment, transport, minerals and waste) around the affected site, or along the impact corridor.

3.26 The potential for in-combination impacts will therefore focus on plans prepared by local authorities that overlap with European sites that are within the scope of this HRA. The findings of any associated HRA work for those plans will be reviewed where available. Where relevant, any strategic projects in the area that could have in-combination effects with the plan will also be identified and reviewed.

3.27 The online HRA Handbook [\[See reference 26\]](#) suggests the following plans and projects may be relevant to consider as part of the in-combination assessment:

- Applications lodged but not yet determined, including refusals subject to an outstanding appeal or legal challenge;
- Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration;
- Projects authorised but not yet started’;
- Projects started but not yet completed;
- Known projects that do not require external authorisation; and
- Proposals in adopted plans.

Chapter 4

Screening Assessment

4.1 As described in Chapter 3, a Screening assessment was carried out in order to identify the likely significant effects of the Stradbroke Neighbourhood Plan Review on the scoped-in European sites. The detailed Screening assessment of the policies in the emerging Neighbourhood Plan can be found below.

HRA Screening of Policies

Policy STRAD1: Development Strategy and Principles

Potential likely significant effects

4.2 New residential development – This policy stipulates that new development in Stradbroke during the Plan period will be focused within the settlement boundary of Stradbroke village and on the four site allocations in Policies STRAD2-5. The Plan provides for a minimum of 212 dwellings during the plan period. Development within the settlement boundary will be expected to provide new housing which addresses evidence-based needs, and provides key infrastructure including education, health, transport and movement, community facilities, utilities and public realm improvements, through direct provision and/or developer contributions, and is designed to be high quality and delivered with high quality natural landscaping to retain the rural character and physical structure of Stradbroke, conserving and if possible enhancing the historic environment. This policy will therefore directly result in new development which could have a range of possible effects on European sites as a result of construction, additional vehicle traffic, demand for water supply and treatment and recreation activities.

Policy STRAD2: Land South of Mill Road

Potential likely significant effects

4.3 New residential development – This policy states that the site allocation at land to the south of Mill Road was granted planning permission in August 2024 and includes 4 hectares of land for approximately 80 dwellings. This policy sets out criteria for proposals for the site and will therefore directly result in new development which

could have a range of possible effects on European sites as a result of construction, additional vehicle traffic, demand for water supply and treatment and recreation activities.

Policy STRAD3: Land North of Laxfield Road

Potential likely significant effects

4.4 New residential development – This policy states that land north of Laxfield Road was granted planning permission and includes 1.9 hectares for approximately 28 dwellings. This policy states if the planning permission is not delivered or alternatives proposed, development is subject to the criteria outlined in this policy. This policy will therefore directly result in new development which could have a range of possible effects on European sites as a result of construction, additional vehicle traffic, demand for water supply and treatment and recreation activities.

Policy STRAD4: Land at Grove Farm

Potential likely significant effects

4.5 New residential development – This policy states that land at Grove Farm was granted planning permission in December 2025 and includes 3 hectares for approximately 45 dwellings. This policy states that if the planning permission is not delivered or alternatives proposed, development is subject to the criteria outlined in this policy and specifically preserves and enhances, where possible, the setting of the Conservation Area. This policy will therefore directly result in new development which could have a range of possible effects on European sites as a result of construction, additional vehicle traffic, demand for water supply and treatment and recreation activities.

Policy STRAD5: Land off Laxfield Road (adjacent Strawberry Field)

Potential likely significant effects

4.6 New residential development – This policy allocates the land off Laxfield Road (adjacent strawberry field) which is 3.23 hectares for approximately 60 dwellings. The policy sets out criteria for development proposals. This policy will therefore directly

result in new development which could have a range of possible effects on European sites as a result of construction, additional vehicle traffic, demand for water supply and treatment and recreation activities.

Policy STRAD6: Historic Environment and Design

Potential likely significant effects

4.7 None – This policy outlines expectations for development proposals in terms of Stradbroke’s rural setting and heritage. The policy will not directly result in development.

Policy STRAD7: Housing Mix

Potential likely significant effects

4.8 None – This policy sets out that housing developments of five or more units must deliver at least 40% of these units as one or two bed properties and where this policy results in a need to deliver at least five one and two properties, a minimum of 30% of these units should be one-bed properties. The policy will not directly result in development.

Policy STRAD8: Utilities Provision

Potential likely significant effects

4.9 None – This policy sets out how development proposals are expected to demonstrate that they will not worsen the existing drainage situation and electricity networks through the use of effective modern solutions. The policy will not directly result in development.

Policy STRAD9: Flood Mitigation

Potential likely significant effects

4.10 None – This policy outlines that flood risk from surface water flows should be managed using Sustainable Drainage Systems (SuDs). Development proposals are

encouraged to take opportunities to reduce flood risk and create betterment. This policy will not directly result in development.

Policy STRAD10: Education and Health Infrastructure

Potential likely significant effects

4.11 Development of new education and healthcare facilities – This policy sets out how developments should meet the needs of the growing community of Stradbroke and its wider functional cluster, through the expansion of education and health capacity – either on an existing site or through development of a new site. Whilst there are no specific allocations proposed, this policy could result in new development which could have a range of possible effects on European sites as a result of construction, additional vehicle traffic and demand for water supply and treatment.

Policy STRAD11: Highways and Pedestrian Movement

Potential likely significant effects

4.12 Highways development – This policy sets out that proposals to improve the flow of traffic and pedestrian safety on highways in the Neighbourhood Plan area are strongly encouraged especially for two main junctions. It also encourages development proposals to enhance the Walkway Routes in the Proposals Map to ensure pedestrians can move easily and safely around Stradbroke village and that development link into the public rights of way network where possible. Whilst there are no specific allocations proposed, this policy could result in new development which could have a range of possible effects on European sites as a result of construction in particular.

Policy STRAD12: Parking Provision

Potential likely significant effects

4.13 None – This policy sets out that development proposals that generate an increased need for parking must provide suitable parking to meet the need of its users and occupiers and to minimise obstruction of the local road network in the interests of safety for all road users. This policy will not directly result in development.

Policy STRAD13: Local Green Spaces

Potential likely significant effects

4.14 None – This policy designates four Local Green Spaces and as such development will only be permitted in very special circumstances. This policy will not result in development.

Policy STRAD14: Light Pollution

Potential likely significant effects

4.15 None – This policy sets out that new development will be required to demonstrate how it has minimised light pollution. This policy will not result in development.

Policy STRAD15: Retail Provision

Potential likely significant effects

4.16 New retail development – This policy sets out that development proposals which will enable the retention of existing retail services and provide new retail premises will be strongly encouraged. Whilst there are no specific allocations proposed, this policy could result in new development which could have a range of possible effects on European sites as a result of construction and additional vehicle traffic.

Potential Impact Pathways

4.17 The Neighbourhood Plan includes overall residential growth of 212 houses, as set out within policy STRAD1, and site allocations as set out within policies STRAD2 to STRAD5. This growth will result in the development of associated new education and healthcare infrastructure (as set out within policy STRAD10), new highway infrastructure (policy STRAD11), and new retail development (policy STRAD15). This development could result in likely significant effects on European sites, and therefore it is necessary to consider the potential impact pathways. However, it is noted that planning permission is already granted for four of the site allocations and only one allocation (STRAD5 for 60 dwellings) does not have an existing permission.

4.18 For some types of impacts, screening for likely significant effects can be determined on a proximity basis, using GIS data to determine the distance of potential development locations to the European sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, a number of assumptions are applied in relation to the potential impact pathways that may result from the plan, as described below.

Physical damage and loss of habitat

4.19 Any development resulting from the Stradbroke Neighbourhood Plan would take place within Stradbroke Parish; therefore, only European sites within the Parish could be affected through physical damage or loss of habitat from within the site boundaries.

4.20 No European sites are located within the boundary of the parish and thus there are no likely significant effects relating to physical damage and loss of habitat.

Physical damage and loss of functionally linked land

4.21 As described in Chapter 3, there is potential for some of the European sites within 20km to support mobile species which may utilise off-site functionally linked land. Therefore, consideration as to the potential for impact upon functionally linked land is provided for each relevant species group.

Invertebrates

4.22 Minsmere-Walberswick Ramsar site is designated for an estuarine mollusc, *Vertigo augustior*.

4.23 The Redgrave and South Lopham Fens Ramsar site is designated for freshwater invertebrates, the fen raft spider *Dolomedes plantarius*.

4.24 Habitats located outside of the European sites may contribute to maintaining the population of these species. Due to the rarity of the qualifying invertebrate species, there is very limited published data on their use of habitats located outside of European sites. Therefore, it has been assumed that invertebrates of these European sites may rely on suitable habitat within 500m of the European sites.

4.25 There are no estuarine habitats within the Neighbourhood Plan area, and given the distance of over 16km of these European sites there will be no likely significant effect upon functionally linked land for invertebrates of Minsmere-Walberswick Ramsar or Redgrave and South Lopham Fens Ramsar site.

Amphibians

4.26 Great crested newts are a qualifying feature at Dew's Pond SAC. Great crested newt typically inhabit the land within 500m of their breeding ponds and are known to travel up to 2km from their breeding ponds. Dew's Pond SAC is located approximately 11km outside the plan area; therefore, there will be no likely significant effect in relation to impacts upon functionally linked habitats used by great crested newts of Dew's Pond SAC.

Birds

4.27 The following European sites are designated for populations of birds of freshwater, estuarine, coastal and/ or marine habitats, which may use habitats outside the designated European sites:

- Alde-Ore Estuary SPA: avocet, lesser black-backed gull, little tern, marsh harrier, redshank, ruff, and sandwich tern.
- Minsmere-Walberswick Ramsar site: bird assemblage - bearded reedling, Eurasian marsh harrier, Eurasian teal, gadwall, great bittern, northern shoveler, pied avocet.
- Minsmere-Walberswick SPA: gadwall, great bittern, Eurasian marsh harrier, European nightjar, Eurasian teal, greater white-fronted goose, hen harrier, little tern, northern shoveler, pied avocet.
- Sandlings SPA: nightjar, woodlark.

4.28 The distance for consideration of offsite functionally linked habitat for birds is dependent on many factors such as habitat preferences and species dispersal distances. No targeted studies determining areas of functionally linked habitat within Babergh and Mid Suffolk are currently available. However, for many species, including those associated with each of the European sites within 20km of the Neighbourhood Plan area, the core areas of functionally linked habitat are likely to occur relatively close to the designated sites e.g. within 2km. Some species such as curlew, lapwing, golden plover and pink-footed goose have larger dispersal distances

of 15-20km. These are the typical distances considered with regards to local plan HRA, as determined through discussions and consultation with Natural England for neighbouring local plan HRAs such as for the HRA undertaken to inform the North Essex Shared Strategic Plan.

4.29 All of the SPA and Ramsar sites with bird species are at least 16km away from the Neighbourhood Plan area. There are therefore no functionally linked habitats used by birds within the plan area.

4.30 As established for each species group, there will be no likely significant effects in relation to functionally linked land. Therefore, impacts such as habitat damage and loss or disturbance of species utilising functionally linked land are screened out of further consideration.

Non-physical disturbance (noise, vibration and light)

4.31 Non-physical disturbance effects are most likely to disturb bird species; thus are a key consideration with respect to potential effects on European sites where birds are the qualifying features. Noise and artificial lighting at night have the potential to affect species where it occurs in close proximity to key habitat areas, such as key roosting sites of SPA and Ramsar birds. It has been assumed that the effects of noise, vibration and light are most likely to be significant within a distance of 500m. There is also evidence of 300 metres being used as a distance up to which certain bird species can be disturbed by the effects of noise [\[See reference 27\]](#); however, it has been assumed (on a precautionary basis) that the effects of noise, vibration and light pollution are capable of causing an adverse effect if development takes place within 500 metres of a European site or area of functionally linked land supporting qualifying features sensitive to these types of disturbance.

4.32 All European sites are located over 500m from the Neighbourhood Plan area and therefore there will be no likely significant effects as a result of non-physical disturbance at a European site.

Air Pollution (vehicle emissions)

4.33 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying species may also be affected, either directly or indirectly, by deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen levels, which can then affect plant health, productivity and vegetation composition.

4.34 In terms of vehicle traffic, nitrogen oxides (NO_x, i.e. NO and NO₂) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO_x can cause eutrophication of soils and water.

4.35 Based on the Highways England Design Manual for Road and Bridges (DMRB) LA 105 Air quality (which sets out the requirements for assessing and reporting the effects of highway projects on air quality), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

4.36 For highways within 200m of sensitive receptors, the DMRB provides the following Screening criteria to ascertain whether there are likely to be significant impacts from developments:

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
- There will be a change in speed band; or
- Road carriageway alignment will change by 5 m or more.

4.37 Thus, where significant increases in traffic are possible on roads within 200 metres of European sites, traffic forecast data may be needed to determine if increases in vehicle traffic are likely to be significant. In line with the Wealden judgment [See reference 28], the traffic growth considered by the HRA should be based on the effects of development provided for by the plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

4.38 Usually, it is only those roads forming part of the primary road network (motorways and 'A' roads) that are likely to experience any significant increases in vehicle traffic as a result of development (i.e. greater than 1,000 AADT), although there are sometimes exceptions.

4.39 The JNCC's 'Guidance on decision-making thresholds for air pollution' [See reference 29] states that, when assessing the air pollution impacts of a development plan, 10km should be used as a zone of influence within which the plan is likely to have significant effects on air quality, i.e. European sites beyond 10 km from the plan area can be screened out in relation to air pollution.

4.40 All European sites are located further than 10km from the Neighbourhood Plan area. Therefore, there will be no likely significant effects associated with increased air pollution from vehicle emissions.

Air Pollution (dust)

4.41 Development can result in the creation of dust, which can smother habitats preventing natural processes and lead to effects associated with increased sediment. This can affect the turbidity of aquatic habitats and may contribute to nutrient enrichment, which can lead to changes in the rate of vegetative succession and habitat composition.

4.42 Large dust particles mostly deposit close to the source, and the assumption is that the vast majority of dust deposition occurs within 100m, although some smaller particles may travel up to 200-500m [\[See reference 30\]](#). Therefore, in line with the precautionary principle, significant effects on European sites from dust are unlikely to occur beyond 500m.

4.43 There are no European sites located within 500m of the Neighbourhood Plan area. Therefore, there are no likely significant effects relating to dust.

Recreation

4.44 Recreational activities and human presence can result in significant effects on European sites. European sites with qualifying bird species are likely to be particularly susceptible to recreational disturbances from walking, dog walking, angling, illegal use of off-road vehicles and motorbikes, wildfowling, and water sports. In addition, recreation can physically damage habitat as a result of trampling, fire or vandalism or erosion.

4.45 Each European site will typically have a 'Zone of Influence' (ZOI) within which increases in population would be expected to result in likely significant effects. ZOIs are usually established following targeted visitor surveys, and the findings are therefore typically specific to each European site (and often to specific areas within a European site). The findings are likely to be influenced by a number of complex and interacting factors and therefore it is not always appropriate to apply a generic or non-specific ZOI to a European Site.

4.46 For European sites on the Suffolk coast, a mitigation strategy has been established: the Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (RAMS) [See reference 31]. The survey work underpinning the Suffolk Coast RAMS has established a ZOI of 13km. Recreation pressure can sometimes impact upon functionally linked habitats, and the Suffolk Coast RAMS takes into account the areas used by the species with the largest ranges. There is no extension of the ZOI into Mid Suffolk District as there are no additional functionally linked habitats that need to be considered. Suffolk Coast sites with a 13km ZOI are as follows. The ZOIs do not overlap with the Neighbourhood Plan area, and these sites have therefore been screened out in relation to recreation pressure:

- Alde-Ore Estuary SPA and Ramsar;
- Minsmere-Walberswick SPA and Ramsar;
- Minsmere to Walberswick Heaths and Marshes SAC; and
- Sandlings SPA.

4.47 Similar work has been undertaken in Norfolk. The Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (GIRAMS, March 2021) [See reference 32] supplemented by information in the GIRAMS action plan [See reference 33] identifies some localised issues with recreation pressure (e.g. dog walking) at the following sites, but they were not considered sufficiently sensitive to recreation pressure to include in the mitigation strategy. There are no ZOIs for these sites and they have been screened out in relation to recreation pressure:

- Redgrave and South Lopham Fens Ramsar site; and
- Waveney and Little Ouse Valley Fens SAC.

4.48 Dew's Pond SAC is not identified as sensitive to recreation pressure in its Site Improvement Plan or Supplementary Advice for Conservation Advice and has therefore been screened out in relation to recreation pressure.

4.49 No recreational ZOIs extend into the Neighbourhood Plan area and there are no functionally linked habitats that could be affected by recreational pressure associated with the Neighbourhood Plan. Therefore, there is no likely significant effects in relation to recreation pressure upon any European sites.

Water Quantity and Quality (abstraction)

4.50 The Neighbourhood Plan area lies within Water Resources East regional water resource group, and specifically within the Hartismere Water Resource Zone (WRZ). Hartismere WRZ lies within Essex and Suffolk Water's Suffolk supply area.

4.51 Hartismere WRZ is in supply deficit of over 10%, with the wider East Anglian area being a 'Seriously Water Stressed Area' as defined by Environment Agency, resulting in a moratorium on new non-domestic water supplies within the WRZ until 2033 [See reference 34]. The water supplied within this WRZ is sourced from groundwater abstracted from boreholes drilled into the chalk and crag (sand and gravel) aquifers (water bearing rocks).

4.52 The location of these boreholes is situated within the WRZ, with some located near the River Waveney (at Redgrave and Syleham) and River Dove (Eye and Bedingfield) and others located elsewhere at Rickinghall and Mendlesham. The process of developing the WRMP24 required agreement with the Environment Agency to reduce how much water was abstracted from the River Waveney and River Bure catchments. River Waveney is hydrologically connected to Waveney and Little Ouse Valley Fens SAC, which is located 27km west along waterways, and The Broads SAC and Broadland SPA and Ramsar site, which is located over 30km east along waterways.

4.53 Essex and Suffolk Water's Water Resources Management Plan [See reference 35] (WRMP) 2024 sets out how water will be balanced across the region, to ensure supply and identifies any measures required to achieve this, for example works to transfer water. The summary document [See reference 36] states "*We've agreed with the Environment Agency to reduce how much water we take from aquifers from 2030 to make sure important groundwater dependent ecosystems including rivers and wetlands such as those in the Norfolk Broads, are not adversely impacted as populations grow and the climate changes.*"

4.54 There is also a Drought Plan [See reference 37] in place to support Essex and Suffolk WRMP24, which sets out the short-term operational steps to addressing drought over 5 year period until the next WRMP has been published.

4.55 In the absence of information to confirm whether there is adequate capacity within the water supply system to enable housing and associated development of community facilities and infrastructure without detriment to the condition of European sites, it cannot be concluded that there would be no likely significant effects.

4.56 Without mitigation (for example the measures set out within the WRMP), increased demand for water could therefore increase abstraction of water from Little

Ouse Valley Fens SAC, The Broads SAC or Broadlands SPA and Ramsar site. New homes associated with the Neighbourhood Plan, could increase demand for water and therefore contribute to likely significant effects from abstraction.

4.57 Therefore, there is potential for likely significant effect upon Little Ouse Valley Fens SAC and The Broads SAC and Broadland SPA and Ramsar site as a result of abstraction in relation to growth within the Neighbourhood Plan. This will need to be considered through Appropriate Assessment, at which point mitigation measures can be taken into account.

Water Quantity and Quality (wastewater treatment)

4.58 Sewerage services are provided within the plan area by Anglian Water and the approach to supplying wastewater treatment and managing surface water drainage is set out within the Anglian Water Drainage and Wastewater Management Plan (DWMP23) [See reference 38]. Stradbroke water treatment is supplied by Eye-Hoxne Road Water Recycling Centre (WRC).

4.59 Although the Neighbourhood Plan area and the River Waveney do not lie within a nutrient neutrality catchment, there is potential that the wastewater treatment works just north of Stradbroke discharges into a tributary of the River Waveney with potential for downstream impacts upon The Broads SAC and Broadland SPA and Ramsar site. In the absence of information about the capacity of the receiving WRC and wastewater treatment network and any required mitigation (for example the measures set out within the DWMP), increased demand for wastewater could therefore increase nutrients at The Broads SAC and Broadland SPA and Ramsar site. New homes associated with the Neighbourhood Plan, could increase demand for wastewater treatment and therefore contribute to likely significant effects from wastewater. Therefore, it cannot be concluded that there would be no likely significant effect on these European sites.

4.60 Therefore, there is potential for likely significant effect upon The Broads SAC and Broadland SPA and Ramsar site as a result of wastewater impacts on water quality in relation to growth within the Neighbourhood Plan. This will need to be considered through Appropriate Assessment.

Water Quantity and Quality (direct pollution)

4.61 Direct pollution can occur during construction due to runoff of surface water. The distance at which this impact can occur depends on the topography of a site, flow

rate, direction and the scale of pollution event (associated with the type and scale of development e.g. infrastructure, industrial developments or housing). Hydrological connectivity occurs when a watercourse flows from the location of development, and along connected waterways, to a receptor such as qualifying feature within a European site which is sensitive to poor water quality (such as a watercourse, waterbody, groundwater dependent terrestrial ecosystem or species associated with these habitats).

4.62 There are no main rivers which pass through Stradbroke, however, there are streams and ditches surrounding Stradbroke which offer hydrological connectivity to the river catchments of the Chickering Beck to the west and tributary of the River Waveney to the north. These river catchments offer distant hydrological connectivity to tributaries of the River Dove in the north-west and River Waveney in the north-east.

4.63 All European sites including the nearest site, Little Ouse and Valley Fens SAC, are located over 16km in a direct line from Stradbroke and lie outside of the river catchments for which development will occur. Little Ouse and Valley Fens SAC is not located downstream of the Neighbourhood Plan area. However, there is distant downstream hydrological connectivity along the River Dove and River Waveney towards The Broads SAC and Broadland SPA and Ramsar site in the east (over 30km along waterways).

4.64 Any pollution event to occur as a result of development associated with the Neighbourhood Plan in Stradbroke would be small in scale both spatially and temporally and localised to the river catchments of the Chickering Beck and tributary of the River Waveney which surround Stradbroke. Based on the relatively small number of homes allocated in the Plan (60 without existing planning permission) any direct pollution as a result of surface water run off would not have a likely significant effect on any downstream European sites.

4.65 Therefore, there is no likely significant effect upon The Broads SAC and Broadland SPA and Ramsar site as a result of direct pollution of water.

Screening conclusion

4.66 The HRA Screening was unable to rule out likely significant effects in relation to the following impacts:

- Abstraction impacts upon Little Ouse Valley Fens SAC and The Broads SAC and Broadland SPA and Ramsar site.

- Wastewater pollution impacts upon The Broads SAC and Broadland SPA and Ramsar site.

4.67 The impact pathways are associated with the overall growth set out in policy STRAD1 and development within the four site allocations STRAD2, STRAD3, STRAD4 and STRAD5. The impacts are unlikely to be significant as a result of development of individual site allocations, however, impacts could be significant considering the total level of growth associated with the Neighbourhood Plan; and when considering growth in this Neighbourhood Plan in combination with other plans or projects.

4.68 All other impact pathways have been screened out as there will be no likely significant effects.

Chapter 5

Conclusion and next steps

5.1 At the Screening stage of the HRA, potential likely significant effects on European sites as a result of the Pre-Submission Draft version of the Stradbroke Neighbourhood Plan Review were identified in relation to:

- Abstraction impacts upon Little Ouse Valley Fens SAC and The Broads SAC and Broadland SPA and Ramsar site.
- Wastewater pollution impacts upon The Broads SAC and Broadland SPA and Ramsar site.

5.2 These issues will therefore require further consideration through an Appropriate Assessment.

Next steps

5.3 Appropriate Assessment must be undertaken in order to assess the potential for Adverse Effect on Integrity (AEoI) in relation to those impacts screened in for Likely Significant Effect (LSE) at this screening stage. Key evidence, information and mitigation to inform the Appropriate Assessment for each impact type are outlined in the following sub-headings.

Abstraction

5.4 HRA was conducted of the measures and solutions set out within the Essex and Suffolk Water WRMP24. The HRA assessed the various plan options including the 'Best Value' Plan and considers the mitigation measures set out in order to ensure no adverse effect on integrity of European sites. These measures are summarised within the summary document [\[See reference 39\]](#) and include the following:

- Linking our WRZs – building new pipelines to move water around the network from areas with additional water (e.g. Northern Water WRZ) to address water shortages (Hartismere WRZ and others)
- New storage reservoirs – these will hold treated water in Hartismere WRZ which will provide a few days' worth of supply for the area.
- North Suffolk Winter Storage Adaptive Programme – storing water and pumping across low ground over short distances (as an option instead of Lowestoft and Caister water reuse scheme)

- New pipeline – installing a new pipeline from an existing well near Bungay to a nearby water treatment works by 2030 to increase capacity in the area.
- Water reuse scheme – Lowestoft and Caister (as an option instead of North Suffolk Winter Storage)

5.5 The Appropriate Assessment should consider the conclusions of the Essex and Suffolk Water WRMP24 and associated HRA for the Suffolk supply area.

Wastewater Treatment

5.6 Information on the capacity within the receiving wastewater recycling centre(s) (WRC) for allocations within the plan is required in order to determine whether there is potential for adverse effect on integrity of European sites. Additionally, the Anglian Water DWMP23 plan sets out the options to address increased demand for wastewater treatment.

5.7 The Appropriate Assessment should consider the capacity of receiving WRC and options set out within the DWMP23 and associated HRA, and any available updated wastewater management plan documents or information available from Anglian Water to determine whether there is potential for adverse impacts upon The Broads SAC and Broadland SPA and Ramsar site.

5.8 HRA is an iterative process and as such, this assessment should be updated if any relevant, newly available evidence or comments from key consultees are received prior to the plan being finalised. It is recommended that this report is subject to consultation with Natural England to confirm that the conclusions of the assessment are considered appropriate at this stage of the plan-making.

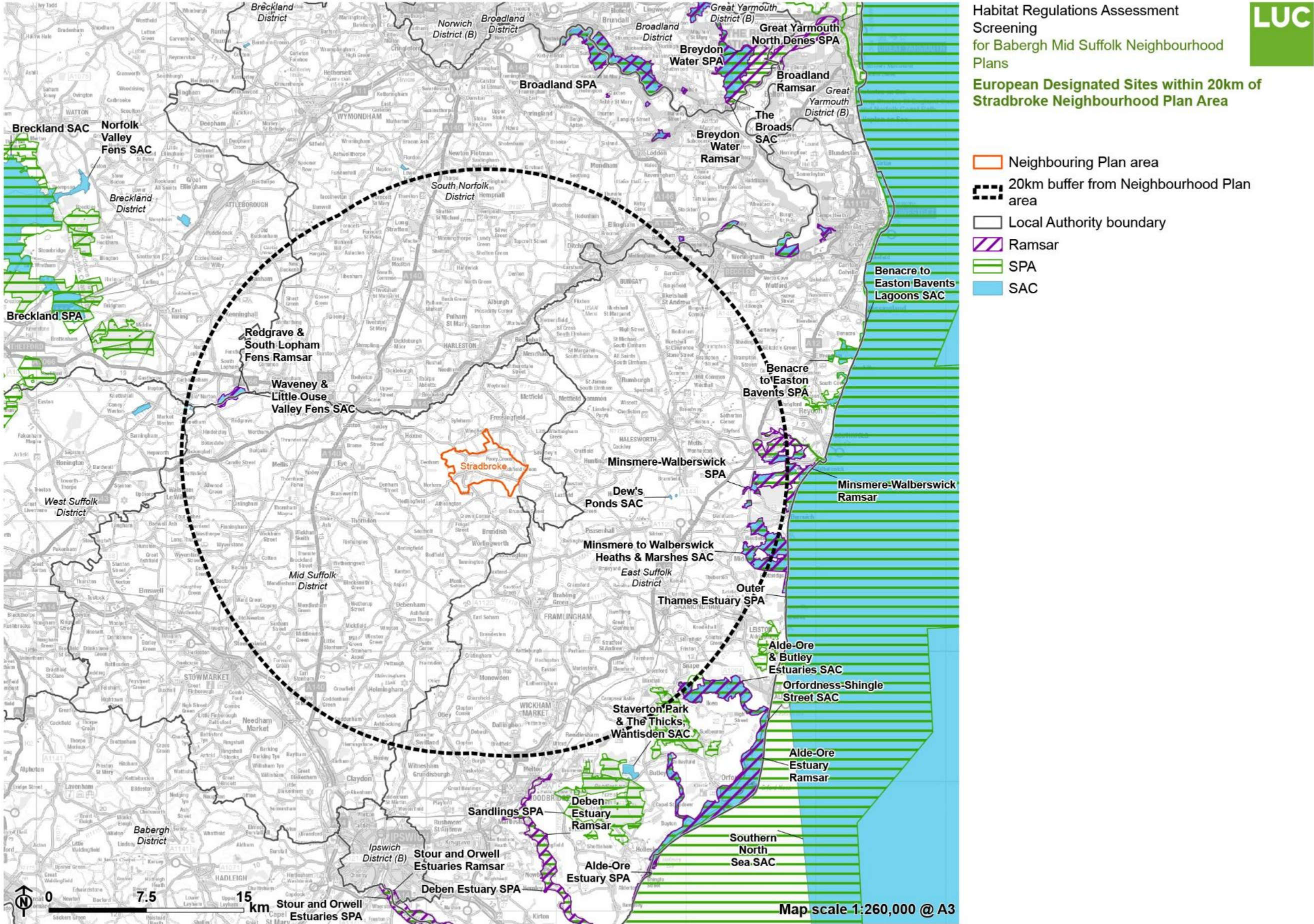
LUC

June 2026

Appendix A

Map of European Sites within 20 km of Stradbroke Neighbourhood Plan Area

Figure A.1: European Designated Sites within 20km of Stradbroke Neighbourhood Plan Area



Appendix B

Attributes of European Sites

B.1 This appendix contains information on the European sites that have been scoped into the HRA. Site areas and designated features are drawn from SAC and SPA Standard Data Forms and Ramsar Site Information Sheets [\[See reference 40\]](#). The overviews of sites and their locations are drawn from Natural England's Site Improvement Plans [\[See reference 41\]](#). Site conservation objectives are drawn from Natural England's website and are only available for SACs and SPAs [\[See reference 42\]](#).

Alde-Ore and Butley Estuaries SAC

Overview of site and its location

B.2 The Alde-Ore Estuary SPA, Alde, Ore and Butley Estuaries SAC and Orfordness-Shingle Street SAC are overlapping/adjacent sites on the east coast of Suffolk, England.

B.3 Their scientific interests are outstanding and diverse. The sites contain a number of coastal formations and estuarine features including mud-flats, saltmarsh, vegetated shingle and coastal lagoons which are of special botanical and ornithological value.

Qualifying features

Annex I habitats

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

Conservation objectives

B.4 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.

Key Vulnerabilities

- **Hydrological changes** – Flood wall breaches have led to the flooding of Hazelwood Marshes and Lantern Marshes which has led to a loss of nesting habitat and saline lagoons.
- **Public access/disturbance** - Human disturbance to nesting birds on beaches, notably on Orfordness and Shingle Street, by people accessing the southern end of the ness by boat, plus walkers along the beach from Aldeburgh, and recreational beach users at Shingle Street. Human trampling affects vegetated shingle habitat and military and private aircraft regularly fly low over the site which leads to the disturbance of SPA features, wintering and breeding birds.
- **Inappropriate coastal management** - Maintaining coastal defences at Bawdsey and Slaughden is leading to increased shingle recharge requirements at Slaughden, and loss of shingle beach at the southern end of the SAC at Bawdsey.
- **Coastal squeeze** - Seawalls afford little scope for natural adaption of the estuary to sea level rise through roll back of habitat. Saltmarsh is at risk of being squeezed in the future (although currently the estuary is perceived as in balance) and limited areas of natural habitat transition within the site could be lost. The developing policy of the Alde and Ore Estuary Partnership should consider scope for natural adaption to sea level rise.
- **Inappropriate pest control** - Fox predation/disturbance is a key issue for breeding birds on Orfordness, particularly Lesser black backed gulls. Foxes can cause gulls and other breeding birds to abandon nesting sites, and predate adult birds and chicks.
- **Changes in species distributions** - There are negative population trends in bird species using the site. Breeding locations are moving within and away from

the designated site, possibly due to habitat change on site, as a reaction to other species and due to the draw of other adjacent hinterland habitat. This requires further investigation and possible mitigation.

- **Invasive species** - *Spartina* is encroaching on estuarine muds. With *Spartina* at the front, and reed encroaching at the back, saltmarsh could be squeezed out.
- **Air pollution** - Air pollution impacts on vegetation diversity. Aerial deposits of nitrogen may exceed the site relevant critical load (20 – 30 kg N ha⁻¹ yr⁻¹) above which the diversity of saltmarsh vegetation begins to be altered (possibly to reed) and adversely impacted. Many land use practices contribute to this problem locally including land spreading, outdoor pigs, high nutrient inputs on fields.
- **Fisheries** - There are many different fishing pressures close to shore that may include bycatch of juvenile fish and disturbance of fish nursery areas that could potentially have an impact on Little tern *Sterna Albifrons* by reducing suitable feeding areas.

Alde-Ore Estuary SPA

Overview of site and its location

B.5 The Alde-Ore Estuary SPA, Alde, Ore and Butley Estuaries SAC and Orfordness-Shingle Street SAC are overlapping/adjacent sites on the east coast of Suffolk, England.

B.6 Their scientific interests are outstanding and diverse. The sites contain a number of coastal formations and estuarine features including mud-flats, saltmarsh, vegetated shingle and coastal lagoons which are of special botanical and ornithological value.

Qualifying features

Annex I bird species

- Pied avocet, *Recurvirostra avosetta* (breeding and non-breeding);
- Lesser black-backed gull, *Larus fuscus* (breeding);
- Little tern, *Sternula albifrons* (breeding);

- Marsh harrier, *Circus aeruginosus* (breeding);
- Common redshank, *Tringa tetanus* (non-breeding);
- Ruff, *Calidris pugnax* (non-breeding); and
- Sandwich tern, *Thalasseus sandvicensis* (breeding).

Conservation objectives

B.7 The site's conservation objectives apply to the site and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying features' listed above).

B.8 The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and 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 populations of each of the qualifying features
- the distribution of qualifying features within the site

Key Vulnerabilities

- Refer to Alde-Ore and Butley Estuaries SAC above.

Alde-Ore Estuary Ramsar site

Overview of site and its location

B.9 Refer to Alde-Ore Estuary SPA and Alde-Ore Butley Estuaries SAC, above.

B.10 The site 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 [\[See reference 43\]](#).

Qualifying features

Ramsar criterion 2

B.11 The site supports a number of nationally-scarce plant species and British Red Data Book invertebrates.

Ramsar criterion 3

B.12 The site supports a notable assemblage of breeding and wintering wetland birds.

Ramsar criterion 6

B.13 The site supports qualifying species/populations during the breeding season and winter:

- Lesser black-backed gull, *Larus fuscus graellsii* (breeding);
- Pied avocet, *Recurvirostra avosetta* (wintering); and
- Common redshank, *Tringa totanus totantus* (wintering).

Conservation objectives

B.14 None available.

Key Vulnerabilities

B.15 Refer to Alde-Ore and Butley Estuaries SAC above.

Broads SAC

Overview of site and its location

B.16 The Broads in East Anglia contain several examples of naturally nutrient-rich lakes. Although artificial, having been created by peat digging in medieval times, these lakes and the ditches in areas of fen and drained marshlands support relict vegetation of the original Fenland flora, and collectively this site contains one of the richest assemblages of rare and local aquatic species in the UK. The stonewort – pondweed – water-milfoil – water-lily (*Characeae* – *Potamogeton* – *Myriophyllum* – *Nuphar*) associations are well-represented, as are club-rush– common reed *Scirpo* – *Phragmitetum* associations. The dyke (ditch) systems support vegetation characterised by water-soldier *Stratiotes aloides*, whorled water-milfoil *Myriophyllum verticillatum* and broad-leaved pondweed *Potamogeton natans* as well as being a stronghold of little whirlpool ram’s-horn snail *Anisus vorticulus* and Desmoulin’s whorl snail *Vertigo moulinsiana* in East Anglia. The range of wetlands and associated habitats also provides suitable conditions for otters *Lutra lutra*.

B.17 The Broads is the richest area for stoneworts (charophytes) in Britain. The core of this interest is the Thurne Broads and particularly Hickling Broad, a large shallow brackish lake. Within the Broads examples of *Chara* vegetation are also found within fen pools (turf ponds) and fen and marsh ditch systems. The Broads supports a number of rare and local charophyte species, including *Chara aspera*, *C. baltica*, *C. connivens*, *C. contraria*, *C. curta*, *C. intermedia*, *C. pedunculata*, *Nitella mucronata*, *Nitellopsis obtusa*, *Tolypella glomerata* and *T. intricata*.

B.18 The complex of sites contains the largest blocks of alder *Alnus glutinosa* wood in England. Within the complex complete successional sequences occur from open water through reedswamp to alder woodland, which has developed on fen peat. There is a correspondingly wide range of flora, including uncommon species such as marsh fern *Thelypteris palustris*.

Qualifying features

B.19 Annex I habitats present as a qualifying feature:

- Hard oligo-mesotrophic waters with benthic vegetation of *Chara* spp.; Calcium-rich nutrient-poor lakes, lochs and pools
- Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation; Naturally nutrient-rich lakes or lochs which are often dominated by pondweed

- *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows
- Transition mires and quaking bogs; Very wet mires often identified by an unstable `quaking` surface
- Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by great fen sedge (saw sedge)
- Alkaline fens; Calcium-rich springwater-fed fens
- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains

B.20 Annex I species present as a qualifying feature:

- *Vertigo moulinsiana*; Desmoulin`s whorl snail
- *Lutra lutra*; Otter
- *Liparis loeselii*; Fen orchid
- *Anisus vorticulus*; Little whorlpool ram's-horn snail

Conservation objectives

B.21 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 and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and
- The distribution of qualifying species within the site.

Key Vulnerabilities

- **Water pollution** - Diffuse water pollution (DWP) is a key issue potentially affecting all Broads sites and remains one of the priority issues to address in the Broads. There are a variety of sources, pathways and effects, and interactions with climate change. Hence, a variety of solutions is required to address the problem. In many cases measures are required throughout the catchment, rather than within the site or adjacent to the site. Saline incursion is also an increasing threat to much of the Broads' system (although most acutely in the lower Broads) due to climate change and increasing likelihood of both regular and extreme tidal impacts. Furthermore, Diffuse pollution from the Brograve level due to past drainage in the catchment has led to elevated salinity and ochre levels in both Horsey Mere and Hickling Broad.
- **Climate change** - Climate change is a cross-cutting issue that potentially impacts on many of the other identified issues. There is a need to improve the understanding of the potential effects on the Broads and the features it supports. This will be with a view to developing appropriate adaptation strategies going forward into the future.
- **Invasive species** - Invasive species involving a number of different species are impacting on SAC and SPA features; this is a key issue in the Broads and could be exacerbated by climate change.
- **Siltation** - Many of the open water bodies in the Broads have been subjected to siltation over many decades. Whilst many sites have been in receipt of a range of lake restoration measures, a number of sites require significant lake restoration to restore SAC quality open water features. There is a strong link to DWP to ensure that sediment/nutrient sources are largely removed in conjunction with lake restoration works.
- **Inappropriate water levels** - Water level management is key to the maintenance of features throughout the Broads. As such, it is essential that the correct water management infrastructure and operating protocols are in place to deliver the optimum hydrological regime for the features of interest at a site, also in the context of a changing climate. Operating procedures need to be updated at a number of locations following the implementation of Water Level Management Plan works. Appropriate water level management is also critical to the maintenance of dykes and infield water features (for breeding waders).
- **Hydrological changes** - Water availability to sites from both surface and groundwater sources will come under increasing pressure in a changing climate. This relates to both management of water within sites and also in their wider catchments.

- **Water abstraction** - Water abstraction is a key issue potentially affecting the full range of Broads' habitats and species. Whilst many of the concerns have been addressed through EA's Review of Consents (RoC) and Restoring Sustainable Abstraction (RSA) programmes, and the water companies' Asset Management Plan (AMP) programme, there remain concerns in some situations, and also a need to review licences in the context of a changing climate.
- **Change in land management** - Changes in land management within the catchment of sites as a result of expiring agreements and/or changes in land management practice could have a significant impact on water supply and quality affecting sites.
- **Inappropriate ditch management** - Understanding of the role and function of catch dykes (dykes lying between the floodplain and the upland) is indicating that they may play a key role both in the transfer of diffuse pollution into sites, the interruption of the hydrosereal succession from wet to dry habitats on the valley sides, impacts on water chemistry, and impacts on saline incursion.
- **Inappropriate scrub control** - Encroachment of scrub into fens remains an issue across the Broads, either in terms of one-off capital programmes or ongoing maintenance. This issue has to a large degree been addressed through the large capital programmes over the last 20 years, and maintenance through agri-environment. It remains an issue on sites outside agreement, where HLS payments are insufficient to meet costs, and where the expertise is not available to deliver the works.
- **Changes in species distributions** - Understanding changes in principally plant and invertebrate species and communities (in terms of distribution and composition) over time are critical to identifying general and site-specific trends, particularly in a changing climate and changes in salinity. This in turn allows issues to be identified and addressed at an early stage.
- **Public Access/Disturbance** - Recreational impacts on SAC habitats and disturbance to wintering waterfowl in particular, is an issue on a number of Broads' sites. This is largely a result of boat-based use of the water bodies.
- **Undergrazing** - Undergrazing is an issue on a number of sites within the Broads that have been historically grazed or require grazing. Often the issues are associated with the difficult ground, the difficulty of implementing grazing infrastructure, and/ or the lack of suitable stock. This can also impact on dyke margins, as is the case at Muckfleet Marshes.
- **Drainage** - A Water Level Management Plan to address ochre has now been costed and is planned to be delivered by 2015 by the Broads IDB. Recent

developments in the catchment mean that this plan now needs to be reviewed to identify whether the proposed solution or an alternative solution is still required.

- **Direct impact from third party** - The presence of military and police aircraft performing training exercises within the SPA is causing disturbance to the wildfowl interest features.
- **Inappropriate coastal management** - The presence of the sea wall at Winterton-Horsey Dunes compromises the coastal processes, and the dynamism within the dune features. This is a difficult issue to address due to the historical management of the coast, the complexities of the coastal environment, potential impacts on the Broads (Upper Thurne Broads & Marshes SSSI), and potential impacts on people and property. This is managed through the Shoreline Management Plan.
- **Air pollution** - Nitrogen deposition exceeds the site relevant critical load for ecosystem protection and hence there is a risk of harmful effects, particularly in the light of a changing climate

Broadlands SPA

Overview of site and its location

B.22 The fens of the Broads contain a diverse mix of species making it one of the most extensive remaining areas of fen habitat in Europe, being internationally recognised for eight fen communities. The fens and drained marshes are dissected by networks of dykes that support internationally important aquatic plant communities that have been lost from many broads: the fen habitats are also used by the internationally important otter.

B.23 The Broads also represent the largest area of floating forest and wet woodland in Britain and possibly Western Europe. Carr woodland supports four nationally important plant species and the limited area of mature alder carr is considered of priority international importance. In addition, parts of the Broads support a nationally rare scrub type that is almost entirely confined to East Anglia.

B.24 Fen habitats offer foraging and nesting sites for populations of three internationally important bird species; marsh harrier, bittern and crane. Nationally important populations of pochard and shoveler breed on unreclaimed fens and drained marshes adjacent to open water. Cetti's warbler, Savi's warbler and the bearded reedling are further species present in nationally important breeding

numbers. Internationally important populations of shoveler overwinter in unreclaimed fens and marshes.

B.25 The Broads is a complex site and there are a range of issues impacting across the catchment or in specific parts of the catchment. In many cases there are interactions between issues. This SIP links with actions in key documents, such as the Broads Plan and the Broadland Rivers Catchment Plan. Twenty-eight Sites of Special Scientific Interest (SSSI) have been notified in the Broads, with most of these sites being of international importance for their habitats and/or bird populations or species and have been included within the European Directives as the Broads Special Area of Conservation and the Broadland Special Protection Area.

Qualifying features

Annex I species:

- Great bittern; *Botaurus stellaris*
- Eurasian marsh harrier; *Circus aeruginosus*
- Bewick's swan; *Cygnus columbianus bewickii*
- Whooper swan; *Cygnus cygnus*
- Eurasian wigeon; *Anas Penelope*
- Gadwall; *Anas strepera*
- Northern shoveler; *Anas slypeata*
- Hen harrier; *Circus cyaneus*
- Ruff; *Philomachus pugnax*

Conservation objectives

B.26 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.

Key Vulnerabilities

5.9 Refer to The Broads SAC above.

Broadland Ramsar site

Overview of site and its location

B.27 Refer to Broadland SPA and The Broads SAC above.

Qualifying features

Ramsar criterion 2

- The site supports a number of rare species and habitats within the biogeographical zone context, including the following Habitats Directive Annex I features: Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae* calcium-rich fen dominated by great fen sedge, Alkaline fens, Alluvial forests and the Annex II species: *Verigo moulinsiana* Desmoulin's whorl snail, *Lutra lutra* otter and *Liparis loeselii* Fen orchid.

Ramsar criterion 6

- The site supports qualifying species/populations including *Cygnus columbianus bewickii*, Tundra swan; *Anas Penelope* Eurasian wigeon; *Anas strepera strepera*, Gadwall; and *Anas clypeata*, Northern shoveler.

Conservation objectives

B.28 None available.

Key Vulnerabilities

B.29 Refer to The Broads SAC above.

Dew's Pond SAC

Overview of site and its location

B.30 This site in rural East Suffolk comprises a series of 12 ponds set in an area of formerly predominantly arable land. The ponds range from old field ponds created for agricultural purposes to some constructed in recent years specifically for wildlife. Some of the land has been converted from arable to grassland, with a variety of grassland types present. Other habitats include hedges and ditches. Great crested newts *Triturus cristatus* have been found in the majority of ponds on the site.

B.31 Overlapping/adjacent to the SAC are the following Site(s) of Special Scientific Interest (SSSI):

- Dew's Pond SSSI

Qualifying features

Annex II species

- Great crested newt *Triturus cristatus*

Conservation objectives

B.32 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.

Key Vulnerabilities

- Water quality; and
- Air quality.

Minsmere to Walberswick Heaths and Marshes SAC

Overview of site and its location

B.33 Minsmere – Walberswick Heaths & Marshes SAC is located on the Suffolk coast south of Southwold in eastern England. It comprises two large marshes, the tidal Blyth estuary and associated habitats. This composite coastal site contains a complex mosaic of habitats, notably areas of marsh with dykes, extensive reedbeds, mud-flats, lagoons, shingle, woodland and areas of lowland heath. It supports the largest continuous stand of Common Reed *Phragmites australis* in England and Wales and demonstrates the nationally rare transition in grazing marsh ditch plants from brackish to fresh water. There are nationally important numbers of breeding and wintering birds. In particular, the reedbeds are of major importance for breeding Bittern *Botaurus stellaris* and Marsh Harrier *Circus aeruginosus*. A range of breeding waders (e.g. *Avocets Recurvirostra avosetta*) and heathland birds occur in other areas of the SPA. The shingle beaches support important numbers of breeding Little Tern *Sterna albifrons*, which feed substantially outside the SPA in adjacent marine waters. The site is also important for wintering Bitterns and raptors. The SAC features are heathland, vegetated annual and perennial shingle habitats.

B.34 Overlapping/adjacent to the SAC are the following Site(s) of Special Scientific Interest (SSSI):

- Minsmere to Walberswick Heaths and Marshes SSSI

Qualifying features

Annex I habitats present as a qualifying feature:

- Annual vegetation of drift lines
- European dry heaths
- Perennial vegetation of stony banks. (Coastal shingle vegetation outside the reach of waves)

Conservation objectives

B.35 With regard to the SAC 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:

- Annual vegetation of drift lines
- Perennial vegetation of stony banks.
- To maintain in favourable condition:
- Dry heaths

Key Vulnerabilities

B.36 Refer to Minsmere to Walberswick Heaths and Marshes SPA below.

Minsmere-Walberswick SPA

Overview of site and its location

B.37 Minsmere–Walberswick Special Protection Area (SPA) is located on the Suffolk coast south of Southwold in eastern England. It comprises of two large marshes, the tidal Blyth estuary, and associated habitats and covers 20 km². This composite coastal site contains a complex mosaic of habitats, notably areas of marsh with dykes, extensive reedbeds, mudflats, lagoons, shingle, woodland and areas of lowland heath. The site has close ecological links with the Hamford Water and Mid-Essex Coast SPAs, lying to the south on the same coast.

Qualifying features

- Annex I bird species Great bittern *Botaurus stellaris*
- Gadwall *Anas strepera*
- Eurasian teal *Anas crecca*
- Northern shoveler *Anas clypeata*
- Eurasian marsh harrier *Circus aeruginosus*
- Hen harrier *Circus cyaneus*
- Pied avocet *Recurvirostra avosetta*
- Little tern *Sterna albifrons*
- European nightjar *Caprimulgus europaeus*
- Greater white-fronted goose *Anser albifrons albifrons*

Conservation objectives

B.38 With regard to the individual species and/or assemblage of species for which the site has been classified (“the Qualifying Features” listed below);

Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.

Subject to natural change, to maintain or restore:

- 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.

Key Vulnerabilities

- **Coastal squeeze** – Coastal squeeze and greater frequency of coastal flooding is leading to loss of reedbed (at Walberswick and Corporation Marshes) and to loss of freshwater marsh (between Dunwich and Walberswick). There is evidence of erosion and accretion on leading edges at the Blyth (limited in most places) where coastal management is in line with the Shoreline Management Plan and deemed appropriate, but this may change in the future with sea level rise, increased flood risk and increased/reduced tidal prism. There is a risk of saline incursion into Westward Marshes if Waller's Wall is no longer maintained.
- **Public access/disturbance** – A great number of recreational visitors are attracted by area contributing to bird disturbance (e.g. human and dog disturbance to Little terns, Nightjar and Woodlark). Increased corvid predation is perceived as birds are flushed. The downward trends for these species are a concern. Trampling of heathland habitat and vegetated shingle (and Dune) habitat is an issue. Private aircraft (helicopters and planes, paramotorists) and MOD aircraft (helicopters and planes) regularly fly low over the site leading to disturbance of SPA features. Whilst wildfowling/shooting activities on site are fully assessed the impact of disturbance from unregulated shooting activity adjacent to the SPA/SAC is not fully understood.
- **Changes in species distributions** – The downward trend in population numbers of Woodlark, Nightjar, Marsh Harrier and Little Tern presents

concerns. Reasons for decline (predation, disturbance, habitat management, food sources, possibly persecution, etc.) need to be better understood and mitigated as appropriate.

- **Invasive species** – *Spartina anglica* is encroaching on estuarine muds. With *Spartina* at the front, and reed encroaching at back, saltmarsh could be squeezed out.
- **Inappropriate pest control** – Corvids and gulls are attracted by feed of nearby outdoor pig farming, predating and disturbing SPA features.
- **Air pollution: impact of atmospheric nitrogen deposition** – Air pollution can impact on vegetation diversity. Modelled aerial deposits of nitrogen exceed the threshold limit above which the diversity of heathland vegetation begins to be altered and adversely impacted. Many land use practices contribute to this problem including land spreading, outdoor pigs, high nutrient inputs on fields, etc.
- **Water pollution** – Inappropriate surface and ground water quality may impact on SAC habitats and the supporting habitats of some SPA birds. The estuary water is nutrient rich with high pollutant levels. Eutrophication is having an influence on reed. Increased flood events could lead to habitat change/loss of diversity. nutrient run off from outdoor pig farming could exacerbate the issue locally. Ground water pollution on light lands from land use practices such as treatment plants, land spreading, outdoor pigs, high nutrient inputs on fields, etc, may be an issue locally. There is a lack of groundwater monitoring in place.
- **Deer** – High numbers of red deer are damaging reedbed (runways and wallows/loss of structure), woodland (reduced structural diversity) and heathland (erosion and reduced structural diversity) habitat. Minsmere RSPB Reserve has started a culling programme. Some areas/habitats benefit from deer browsing whilst others are damaged. There is no coordinated approach to deer control in the wider area.
- **Fisheries: Commercial marine and estuarine** – Many different fishing pressures close to shore that may include bycatch of juveniles numbers/ disturbance of fish nursery areas that could potentially have an impact on Little tern *Sterna albifrons*.

Minsmere-Walberswick Ramsar site

Overview of site and its location

B.39 Refer to Minsmere to Walberswick Heaths and Marshes SAC and Minsmere-Walberswick SPA, above.

Qualifying features

Ramsar criterion 1

- The site contains a mosaic of marine, freshwater, marshland and associated habitats, complete with transition areas in between. Contains the largest continuous stand of reedbeds in England and Wales and rare transition in grazing marsh ditch plants from brackish to fresh water.

Ramsar criterion 2

- This site supports nine nationally scarce plants and at least 26 red data book invertebrates. Supports a population of the mollusc *Vertigo angustior* (Habitats Directive Annex II; British Red Data Book Endangered), recently discovered on the Blyth estuary river walls.
- An important assemblage of rare breeding birds associated with marshland and reedbeds including: *Botaurus stellaris*, great bittern; *Anas strepera*, gadwall; *Anas crecca*, Eurasian teal; *Anas clypeata*, northern shoveler; *Circus aeruginosus*, Eurasian marsh harrier; *Recurvirostra avosetta*, pied avocet; *Panurus biarmicus*, bearded reedling.

Conservation objectives

B.40 None available.

Key Vulnerabilities

B.41 Refer to Minsmere-Walberswick SPA above.

Redgrave and South Lopham Fens Ramsar site

Overview of site and its location

B.42 Redgrave and Lopham Fen is an extensive area of spring-fed valley fen in the headwaters of the River Waveney. It is the largest fen in lowland England. The reserve has a range of distinct habitats including the internationally important saw sedge beds and purple-moor grasslands.

Qualifying features

Ramsar criterion 1

- The site is an extensive example of spring-fed lowland base-rich valley, remarkable for its lack of fragmentation.

Ramsar criterion 2

- The site supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*.

Ramsar criterion 3

- The site supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. The diversity of the site is due to the lateral and longitudinal zonation of the vegetation types characteristic of valley mires.

Conservation objectives

B.43 None available.

Key Vulnerabilities

- Dredging
- Eutrophication
- Pollution – agricultural fertilisers
- Pollution – pesticides/agricultural runoff

Sandlings SPA

Overview of site and its location

B.44 The Sandlings SPA lies near the Suffolk coast between the Deben Estuary and Leiston. In the 19th century, the area was dominated by heathland developed on glacial sandy soils. During the 20th 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 which have survived successional changes and the consequent spread of bracken *Pteridium aquilinum*, shrubs and trees. The recent conservation management work, however, is resulting in their restoration. The heaths support both acid grassland and heather-dominated plant communities with dependent invertebrate and bird communities of conservation value. Woodlark *Lullula arborea* and Nightjar *Caprimulgus europaeus* have also adapted to breeding in the large blocks of conifer forest, using areas that have recently been felled and recent plantation, as well as areas managed as open ground.

B.45 Overlapping/adjacent to the SAC are the following Site(s) of Special Scientific Interest (SSSI):

- Sandlings Forest SSSI
- Leiston-Aldeburgh SSSI
- Blaxhall Heath SSSI
- Tunstall Common SSSI
- Sutton & Hollesley Heaths SSSI
- Snape Warren SSSI

Qualifying features

Annex I bird species

- Nightjar *Caprimulgus europaeus*
- Woodlark *Lullula arborea*

Conservation objectives

B.46 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.

Key Vulnerabilities

- **Changes in species distributions** – Woodlark and Nightjar populations on the Suffolk coast have declined by 65% and 66% respectively since notification in 2001.
- **Inappropriate scrub control** – Scrub encroachment is reducing habitat suitability for Woodlark and Nightjar. Regular management is essential to maintain and restore the supporting heathland habitat to favourable condition.
- **Deer** – A large deer population exerting grazing pressure on habitats will affect quality of nesting habitat. There is also potential for deer to trample nests.
- **Air pollution: impact of atmospheric nitrogen deposition** – Nitrogen deposition exceeds site relevant critical loads.
- **Public Access/Disturbance** – The need to understand recreational pressure and implement appropriate management is an ongoing issue. Recreational pressure could be increased by new housing developments in the area and by the potential displacement of visitors during the construction of Sizewell C.

Waveney and Little Ouse Valley Fens SAC

Overview of site and its location

B.47 This site occurs in the East Anglian centre of distribution of calcareous fens and contains very extensive great fen-sedge *Cladium mariscus* beds, including managed examples, as well as stands in contact zones between small sedge mire and

species-poor *Cladium* beds. The habitat type here occurs in a spring-fed valley fen. Purple moor-grass – meadow thistle (*Molinia caerulea* – *Cirsium dissectum*) fen-meadows are associated with the spring-fed valley fen systems. The *Molinia* meadows occur in conjunction with black bog-rush – blunt-flowered rush (*Schoenus nigricans* – *Juncus subnodulosus*) mire and calcareous fens with great fen-sedge. Where the fen-meadow is grazed it is more species-rich, with frequent southern marsh-orchid *Dactylorhiza praetermissa*. A population of Desmoulin’s whorl snail *Vertigo moulinsiana* occurs in a valley fen at Weston Fen.

Qualifying features

Annex I habitats

- Calcareous fens with *Cladium mariscus* and species of *the Caricion davallianae*. (Calcium-rich fen dominated by great fen sedge (saw sedge))
- *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*). (Purple moor-grass meadows)

Annex II species

- Desmoulin’s whorl snail *Vertigo moulinsiana*

Conservation objectives

B.48 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 and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and
- The distribution of qualifying species within the site.

Key Vulnerabilities

- **Inappropriate scrub control** – Historically sections of the fen have been allowed to scrub over. These now form wet woodland and scrub with glades containing the remnants of the qualifying features. The aim is to ensure the site includes the same area of Cladium fen (H7210 Calcium-rich fen dominated by great fen sedge (saw sedge)) present at the time of designation.
- **Inappropriate water levels** – Concerns have been expressed about water levels in the SAC. Some areas such as Redgrave and Lopham Fens have already been worked on. Others (Blo' Norton and Thelnetham Fens) are currently being investigated through the Water Level Management Plan process. Historical evidence suggests that water levels have significantly dropped over time and as a result habitats and features have been damaged. Parts of the fen supported swingmoor habitats and these are a poor representation of their former selves.
- **Air pollution: impact of atmospheric nitrogen deposition** – Nitrogen deposition exceeds site relevant critical loads.
- **Water pollution** – Poor water quality arising from agricultural run-off particularly from nearby outdoor poultry and pig units causes nutrient enrichment and can lead to a reduction in biodiversity.

References

- 1 [HM Government \(2007\) The Conservation \(Natural Habitats, &c.\) \(Amendment\) Regulations 2007 \(SI No. 2007/1843\)](#)
- 2 [HM Government \(2017\) The Conservation of Habitats and Species Regulations 2017 \(SI No. 2017/1012\), as amended by HM Government \(2019\) The Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations 2019 \(SI No. 2019/579\)](#)
- 3 The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)
- 4 [Department for Levelling Up, Housing and Communities \(2019\) Appropriate assessment: Guidance on the use of Habitats Regulations Assessment](#)
- 5 Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive').
- 6 Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the 'Birds Directive').
- 7 [The network of protected areas identified by the EU: European Commission \(2008\) Natura 2000](#)
- 8 [Department for Environment, Food and Rural Affairs \(2021\) Changes to the Habitats Regulations 2017](#)
- 9 [Department for Environment, Food and Rural Affairs, Natural England, Welsh Government and Natural Resources Wales \(2021\) Habitats regulations assessments: protecting a European site](#)
- 10 [Ministry of Housing, Communities and Local Government \(2024\) National Planning Policy Framework \(paragraph 194\)](#)
- 11 [David Tyldesley & Associates \(undated\) The HRA Handbook \(Section A3\) – A subscription based online guidance document](#)
- 12 [Department for Environment, Food and Rural Affairs, Natural England, Welsh Government and Natural Resources Wales \(2021\) Habitats regulations assessments: protecting a European site](#)
- 13 Regulations 5 of the Habitats Regulations 2017.
- 14 [Department for Levelling Up, Housing and Communities \(2019\) Appropriate assessment: Guidance on the use of the Habitats Regulations Assessment](#)

-
- 15 European Commission (2001) Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC
 - 16 [David Tyldesley & Associates \(undated\) The HRA Handbook \(Section A3\)](#) – A subscription based online guidance document
 - 17 [Natural England \(undated\) Conservation Objectives for European Sites](#)
 - 18 In line with the CJEU judgement in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.
 - 19 In addition to SAC and SPA citations and conservation objectives, key information sources for understanding factors contributing to the integrity of the sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England: [Natural England \(undated\) Site Improvement Plans by region](#)
 - 20 A buffer distance of 20 kilometres has been applied based on the buffer distance applied to North Essex HRAs. This seems relevant given the large distances identified in relation to recreation.
 - 21 Obtained from the [Natural England website](#).
 - 22 [Natural England \(undated\) Conservation Objectives for European Sites](#)
 - 23 SI No. 2017/2012.
 - 24 ECJ Case C-127/02 “Waddenzee” Jan 2004.
 - 25 [David Tyldesley & Associates \(undated\) The HRA Handbook \(Section A3\)](#) – A subscription based online guidance document
 - 26 [David Tyldesley & Associates \(undated\) The HRA Handbook \(Section A3\)](#) – A subscription based online guidance document
 - 27 British Wildlife Magazine (October 2007)
 - 28 Wealden v SSCLG [2017] EWHC 351 (Admin).
 - 29 JNCC (2021) Guidance on decision-making thresholds for air pollution, <https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>
 - 30 As referenced in the Institute of Air Quality Management guidance Guidance on the Assessment of Mineral Dust Impacts for Planning (2016), https://iaqm.co.uk/text/guidance/mineralsguidance_2016.pdf

-
- 31 Mid Suffolk Council, Habitats Sites Mitigation – Suffolk Coast RAMS, <https://www.midsuffolk.gov.uk/w/habitats-sites-mitigation>
 - 32 Place Services (2021) Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy, March 2021, https://www.west-norfolk.gov.uk/download/downloads/id/7867/girams_strategy_-_march_2021.pdf
 - 33 Footprint Ecology (2024) Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan, https://www.west-norfolk.gov.uk/download/downloads/id/9378/norfolk_rams_action_plan_-_april_2025.pdf
 - 34 Available online at - https://www.eswater.co.uk/globalassets/business/wtr0534-mortatoriumleafletimageov_sa_v3.pdf
 - 35 Essex & Suffolk Water Resources Management Plan 2024, <https://www.nwg.co.uk/responsibility/environment/wrmp/wrmp-2025-2030/>
 - 36 Available online at - <https://www.nwg.co.uk/responsibility/environment/wrmp/>
 - 37 Available online at - <http://www.nwg.co.uk/droughtplan>
 - 38 Available online at - <https://www.anglianwater.co.uk/siteassets/household/about-us/dwmp/dwmp-1.pdf>
 - 39 Available online at - <https://www.nwg.co.uk/responsibility/environment/wrmp/>
 - 40 [JNCC \(2019\) UK Protected Area Datasets for Download](#)
 - 41 [Natural England \(2014-2015\) Site Improvement Plans: East of England](#)
 - 42 [Natural England \(undated\) Conservation Objectives for European Sites](#)
 - 43 [JNCC \(2008\) Information Sheet on Ramsar Wetlands \(RIS\). Alde-Ore Estuary](#)

Report produced by LUC

Report produced by LUC

Bristol

12th Floor, Beacon Tower, Colston Street, Bristol BS1 4XE
0117 389 0700

Cardiff

Room 1.12, 1st Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 254 0920

Edinburgh

Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 326 0900

Glasgow

5th Floor, The Garment Factory, 10 Montrose Street, Glasgow G1 1RE
0141 403 0900

London

250 Waterloo Road, London SE1 8RD
020 7199 5801

Manchester

4th Floor, 57 Hilton Street, Manchester M1 2EJ
0161 802 2800

Sheffield

32 Eyre Street, Sheffield, S1 4QZ
0114 392 2366

Email address for general enquiries: hello@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment / Transport Planning
Development Planning / Urban Design & Masterplanning / Arboriculture
Environmental Impact Assessment / Landscape Planning & Assessment
Landscape Management / Ecology / Historic Environment / GIS & Visualisation