

Habitats Regulations Assessment of the South Norfolk Village Clusters Housing Site Allocations Plan

Preliminary European Site Scoping Technical Advice Report

September 2020



Habitats Regulations Assessment of the South Norfolk Village Cluster Housing Site Allocations Plan

Preliminary European Site Scoping Technical Advice Report

LC-654	Document Control Box
Client	South Norfolk Council
Report Title	Habitats Regulations Assessment Preliminary European Site Scoping – Technical Advice Report
Status	FINAL
Filename	LC-654_South Norfolk_HRA_Preliminary Scoping Report_3_300920SC.docx
Date	September 2020
Author	SC
Reviewed	ND
Approved	ND

Photo: Breydon Water by Kevin Millican

Contents

1	Introduction	1
1.2	Purpose of this report	1
2	The HRA process	3
2.2	Previous HRA work	6
3	Methodology.....	12
3.1	HRA guidance	12
3.2	Identification of European sites	13
3.3	HRA methodology.....	18
3.4	Stage 1: Screening for likely significant effects.....	18
3.5	What is a Likely Significant Effect?	20
3.6	In-combination effects.....	22
3.7	Case law	24
3.8	Stage 2: Appropriate Assessment and Integrity Test	26
3.9	Dealing with uncertainty.....	27
3.10	The Precautionary Principle.....	27
3.11	European sites	28
3.12	Ecological information.....	28
4	Threats and pressures.....	31
4.2	Air quality	32
4.3	Hydrology	41
4.4	Public access and disturbance	49
4.5	Habitat fragmentation and loss.....	54
4.6	European sites	55
5	Next Steps	60
5.1	Summary	60
5.2	Next steps.....	61

Appendix A: European site conservation objectives

Appendix B: Scoping of threats and pressures at European sites

List of Figures

Figure 2.1: Stages in the Habitats Regulations Assessment process	5
Figure 3.1: SACs within HRA study area	15
Figure 3.2: SPAs within HRA study area	16
Figure 3.3: Ramsar sites within HRA study area	17
Figure 3.4: Outline of steps in stage 1; the whole screening process	19
Figure 3.5: Outline of the in-combination pre-screening assessment methodology	22
Figure 4.1: Traffic contribution to pollution concentration at different distances from road centre...	35

List of Tables

Table 2.1: Summary of HRA work undertaken to date to support the GNLP	6
Table 2.2: Review of HRA related representations	8
Table 3.1: Assessment and reasoning categories from Part F of the DTA Handbook	20
Table 4.1: Inflow and outflow traffic data for South Norfolk – journeys by car and van only	37
Table 4.2: Identification of roads within 200m of European sites	39
Table 4.3: Air quality recommendations and further work	41
Table 4.4: Hydrology recommendations and further work	49
Table 4.5: Public access and disturbance recommendations and further work	54
Table 4.6: Habitat loss and fragmentation recommendations and further work	55
Table 4.7: Scoping summary for European sites within HRA study area	56

Abbreviations

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
APIS	Air Pollution Information System
CJEU	Court of Justice of the European Union
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
DTA	David Tyldesley and Associates
EEC	European Economic Community
EMS	European Marine Site
EU	European Union
EUNIS	European Nature Information System
GIRAMS	Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy
GIS	Geographic Information System
GNLP	Greater Norwich Local Plan
HDV	Heavy Duty Vehicles
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
IUCN	International Union for Conservation of Nature
JNCC	Joint Nature Conservation Committee
LPA	Local Planning Authority
LSE	Likely Significant Effect
N	Nitrogen
NE	Natural England
NO₂	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
PRoW	Public Right of Way
RBMP	River Basin Management Plan
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SIP	Site Improvement Plan
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest

SuDS	Sustainable Urban Drainage
UK	United Kingdom
VCHAP	Village Cluster Housing Allocation Plan
WRC	Wastewater Recycling Centres
WCS	Water Cycle Study
WFD	Water Framework Directive
WRMP	Water Resource Management Plan
WRZ	Water Resource Zone
WWT	Wildfowl and Wetlands Trust
WwTW	Wastewater Treatment Works

1 Introduction

- 1.1.1 South Norfolk Council (hereafter referred to as the Council) is in the early stages of producing a new local plan document that will identify land for a minimum of 1,200 new homes in appropriate villages across South Norfolk up to 2038. This is known as the South Norfolk Village Cluster Housing Allocations Plan (VCHAP).
- 1.1.2 The Council is also working with Broadland Council and Norwich City Council to produce the Greater Norwich Local Plan (GNLP). Amongst other things, the GNLP identifies how many homes need to be built across the three authorities between now and 2038.
- 1.1.3 It was initially intended that the GNLP would identify the land on which new homes will be built across the whole of the three authority areas. However, during production of the GNLP it became apparent to South Norfolk Council that the choice of potential development sites would not enable an appropriate distribution specifically across the South Norfolk Villages. As a consequence, the decision was taken to produce a separate site allocation document for those settlements. Site allocations for Broadland, Norwich and for larger settlements at the Norwich fringe in South Norfolk remain part of the GNLP.
- 1.1.4 The strategic policies in the GNLP will continue to identify how many homes need to be built between now and 2038 in different locations across the areas of Broadland, Norwich and South Norfolk. For the South Norfolk Village clusters a minimum of 1,200 homes (over and above existing commitments) have currently been identified.

1.2 Purpose of this report

- 1.2.1 Lepus Consulting has been appointed by the Council to undertake a Habitats Regulations Assessment (HRA) to inform the preparation of the VCHAP.

- 1.2.2 The HRA will be prepared in accordance with the Conservation of Habitats and Species Regulations 2017^{1,2} (the Habitats Regulations). When preparing development plan documents, councils are required by law to carry out an HRA. The requirement for authorities to comply with the Habitats Regulations when preparing a local plan is also noted in the Government's online planning practice guidance³.
- 1.2.3 The most effective way to deliver the outputs of HRA is to ensure that it is incorporated into the plan-making process as early as possible. This allows adverse impacts to be avoided in the first instance through strategic planning of options or, where this is not possible, effective mitigation. Mitigation measures can then be designed to avoid, cancel or reduce significant effects following the mitigation hierarchy. Such measures may take the form of guiding principles and policy requirements, drawing on existing best practice. Should mitigation not be possible there may be a need to consider alternatives which may require some more complex changes to a plan.
- 1.2.4 Regular contact with the plan-making team is essential to ensure that the planning and HRA processes run alongside each other effectively and iteratively. This will ensure that the plan making team has plenty of time to respond to and incorporate the findings of the HRA process.
- 1.2.5 The purpose of this report is therefore to provide HRA guidance and advice to the Council at the early stages of preparing the VCHAP. This preliminary HRA scoping exercise aims to identify those European sites that will be considered in the HRA process through application of a 'source-pathway-receptor' model. In addition, key constraints and opportunities at European sites and likely pathways of impact from the VCHAP are set out. This report also outlines HRA methodologies that will be taken forward alongside the preparation of the VCHAP and makes recommendations where information allows.

¹ The Conservation of Habitats and Species Regulations (2017) SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed: 28/07/20]

² The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/978011176573> [Date Accessed: 07/08/20]

³ Ministry of Housing, Communities and Local Government (2019) Appropriate Assessment: Guidance on the use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment> [Date Accessed: 28/07/20]

2 The HRA process

- 2.1.1 The HRA process assesses the potential effects of a plan or project on the conservation objectives of European sites designated under the Habitats⁴ and Birds⁵ Directives. These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'.
- 2.1.2 European sites provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within the European Union (EU). These sites consist of Special Areas of Conservation (SACs), designated under European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive), and Special Protection Areas (SPAs), classified under European Directive 2009/147/EC on the conservation of wild birds (the Birds Directive)⁶. Additionally, paragraph 176 of the National Planning Policy Framework (NPPF)⁷ requires that sites listed under the Ramsar Convention (The Convention on Wetlands of International Importance, especially as Waterfowl Habitat) are to be given the same protection as fully designated European sites.
- 2.1.3 Collectively, and for ease of reference, these sites are referred to as European sites within this report. It is however noted that Ramsar sites are international designations.

⁴ Official Journal of the European Communities (1992) Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN%207> [Date Accessed: 28/07/20]

⁵ Official Journal of the European Communities (2009) Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. Available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0147&from=EN> [Date Accessed: 28/07/20]

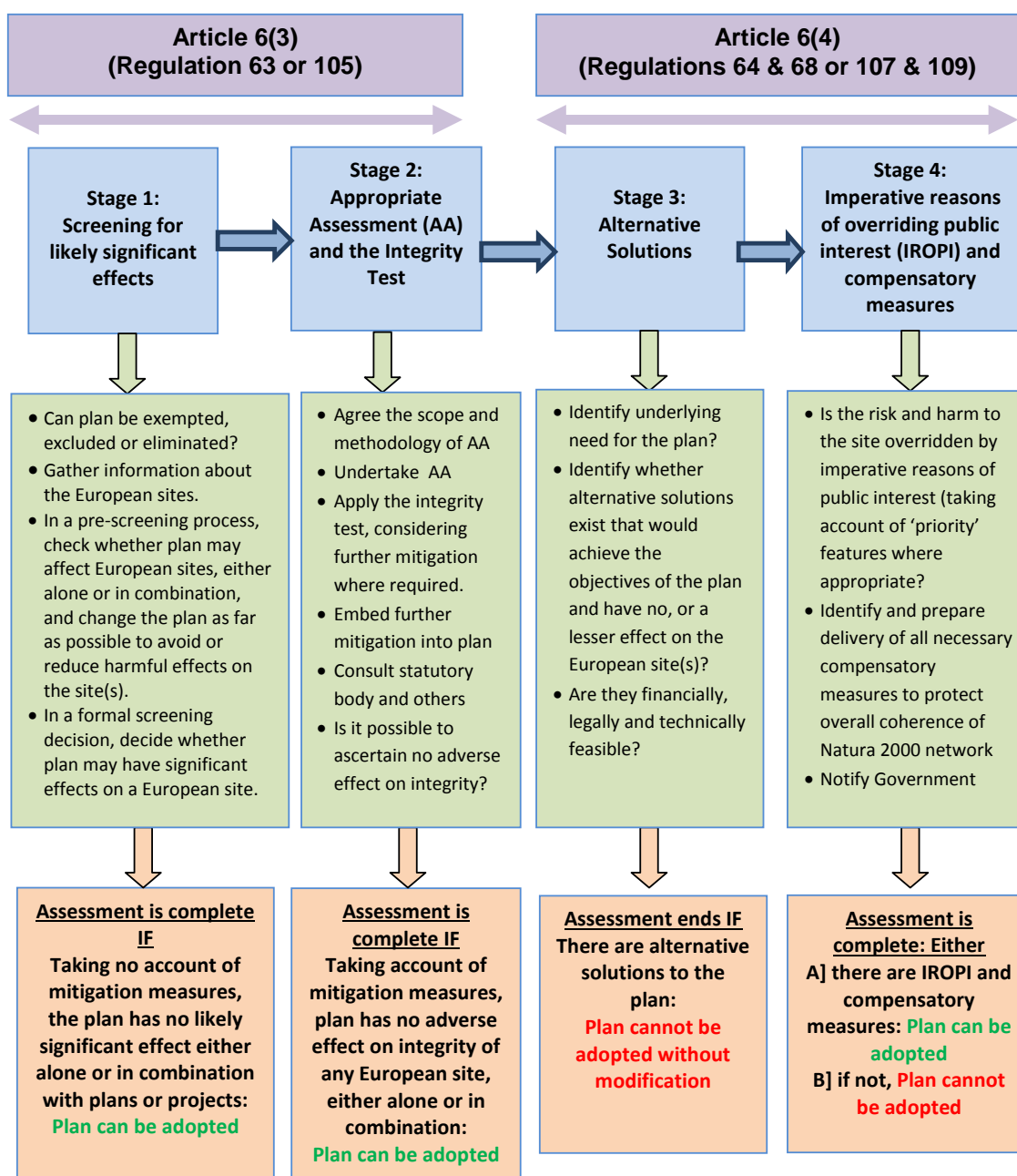
⁶ A European Marine Site is a European site (SPAs or SACs) so far as it consists of marine areas (are below the Mean High Water Mark) and to the 12nm limit of territorial seas.

⁷ Ministry of Housing, Communities & Local Government (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 28/07/20]

- 2.1.4 There is no set methodology or specification for carrying out and recording the outcomes of the assessment process. The Habitats Regulations Assessment Handbook, produced by David Tyldesley Associates (referred to hereafter as the ‘DTA Handbook’), provides an industry recognised good practice approach to HRA. The DTA Handbook, and in particular ‘Practical Guidance for the Assessment of Plans under the Regulations’⁸, which forms part F, has therefore been used to prepare this report. The DTA Handbook is used by Natural England, the Government’s statutory nature conservation organisation, and is widely considered to be an appropriate basis for the HRA of plans.
- 2.1.5 A step-by-step guide to the methodology adopted in this assessment, as outlined in the DTA Handbook, is illustrated in **Figure 2.1**. In summary, the four key stages of the HRA process are as follows:
- **Stage 1. Screening:** Screening to determine if the VCHAP would be likely to have a significant effect on a European site. This stage comprises the identification of potential effects associated with the VCHAP on European sites and an assessment of the likely significance of these effects.
 - **Stage 2. Appropriate Assessment and the ‘Integrity Test’:** Assessment to ascertain whether or not the VCHAP would have a significant adverse effect on the integrity of any European site to be made by the Competent Authority (in this instance the Council). This stage comprises an impact assessment and evaluation in view of a European site’s conservation objectives. Where adverse impacts on site integrity are identified, consideration is given to alternative options and mitigation measures which are tested.
 - **Stage 3. Alternative solutions:** Deciding whether there are alternative solutions which would avoid or have a lesser effect on a European site.
 - **Stage 4. Imperative reasons of overriding public interest and compensatory measures:** Considering imperative reasons of overriding public interest and securing compensatory measures.

⁸ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (September) (2013) edition
UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

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



Extract from *The Habitats Regulations Assessment Handbook*, www.dtapublications.co.uk
© DTA Publications Limited (October 2018) all rights reserved
This work is registered with the UK Copyright Service

Figure 2.1: Stages in the Habitats Regulations Assessment process⁹

⁹ Tyldesley, D., and Chapman, C. (2013) *The Habitats Regulations Assessment Handbook* (October) (2018) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

2.2 Previous HRA work

2.2.1 Notwithstanding the fact that the allocation of sites for residential development within the South Norfolk Village Clusters area has now been decoupled from the GNLP, HRAs, including screening, have been prepared alongside the production of the GNLP. The GNLP was originally to include site allocations within the South Norfolk Village Clusters area. **Table 2.1** provides a summary of the HRA work undertaken to date in support of the GNLP.

Table 2.1: Summary of HRA work undertaken to date to support the GNLP

HRA Report	Summary of findings
<p>Habitats Regulations Assessment of Greater Norwich Local Plan Issues and Options stage for Greater Norwich Development Partnership</p> <p>Author: The Landscape Partnership</p> <p>December 2017</p>	<p>This HRA provided an interim assessment at the Regulation 18 Issues and Options stage. It considered alternative housing numbers and options for their distribution.</p> <p>The HRA provided an assessment of impacts upon the following European sites:</p> <ul style="list-style-type: none"> - River Wensum SAC; - Norfolk Valley Fens SAC; - The Broads SAC/ Broadland SPA, Ramsar; - Breydon Water SPA/Ramsar/SPA (Marine); - Great Yarmouth North Denes SPA; - Winterton – Horsey Dunes SAC; - Paston Great Barn SAC; - Overstrand Cliffs SAC; - Waveney & Little Ouse Valley Fens SAC; - Redgrave and South Lopham Fens Ramsar; - Breckland SPA/SAC; - Benacre to Easton Barents Lagoons SAC/Benacre to Easton Barents SPA; - Dew's Ponds SAC; - The Wash and North Norfolk Coast SAC (inshore); - North Norfolk Coast SPA (marine)/SAC (inshore)/Ramsar; - Southern North Sea cSAC (offshore and inshore); - Outer Thames Estuary SPA (marine)/Outer Thames Estuary Extension pSAC (marine); and - Haisborough, Hammond and Winterton SCL. <p>The HRA applied a number of zones of influence for each potential impact as follows:</p> <ul style="list-style-type: none"> - Recreation – by foot 1km - 8km; - Recreation to special sites e.g. coastal reserves – 8km - 20km; - Water resources – 20km; - Pollution impacts to watercourses – 8km; - Air quality – not investigated but road corridors used as zone of influence; - Urbanisation effects – 1km; and - Direct impacts – 250m.

HRA Report	Summary of findings
	<p>The HRA found that the distributional alternatives for housing are likely to have a significant effect on European sites and so further assessment is necessary as the plan develops.</p> <p>Potential significant effects of the GNLP in combination with other plans and projects were noted to include the following:</p> <ul style="list-style-type: none"> - Impacts resulting from in-combination effects associated with water abstraction on internationally designated wetland sites; - Water quality impacts resulting from in-combination effects associated with wastewater discharges on internationally designated wetland sites; - Air quality impacts associated with increased traffic generation resulting from development on internationally designated sites that support vegetation sensitive to NOx, SO2 or total Nitrogen; and - Increased disturbance and visitor pressure resulting from in-combination effects on the wetland, grassland/heathland and coastal sites. <p>Assessment of the distributional alternatives for housing identified that allocations to the north-west, west and south-west of Norwich were situated to reduce the likely impact of regular visitors to The Broads / Broadland European sites. The options 'transport corridors' and 'Cambridge – Norwich tech corridor' were noted to be strong options in terms of avoiding impacts to European sites. Allocations to the north-east of Norwich were marginally outside zones of influence of the popular coastal European sites although as with all options some additional occasional visits to the popular coastal European sites were predicted. Options for dispersal, or dispersal plus a new settlement were harder to assess as the HRA stated that the housing could be almost anywhere.</p> <p>The HRA set out a number of mitigation recommendations for incorporation into the GNLP as it develops. These included development of new recreational space and preparation of an updated Water Cycle Study (WCS).</p>
<p>Habitats Regulations Assessment of Greater Norwich Regulation 18 Draft Plan for Greater Norwich Development Partnership</p> <p>Author: The Landscape Partnership</p> <p>December 2019</p>	<p>This HRA provides an assessment of the Consultation Draft stage v8.1 of the emerging Greater Norwich Local Plan, encompassing Norwich City, Broadland District (excluding the Broads Authority area), and South Norfolk District.</p> <p>Impacts considered in the HRA included:</p> <ul style="list-style-type: none"> - Water cycles (use and disposal); - Traffic related air pollution; - Water pollution or enrichment; and - Increased visitors to European sites. <p>The HRA focused on the same European sites as identified in the Issues and Options HRA (above).</p> <p>The HRA concluded that the GNLP would have no adverse effect upon the integrity of any European site acting alone, subject to the following outstanding matters:</p> <ul style="list-style-type: none"> • Mitigation of recreational impact upon European sites comprising a) a tariff based payment taken from residential, and other relevant accommodation e.g. tourist accommodation, that

HRA Report	Summary of findings
	<p>will be used to fund a mixture of mitigation measures, most likely of soft and hard mitigation measures at the European sites; b) the provision of suitable alternative natural green space (SANGs), which would be large enough to meet a range of recreational needs, c) implementation of a wider programme of Green Infrastructure Improvements in accordance with current and emerging project plans, so that residents have an alternative to European sites for regular activities such as dog walking. Reference is made to the emerging Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) currently in preparation by the Norfolk Authorities.</p> <ul style="list-style-type: none"> • Satisfactory completion of a Water Cycle Study which demonstrates no adverse impact on European sites. • Update to policy wording to read that 'Habitats Regulations Assessments will be required for small scale tourism accommodation within 1km, and for larger scale tourism accommodation within 10km, of a European site. Habitats Regulations Assessment will also be required for tourism, leisure, cultural and environmental activities which would utilise European sites'. <p>In terms of in-combination impacts, the HRA recommended that road schemes, not allocated or promoted by the GNLP but mentioned in the plan, receive stronger recognition from the plan with respect to protection of European sites.</p> <p>The overall conclusion was that subject to satisfactory resolution of the outstanding matters there would be no adverse effect upon the integrity of any European site.</p>

2.2.2 Natural England was consulted upon the HRA work undertaken in support of the GNLP. The output of this consultation is summarised in **Table 2.2**.

Table 2.2: Review of HRA related representations

Organisation	Summary of representation	How this has been taken into consideration in the HRA / Recommendations
Natural England 21 March 2018	Natural England note the requirement of the GNLP to provide a range of avoidance and mitigation measures to address recreation impacts. These include the provision of new well designed GI either on-site and/or off-site, with suitable and accessible green space for recreational activities, including dog walking, together with good connectivity to the surrounding PROW network, and costs towards	The VCHAP HRA will integrate the outputs of the strategic GIRAMS and draw upon the findings of the updated WCS which is currently being undertaken in support of the GNLP.

Organisation	Summary of representation	How this has been taken into consideration in the HRA / Recommendations
	<p>the mitigation of impacts on designated sites.</p> <p>Natural England state that “residential and commercial development, and waste water discharges affecting water quality. Water-dependent designated sites, including the River Wensum, those in The Broads, the Norfolk Valley Fens and the Waveney Valley Fens, are affected by these issues which can arise from a single development or in combination with other developments. A detailed water cycle study will need to be undertaken to determine where allocations should be located and what measures will be required to address water quantity and quality issues identified, which should then need to be addressed through policies and allocations in the Greater Norwich Local Plan (GNLP).”</p>	
Natural England 16 March 2020	<p>Natural England provided comments on the 2019 Regulation 18 version of the HRA. These comments are summarised below.</p> <ul style="list-style-type: none"> - NE note that the European designated sites have been identified correctly and that they agree with the likely significant effects identified. - NE note that water resources are required for both residential and employment allocations. - NE highlighted some concern regarding securing mitigation set out within the HRA. - NE advised that the HRA be re-examined to take into consideration the findings of the GIRAMS. NE recognise that the findings of GIRAMS will need to be reflected in the Local Plan regarding tariffs, Natural England does not consider the two other strands of suitable alternative natural green space (SANGS) and the implementation of a cohesive programme of GI improvements, have been covered 	<p>The HRA will ensure that it draws on the findings of a number of other pieces of the GNLP and Local Plan evidence base as follows:</p> <ul style="list-style-type: none"> - Updated WCS. Council to confirm when this will be available. - Traffic modelling. This will take into consideration alone and in-combination effects. - Emerging GIRAMS. Requested from Council 22.09.20. - In-combination effect of NWL road to be taken into consideration. Council to provide HRA related assessment information to allow a through in-combination assessment. - Overarching policies in terms of water quality and water efficiency to be included in the GNLP. - Allocation specific policy wording relating to provision of informal / formal

Organisation	Summary of representation	How this has been taken into consideration in the HRA / Recommendations
	<p>adequately in the Plan to conclude that these will be delivered in a coherently and timely approach at the appropriate locations.</p> <p>- NE note that the proposed Norwich Western Link (NWL) road will pass within 200 m of the River Wensum Special Area of Conservation (SAC), and although the road is proposed by Norfolk County Council, it has been identified as necessary in order to support the future housing and employment growth in the Greater Norwich area. The Plan references the NWL, including under Policy 4 - Strategic Infrastructure, and the road should be considered in combination with the other proposals under Policy 4 that have the potential to affect designated sites through increases in air pollution.</p> <p>- In addition, to examining the distance of proposed allocations from European sites, further assessment of air quality is required where changes to the road network or traffic volumes might increase daily traffic flows by 1,000 Average Annual Daily Traffic (AADT) or more where the road stretch has sensitive habitats within 200 m of the road. Air quality considerations need to have appropriate regard for any impacts that may act in combination. NE note that it is unclear whether this work has been done.</p> <p>- NE note that the WCS outputs need to feed into the Plan policies and inform the HRA. NE note that they would expect future iterations of the HRA to recognise the need for water efficiency planning policies to support water efficiency requirements in new builds. Solutions to any water quality issues or water supply issues identified in the WCS need to form part of the detailed master plan stage so there is certainty in what is required and timely delivery, prior to any planning application being made.</p>	<p>recreational space, water quality and water efficiency measures and requirement for project level HRA to be included in VCHAP where necessary.</p>

Organisation	Summary of representation	How this has been taken into consideration in the HRA / Recommendations
	<ul style="list-style-type: none"> - With regard to any water treatment issues identified, the HRA will need to examine if the Local Plan contains clear wording in relation to assuring timely delivery of required infrastructure and treatment capabilities for phosphate, ammonia and nitrogen. - Whilst NE agrees that the Policy will not have an adverse effect on any European site, they do not consider the current wording and supporting text to be sufficient to secure the delivery of the mitigation measures identified in the HRA. NE does not consider it possible at this stage to conclude no adverse effect upon the integrity of any European site. - NE has concerns whether the current wording and supporting text of various Plan policies are sufficient to secure the delivery of the mitigation measures identified in the HRA including GI, whether on-site or off-site, and SANGS. - Where GI is required, reference should be incorporated into the policy and supporting text of each individual site allocation policy, making it clear that the allocation will only be deliverable if a project level HRA can demonstrate no adverse effects. Similarly, the policy and supporting text of each individual site allocation policy will need to include details of any other non-recreational related mitigation measures where these are identified at a subsequent stage of the Plan (together with a requirement for a project level HRA). The requirement for individual project level HRAs needs to be covered in the revised HRA, (and reflected in the relevant policy wording within the Local Plan) in light of the ZOI in the GIRAMS. - In conclusion NE does not consider that it is possible at this stage to conclude no adverse effect upon the integrity of any European site arising from the GNLP alone. 	

3 Methodology

3.1 HRA guidance

3.1.1 As noted above, the application of HRA to land-use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended)¹⁰, the UK's transposition of European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). HRA applies to plans and projects, including all Local Development Documents in England and Wales.

3.1.2 The HRA for the VCHAP will be informed by the following guidance:

- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites - European Commission, 2001¹¹;
- Planning Practice Guidance: Appropriate Assessment¹²;
- The Habitat Regulations Assessment Handbook¹³ - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), in particular Part F: '*Practical Guidance for the Assessment of Plans under the Regulations*'; and
- The Appropriate Assessment of Spatial Plans in England – A Guide to How, When and Why to do it - RSPB, 2007¹⁴.

¹⁰ The Conservation of Habitats and Species Regulations (Various Amendments) (England and Wales) 2018. Regulation SI No. 1307. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed: 28/07/20]

¹¹ 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. Available at: https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf [Date Accessed: 28/07/20]

¹² Ministry of Housing, Communities and Local Government (2019) Appropriate Assessment: Guidance on the use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment> [Date Accessed: 28/07/20]

¹³ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (October) (2018) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

¹⁴ RSPB (2007) The Appropriate Assessment of Spatial Plans in England. A Guide to How, When and Why to do it. Available at: http://ww2.rspb.org.uk/Images/spatialplansengland_tcm9-168180.pdf [Date Accessed: 28/07/20]

3.2 Identification of European sites

- 3.2.1 There is no guidance that defines the study area for inclusion in HRA. Planning Practice Guidance for Appropriate Assessment (listed above) indicates that:
- 3.2.2 *“The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. ‘Appropriate’ is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site”.*
- 3.2.3 Therefore, in order to determine a study area for the HRA, consideration has been given to the nature and extent of potential impact pathways from the VCHAP and their relationship to European sites.
- 3.2.4 The HRA reports undertaken for the GNLP (see **Table 2.1**) considered the scope of the HRA to include European sites within a number of different threat specific zones of influence. It is noted that Natural England indicated their agreement with the scope of European sites within the GNLP HRA (**Table 2.2**).
- 3.2.5 The European sites to be assessed in this HRA scoping report, taking into consideration individual impact pathways and drawing on previous HRA work undertaken alongside the GNLP, include the following (as illustrated in **Figures 3.1 to 3.3**):
- River Wensum SAC;
 - Norfolk Valley Fens SAC;
 - The Broads SAC;
 - Broadland SPA;
 - Broadland Ramsar;
 - Breydon Water SPA;
 - Breydon Water Ramsar;
 - Great Yarmouth North Denes SPA;
 - Winterton-Horsey Dunes SAC;
 - Paston Great Barn SAC;
 - Overstrand Cliffs SAC;
 - Waveney & Little Ouse Valley Fens SAC;
 - Redgrave and South Lopham Fens Ramsar;
 - Breckland SPA;
 - Breckland SAC;

- Benacre to Easton Bavents Lagoons SAC;
- Benacre to Easton Bavents SPA;
- Dew's Ponds SAC;
- The Wash and North Norfolk Coast SAC;
- The Wash SPA;
- The Wash Ramsar;
- The Greater Wash SPA;
- North Norfolk Coast SPA;
- North Norfolk Coast SAC;
- North Norfolk Coast Ramsar;
- Southern North Sea SAC;
- Outer Thames Estuary SPA;
- Hainsborough, Hammond and Winterton SAC;
- Minsmere-Walberswick Ramsar;
- Minsmere-Walberswick SPA;
- Minsmere-Walberswick SAC;
- Roydon Common & Dersingham Bog SAC;
- Dersingham Bog Ramsar;
- Roydon Common Ramsar;
- Alde-Ore Estuary SPA;
- Alde-Ore Estuary Ramsar;
- Alde-Ore & Butley Estuaries SAC;
- Orfordness-Shingle Street SAC;
- Sandlings SPA;
- Deben Estuary SPA;
- Deben Estuary Ramsar;
- Stour and Orwell Estuaries SPA;
- Stour and Orwell Estuaries Ramsar; and
- Staverton Park & The Thicks, Wantisden SAC.

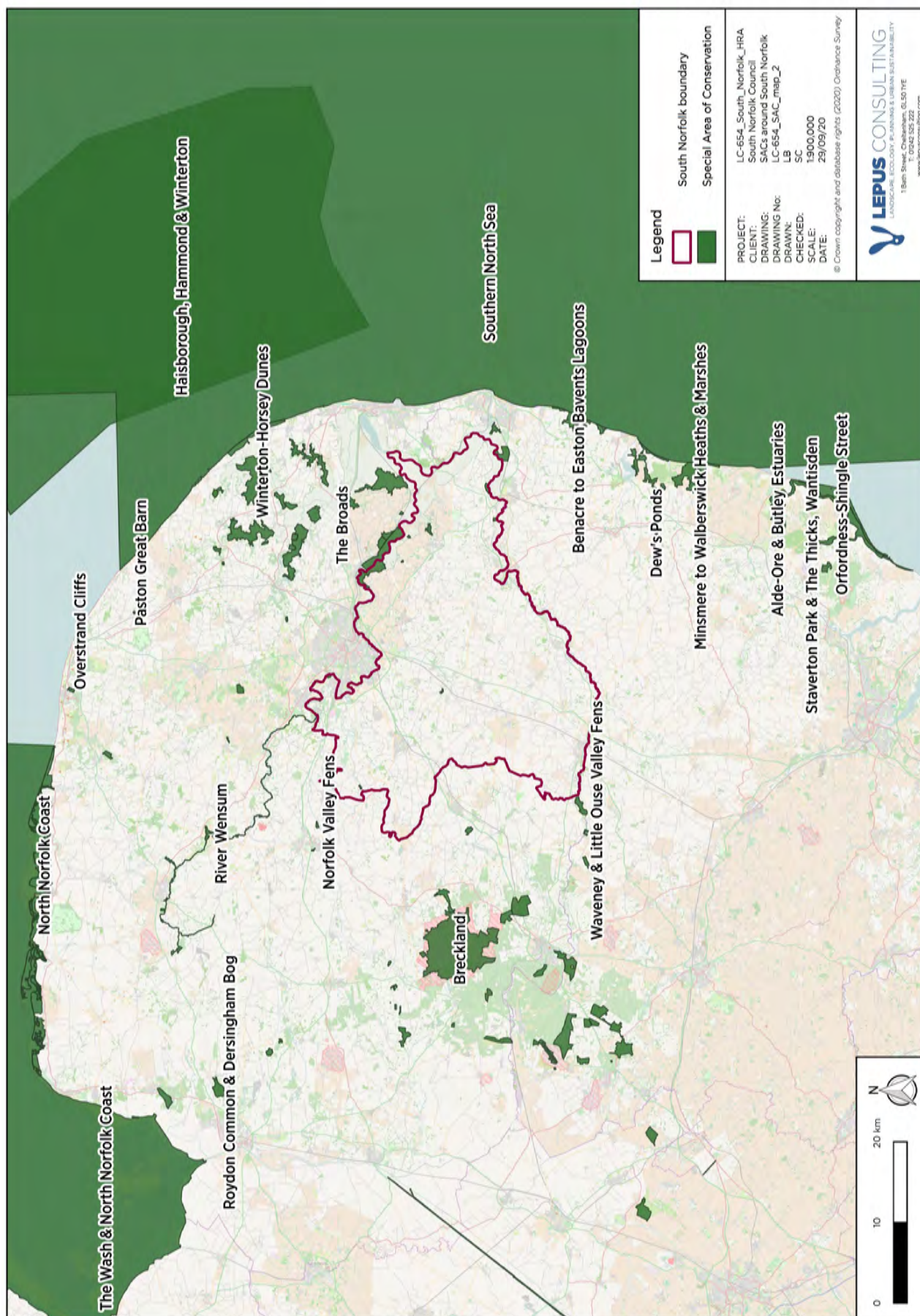


Figure 3.1: SACs within HRA study area

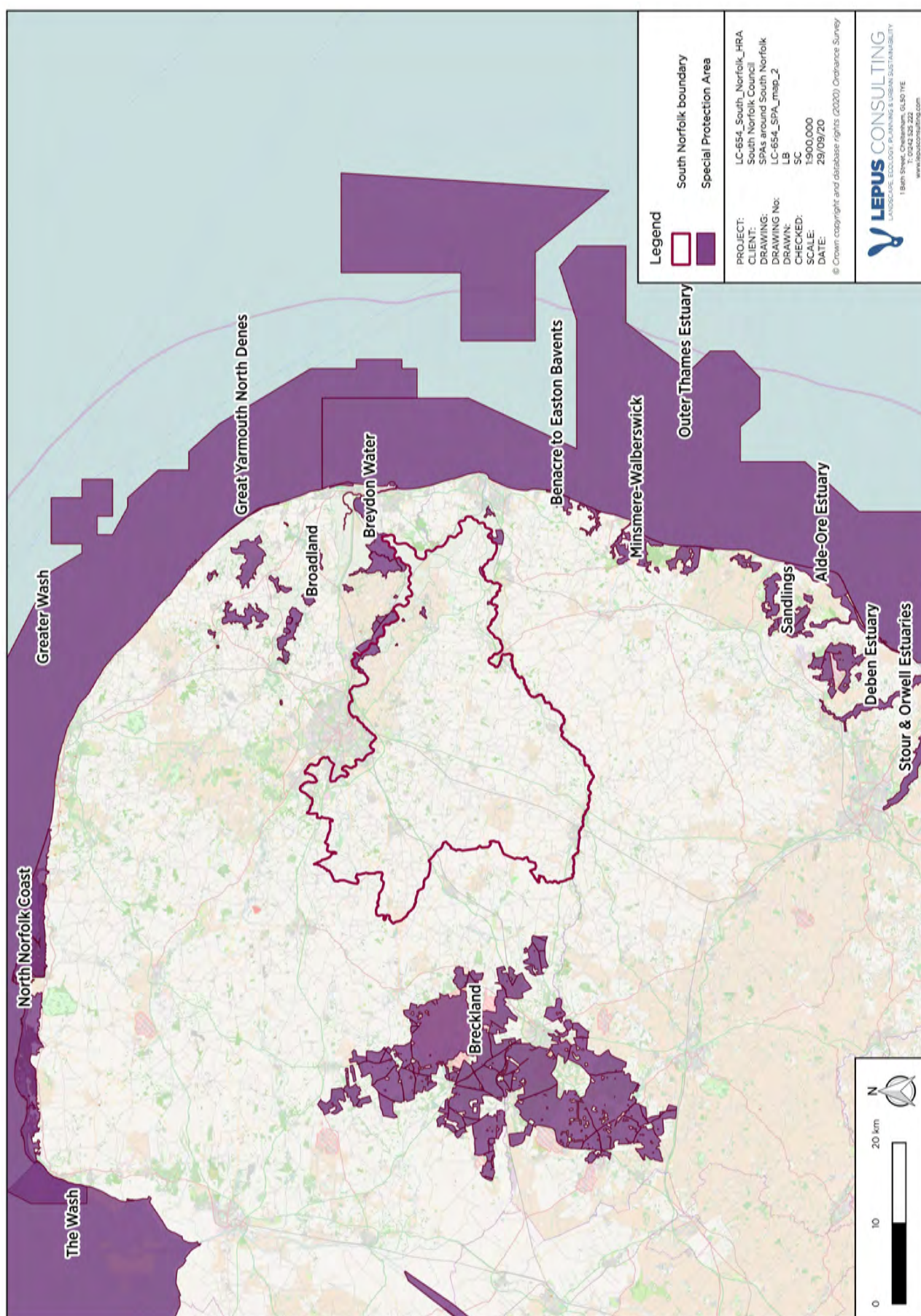


Figure 3.2: SPAs within HRA study area

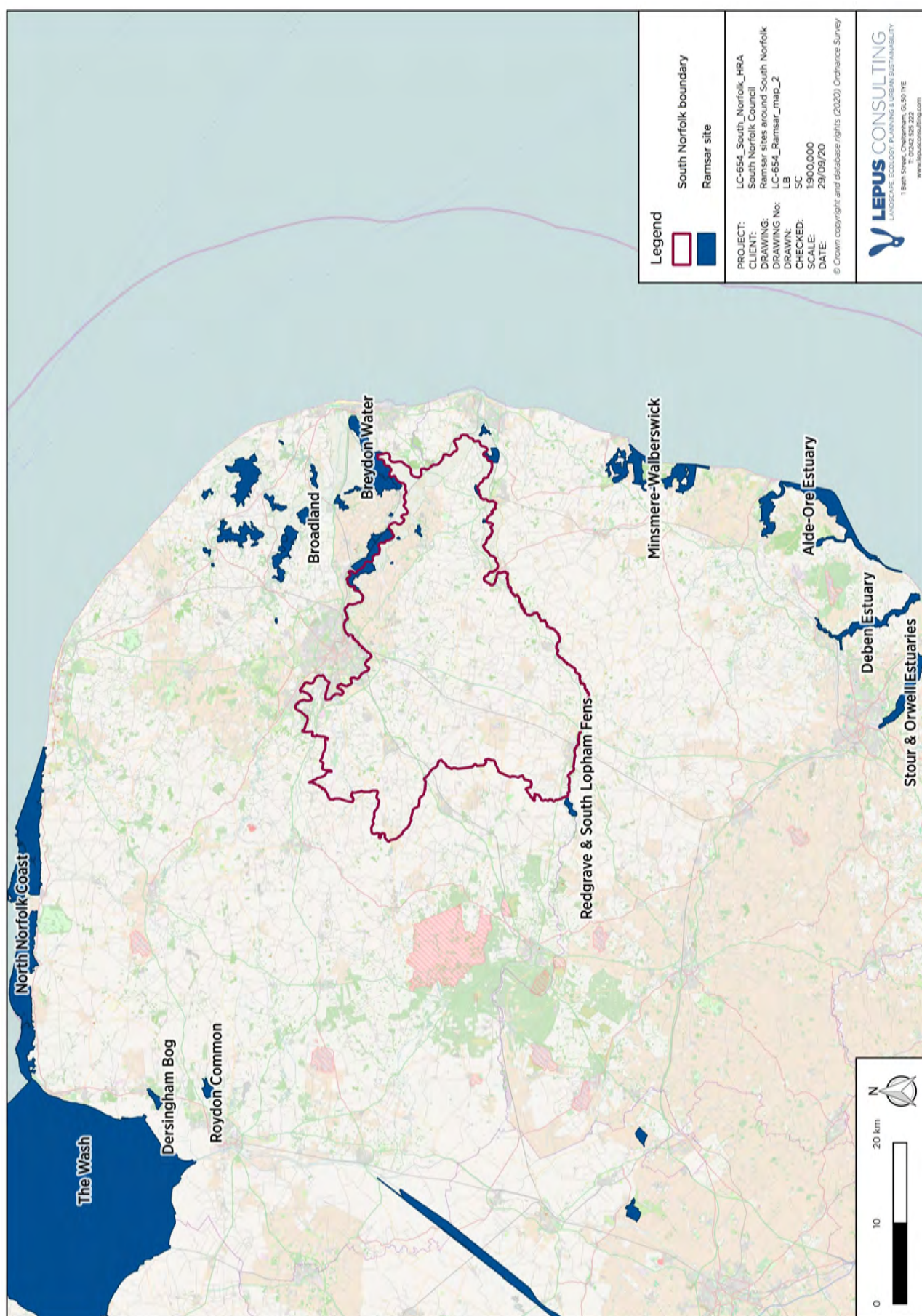


Figure 3.3: Ramsar sites within HRA study area

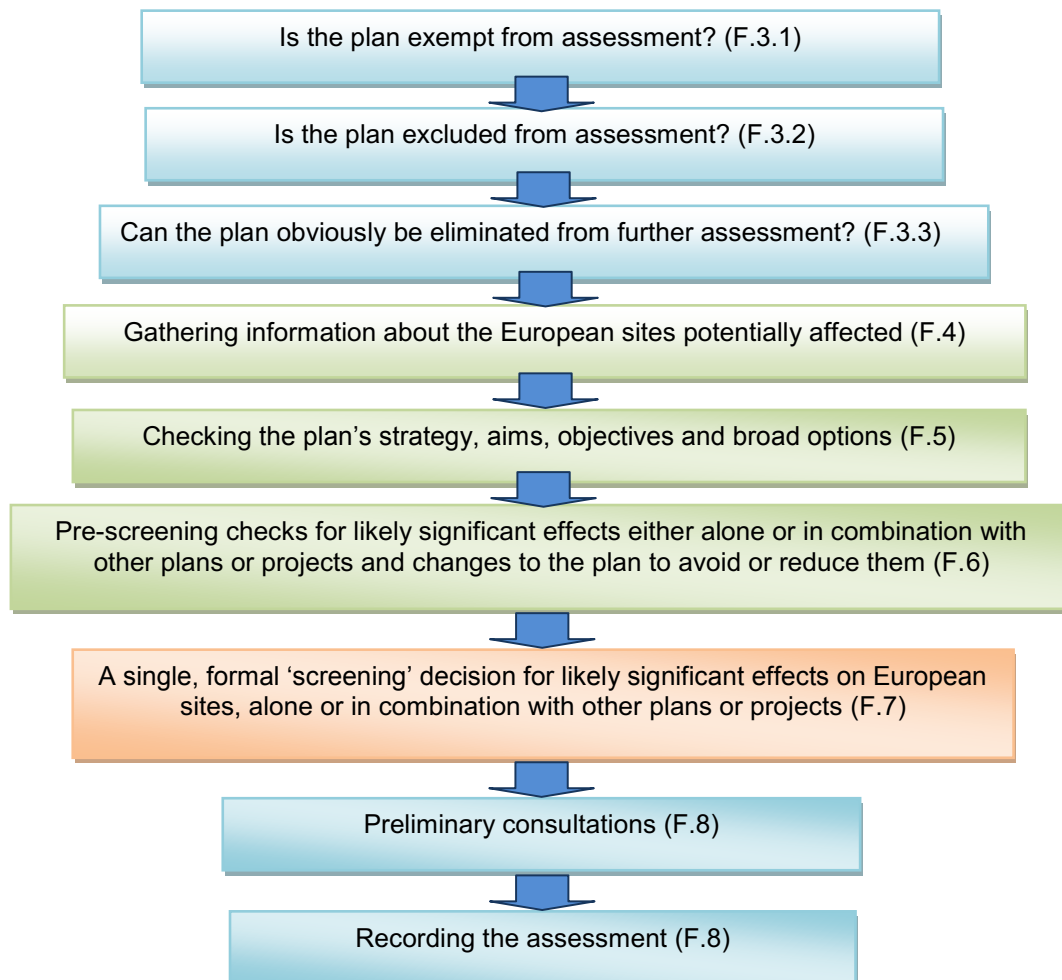
3.3 HRA methodology

- 3.3.1 HRA is a rigorous precautionary process centred around the conservation objectives of a European site's qualifying interests. It is intended to ensure that designated European sites are protected from impacts that could adversely affect their integrity, as required by the Birds and Habitats Directives. A step-by-step guide to this methodology is outlined in the DTA Handbook and has been reproduced in **Figure 2.1**.

3.4 Stage 1: Screening for likely significant effects

- 3.4.1 The first stage in the HRA process comprises the screening stage. This process identifies likely significant effects (LSEs) of a plan or project upon a European site, either alone or in combination with other plans or projects. This stage considers the potential 'significance' of adverse effects. Where elements of the plan will not result in an LSE on a European site these may be screened out and not considered in further detail in the process.
- 3.4.2 The screening stage follows a number of steps which are outlined in **Figure 3.4**.

Outline of the steps in stage 1, the whole of the screening process



Extract from *The Habitats Regulations Assessment Handbook*, www.dtapublications.co.uk
© DTA Publications Limited (November 2018) all rights reserved
This work is registered with the UK Copyright Service

Figure 3.4: Outline of steps in stage 1; the whole screening process

- 3.4.3 The screening process uses a number of evaluation codes to summarise whether or not a plan component is likely to have significant effects alone or in-combination, see **Table 3.1**.

Table 3.1: *Assessment and reasoning categories from Part F of the DTA Handbook*

Assessment and reasoning categories from Chapter F of The Habitats Regulations Assessment Handbook (DTA Publications, 2013):

- A. General statements of policy / general aspirations.
- B. Policies listing general criteria for testing the acceptability / sustainability of proposals.
- C. Proposal referred to but not proposed by the plan.
- D. General plan-wide environmental protection / site safeguarding / threshold policies
- E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.
- F. Policies or proposals that cannot lead to development or other change.
- G. Policies or proposals that could not have any conceivable or adverse effect on a site.
- H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects).
- I. Policies or proposals with a likely significant effect on a site alone.
- J. Policies or proposals unlikely to have a significant effect alone.
- K. Policies or proposals unlikely to have a significant effect either alone or in combination.
- L. Policies or proposals which might be likely to have a significant effect in combination.
- M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.

3.5 What is a Likely Significant Effect?

- 3.5.1 HRA screening provides an analysis of LSEs identified during the HRA screening process. It considers the nature, magnitude and permanence of potential effects in order to inform the plan making process.
- 3.5.2 The DTA Handbook guidance provides the following interpretation of LSEs:
- 3.5.3 *“In this context, ‘likely’ means risk or possibility of effects occurring that cannot be ruled out on the basis of objective information. ‘Significant’ effects are those that would undermine the conservation objectives for the qualifying features potentially affected, either alone or in combination with other plans or projects ... even a possibility of a significant effect occurring is sufficient to trigger an ‘appropriate assessment’”¹⁵.*

¹⁵Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook – Chapter F. DTA Publications

- 3.5.4 With reference to the conservation status of a given species in the Habitats or Birds Directives, the following examples would be considered to constitute a significant effect:
- Any event which contributes to the long-term decline of the population of the species on the site;
 - Any event contributing to the reduction, or to the risk of reduction, of the range of the species within the site; and
 - Any event which contributes to the reduction of the size of the habitat of the species within the site.
- 3.5.5 Rulings from the 2012 ‘Sweetman’¹⁶ case provide further clarification:
- 3.5.6 *“The requirement that the 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”.*
- 3.5.7 Therefore, it is not necessary for the Councils to show that the VCHAP will result in no effects whatsoever on any European site. Instead, the Council is required to show that the VCHAP, either alone or in-combination with other plans and projects, will not result in an effect which undermines the conservation objectives of one or more qualifying features.
- 3.5.8 Determining whether an effect is significant requires careful consideration of the environmental conditions and characteristics of the European site in question, as per the 2004 ‘Waddenzee’¹⁷ case:
- 3.5.9 *“In assessing the potential effects of a plan or project, their significance must be established in the light, inter alia, of the characteristics and specific environmental conditions of the site concerned by that plan or project”.*

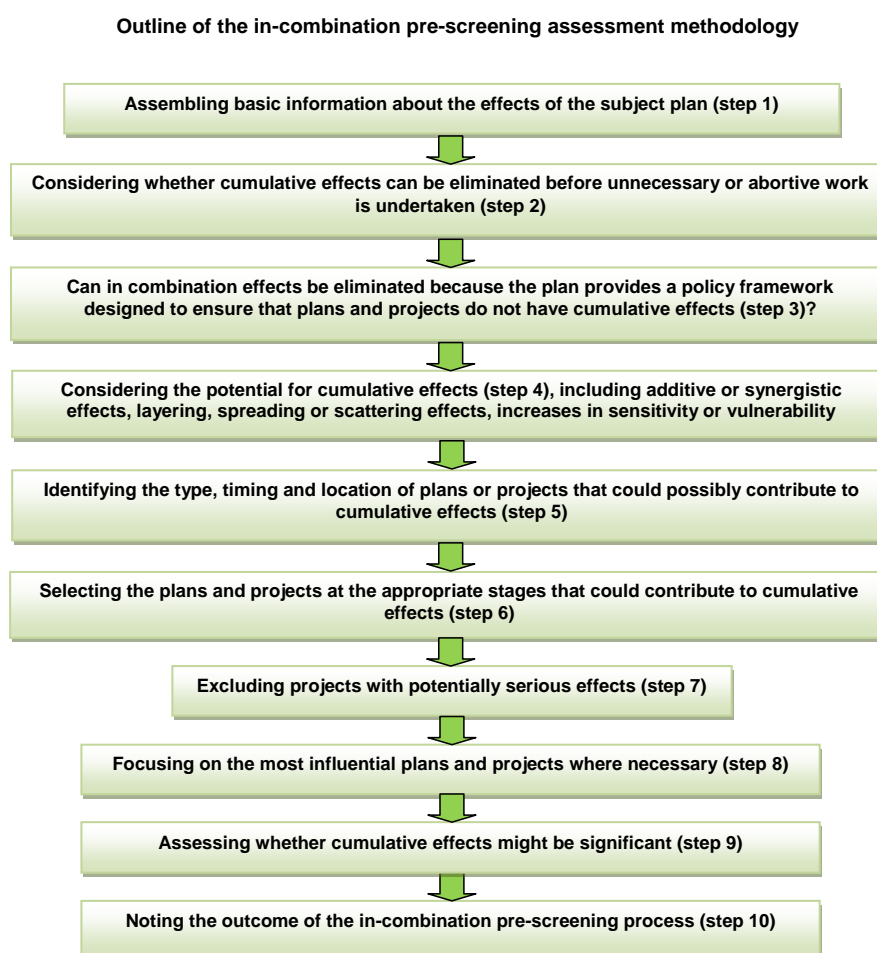
¹⁶ Source: EC Case C-258/11 Reference for a Preliminary Ruling, Opinion of Advocate General Sharpston ‘Sweetman’ delivered on 22nd November 2012 (para 48)

¹⁷ Source: EC Case C-127/02 Reference for a Preliminary Ruling ‘Waddenzee’ 7th Sept 2004 (para 48)

3.6 In-combination effects

3.6.1 As well as considering the LSEs of the VCHAP general planning policies and allocated sites alone on European sites at the screening stage, it is also necessary to consider whether the effects of the policies in-combination with other plans and projects would combine to result in an LSE on any European site. It may be that the VCHAP alone may not have a significant effect but could have a residual effect that may contribute to in-combination effects on a European site.

3.6.2 The in-combination assessment presented in Chapter F of the DTA Handbook comprises a ten-step approach as illustrated in **Figure 3.5** below.



Extract from *The Habitats Regulations Assessment Handbook*, www.dtapublications.co.uk
© DTA Publications Limited (November 2018) all rights reserved
This work is registered with the UK Copyright Service

Figure 3.5: Outline of the in-combination pre-screening assessment methodology

- 3.6.3 Plans and projects which are considered to be of most relevance to the in-combination assessment of the VCHAP include those that have similar impact pathways. These include those plans that have the potential to increase development in the HRA study area. In addition, other plans and projects with the potential to increase traffic across the study area which may act in-combination with the VCHAP, such as transport, waste and mineral plans and projects, have also been taken into consideration. Plans which allocate water resources or are likely to influence water quality in the study area have also been considered. Finally, neighbouring authority local plans which may increase development public access and disturbance pressures at European sites have also been considered.
- 3.6.4 In terms of projects, major developments in the UK which could potentially affect European sites under consideration were identified from the National Infrastructure Planning website. All live projects were identified which were: (a) located within the HRA study area, and (b) had the potential to adversely affect one of the European sites that forms the focus of this HRA. These projects included both road and non-road strategic developments. Published information relevant to these developments was obtained from the National Infrastructure Planning website (for current and determined applications)¹⁸.
- 3.6.5 It is recognised that the status of other plans and projects will change over the timescale of the VCHAP plan-making process. As such, and for the purposes of this stage of the HRA process, a list of plan and projects that will be considered in the in-combination assessment has been provided below. We would appreciate input from the Council on the below list to ensure that all relevant projects and plans are captured. A more detailed review and assessment of these will take place at the formal screening stage of the plan.
- South Norfolk Council, Norwich City Council and Broadlands Council - Greater Norwich Local Plan;
 - Great Yarmouth District - Local Plan Part 1 (Core Strategy) and emerging Local Plan Part 2;
 - North Norfolk District – North Norfolk Local Development Framework Core Strategy and emerging North Norfolk Local Plan 2016 to 2036;
 - East Suffolk Council – The Waveney Local Plan;
 - East Suffolk Council – Suffolk Coastal District Local Plan;

¹⁸ National Infrastructure Planning (2012) Available at: <https://infrastructure.planninginspectorate.gov.uk/projects/>
[Date Accessed: 28/07/20]

- Broads Authority – Local Plan for the Broads plan period 2015 – 2036;
- Breckland District – Local Plan 2019;
- Mid Suffolk District – Core Strategy and emerging Babergh and Mid Suffolk Joint Local Plan;
- West Suffolk Council – West Suffolk Local Plan (consisting of the former Forest Heath area (FHDC) and former St Edmundsbury area (SEBC) Local Plan documents and emerging West Suffolk Local Plan review;
- King's Lynn and West Norfolk District – Core Strategy and Site Allocation and Development Management Policies and draft Local Plan review;
- Ipswich Borough Council – Adopted Ipswich Plan (2011 – 2031 and emerging Ipswich Local Plan review (2018 – 2036);
- Norfolk County Council – Minerals and Waste Development Framework;
- Norfolk County Council – Mineral Site-Specific Allocations Development Plan Document;
- Norfolk County Council – Waste Site Specific Allocations Development Plan Document;
- Norfolk County Council Local Transport Plan – Connecting Norfolk Norfolk's Transport Plan for 2026 and emerging review;
- GNLP Water Cycle Study;
- Green Infrastructure Strategy (2007) and Green Infrastructure Delivery Plan (2009);
- River Basin Management Plan for the Anglian Water Basin District (2015); and
- Norwich Northern Distributor Link Road.

3.7 Case law

- 3.7.1 The recent European Court Judgement on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Colitte Teoranta (Case C-323/17¹⁹) determined that mitigation measures are only permitted to be considered as part of an appropriate assessment (**Box 1**).

¹⁹ InfoCuria (2018) Case C-323/17. Available at:
<http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date Accessed: 29/07/20]

Box 1: The Sweetman Case (April 2018)

A recent decision by the Court of Justice of the European Union (CJEU) *People Over Wind and Sweetman v Coillte Teoranta* (C-323/17) (from here on known as the ‘Sweetman Case’) has important consequences for the HRA process in the UK.

In summary, the ruling reinforces the position that if an LSE is identified during the HRA screening process it is not appropriate to incorporate mitigation measures to prevent the LSE at this stage. An appropriate assessment (AA) of the potential effects and the possible avoidance or mitigation measures must be undertaken. The ‘re-screening the Plan after mitigation has been applied’ is no longer an option which would be legally compliant:

“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, 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 the measures intended to avoid or reduce the harmful effects of the plan or project on that site.”

3.7.2 In light of the above, it is necessary to further define mitigation measures. The DTA Handbook notes that there are two types of measures as follows:

- *“Measures intended to avoid or reduce harmful effects on a European site; or*
- *Features or characteristics of a plan which are essential in defining the nature, scale, location, timing, frequency or duration of the plan’s proposals, or they may be inseparable aspects of the plan, without which an assessment of the plan could not properly be made, in the screening decision, even though these features or characteristics may incidentally have the effect of avoiding or reducing some or all of the potentially adverse effects of a plan”.*

3.7.3 The HRA screening process undertaken for the VCHAP will not take into account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a European site when assessing the LSE of the VCHAP on European sites. These are measures, which if removed (i.e. should they no longer be required for the benefit of a European site), would still allow the lawful and practical implementation of a plan.

3.7.4 Traffic and roads present a cross boundary issue. On 20th March 2017 a high court ruling²⁰ found that traffic increases and subsequent air pollution on roads within 200m of a European site also requires an in-combination approach that considers the development of neighbouring and nearby authorities (**Box 2**).

²⁰ Wealden District Council & Lewes District Council before Mr Justice Jay. Available at: <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html> [Date Accessed: 29/07/20]

Box 2: The Wealden Case (March 2017)

On 20th March 2017 a high court ruling found that traffic increases and subsequent air pollution on roads within 200m of an EU site also requires an in-combination approach that considers the development of neighbouring and nearby authorities. This is because projects and plans that increase road traffic flow have a high likelihood of acting together, or 'in-combination', with other plans or projects that would also increase traffic on the same roads. If the combined effects of borough's development will lead to increases of traffic of more than 1,000 cars a day, further consideration of the issue is required. This would be through traffic and air quality modelling. It is therefore necessary to consider the potential impact of the Plan on roads within 200m of each EU site both alone and in-combination with relevant plans and projects.

- 3.7.5 Consideration has therefore been given at the screening stage to LSEs of the VCHAP both alone and in-combination with other plans and projects. This approach is compliant with the Wealden Judgement.

3.8 Stage 2: Appropriate Assessment and Integrity Test

- 3.8.1 Stage 2 of the HRA process comprises the appropriate assessment and integrity test. The purpose of the appropriate assessment (as defined by the DTA Handbook) is to *"undertake an objective, scientific assessment of the implications for the European site qualifying features potentially affected by the plan in light of their consideration objectives and other information for assessment"*.
- 3.8.2 As part of this process decision makers should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation and should consult interested parties on the possible ways of managing the risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on European sites. Mitigation measures may take the form of policies within the VCHAP or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate adverse effects for which they are targeted.
- 3.8.3 The appropriate assessment aims to present information in respect of all aspects of the VCHAP and ways in which it could, either alone or in-combination with other plans and projects, affect a European site.

- 3.8.4 The plan-making body (as the Competent Authority) must then ascertain, based on the findings of the appropriate assessment, whether the VCHAP will adversely affect the integrity of a European site either alone or in combination with other plans and projects. This is referred to as the Integrity Test.

3.9 Dealing with uncertainty

- 3.9.1 Uncertainty is an inherent characteristic of HRA, and decisions can be made only on currently available and relevant information. This concept is reinforced in the 7th September 2004 ‘Waddenzee’ ruling²¹:
- 3.9.2 *“However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead it is clear from the second sentence of Article 6(3) of the habitats directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the appropriate assessment. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty”.*

3.10 The Precautionary Principle

- 3.10.1 The HRA process is characterised by the precautionary principle. This is described by the European Commission as being:
- 3.10.2 *“If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”.*

²¹EC Case C-127/02 Reference for a Preliminary Ruling ‘Waddenzee’ 7th September 2004 Advocate General’s Opinion (para 107)

3.11 European sites

3.11.1 Each site of European importance has its own intrinsic qualities, besides the habitats or species for which it has been designated, that enables the site to support the ecosystems that it does. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human induced activities in the surrounding environment (known as pressures and threats). For example, sites can be affected by land use plans in a number of different ways, including the direct land take of new development, the type of use the land will be put to (for example, an extractive or noise-emitting use), the pollution a development generates, and the resources used (during construction and operation for instance).

3.11.2 An intrinsic quality of any European site is its functionality at the landscape ecology scale. This refers to how the site interacts with the zone of influence of its immediate surroundings, as well as the wider area. This is particularly the case where there is potential for developments resulting from the plan to generate water or air-borne pollutants, use water resources or otherwise affect water levels. Adverse effects may also occur via impacts to mobile species occurring outside a designated site, but which are qualifying features of the site. For example, there may be effects on protected birds that use land outside the designated site for foraging, feeding, roosting or other activities.

3.12 Ecological information

3.12.1 The CJEU ruling in the Holohan case (C-461/17²²) confirmed that appropriate assessment should: (i) catalogue (i.e. list) all habitats and species for which the site is protected and (ii) include in its assessment other (i.e. non-protected) habitat types or species which are on the site and habitats and species located outside of the site if they are necessary to the conservation of the habitat types and species listed for the protected area (**Box 3**).

²² EUR-Lex (2018) Case C-461/17. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62017CJ0461&from=EN> [Date Accessed: 29/07/20]

Box 3: Holohan v An Bord Pleanala (November 2018)

“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.

Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the ‘appropriate assessment’ must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned”.

- 3.12.2 This report fully considers the potential for effects on species and habitats. This includes those not listed as a qualifying feature for the European site, but which may be important to achieving its conservation objectives. This ensures that the functional relationships underlying European sites and the achievement of their conservation objectives are adequately understood.
- 3.12.3 **Appendix A** identifies the qualifying features of each of these sites and presents details of their conservation objectives. This information is drawn from the Joint Nature Conservancy Council (JNCC)²³, Natural England²⁴ and Natural Resources Wales.
- 3.12.4 SSSIs are protected areas in the United Kingdom designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. A SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. Whilst typically analogous in ecological function, the reasons for its designation can be entirely different to those for which the same area is designated as a SAC, SPA or Ramsar.

²³ JNCC (2019) Available at: <http://jncc.defra.gov.uk/page-1458> [Date Accessed: 29/07/20]

²⁴ Natural England (2019) Available at: <http://publications.naturalengland.org.uk/> [Date Accessed: 29/07/20]

- 3.12.5 Natural England periodically assesses the conservation conditions of each SSSI unit, assigning it a status. The conservation status of each SSSI highlights any SAC/SPA that is currently particularly vulnerable to threats/pressures. Conservation status is defined as follows:
- Favourable;
 - Unfavourable – recovering;
 - Unfavourable – no change; or
 - Unfavourable – declining.
- 3.12.6 SSSI units in either an ‘Unfavourable – no change’ or ‘Unfavourable – declining’ condition indicate that the European site may be particularly vulnerable to certain threats or pressures. It is important to remember that the SSSI may be in an unfavourable state due to the condition of features unrelated to its European designation. However, it is considered that the conservation status of SSSI units that overlap with European designated sites offer a useful indicator of habitat health at that location.
- 3.12.7 Natural England defines zones around each SSSI which may be at risk from specific types of development, these are known as Impact Risk Zones (IRZ). These IRZs are *“a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and “Compensation Sites”, which have been secured as compensation for impacts on Natura 2000/Ramsar sites”*²⁵. The location of IRZs has been taken into consideration in this assessment as they provide a useful guide as to the location of functionally linked land and likely vulnerabilities to development proposed within the VCHAP.

²⁵ Natural England (2019) Natural England’s Impact Risk Zones for Sites of Special Scientific Interest User Guidance. Available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf [Date Accessed: 29/07/20]

4 Threats and pressures

- 4.1.1 Threats and pressures to which each European site is vulnerable have been identified through reference to data held by the JNCC on Natura 2000 Data Forms, Ramsar Information Sheets and Site Improvement Plans (SIPs). This information provides current and predicted issues at each European site. Threats and pressures which are likely to be impacted by the VCHAP at each European site are provided at **Appendix A**.
- 4.1.2 Supplementary advice notices prepared by Natural England provide more recent information on threats and pressures upon European sites than SIPs. Additional threats flagged up by supplementary advice notices which may be impacted by the VCHAP have also been identified (**Appendix A**).
- 4.1.3 A number of similar threats and pressures have been considered together, for instance ‘recreation’ is considered under ‘public access and disturbance’. A number of threats and pressures are considered to be beyond the scope of the potential impacts of VCHAP. These threats and pressures have not been included in this assessment having been scoped out.
- 4.1.4 Following a review of HRA assessment work undertaken to date for the GNLP HRA and an identification of causal connections and links, the remaining threats and pressures that were considered to be within the scope of influence of the VCHAP include:
- Air pollution;
 - Hydrological changes (to include water abstraction, water resources and water pollution);
 - Public access and disturbance (to include impacts of development, urbanisation effects and recreational impacts); and
 - Habitat loss and fragmentation (to include habitat connectivity).

4.2 Air quality

- 4.2.1 Air pollution can affect European sites if it has an adverse effect on its features of qualifying interest. The main mechanisms through which air pollution can have an adverse effect is through eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)²⁶. Deposition of air pollutants can alter the soil and plant composition and species which depend upon these.
- 4.2.2 As highlighted through the review of threats and pressures at European sites, and as reported upon in **Appendix A**, air pollution, and in particular atmospheric nitrogen deposition, has been identified as a threat or pressure for qualifying features of a number of European sites within the relevant SIPs and Supplementary Advice Notes:
- 4.2.3 Excess atmospheric nitrogen deposition within an ecosystem or habitat can disrupt the delicate balance of ecological processes interacting with one another. As the availability of nitrogen increases in the local environment, some plants that are characteristic of that ecosystem may become competitively excluded in favour of more nitrophilic plants. It also upsets the ammonium and nitrate balance of the ecosystem, which disrupts the growth, structure and resilience of some plant species.
- 4.2.4 Excess nitrogen deposition often leads to the acidification of soils and a reduction in the soils' buffering capacity (the ability of soil to resist pH changes). It can also render the ecosystem more susceptible to adverse effects of secondary stresses, such as frost or drought, and disturbance events, such as foraging by herbivores.
- 4.2.5 As an attempt to manage the negative consequences of atmospheric nitrogen deposition, 'critical loads' have been established for ecosystems in Europe. Each European site is host to a variety of habitats and species, the features of which are often designated a critical load for nitrogen deposition. The critical loads of pollutants are defined as a:

²⁶ APIS (2016) Ecosystem Services and air pollution impacts. Available at: <http://www.apis.ac.uk/ecosystem-services-and-air-pollution-impacts> [Date Accessed: 29/07/20]

- 4.2.6 *“...quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge”²⁷.*
- 4.2.7 Natural England’s advice on the assessment of air quality impacts under the Habitats Regulations states that consideration should be given to the risk of road traffic emissions associated with a local plan²⁸. This advice states that an assessment of the risks from road traffic emissions can be expressed in terms of the average annual daily traffic flow (AADT as a proxy for emissions). The use of the AADT screening threshold is advocated by Highways England in their Design Manual for Roads and Bridges (DMRB). This screening threshold is intended to be used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic is required. This non-statutory or guideline threshold is based on a predicted change of daily traffic flows of 1,000 AADT or more (or heavy-duty vehicle flows on motorways (HDV) change by 200 AADT or more).
- 4.2.8 The AADT thresholds do not themselves imply any intrinsic environmental effects and are used solely as a trigger for further investigation. Widely accepted environmental benchmarks for imperceptible impacts are set at 1% of the critical load or level, which is considered to be roughly equivalent to DMRB thresholds for changes in traffic flow of 1,000 AADT and for HDV of 200 AADT. This has been confirmed by modelling using the DMRB Screening Tool that used average traffic flow and speed figures from the Department of Transport (DfT) data to calculate whether the NO_x outputs could result in a change of >1% of critical load / level on different road types. A change of >1,000 AADT on a road was found to equate to a change in traffic flow which might increase emissions by 1% of the Critical Load or Level and might consequentially result in an environmental effect nearby (e.g. within 10 metres of roadside).

²⁷ UNECE (2004) ICP Modeling and Mapping Critical loads and levels approach. Available at: <http://www.unece.org/fileadmin/DAM/env/lrtap/WorkingGroups/wge/definitions.htm> [Date Accessed: 29/07/20]

²⁸ Natural England (2018) Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824> [Date Accessed: 29/07/20]

- 4.2.9 The AADT thresholds and 1% of critical load/level are considered by Natural England to be suitably precautionary as any emissions below this level are widely considered to be imperceptible and, in the case of AADT, undetectable through the DMRB model. There can, therefore, be a high degree of confidence in its application to screen for risks of an effect.
- 4.2.10 It is widely accepted that the effects of air pollutants from road transport decrease with distance from the source of pollution i.e. the road carriageway^{29,30,31}. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, “*beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant*”³². This is illustrated in **Figure 4.1**. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers^{33,34}. However, it is also noted that effects can, in some circumstances, occur beyond 200m.

²⁹ The Highways Agency, Transport Scotland, Welsh Assembly Government, The Department for Regional Development Northern Ireland (2007) Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1: Air Quality.

³⁰ Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

³¹ Signal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

³² Department for Transport (2015) TAG UNIT A3 Environmental Impact Appraisal. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/487684/TAG_unit_a3_envir_imp_a_pp_dec_15.pdf [Date Accessed: 29/07/20]

³³ Signal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

³⁴ Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

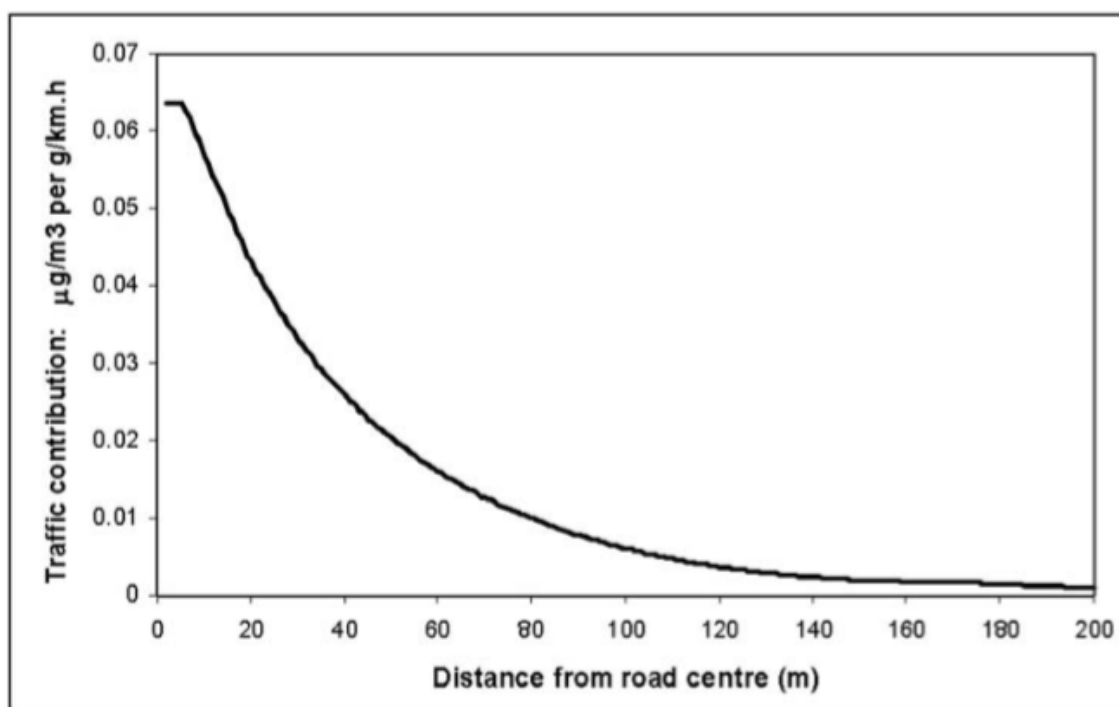


Figure 4.1: Traffic contribution to pollution concentration at different distances from road centre

4.2.11 Advice from Natural England³⁵ states that a four-step process for screening if there will be an LSE from air pollution should be adopted as follows:

- **Step 1:** Does the proposal give rise to emissions which are likely to reach a European site? As noted above, distance-based criteria have been established by Natural England and Highways England to determine the likely impact of air pollution from a road source on a European site. This distance was taken as 200m for the purposes of this assessment. For the purpose of this scoping assessment it has been assumed that roads forming part of the strategic road network (i.e. motorways, 'A' roads and 'B' roads) are likely to experience the most significant increases in vehicle traffic as a result of development (i.e. greater than 1,000 AADT). This has allowed a high-level filter to scope in / out key road links based on national statistics commuting data. It is understood that the County Council has undertaken traffic modelling in support of the VCHAP (and GNLP) plan-making process which was not available at the time of writing. These road links will be subject to further scoping following receipt of traffic modelling data when available from the County Council and through consultation with traffic consultants.

³⁵ Natural England (2018). Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. Version June 2018.

- **Step 2:** Are the qualifying features of sites within 200m of a road sensitive to air pollution? The sensitivity of qualifying features has been determined through a review of SIP and NE Supplementary Advice information. A further assessment will be undertaken at the screening stage following receipt of County Council traffic data drawing on air pollution data for individual sites where the VCHAP is likely to increase traffic related emissions.
- **Step 3:** Could the sensitive qualifying features of the site be exposed to emissions? Where European sites are screened into the HRA process following outputs of Steps 1 and 2 further more detailed site based assessment work may be required to determine potential implications of any exceedance at qualifying features.
- **Step 4:** Application of screening thresholds:
 - **Step 4a:** Apply the thresholds alone. Where a proposal is considered to have an LSE because it breaches the screening threshold alone it should go through to an appropriate assessment 'alone'. There is no need to consider the potential for in-combination effects at the screening step as an appropriate assessment is needed in any event. If the predicted change in traffic flow is less than 1,000 AADT (or the level of emissions is <1% of the critical load/level), the associated emissions are not likely to have a significant effect alone, but the risk of in-combination effects should be considered further.
 - **Step 4b:** Apply the threshold in-combination with emissions from other road traffic plans and projects. Where a proposal is below the screening threshold 'alone' (step 4a), step 4b must be considered to apply the same screening threshold 'in-combination'.
 - **Step 4c:** Apply the threshold in-combination with emissions from other non-road plans and projects. Consider non-road plans and projects to recognise in-combination effects from other pollution sources.

- 4.2.12 Consideration of Natural England’s screening thresholds set out above must be applied for both the VCHAP alone and in-combination with other plans and projects. This is because any increase in traffic flows may lead to in-combination effects on the European sites. Vehicle movements generated by different plans and projects are likely to increase the traffic on the same roads. This approach is compliant with the Wealden Judgement which determined that traffic and roads are a cross boundary issue (see **Box 2**). The high court ruling on 20 March 2017³⁶ found that traffic increases and subsequent air pollution on roads within 200m of a European site also requires an in-combination approach that considers the development of neighbouring and nearby authorities. If the combined effects of borough’s development will lead to increases of traffic of more than 1,000 AADT or if air quality modelling data indicates that there is going to be an increase in deposition loads of more than 1% on background levels; an LSE is anticipated.
- 4.2.13 Data obtained from the Office for National Statistics highlights the most common destinations for journeys to work undertaken by car or van arising from South Norfolk and those finishing in South Norfolk³⁷ (**Table 4.1**). It is noted that these figures do not include journeys to work that both start and end in South Norfolk.

Table 4.1: *Inflow and outflow traffic data for South Norfolk – journeys by car and van only*

South Norfolk Inflow (person(s) commuting to South Norfolk from other Local Authority areas)	South Norfolk Outflow (person(s) commuting out of South Norfolk to other Local Authority areas)
<ul style="list-style-type: none"> Norwich (4,363) Broadland (4,109) Breckland (3,715) Waveney (1,411) Mid Suffolk (1,204) North Norfolk (808) Great Yarmouth (730) Kings Lynn (225) Suffolk Coastal (175) St Edmundsbury (171) 	<ul style="list-style-type: none"> Norwich (9,627) Broadland (3,052) Breckland (2,449) Waveney (2,022) Mid Suffolk (1,512) Great Yarmouth (803) North Norfolk (448) St Edmundsbury (403) Suffolk Coastal (257) Ipswich (251)

³⁶ Wealden District Council & Lewes District Council before Mr Justice Jay. Available at: <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html> [Date Accessed: 28/10/19]

³⁷ Office for National Statistics (2011) Location of usual residence and place of work by method of travel to work (2011 census data). Available at: <https://www.nomisweb.co.uk/census/2011/wu03uk/chart> and <https://www.nomisweb.co.uk/census/2011/wu03uk> [Date Accessed: 14/09/20]

- 4.2.15 It is understood that traffic modelling has been undertaken by the County Council Highways team in support of the VCHAP (and GNLP). This data will be analysed in the context of Natural England’s screening methods (above) and, where required, further assessment will be undertaken. At the time of writing, the traffic modelling was not available and as such this preliminary scoping assessment focuses on determining whether there are roads within 200m of a European site which may result in increased traffic flows as a consequence of the VCHAP and whether European sites have the potential to be sensitive to a reduction in air quality. The study area applied has reflected national statistics commuting data. This scoping exercise will be updated once the traffic data is available and through detailed consultation with the traffic consultants.
- 4.2.16 **Table 4.2** identifies roads within 200m of any European site that has been identified as being sensitive to changes in air quality within the HRA study area and within the above national statistic key commuting zones for South Norfolk (**Table 4.1**). This has allowed European sites to be scoped into / out of the assessment in terms of air quality impacts.

Table 4.2: Identification of roads within 200m of European sites (using national statistics commuting data zone of influence)

European site vulnerable to changes in air quality	Strategic road links (motorways, A and B roads) located within 200m of European site	European site scoped in for further consideration in HRA in terms of air quality
River Wensum SAC	A1065, A1067, B1110, B1154 and B1535	Yes
Norfolk Valley Fens SAC	A47, B1149, B1075, B1153 and A149	Yes
The Broads SAC	B1150, A149, A47, A1064 and A146	Yes
Broadland SPA	B1150, A149, A1064, A1062 and A146	Yes
Great Yarmouth North Deans SPA	None	No
Winterton-Horsey Dunes SAC	None	No
Paston Great Barn SAC	B1159	No. The B1159 terminates at the Gas Works before Paston Barn, is located approx. 25km to the north east of the Plan area, is unlikely to link to key housing / areas of employment associated with the Plan area and therefore is unlikely to result in an alone / in-combination breach of air quality thresholds. Council to confirm if gas works is a key employment area for South Norfolk.
Overstrand Cliffs SAC	None	No
Waveney & Little Ouse Valley Fens SAC	B1113	Yes
Breckland SAC	A1065, A11, B1112, A1101, A134 and A1075	Yes
Breckland SPA	A1065, B1112, B1111, A14, B1108, B1101, A134, A1075, A1066, B1107, B1106 and A1122	Yes
Benacre to Easton Barents Lagoons SAC	B1127	Yes
Benacre to Easton Barents Lagoons SPA	B1127	Yes
Dew's Ponds SAC	None	No
The Wash and North Norfolk Coast SAC	A149 and B1161	Yes
The Wash SPA	B1161	Yes
North Norfolk Coast SPA	A149	Yes
North Norfolk Coast SAC	A149	Yes

Minsmere to Walkerswick SAC	B1387 and B1125	Yes
Minsmere to Walkerswick SPA	B1387, B1125, A12 and A1095	Yes
Roydon Common & Dersingham Bog SAC	A149 and B1440	Yes
Alde-Ore & Butley Estuaries SAC	B1084	No. The B1084 terminates at the SAC and does not link to potential key housing / employment areas that may link this European site to the Plan area. The SAC is located approx. 28.8km to the south east of the Plan area. Therefore, it is unlikely that growth in the Local Plan will result in an alone / in-combination breach of air quality thresholds at this location.
Alde-Ore & Butley Estuaries SPA	B1084	No. As above.
Orfordness-Shingle Street SAC	B1084	No. As above.
Staverton Park & The Thicks Wantisden SAC	B1084	No. As above.
Sandlings SPA	B1084, B1122, B1343 and B1083	The SPA is located approximately 27.7km to the south east of the Plan area at its closest point. The B grade roads link the plan area to coastal areas and Woodbridge Airfield. Council to confirm that there are no key employment areas associated with Woodbridge Airfield. TBC – however it is anticipated that, due to the above reasons, there will be no adverse effect of the Local Plan alone or in-combination on traffic related air quality at this location.
Debden Estuary SPA	A1153, B1438 and B1083	Yes
Stour and Orwell Estuary SPA	A14	Yes. Suffolk Coastal and Ipswich are noted by National Statistics to be key commuter destinations from / to the Plan area and therefore the components of the SPA located within these authority areas only have been the subject of this scoping exercise.

4.2.17 European sites which have been scoped in will be assessed further through the HRA screening assessment process. This will be undertaken upon receipt of traffic data and through liaison with the traffic consultants who will be familiar with local traffic movements trip origins / destinations. Screening will entail a comparison of traffic flows from the Plan alone, and in-combination with other plans and projects, at these European sites against Natural England's AADT thresholds. It will also draw on air pollution data for individual European sites where relevant.

- 4.2.18 The next stages of the HRA process in terms of assessing air quality impacts is summarised in **Table 4.3** below. This also sets out preliminary recommendations which should be considered in the development of VCHAP in terms of site allocations and policy wording. These recommendations will be update and added to as the HRA progresses.

Table 4.3: *Air quality recommendations and further work*

Recommendations and further work	
1	Lepus to provide a note and mapping to identify all road links within 200m of European sites considered to be vulnerable to change in air quality.
2	Council to provide traffic data for all road links within 200m of European sites which are identified as being vulnerable to changes in air quality.
3	Lepus to use traffic data to undertake HRA screening of air quality impacts in line with NE air quality guidance and relevant HRA screening thresholds. This exercise will include consultation with County Council Highways team.
4	Council to ensure sustainable modes of transport and behavioural shifts are promoted in VCHAP through site selection and development of policies.

4.3 Hydrology

- 4.3.1 Potential hydrological effects of urbanisation within European sites can be associated with an alteration in water balance and reduced water quality.
- 4.3.2 Urban development can reduce catchment permeability and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to European sites or watercourses which run through them. Water mains leakage and sewer infiltration may also affect the water balance.
- 4.3.3 In addition, urbanisation has the potential to reduce the quality of water entering a catchment during the construction of a development through processes such as sedimentation, accidental spillage of chemicals and materials. Water quality may also be reduced through effluent discharges and pollution as well as an increased water temperature.
- 4.3.4 Features for which a European site is designated are often sensitive to changes in water balances and water quality. Therefore, urbanisation affecting drainage streams which flow through or ground water which feeds into a European site has the potential to adversely affect the features for which it is designated.

4.3.5

The Plan area lies within the Anglian river management basin and within the Broadland Rivers surface water management catchment area. The upper reaches of the Broadland Rivers' management catchment include the River Wensum and the River Waveney. Further down the catchment the land is mostly at or below sea level and forms an area of slow-flowing rivers and interconnected lakes and wetlands. These lower reaches are affected by tidal surges from the North Sea as well as upstream inputs. The Broadland Rivers management catchment is further divided into four operational management catchments associated with the following rivers³⁸:

- The River Bure, is located to the north of the Plan area. It rises at Melton Constable and flows south west through the Broads towards the sea at Great Yarmouth. Downstream of Wroxham, it is joined by the Ant and then the Thurne. This low-lying area incorporates many of the broads.
- The River Waveney runs along the southern Plan boundary. It begins in the Regrave and Lopham Fen National Nature Reserve flowing east through the towns of Diss, Harleston, Bungay and Beccles. Finally joining the River Yare to reach the sea at Great Yarmouth. The Waveney branches off to Oulton Broad towards Lowestoft where a sea lock divides sea water, linking Oulton Broad with Lake Lothing and the sea.
- The River Wensum which flows along the northern boundary of the Plan area, through Fakenham and the Pensthorpe nature reserve, and on through Swanton Morley, Taverham and Norwich, joining the river Yare at Whitlingham.
- The River Yare rises south of Dereham close to the village of Shipdham, and then flows east towards Norwich across the north of the Plan area. It has two major tributaries, the river Tiffey which flows north through Wymondham and joins the Yare at Barford, and the River Tas, which flows north through Long Stratton before joining the Yare at Trowse³⁹.

³⁸ Environment Agency. Catchment Data Explorer. <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/5> Date Accessed: 25/09/20

³⁹ Data taken from Environment Agency Catchment Data Explorer. Reference above.

- 4.3.6 The Water Framework Directive (WFD) provides an indication of the health of the water environment and whether a water body is at good status or potential. This is determined through an assessment of a range of elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve good ecological status or potential, good chemical status or good groundwater status every single element assessed must be at good status or better. If one element is below its threshold for good status, then the whole water body's status is classed below good. Surface water bodies can be classed as high, good, moderate, poor or bad status.
- 4.3.7 The WFD sets out areas which require special protection. These include areas designated for *“the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in their protection including relevant Natura 2000 sites designated under Directive 92/43/EEC (the Habitats Directive) and Directive 79/409/EEC (the Birds Directive)”*⁴⁰.
- 4.3.8 A review of Environment Agency monitoring data⁴¹ indicates that in 2019, out of 603 surface waterbodies in the Anglian River Basin District Area, 22 were classified as being of bad ecological status and 603 as failing chemical status testing. Out of 31 ground waterbodies, 14 were classified as being of poor quantitative status and 15 as poor chemical status.

⁴⁰ Official Journal of the European Communities (2000) Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy. Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:5c835afb-2ec6-4577-bdf8-756d3d694eeb.0004.02/DOC_1&format=PDF [Date Accessed: 05/11/19]

⁴¹ Environment Agency (2019) Water Quality Monitoring Data Archive. 2019 Cycle 2 Available at: <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/5/Summary> [Date Accessed: 25/09/20]

- 4.3.9 In support of the GNLP AECOM has prepared an Outline Water Cycle Study (WCS). This aimed to help the Greater Norwich Authorities determine the most appropriate options for development within the study area with respect to water infrastructure and the water environment⁴². This provides an assessment of GNLP numbers in terms of water supply, environmental capacity and wastewater capacity. It highlights water quality issues, requirements for infrastructure improvements and other constraints. The WCS also sets out a number of policy recommendations. It is recommended that these be incorporated into relevant VCHAP policy wording where applicable. In particular the WCS recommends the incorporation of SUDS into biodiversity policies to achieve water quality benefits at ecological receptors.
- 4.3.10 Anglian Water is the potable water provider for the Greater Norwich Authorities. The East of England is one of the driest regions of the UK with the Anglian region being classed by the Environment Agency as being under serious water stress⁴³.
- 4.3.11 It is a statutory requirement that every five years water companies produce and publish a Water Resources Management Plan (WRMP). The WRMP demonstrates long term plans to accommodate the impacts of population growth, drought, environmental obligations and climate change uncertainty in order to balance supply and demand. Anglian Water's WRMP⁴⁴, which covers the period to 2045, sets out a series of measures to ensure the water supply - demand balance is achieved. This includes measures such as smart metering, leakage reduction, water efficiency, strategic water planning / transfers. The WRMP indicates that the total impact to the supply-demand balance is 294 MI/d by 2045 which results in a reduction in the baseline supply-demand balance from a total regional surplus of 150 MI/d in 2020, to a total regional deficit of -30 MI/d by 2025 and -144 MI/d by 2045. Following application of the measures the WRMP concludes that adequate water supplies will be available up to 2045 and will cater for proposed levels of growth in the region.

⁴² AECOM. February 2020. Norwich Water Cycle Study. Greater Norwich Authorities Draft for consultation.

⁴³ Environment Agency. Areas of water stress: final classification. Available at: <https://www.iow.gov.uk/azservices/documents/2782-FEI-Areas-of-Water-Stress.pdf> [Date Accessed: 25/09/20].

⁴⁴ Anglian Water. 2019. Water Resources Management Plan 2019. Available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>. [Date Accessed: 25/09/20]

- 4.3.12 An HRA was undertaken alongside the preparation of the WRMP⁴⁵. This concluded there would be no adverse effects on the integrity of any European site but highlighted the importance of lower tier project-level HRA of future plans, projects, or permissions which may act in-combination with WRMP options to refine mitigation strategies and assessment conclusions once appropriate detailed design is available.
- 4.3.13 Water companies divide their supply into Water Resource Zones (WRZs). South Norfolk lies within the Norwich and the Broads WRZ and Norfolk Rural WRZs. The WCS looks at the impact of growth in the GNLP area upon water supply (and as such water supply in the VCHAP area). It also looks at the implication of this upon ecologically designated sites including European sites. The WCS sets out options to ensure the minimisation of water use over the GNLP period and explores a number of water neutrality scenarios. It is recommended that recommendations set out within the WCS in terms of water efficiency be incorporated within the VCHAP policies as appropriate.
- 4.3.14 Wastewater treatment in the Plan area is provided via wastewater recycling centres (WRCs) operated and maintained by Anglian Water Services (AWS). Treated wastewater is ultimately discharged to nearby water bodies. Each of the WRCs is connected to development by a network of wastewater pipes (the sewerage system) which collects wastewater generated by homes and businesses to the WRC. The Environment Agency control discharges to WRC through issue of permits.
- 4.3.15 The WCS provides an assessment of the impact of growth in the GNLP area (and thus within the VCHAP area) upon water quality due to increased discharges to WRC. This has a focus upon ecologically designated sites (including the River Wensum SAC, The Broads SAC and Broadland SPA) and applies water quality thresholds set through implementation of the WFD to ensure the protection of environmental receptors and no change to WFD status or a 10% deterioration in water quality.

⁴⁵ Mott McDonald. 2019. Anglian Water - Water Resources Management Plan Habitats Regulations Assessment Task II: Appropriate Assessment Final for Publication.

- 4.3.16 Two WRCs discharge to watercourses that ultimately drain to the River Wensum SAC including Foulsham-Station Rd WRC and Reepham (Norfolk) WRC. Natural England and the Environment Agency have set a series of standards that need to be achieved for elements of environmental quality that support the achievement of objectives for River Wensum SAC⁴⁶. Flow rates and water quality thresholds are also set out in Natural England's Supplementary Advice Note⁴⁷. These targets have been taken into consideration in the WCS water quality modelling.
- 4.3.17 The broads and marshes (including Broadland SPA and The Broads SAC) are functionally linked to the River Yare and the River Bure. The WCS indicates that two WRCs will exceed their current licence discharge to tributaries of the Yare or Bure upstream of the Broads SAC and Broadland SPA. These are Whitlingham Trowse WRC which discharges to the River Yare and Freethorpe WRC which discharges to The Fleet. In addition to these WRCs, Ditchingham WRC discharges to Broome Beck, a tributary of the River Waveney which flows to the Geldeston Meadows SSSI (a flood meadow constituting part of The Broads SAC). The Broads SAC is located approximately 8km downstream of this WRC.
- 4.3.18 The WCS notes that a number of other WRCs that have been shown to exceed their current licence with proposed growth in the GNLP, also discharge to watercourses that ultimately drain to either the River Yare or River Bure and are therefore functionally linked to The Broads SAC and Broadland SPA. These include Aylsham, Long Stratton, Rackheath and Wymondham WRCs. The WCS however concludes that these four WRCs are sufficiently remote from any European site to allow dilution of any discharge and therefore a negligible impact on water quality which is imperceptible either alone or in-combination.

⁴⁶ Natural England. 2014. Proposed Targets for SAC Conservation Objectives.

<http://publications.naturalengland.org.uk/file/5553364213432320> [Date Accessed: 25/09/20]

⁴⁷ Natural England (2019) River Wensum SAC Conservation Objectives Supplementary Advice. Available at:

<http://publications.naturalengland.org.uk/file/6254570196172800> [Date Accessed: 22/09/20]

- 4.3.19 The Anglian River Basin Management Plan (RBMP)⁴⁸ provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning. It provides strategic level policy guidance in relation to baseline classification of water bodies, statutory objectives for protected areas and water bodies and a summary of measures to achieve statutory protection.
- 4.3.20 The Anglian RBMP outlines a number of measures to tackle water management issues and achieve a series of environmental objectives set out within the plan. Local measures are set out on a catchment basis. The Plan area sits within the Broadland Rivers management catchment area. Within this catchment the priority river basin management issues include tackling diffuse pollution from rural areas, physical modification of rivers and lakes, and pollution from wastewater. An HRA was undertaken alongside the preparation of the RBMP⁴⁹. This HRA concluded that, at the strategic plan level, and given the range of potential mitigation options available, the RBMP is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects. It notes the requirement for project level HRA where necessary for lower tier plans.
- 4.3.21 In order to scope those European sites that will be considered further in the HRA process in terms of hydrology impacts (alone and in-combination), an assessment has been made of their hydrological connectivity with the Plan area. The WCS identifies that the following European sites will be sensitive to hydrological impacts from development set out in the GNLP (and therefore VCHAP):
- River Wensum SAC;
 - Broadlands SPA; and
 - The Broads SAC.

⁴⁸ Environment Agency (2015) Anglian River Basin Management Plan. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718327/Anglian_RBD_Part_1_river_basin_management_plan.pdf [Date Accessed: 25/09/20]

⁴⁹ Environment Agency (2015). River basin management plan for the Anglian River Basin District Habitats Regulations Assessment Updated December 2015. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496430/RBMP_HRA_Anglian_FINAL_Jan_2016.pdf [Date Accessed: 25/09/20]

- 4.3.22 In addition, the following European sites, which are known to be sensitive to hydrological impacts, are also hydrologically linked to the Plan area and will therefore also be considered further.
- Norfolk Valley Fens SAC (at Flordon Common SSSI within the Plan area);
 - Broadland Ramsar;
 - Breydon Water SPA (adjacent to the River Yare and downstream of the Plan area); and
 - Breydon Water Ramsar (as above).
- 4.3.23 All other European site within the HRA study area are not considered to be hydrologically linked to the Plan area either due to their location or because they are not considered to be sensitive to hydrological impacts associated with VCHAP. As such these sites have been scoped out of the HRA in terms of hydrological impacts (including water quality and water quantity issues) (see **Appendix B**).
- 4.3.24 At the screening stage an analysis will be undertaken to further determine hydrological links from development proposed in the VCHAP (allocations and policies). This will consider groundwater and surface water receptors. The output of this review will be analysed spatial using GIS in the context of the location of allocated sites. The outputs of this analysis will allow an assessment of the impacts on both European sites directly and indirectly.
- 4.3.25 It is understood that the outline WCS will be updated as part of the GNLP plan making process. The updated version of the WCS will be drawn upon when screening LSEs of the VCHAP.
- 4.3.26 The next stages of the HRA process in terms of assessing hydrology impacts is summarised in **Table 4.4** below. This table also sets out preliminary recommendations which should be considered in the development of VCHAP in terms of site allocations and policy wording. These recommendations will be update and added to as the HRA progresses.

Table 4.4: *Hydrology recommendations and further work*

Recommendations and further work	
1	Consider potential for hydrological links from allocations once available.
2	WCS to be updated to reflect the development of the GNLP and VCHAP. It is recommended that consideration also be given to hydrological impacts upon the following European sites within the WCS: Norfolk Valley Fens SAC (at Flordon Common SSSI within the Plan area); Broadland Ramsar, Breydon Water SPA (adjacent to the River Yare and downstream of the Plan area) and Breydon Water Ramsar.
3	Recommendations set out in the WCS in terms of water quality and water efficiency to be incorporated into the VCHAP.
4	Policy wording to ensure protection of water quality (from run off) is promoted at all allocations for instance through the requirement of drainage strategies. It is recommended that consideration be given to the incorporation of SUDS to improve surface water from allocations as per WCS recommendations.
5	Consideration should be given to the outputs of the WCS in terms of the timing and opportunities for WRCs to be upgraded to accommodate growth (taking a phased approach) to ensure that water quality is maintained and WFD objectives are not compromised. Ongoing liaison will be required with the WRC providers and Council. Use of a Grampian condition to be considered.
6	Ongoing consultation should be undertaken with Anglian Water to ensure sufficient water supply is available for proposed levels of growth.
7	Avoid location of allocations within close proximity to watercourses.

4.4 Public access and disturbance

4.4.1 Public access/disturbance can take a number of forms. Physical disturbance as a result of urbanisation may include damage to habitats through erosion, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, litter and fly-tipping, tree climbing, wildfire and arson, noise and light pollution and vandalism. Typically, disturbance of habitat and species is the unintentional consequence of people's presence which can impact breeding success and survival. In particular, problems can be associated with dogs and cats, such as predation, disturbing birds and dog fouling.

4.4.2 Urbanisation effects typically occur where development is located close to a European site boundary. These may include impacts such as noise disturbance, lighting effects, cat predation, fly-tipping, wildfire, littering and vandalism. Strategic mitigation schemes elsewhere in the UK have set a presumption against development (i.e. no net increase in residential dwellings) on the basis of site-specific evidence to safeguard against these impacts of between 400m and 500m. As such this buffer distance will be applied in the case of urbanisation effects at the screening stage on a site by site basis, taking into consideration the sensitivities of each European site individually. The following European sites are therefore considered to be sensitive to urbanisation threats as they are located within or adjacent to the Plan area.

- River Wensum SAC;
- Broadland SPA;
- Broadland Ramsar;
- Breydon Water SPA; and
- Breydon Water Ramsar.

4.4.3 A common approach taken across the UK to address recreational impacts at European sites is to establish a zone of influence. This is the area within which there are likely to be significant effects arising from recreational activities undertaken by additional residents due to growth. This is often calculated by taking the distance at which 75% of interviewees have travelled to reach a particular site (based on a review of visitor survey data).

4.4.4 In 2015 and 2016 Footprint Ecology was commissioned by Norfolk County Council/the Norfolk Biodiversity Partnership (NBP) on behalf of all local planning authorities, to undertake a number of visitor surveys to determine current and projected visitor patterns to European sites across Norfolk⁵⁰. The European sites which formed the focus of this commission included the following:

- Breckland SAC/SPA;
- Norfolk Valley Fens SAC;
- North Norfolk Coast SAC/SPA/Ramsar;
- Roydon Common & Dersingham Bog SAC/Ramsar;
- The Broads / Broadland SAC/SPA/Ramsar;
- The Wash SPA/Ramsar;

⁵⁰ Panter, C., Liley, D. & Lowen, S. (2016). Visitor surveys at European protected sites across Norfolk during 2015 and 2016. Unpublished report for Norfolk County Council. Footprint Ecology.

- Winterton Horsey Dunes / Great Yarmouth North Denes SAC/SPA; and
- Breydon Water SPA/Ramsar.

- 4.4.5 Visitor surveys were undertaken in 2015 and 2016 at 35 agreed sites across these European designations following input from a range of stakeholders. Following analysis of the findings Footprint Ecology concluded that over half of interviewees were visiting from home and resident within Norfolk, with 16% of interviewees travelling from home on a short visit/day trip from outside Norfolk. The most popular activities undertaken on site were shown to be dog walking and walking. A high number of trips were made from holiday makers to the North Coast and Broads (66%), with the majority staying locally or on boats in the Broads. Over three quarters (77%) of all interviewees were shown to have arrived at the interview location by car.
- 4.4.6 The Footprint Ecology research highlighted a number of strategic mitigation options on a site by site basis, such as access management, wardening, raising public awareness, site management and delivery of Suitable Alternative Natural Greenspace (SANG).
- 4.4.7 It is understood that an in-depth review of the Footprint Ecology work is currently being progressed by the partnership of Norfolk planning authorities with the aim of identifying a suitable strategic package of mitigation to address increased recreational pressures from future growth in the county. This will take the form of a Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) and will provide a comprehensive strategy addressing on-site access management of visitors and off-site provision of greenspaces to provide a recreation function that reduces the number of visitors that would otherwise go to the European sites. The outputs of the GIRAMS will be drawn upon to inform the HRA screening assessment (allocations and policies), site selection and development of VCHAP policies (and overarching GNLP development management policies), such as the inclusion of tariff arrangements.

- 4.4.8 In response to HRA work undertaken in support of the Great Yarmouth Borough Council Core Strategy, Great Yarmouth Borough Council established a monitoring and mitigation advisory group to deliver required mitigation measures to protect the main local Natura 2000 sites to this Council area including: Winterton-Horsey Dunes SAC, Breydon Water SPA/Ramsar site and North Denes SPA, from any significant effects resulting from increased recreational pressures which may arise from new housing and tourism development. As a result, a Habitats Monitoring and Mitigation Strategy⁵¹ has been approved by Great Yarmouth Borough Council. The Mitigation and Monitoring Strategy applies a series of measures for development within a 5km zone of influence of these European sites including early warning monitoring, monitoring and access management measures (e.g. provision of way marked routes, interpretation boards and wardening). The scale and nature of mitigation required is defined through the application of a number of habitat impact zones. These habitat impact zones have been applied to the scoping of European sites (**Appendix B**).
- 4.4.9 Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and East Suffolk Council commissioned Footprint Ecology in 2019 to prepare a Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy (HRA RAM Strategy)⁵². This set out a means by which sustainable housing growth could be delivered in Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils, facilitating development whilst at the same time adequately protecting European wildlife sites from harm that could otherwise potentially occur because of increased recreation pressure arising from the new housing growth.

⁵¹ Great Yarmouth Borough Council. 2019. Habitats Monitoring and Mitigation Strategy.

⁵² Hoskin, R., Liley, D. & Panter, C. (2019). Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils – Technical Report. Footprint Ecology.

- 4.4.10 The Footprint Ecology work resulted in the establishment of a 13km zone of influence within which recreational impacts were considered likely. This was determined on the basis of a review of existing survey data and reflected the 75th percentile for surveys undertaken at Sandlings⁵³ and the Deben⁵⁴, drawing data from multiple survey points.
- The Alde-Ore SPA/Ramsar;
 - The Deben SPA/Ramsar;
 - Minsmere-Walberswick SPA/Ramsar/SAC;
 - Orfordness-Shingle Street SAC;
 - The Sandlings SPA; and
 - The Stour & Orwell SPA/Ramsar.
- 4.4.11 North of the River Blyth, Footprint Ecology recognised that the key concern from recreation pressure was disturbance to populations of Little Tern. As such they extended the zone of influence along the coastline to include the northern part of Waveney District. This links into the area where the Norfolk strategic mitigation commences for Great Yarmouth Borough, as discussed above, therefore ensuring a continued strategic approach for Little Terns across the relevant European sites for this species in Norfolk and Suffolk. The zone of influence established by Footprint Ecology has been applied when scoping European sites within the HRA study area (**Appendix B**).
- 4.4.12 At the formal HRA screening stage, the location of individual strategic sites in relation to potential buffer zones will be taken into consideration. The benefits of existing and proposed green infrastructure, informal and formal recreational space across the Plan area, and beyond, will also be a key consideration in this element of the assessment. Particular note will also be given to impacts on functionally linked habitat outside the boundary of European sites (see below).

⁵³ Cruickshanks, K., Liley, D. & Hoskin, R. (2010) Suffolk Sandlings Visitor Survey Report. Footprint Ecology / Suffolk Wildlife Trust.

⁵⁴ Lake, S., Petersen, C., Panter, C. & Liley, D. (2014) Deben Estuary Visitor Survey. Unpublished Report, Footprint Ecology / Deben Estuary Partnership.

- 4.4.13 The next stages of the HRA process in terms of assessing public access and disturbance impacts is summarised in **Table 4.5** below. This also sets out preliminary recommendations which should be considered in the development of VCHAP in terms of site allocations and policy wording. These recommendations will be update and added to as the HRA progresses.

Table 4.5: *Public access and disturbance recommendations and further work*

Recommendations and further work	
1	Consider potential recreational impacts in context of the location of allocations and existing and proposed formal and informal recreational space. This will take into consideration the emerging GIRAMS. Council to provide details of GIRAMS to Lepus when available.
2	Consider urbanisation effects when locating allocations – i.e. avoid location of sites within approx. 400-500m of any European site.
3	Ensure formal and informal recreation provision is sufficient to accommodate new growth set out in VCHAP and in line with GIRAMS.

4.5 Habitat fragmentation and loss

- 4.5.1 There are a number of European sites located within the VCHAP area (see **Section 3**). In addition, there is potential for the VCHAP to result in the loss of habitat outside a European site through allocation of sites. Supporting habitat, also referred to as functionally linked habitat⁵⁵, may be located some distance from a European site. The fragmentation of habitats through the loss of connecting corridors would have the potential to hinder the movement of qualifying species.

- 4.5.2 European sites located within and immediately adjacent to the Plan area are listed below. These sites have therefore been scoped into the HRA for further consideration of habitat fragmentation and loss impacts.

- River Wensum SAC;
- Norfolk Valley Fens SAC;
- Broadland SPA;
- Broadland Ramsar;

⁵⁵ “The term ‘functional linkage’ refers to the role or ‘function’ that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore ‘linked’ to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status”. Source: Natural England. 2016. Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

- Breydon Water SPA; and
- Breydon Water Ramsar.

4.5.3 At the HRA screening stage each VCHAP allocation will be analysed in the context of their potential to provide suitable habitat to support the qualifying features of the relevant European site. Where suitable habitat is identified its likelihood to provide an important role in maintaining or restoring the qualifying features at a favourable conservation status will be taken into consideration.

4.5.4 The next stages of the HRA process in terms of assessing habitat loss and fragmentation impacts is summarised in **Table 4.5** below. This also sets out preliminary recommendations which should be considered in the development of VCHAP in terms of site allocations and policy wording. These recommendations will be update and added to as the HRA progresses.

Table 4.6: *Habitat loss and fragmentation recommendations and further work*

Recommendations and further work	
1	Ensure no loss of designated habitat.
2	Ensure no loss of riparian habitat.
3	Review of allocations to determine potential impacts upon functionally linked land.

4.6 European sites

4.6.1 The output of the scoping exercise is provided in **Appendix B**. This provides a detailed explanation as to how European sites have been scoped into / out of the assessment and summarises which threats and pressures will be considered at each European site going forward. **Table 4.7** provides a summary of the scoping outputs.

Table 4.7: Scoping summary for European sites within HRA study area**Key:**

✓ - Scoped in

x - Scoped out

European sites	Air Pollution	Hydrology	Public Access and Disturbance	Habitat Loss and Fragmentation
River Wensum SAC	✓	✓	✓	✓
Norfolk Valley Fens SAC	✓	✓	✓	✓
The Broads SAC	✓	✓	✓	✓
Broadland SPA	✓	✓	✓	✓
Broadland Ramsar	✓	✓	✓	✓
Breydon Water SPA	x	✓	✓	x
Breydon Water Ramsar	x	✓	✓	x
Great Yarmouth North Deans SPA	x	x	✓	x
Winterton-Horsey Dunes SAC	x	x	✓	x
Paston Great Barn SAC	x	x	x	x
Overstrand Cliffs SAC	x	x	x	x
Waveney & Little Ouse Valley Fens SAC	✓	x	x	x
Redgrave and South Lopham Fens Ramsar	✓	x	x	x

Breckland SAC	✓	x	✓	x
Breckland SPA	✓	x	✓	x
Benacre to Easton Bavents Lagoons SAC	✓	x	x	x
Benacre to Easton Bavents Lagoons SPA	✓	x	x	x
Dew's Ponds SAC	x	x	x	x
The Wash and North Norfolk Coast SAC	✓	x	✓	x
The Wash SPA	✓	x	✓	x
The Wash Ramsar	✓	x	✓	x
The Greater Wash SPA	x	x	x	x
North Norfolk Coast SPA	✓	x	✓	x
North Norfolk Coast SAC	✓	x	✓	x
North Norfolk Coast Ramsar	✓	x	✓	x
Southern North Sea SAC	x	x	x	x
Outer Thames Estuary SPA	x	x	x	x
Hainsborough, Hammond and Winterton SAC	x	x	x	x

Minsmere to Walkerswick SAC	✓	x	x	x
Minsmere to Walkerswick SPA	✓	x	x	x
Minsmere to Walkerswick Ramsar	✓	x	x	x
Roydon Common & Dersingham Bog SAC	✓	x	x	x
Roydon Common Ramsar	✓	x	x	x
Dersingham Bog Ramsar	✓	x	x	x
Alde-Ore Estuary SPA	x	x	x	x
Alde-Ore & Butley Estuaries SAC	x	x	x	x
Orfordness-Shingle Street SAC	x	x	x	x
Alde-Ore Estuary Ramsar	x	x	x	x
Staverton Park & The Thicks Wantisden SAC	x	x	x	x
Sandlings SPA	✓	x	x	x
Debden Estuary SPA	✓	x	x	x
Debden Estuary Ramsar	✓	x	x	x
Stour and Orwell Estuary SPA	✓	x	x	x

Stour and Orwell Estuary Ramsar	✓	x	x	x
------------------------------------	---	---	---	---

5 Next Steps

5.1 Summary

5.1.1 The purpose of this report is to ensure that the HRA forms an integral element of the plan-making process and that best practice is followed.

5.1.2 Recommendations and further work required are set out in **Tables 4.3 to 4.6**. These recommendations should inform the selection of allocations and development of VCHAP policies.

5.1.3 This preliminary scoping assessment has concluded that the following European sites will form the focus of the VCHAP HRA.

- **River Wensum SAC** (air pollution, hydrology, public access and disturbance and habitat loss);
- **Norfolk Valley Fens SAC** (air pollution, hydrology, public access and disturbance and habitat loss);
- **The Broads SAC/Broadland SPA/Ramsar** (air pollution, hydrology, public access and disturbance and habitat loss);
- **Breydon Water SPA/Ramsar** (hydrology and public access and disturbance);
- **Great Yarmouth North Deans SPA** (public access and disturbance);
- **Winterton-Horsey Dunes SAC** (public access and disturbance);
- **Waveney & Little Ouse Valley Fens SAC** (air quality);
- **Redgrave and South Lopham Fens Ramsar** (air quality);
- **Breckland SAC/SPA** (air quality and public access and disturbance);
- **Benacre to Easton Bavents Lagoons SAC/SPA** (air quality);
- **The Wash and North Norfolk Coast SAC** (air quality and public access and disturbance);
- **The Wash SPA/Ramsar** (air quality and public access and disturbance);
- **North Norfolk Coast SAC/SPA/Ramsar** (air quality and public access and disturbance);
- **Minsmere to Walkerswick SAC/SPA/Ramsar** (air quality);
- **Roydon Common & Dersingham Bog SAC/Ramsar** (air quality);
- **Sandlings SPA** (air quality);
- **Debden Estuary SPA/Ramsar** (air quality); and
- **Stour and Orwell Estuary SPA/Ramsar** (air quality).

5.2 Next steps

- 5.2.1 The next stage of the HRA process will comprise a formal screening of allocations and policies which form the VCHAP. These will be appraised against the HRA screening criteria (see **Table 3.1**). This will take into consideration case law and best practice and allow the HRA to influence the plan-making process and site selections. The output of this process will be to identify Likely Significant Effects (LSE) of the VCHAP on European sites scoped into this process and identify whether further, more detailed, Appropriate Assessment will be required. It will also set out a number of recommendations intended to help ensure that the VCHAP does not affect the integrity of any European site.
- 5.2.2 This preliminary scoping stage and the formal screening of the VCHAP will be reported upon together in an Interim HRA which will accompany the Draft Plan Regulation 18 Consultation version of the VCHAP. This will be formally consulted upon with Natural England alongside the Draft Regulation 18 version of the VCHAP.

Appendix A: European Site Conservation Objectives

River Wensum SAC¹

Conservation objectives:

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.

Qualifying Features:

H3260. Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation; Rivers with floating vegetation often dominated by water-crowfoot

S1016. *Vertigo moulinsiana*; Desmoulin's whorl snail

S1092. *Austropotamobius pallipes*; White-clawed (or Atlantic stream) crayfish

S1096. *Lampetra planeri*; Brook lamprey

S1163. *Cottus gobio*; Bullhead

Threats and Pressures at European site which may be affected by VCHAP^{2,3}:

- Water Pollution;
- Water Abstraction;
- Impacts on riparian zone habitats; and
- Air Quality.

¹ Natural England (2018) River Wensum SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4906653837426688> [Date Accessed: 22/09/20]

² Natural England (2014) River Wensum SAC SIP. Available at: <http://publications.naturalengland.org.uk/file/5795274547003392> [Date Accessed: 22/09/20]

³ Natural England (2019) River Wensum SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/6254570196172800> [Date Accessed: 22/09/20]

Norfolk Valley Fens SAC⁴

Conservation objectives:

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.

Qualifying Features:

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath H4030. European dry heaths

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco- Brometalia*); Dry grasslands and scrublands on chalk or limestone

H6410. *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows

H7210. Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by great fen sedge (saw sedge)*

H7230. Alkaline fens; Calcium-rich springwater-fed fens

H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains*

S1014. *Vertigo angustior*; Narrow-mouthed whorl snail S1016. *Vertigo moulinsiana*; Desmoulin's whorl snail

* Priority natural habitats or species

Threats and Pressures at European site which may be affected by VCHAP^{5,6}:

- Hydrological Change;
- Water Pollution;
- Water Abstraction; and
- Air Pollution – impact of atmospheric nitrogen deposition.

⁴ Natural England (2019) Norfolk Valley Fens SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4744233475112960> [Date Accessed: 22/09/20]

⁵ Natural England (2014) Norfolk Valley Fens SAC SIP. Available at: <http://publications.naturalengland.org.uk/file/4592297601662976> [Date Accessed: 22/09/20]

⁶ Natural England (2019) Norfolk Valley Fens SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/5508865827536896> [Date Accessed: 22/09/20]

The Broads SAC⁷

Conservation objectives:

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.

Qualifying Features:

H3140. Hard oligo-mesotrophic waters with benthic vegetation of *Chara* spp.; Calcium-rich nutrient-poor lakes, lochs and pools

H3150. Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation; Naturally nutrient-rich lakes or lochs which are often dominated by pondweed

H6410. *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows

H7140. Transition mires and quaking bogs; Very wet mires often identified by an unstable `quaking` surface

H7210. Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by great fen sedge (saw sedge)*

H7230. Alkaline fens; Calcium-rich springwater-fed fens

H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*,

Salicion albae); Alder woodland on floodplains*

S1016. *Vertigo moulinsiana*; Desmoulin's whorl snail S1355. *Lutra lutra*; Otter

S1903. *Liparis loeselii*; Fen orchid

S4056. *Anisus vorticulus*; Little whorlpool ram's-horn snail

* *Priority natural habitats or species*

Threats and Pressures at European site which may be affected by VCHAP^{8,9}:

- Water Pollution;
- Inappropriate Water Levels;

⁷ Natural England (2018) The Broads SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6427605842788352> [Date Accessed: 22/09/20]

⁸ Natural England (2018) Broadland SIP (covering Broadland SPA and The Broads SAC). Available at: <http://publications.naturalengland.org.uk/file/6218680128241664> [Date Accessed: 22/09/20]

⁹ Natural England (2019) The Broads SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/6067900213624832> [Date Accessed: 22/09/20]

- Hydrological Changes;
- Water Abstraction; and
- Air Pollution.

Broadland SPA¹⁰

Conservation objectives:

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.

Qualifying features:

A021 *Botaurus stellaris*; Great bittern (Breeding)

A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)

A038 *Cygnus cygnus*; Whooper swan (Non-breeding)

A050 *Anas penelope*; Eurasian wigeon (Non-breeding)

A051 *Anas strepera*; Gadwall (Non-breeding)

A056 *Anas clypeata*; Northern shoveler (Non-breeding)

A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)

A082 *Circus cyaneus*; Hen harrier (Non-breeding)

A151 *Philomachus pugnax*; Ruff (Non-breeding)

Threats and Pressures at European site which may be affected by VCHAP^{11,12}:

- Water Pollution;
- Inappropriate Water Levels;
- Hydrological Changes;
- Water Abstraction;
- Public Access and Disturbance; and
- Air Pollution.

¹⁰ Natural England (2019) Broadland SPA Conservation Objectives. Available at:
<http://publications.naturalengland.org.uk/file/5433101912375296> [Date Accessed: 22/09/20]

¹¹ Natural England (2018) Broadland SIP (covering Broadland SPA and The Broads SAC). Available at:
<http://publications.naturalengland.org.uk/file/6218680128241664> [Date Accessed: 22/09/20]

¹² Natural England (2019) Broadland SPA Conservation Objectives Supplementary Advice. Available at:
<http://publications.naturalengland.org.uk/file/4516754755944448> [Date Accessed: 22/09/20]

Broadland Ramsar¹³

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion						
2	<p>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 feature</p> <p>H7210 Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> Calcium-rich fen dominated by great fen sedge (saw sedge).</p> <p>H7230 Alkaline fens Calcium-rich springwater-fed fens.</p> <p>H91E0 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) Alder woodland on floodplains, and the Annex II species</p> <p>S1016 <i>Vertigo moulinsiana</i> Desmoulin's whorl snail</p> <p>S1355 <i>Lutra lutra</i> Otter</p> <p>S1903 <i>Liparis loeselii</i> Fen orchid.</p> <p>The site supports outstanding assemblages of rare plants and invertebrates including nine British Red Data Book plants and 136 British Red Data Book invertebrates.</p>						
6	<p>Ramsar criterion 6 – species/populations occurring at levels of international importance.</p> <table border="1"> <thead> <tr> <th colspan="2">Qualifying Species/populations (as identified at designation): Species with peak counts in winter:</th></tr> </thead> <tbody> <tr> <td>Tundra swan , <i>Cygnus columbianus bewickii</i>, NW Europe</td><td>196 individuals, representing an average of 2.4% of the GB population (5 year peak mean 1998/9- 2002/3)</td></tr> <tr> <td>Eurasian wigeon , <i>Anas penelope</i>, NW Europe</td><td>6769 individuals, representing an average of 1.6% of the GB population (5 year peak mean 1998/9-2002/3)</td></tr> </tbody> </table>	Qualifying Species/populations (as identified at designation): Species with peak counts in winter:		Tundra swan , <i>Cygnus columbianus bewickii</i> , NW Europe	196 individuals, representing an average of 2.4% of the GB population (5 year peak mean 1998/9- 2002/3)	Eurasian wigeon , <i>Anas penelope</i> , NW Europe	6769 individuals, representing an average of 1.6% of the GB population (5 year peak mean 1998/9-2002/3)
Qualifying Species/populations (as identified at designation): Species with peak counts in winter:							
Tundra swan , <i>Cygnus columbianus bewickii</i> , NW Europe	196 individuals, representing an average of 2.4% of the GB population (5 year peak mean 1998/9- 2002/3)						
Eurasian wigeon , <i>Anas penelope</i> , NW Europe	6769 individuals, representing an average of 1.6% of the GB population (5 year peak mean 1998/9-2002/3)						

¹³ JNCC. 2008. Information Sheet on Ramsar Wetlands. Broadland Ramsar <https://jncc.gov.uk/jncc-assets/RIS/UK11010.pdf> [Date Accessed: 22/10/20].

	Gadwall , <i>Anas strepera strepera</i> , NW Europe	545 individuals, representing an average of 3.1% of the GB population (5 year peak mean 1998/9- 2002/3)
	Northern shoveler , <i>Anas clypeata</i> , NW & C Europe	247 individuals, representing an average of 1.6% of the GB population (5 year peak mean 1998/9- 2002/3)
	Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in winter:	
	Pink-footed goose , <i>Anser brachyrhynchus</i> , Greenland, Iceland/UK	4263 individuals, representing an average of 1.7% of the population (5 year peak mean 1998/9-2002/3)
	Greylag goose , <i>Anser anser anser</i> , Iceland/UK, Ireland	1007 individuals, representing an average of 1.1% of the population (Source period not collated)
	Threats and Pressures at European site which may be affected by VCHAP: None identified in Ramsar Information Sheet.	

Breydon Water SPA¹⁴

Conservation objectives:

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.

Qualifying Features:

A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)

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

A140 *Pluvialis apricaria*; European golden plover (Non-breeding)

A142 *Vanellus vanellus*; Northern lapwing (Non-breeding)

A151 *Philomachus pugnax*; Ruff (Non-breeding)

¹⁴ Natural England (2019) Breydon Water SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4822248376762368> [Date Accessed: 22/09/20]

A193 *Sterna hirundo*; Common tern (Breeding)A

Waterbird assemblage

Threats and Pressures at European site which may be affected by VCHAP¹⁵:

- Public Access and Disturbance; and
- Hydrology Changes.

Breydon Water Ramsar¹⁶

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion										
5	<p>Ramsar criterion 5 - Assemblages of international importance</p> <p>Species with peak counts in winter: 68175 waterfowl (5 year peak mean 1998/99-2002/2003)</p>										
6	<p>Ramsar criterion 6 – species/populations occurring at levels of international importance.</p> <table border="1"> <tr> <th colspan="2">Qualifying Species/populations (as identified at designation): Species with peak counts in winter:</th></tr> <tr> <td>Tundra swan , Cygnus columbianus bewickii, NW Europe</td><td>171 individuals, representing an average of 2.1% of the GB population (5 year peak mean 1998/9- 2002/3)</td></tr> <tr> <td>Northern lapwing , Vanellus vanellus, Europe - breeding</td><td>20142 individuals, representing an average of 1.3% of the GB population (5 year peak mean 1998/9-2002/3)</td></tr> </table> <table border="1"> <tr> <th colspan="2">Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in winter:</th></tr> <tr> <td>Pink-footed goose , Anser brachyrhynchus, Greenland, Iceland/UK</td><td>5816 individuals, representing an average of 2.4% of the population (5 year peak mean 1998/9-2002/3)</td></tr> </table>	Qualifying Species/populations (as identified at designation): Species with peak counts in winter:		Tundra swan , Cygnus columbianus bewickii, NW Europe	171 individuals, representing an average of 2.1% of the GB population (5 year peak mean 1998/9- 2002/3)	Northern lapwing , Vanellus vanellus, Europe - breeding	20142 individuals, representing an average of 1.3% of the GB population (5 year peak mean 1998/9-2002/3)	Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in winter:		Pink-footed goose , Anser brachyrhynchus, Greenland, Iceland/UK	5816 individuals, representing an average of 2.4% of the population (5 year peak mean 1998/9-2002/3)
Qualifying Species/populations (as identified at designation): Species with peak counts in winter:											
Tundra swan , Cygnus columbianus bewickii, NW Europe	171 individuals, representing an average of 2.1% of the GB population (5 year peak mean 1998/9- 2002/3)										
Northern lapwing , Vanellus vanellus, Europe - breeding	20142 individuals, representing an average of 1.3% of the GB population (5 year peak mean 1998/9-2002/3)										
Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in winter:											
Pink-footed goose , Anser brachyrhynchus, Greenland, Iceland/UK	5816 individuals, representing an average of 2.4% of the population (5 year peak mean 1998/9-2002/3)										

¹⁵ Natural England (2018) Breydon Water SPA SIP. Available at: <http://publications.naturalengland.org.uk/file/5893824219447296> [Date Accessed: 22/09/20]

¹⁶ JNCC. 2008. Information Sheet on Ramsar Wetlands. Breydon Water Ramsar <https://jncc.gov.uk/jncc-assets/RIS/UK11008.pdf> [Date Accessed: 22/10/20].

	Eurasian wigeon , Anas penelope, NW Europe	15624 individuals, representing an average of 1% of the population (5 year peak mean 1998/9- 2002/3)
	Northern shoveler , Anas clypeata, NW & C Europe	478 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/9- 2002/3)
	European golden plover , Pluvialis apricaria apricaria, P. a. altifrons Iceland & Faroes/E Atlantic	10656 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/9-2002/3)
	Black-tailed godwit , Limosa limosa islandica, Iceland/W Europe	1100 individuals, representing an average of 3.1% of the population (5 year peak mean 1998/9-2002/3)
Threats and Pressures at European site which may be affected by VCHAP: None identified in Ramsar Information Sheet.		

Great Yarmouth North Deans SPA¹⁷

Conservation objectives:

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.

Qualifying Features:

A195 *Sterna albifrons*; Little tern (Breeding)

Threats and Pressures at European site which may be affected by VCHAP^{18,19}:

- Public Access and Disturbance;
- Hydrological Changes;

¹⁷ Natural England (2019) Great Yarmouth North Denes SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6450939770961920> [Date Accessed: 22/09/20]

¹⁸ Natural England (2018) Great Yarmouth Winterton Horsey SIP (to cover Great Yarmouth North Denes SPA and Winterton-Horsey Dunes SAC). Available at: <http://publications.naturalengland.org.uk/file/6277135286665216> [Date Accessed: 22/09/20]

¹⁹ Natural England (2012) Great Yarmouth and North Denes SPA Regulation 33 Advice. Available at: <http://publications.naturalengland.org.uk/file/3957913> [Date Accessed: 22/09/20]

- Air Pollution.

Winterton-Horsey Dunes SAC²⁰

Conservation objectives:

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 qualifying natural habitats
- The structure and function (including typical species) of the qualifying natural habitats; and
- The supporting processes on which the qualifying natural habitats rely

Qualifying Features:

H2110. Embryonic shifting dunes

H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram

H2150. Atlantic decalcified fixed dunes (*Calluno-Ulicetea*)*

H2190. Humid dune slacks

*Priority Species.

Threats and Pressures at European site which may be affected by VCHAP^{21,22}:

- Public Access and Disturbance;
- Hydrological Changes; and
- Air Pollution.

Paston Great Barn SAC²³

Conservation objectives:

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.

Qualifying Features:

S1308. *Barbastella barbastellus*; Barbastelle bat

²⁰ Natural England (2018) Winterton-Horsey Dunes SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6564347065401344> [Date Accessed: 24/09/20]

²¹ Natural England (2018) Great Yarmouth Winterton Horsey SIP (to cover Great Yarmouth North Denes SPA and Winterton-Horsey Dunes SAC). Available at: <http://publications.naturalengland.org.uk/file/6218680128241664> [Date Accessed: 24/09/20]

²² Natural England (2019) Winterton-Horsey Dunes SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/5063465840672768> [Date Accessed: 24/09/20]

²³ Natural England (2019) Paston Great Barn SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/5114399593594880> [Date Accessed: 22/09/20]

Threats and Pressures at European site which may be affected by VCHAP^{24,25}:

- Offsite habitat availability / management (loss and changes to hydrological conditions supporting foraging habitat);
- Public access and disturbance (unauthorised access);
- Air Quality (impacts upon broadleaved woodland habitat).

Overstrand Cliffs SAC²⁶

Conservation objectives:

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 qualifying natural habitats;
- The structure and function (including typical species) of the qualifying natural habitats; and
- The supporting processes on which the qualifying natural habitats rely.

Qualifying Features:

H1230. Vegetated sea cliffs of the Atlantic and Baltic coasts

Threats and Pressures at European site which may be affected by VCHAP^{27,28}:

- Water quality; and
- Air Quality.

Waveney & Little Ouse Valley Fens SAC²⁹

Conservation objectives:

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;

²⁴ Natural England (2015) Paston Great Barn SAC SIP. Available at:
<http://publications.naturalengland.org.uk/file/5348069707087872> [Date Accessed: 24/09/20]

²⁵ Natural England (2019) Paston Great Barn SAC Conservation Objectives Supplementary Advice. Available at:
<http://publications.naturalengland.org.uk/file/5001414501990400> [Date Accessed: 24/09/20]

²⁶ Natural England (2018) Overstrand Cliffs SAC Conservation Objectives. Available at:
<http://publications.naturalengland.org.uk/file/6578860724584448> [Date Accessed: 22/09/20]

²⁷ Natural England (2014) Overstrand Cliffs SAC SIP. Available at:
<http://publications.naturalengland.org.uk/file/6475449683148800> [Date Accessed: 24/09/20]

²⁸ Natural England (2015) Overstrand Cliffs SAC Conservation Objectives Supplementary Advice. Available at:
<http://publications.naturalengland.org.uk/file/5574891690524672> [Date Accessed: 24/09/20]

²⁹ Natural England (2018) Waveney & Little Ouse Valley Fens SAC Conservation Objectives. Available at:
<http://publications.naturalengland.org.uk/file/5174901589934080> [Date Accessed: 22/09/20]

- 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.

Qualifying Features:

H6410. *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows

H7210. Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by great fen sedge (saw sedge)*

S1016. *Vertigo moulinsiana*; Desmoulin's whorl snail

* Priority natural habitats or species

Threats and Pressures at European site which may be affected by VCHAP^{30,31}:

- Water Pollution;
- Water Levels' and
- Air pollution.

Redgrave and South Lopham Fens Ramsar³²

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
2	The site supports many rare and scarce invertebrates, including a population of the fen raft spider <i>Dolomedes plantarius</i> .
3	The site supports many rare and scarce invertebrates, including a population of the fen raft spider <i>Dolomedes plantarius</i> . The diversity of the site is due to the lateral and longitudinal zonation of the vegetation types characteristic of valley mires.

Threats and Pressures at European site which may be affected by VCHAP:

- Water quality.

³⁰ Natural England (2015) Waveney & Little Ouse Valley Fens SAC SIP. Available at: <http://publications.naturalengland.org.uk/file/5005196964921344> [Date Accessed: 24/09/20]

³¹ Natural England (2019) Waveney & Little Ouse Valley Fens SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/6068391618281472> [Date Accessed: 24/09/20]

³² JNCC. 2008. Information Sheet on Ramsar Wetlands. Redgrave and South Lopham Fens Ramsar <https://jncc.gov.uk/jncc-assets/RIS/UK11056.pdf> [Date Accessed: 22/10/20].

Breckland SAC³³

Conservation objectives:

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.

Qualifying Features:

H2330. Inland dunes with open *Corynephorus* and *Agrostis* grasslands; Open grassland with grey-hair grass and common bent grass of inland dunes

H3150. Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation; Naturally nutrient-rich lakes or lochs which are often dominated by pondweed

H4030. European dry heaths

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco- Brometalia*); Dry grasslands and scrublands on chalk or limestone

H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*,

Salicion albae); Alder woodland on floodplains*

S1166. *Triturus cristatus*; Great crested newt

* Priority natural habitats or species

Threats and Pressures at European site which may be affected by VCHAP^{34,35}:

- Water pollution;
- Planning permission general (housing noted);
- Air pollution;
- Public access and disturbance; and
- Habitat fragmentation.

Breckland SPA³⁶

Conservation objectives:

³³ Natural England (2018) Breckland SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6441039158312960> [Date Accessed: 22/09/20]

³⁴ Natural England (2015) Breckland SIP (Covering Breckland SAC and Breckland SPA). Available at: <http://publications.naturalengland.org.uk/file/5005196964921344> [Date Accessed: 24/09/20]

³⁵ Natural England (2019) Breckland SAC. Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/6754976231849984> [Date Accessed: 24/09/20]

³⁶ Natural England (2019) Breckland SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4973014479536128> [Date Accessed: 22/09/20]

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.

Qualifying Features:

A133 *Burhinus oedicephalus*; Stone-curlew (Breeding)

A224 *Caprimulgus europaeus*; European nightjar (Breeding)

A246 *Lullula arborea*; Woodlark (Breeding)

Threats and Pressures at European site which may be affected by VCHAP^{37,38}:

- Water pollution;
- Planning permission general (housing noted);
- Air pollution;
- Public access and disturbance; and
- Habitat fragmentation.

Benacre to Easton Bavents Lagoons SAC³⁹

Conservation objectives:

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

Qualifying Features:

H1150. Coastal lagoons*

* *Priority natural habitats or species*

³⁷ Natural England (2015) Breckland SIP (Covering Breckland SAC and Breckland SPA). Available at: <http://publications.naturalengland.org.uk/file/5005196964921344> [Date Accessed: 24/09/20]

³⁸ Natural England (2019) Breckland SPA. Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/5048975426322432> [Date Accessed: 24/09/20]

³⁹ Natural England (2019) Benacre to Easton Bavents Lagoons SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6005842830950400> [Date Accessed: 22/09/20]

Threats and Pressures at European site which may be affected by VCHAP^{40,41}:

- Public access and disturbance;
- Air quality; and
- Water pollution.

Benacre to Easton Bavents Lagoons SPA⁴²

Conservation objectives:

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.

Qualifying Features:

A021 *Botaurus stellaris*; Great bittern (Breeding)

A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)

A195 *Sterna albifrons*; Little tern (Breeding)

Threats and Pressures at European site which may be affected by VCHAP^{43,44}:

- Public access and disturbance;
- Air quality; and
- Water pollution.

Dew's Ponds SAC⁴⁵

Conservation objectives:

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;

⁴⁰ Natural England (2015) Benacre to Easton Bavents SIP (Covering Benacre to Easton Bavents Lagoons SAC and Benacre to Easton Bavents SPA). Available at: <http://publications.naturalengland.org.uk/file/5868757182316544> [Date Accessed: 24/09/20]

⁴¹ Natural England (2019) Benacre to Easton Bavents Lagoons SAC. Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/5503127986110464> [Date Accessed: 24/09/20]

⁴² Natural England (2019) Benacre to Easton Bavents Lagoons SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/5222146070806528> [Date Accessed: 23/09/20]

⁴³ Natural England (2015) Benacre to Easton Bavents SIP (Covering Benacre to Easton Bavents Lagoons SAC and Benacre to Easton Bavents SPA). Available at: <http://publications.naturalengland.org.uk/file/5868757182316544> [Date Accessed: 24/09/20]

⁴⁴ Natural England (2019) Benacre to Easton Bavents Lagoons SPA. Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/5503127986110464> [Date Accessed: 24/09/20]

⁴⁵ Natural England (2018) Dew's Point SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/5809266204344320> [Date Accessed: 23/09/20]

- 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.

Qualifying Features:

S1166. *Triturus cristatus*; Great crested newt

Threats and Pressures at European site which may be affected by VCHAP^{46,47}:

- Water quality; and
- Air quality.

The Wash and North Norfolk Coast SAC⁴⁸

Conservation objectives:

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.

Qualifying Features:

H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks

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

H1150. Coastal lagoons*

H1160. Large shallow inlets and bays

H1170. Reefs

H1310. *Salicornia* and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand

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

H1420. Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*); Mediterranean saltmarsh scrub

⁴⁶ Natural England (2014) Dew's Point SAC SIP. Available at:
<http://publications.naturalengland.org.uk/file/5689361702060032> [Date Accessed: 24/09/20]

⁴⁷ Natural England (2015) Dew's Point SAC. Conservation Objectives Supplementary Advice. Available at:
<http://publications.naturalengland.org.uk/file/6663816760786944> [Date Accessed: 24/09/20]

⁴⁸ Natural England (2018) The Wash and North Norfolk Coast SAC Conservation Objectives. Available at:
<http://publications.naturalengland.org.uk/file/5213489320951808> [Date Accessed: 23/09/20]

S1355. *Lutra lutra*; Otter
 S1365. *Phoca vitulina*; Common seal
 * Priority natural habitats or species

Threats and Pressures at European site which may be affected by VCHAP⁴⁹:

- Water levels;
- Public access and disturbance; and
- Air pollution.

The Wash SPA⁵⁰

Conservation objectives:

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.

Qualifying Features:

A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)
 A040 *Anser brachyrhynchus*; Pink-footed goose (Non-breeding)
 A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)
 A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
 A050 *Anas penelope*; Eurasian wigeon (Non-breeding)
 A051 *Anas strepera*; Gadwall (Non-breeding)
 A054 *Anas acuta*; Northern pintail (Non-breeding)
 A065 *Melanitta nigra*; Black (common) scoter (Non-breeding)
 A067 *Bucephala clangula*; Common goldeneye (Non-breeding)
 A130 *Haematopus ostralegus*; Eurasian oystercatcher (Non-breeding)
 A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
 A143 *Calidris canutus*; Red knot (Non-breeding)
 A144 *Calidris alba*; Sanderling (Non-breeding)
 A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
 A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
 A157 *Limosa lapponica*; Bar-tailed godwit (Non-breeding)
 A160 *Numenius arquata*; Eurasian curlew (Non-breeding)
 A162 *Tringa totanus*; Common redshank (Non-breeding)
 A169 *Arenaria interpres*; Ruddy turnstone (Non-breeding)
 A193 *Sterna hirundo*; Common tern (Breeding)
 A195 *Sterna albifrons*; Little tern (Breeding)
 Waterbird assemblage

⁴⁹ Natural England (2014) The Wash and North Norfolk Coast SIP (to cover Gibraltar Point SPA, N Norfolk Coast SPA, North Norfolk Coast SAC, The Wash and North Norfolk Coast SAC and The Wash SPA). Available at: <http://publications.naturalengland.org.uk/file/6240487188987904> [Date Accessed: 24/09/20]

⁵⁰ Natural England (2019) The Wash SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4748062010638336> [Date Accessed: 23/09/20]

Threats and Pressures at European site which may be affected by VCHAP⁵¹:

- Water levels;
- Public access and disturbance; and
- Air pollution.

The Wash Ramsar⁵²

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion				
1	Ramsar criterion 1 The Wash is a large shallow bay comprising very extensive saltmarshes, major intertidal banks of sand and mud, shallow water and deep channels.				
3	Ramsar criterion 5 Qualifies because of the inter-relationship between its various components including saltmarshes, intertidal sand and mud flats and the estuarine waters. The saltmarshes and the plankton in the estuarine water provide a primary source of organic material which, together with other organic matter, forms the basis for the high productivity of the estuary.				
5	Ramsar criterion 5 Assemblages of international importance: Species with peak counts in winter: 292541 waterfowl (5 year peak mean 1998/99-2002/2003)				
6	Ramsar criterion 6 – species/populations occurring at levels of international importance.				
	Qualifying Species/populations (as identified at designation):				
	<table><tr><th colspan="2">Species with peak counts in spring/autumn</th></tr><tr><td>Eurasian oystercatcher , Haematopus</td><td>15616 individuals, representing an average of 1.5% of the population (5 year peak mean 1998/9-2002/3)</td></tr></table>		Species with peak counts in spring/autumn		Eurasian oystercatcher , Haematopus
Species with peak counts in spring/autumn					
Eurasian oystercatcher , Haematopus	15616 individuals, representing an average of 1.5% of the population (5 year peak mean 1998/9-2002/3)				

⁵¹ Natural England (2014) The Wash and North Norfolk Coast SIP (to cover Gibraltar Point SPA, N Norfolk Coast SPA, North Norfolk Coast SAC, The Wash and North Norfolk Coast SAC and The Wash SPA). Available at: <http://publications.naturalengland.org.uk/file/6240487188987904> [Date Accessed: 24/09/20]

⁵² JNCC. 2008. The Wash Information Sheet on Ramsar Wetlands. The Wash Ramsar <https://jncc.gov.uk/jncc-assets/RIS/UK11072.pdf> [Date Accessed: 23/10/20].

	ostralegus ostralegus, Europe & NW Africa - wintering	
	Grey plover , Pluvialis squatarola, E Atlantic/W Africa -wintering	13129 individuals, representing an average of 5.3% of the population (5 year peak mean 1998/9-2002/3 - spring peak)
	Red knot , Calidris canutus islandica, W & Southern Africa (wintering)	68987 individuals, representing an average of 15.3% of the population (5 year peak mean 1998/9-2002/3)
	Sanderling , Calidris alba, Eastern Atlantic	3505 individuals, representing an average of 2.8% of the population (5 year peak mean 1998/9-2002/3)
	Eurasian curlew , Numenius arquata arquata, N. a. arquata Europe (breeding)	9438 individuals, representing an average of 2.2% of the population (5 year peak mean 1998/9-2002/3)
	Common redshank , Tringa totanus totanus,	6373 individuals, representing an average of 2.5% of the population (5 year peak mean 1998/9-2002/3)
	Ruddy turnstone , Arenaria interpres interpres, NE Canada, Greenland/W Europe & NW Africa	888 individuals, representing an average of 1.7% of the GB population (5 year peak mean 1998/9- 2002/3)
	Species with peak counts in spring/autumn:	
	Pink-footed goose , Anser brachyrhynchus, Greenland, Iceland/UK	29099 individuals, representing an average of 12.1% of the population (5 year peak mean 1998/9-2002/3)
	Dark-bellied brent goose, Branta bernica bernica,	20861 individuals, representing an average of 9.7% of the population (5 year peak mean 1998/9-2002/3)

	Common shelduck , Tadorna tadorna, NW Europe	9746 individuals, representing an average of 3.2% of the population (5 year peak mean 1998/9-2002/3)
	Northern pintail , Anas acuta, NW Europe	431 individuals, representing an average of 1.5% of the GB population (5 year peak mean 1998/9- 2002/3)
	Dunlin , Calidris alpina alpina, W Siberia/W Europe	36600 individuals, representing an average of 2.7% of the population (5 year peak mean 1998/9-2002/3)
	Bar-tailed godwit , Limosa lapponica lapponica, W Palearctic	16546 individuals, representing an average of 13.7% of the population (5 year peak mean 1998/9-2002/3)
	Species/populations identified subsequent to designation for possible future consideration under criterion 6.	
	Species with peak counts in spring/autumn:	
	Ringed plover , Charadrius hiaticula, Europe/Northwest Africa	1500 individuals, representing an average of 2% of the population (5 year peak mean 1998/9- 2002/3)
	Black-tailed godwit , Limosa limosa islandica, Iceland/W Europe	6849 individuals, representing an average of 19.5% of the population (5 year peak mean 1998/9-2002/3)
	Species with peak counts in winter:	
	European golden plover , Pluvialis apricaria apricaria, P. a. altifrons Iceland & Faroes/E Atlantic	22033 individuals, representing an average of 2.3% of the population (5 year peak mean 1998/9-2002/3)
	Northern lapwing , Vanellus vanellus, Europe - breeding	46422 individuals, representing an average of 1.3% of the population (5 year peak mean 1998/9-2002/3)
Threats and Pressures at European site which may be affected by VCHAP:		
None identified in Ramsar Information Sheet.		

The Greater Wash SPA⁵³

Conservation objectives:

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.

Qualifying Features:

A001 *Gavia stellata*; Red-throated diver (Non-breeding)
 A065 *Melanitta nigra*; Common scoter (Non-breeding)
 A177 *Hydrocoloeus minutus*; Little gull (Non-breeding)
 A191 *Sterna sandvicensis*; Sandwich tern (Breeding)
 A193 *Sterna hirundo*; Common tern (Breeding)
 A195 *Sternula albifrons*; Little tern (Breeding)

North Norfolk Coast SPA⁵⁴

Conservation objectives:

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.

Qualifying Features:

A021 *Botaurus stellaris*; Great bittern (Breeding)
 A040 *Anser brachyrhynchus*; Pink-footed goose (Non-breeding)
 A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)
 A050 *Anas penelope*; Eurasian wigeon (Non-breeding)
 A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)
 A084 *Circus pygargus*; Montagu's harrier (Breeding)
 A132 *Recurvirostra avosetta*; Pied avocet (Breeding)
 A143 *Calidris canutus*; Red knot (Non-breeding)
 A191 *Sterna sandvicensis*; Sandwich tern (Breeding)
 A193 *Sterna hirundo*; Common tern (Breeding)
 A195 *Sterna albifrons*; Little tern (Breeding)
 Waterbird assemblage

⁵³ Natural England (2019) The Greater Wash SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4748062010638336> [Date Accessed: 23/09/20]

⁵⁴ Natural England (2019) North Norfolk Coast SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4597105251581952> [Date Accessed: 23/09/20]

Threats and Pressures at European site which may be affected by VCHAP⁵⁵:

- Water levels;
- Public access and disturbance; and
- Air pollution.

North Norfolk Coast SAC⁵⁶

Conservation objectives:

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.

Qualifying Features:

H1150. Coastal lagoons*

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

H1420. Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*); Mediterranean saltmarsh scrub

H2110. Embryonic shifting dunes

H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram

H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*

H2190. Humid dune slacks

S1355. *Lutra lutra*; Otter

S1395. *Petalophyllum ralfsii*; Petalwort

* Priority natural habitats or species

Threats and Pressures at European site which may be affected by VCHAP⁵⁷:

- Water levels;
- Public access and disturbance; and
- Air pollution.

⁵⁵ Natural England (2014) The Wash and North Norfolk Coast SIP (to cover Gibraltar Point SPA, N Norfolk Coast SPA, North Norfolk Coast SAC, The Wash and North Norfolk Coast SAC and The Wash SPA). Available at: <http://publications.naturalengland.org.uk/file/6240487188987904> [Date Accessed: 24/09/20]

⁵⁶ Natural England (2018) North Norfolk Coast SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/5187288007180288> [Date Accessed: 23/09/20]

⁵⁷ Natural England (2014) The Wash and North Norfolk Coast SIP (to cover Gibraltar Point SPA, N Norfolk Coast SPA, North Norfolk Coast SAC, The Wash and North Norfolk Coast SAC and The Wash SPA). Available at: <http://publications.naturalengland.org.uk/file/6240487188987904> [Date Accessed: 24/09/20]

North Norfolk Coast Ramsar⁵⁸

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion								
1	Ramsar criterion 1 The site is one of the largest expanses of undeveloped coastal habitat of its type in Europe. It is a particularly good example of a marshland coast with intertidal sand and mud, saltmarshes, shingle banks and sand dunes. There are a series of brackish-water lagoons and extensive areas of freshwater grazing marsh and reed beds.								
2	Ramsar criterion 2 Supports at least three British Red Data Book and nine nationally scarce vascular plants, one British Red Data Book lichen and 38 British Red Data Book invertebrates.								
5	Assemblages of international importance: Species with peak counts in winter: 98462 waterfowl (5 year peak mean 1998/99-2002/2003)								
6	<p>Ramsar criterion 6 – species/populations occurring at levels of international importance.</p> <p>Qualifying Species/populations (as identified at designation):</p> <table border="1"> <thead> <tr> <th colspan="2">Species regularly supported during the breeding season:</th></tr> </thead> <tbody> <tr> <td>Sandwich tern , Sterna (Thalasseus) sandvicensis sandvicensis, W Europe</td><td>4275 apparently occupied nests, representing an average of 7.7% of the breeding population (Seabird 2000 Census)</td></tr> <tr> <td>Common tern , Sterna hirundo hirundo, N & E Europe</td><td>408 apparently occupied nests, representing an average of 4% of the GB population (Seabird 2000 Census)</td></tr> <tr> <td>Little tern , Sterna albifrons albifrons, W Europe</td><td>291 apparently occupied nests, representing an average of 2.5% of the breeding population (Seabird 2000 Census)</td></tr> </tbody> </table>	Species regularly supported during the breeding season:		Sandwich tern , Sterna (Thalasseus) sandvicensis sandvicensis, W Europe	4275 apparently occupied nests, representing an average of 7.7% of the breeding population (Seabird 2000 Census)	Common tern , Sterna hirundo hirundo, N & E Europe	408 apparently occupied nests, representing an average of 4% of the GB population (Seabird 2000 Census)	Little tern , Sterna albifrons albifrons, W Europe	291 apparently occupied nests, representing an average of 2.5% of the breeding population (Seabird 2000 Census)
Species regularly supported during the breeding season:									
Sandwich tern , Sterna (Thalasseus) sandvicensis sandvicensis, W Europe	4275 apparently occupied nests, representing an average of 7.7% of the breeding population (Seabird 2000 Census)								
Common tern , Sterna hirundo hirundo, N & E Europe	408 apparently occupied nests, representing an average of 4% of the GB population (Seabird 2000 Census)								
Little tern , Sterna albifrons albifrons, W Europe	291 apparently occupied nests, representing an average of 2.5% of the breeding population (Seabird 2000 Census)								

⁵⁸ JNCC. 2008. Information Sheet on Ramsar Wetlands. North Norfolk Coast Ramsar <https://jncc.gov.uk/jncc-assets/RIS/UK11048.pdf> [Date Accessed: 23/10/20].

	Species with peak counts in spring/autumn:	
	Red knot , <i>Calidris canutus islandica</i> , W & Southern Africa (wintering)	30781 individuals, representing an average of 6.8% of the population (5 year peak mean 1998/9-2002/3)
	Species with peak counts in winter:	
	Pink-footed goose , <i>Anser brachyrhynchus</i> , Greenland, Iceland/UK	16787 individuals, representing an average of 6.9% of the population (5 year peak mean 1998/9-2002/3)
	Dark-bellied brent goose, <i>Branta bernicla bernicla</i> ,	8690 individuals, representing an average of 4% of the population (5 year peak mean 1998/9- 2002/3)
	Eurasian wigeon , <i>Anas penelope</i> , NW Europe	17940 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/9-2002/3)
	Northern pintail , <i>Anas acuta</i> , NW Europe	1148 individuals, representing an average of 1.9% of the population (5 year peak mean 1998/9-2002/3)
	Species/populations identified subsequent to designation for possible future consideration under criterion 6.	
	Species with peak counts in spring/autumn:	
	Ringed plover , <i>Charadrius hiaticula</i> , Europe/Northwest Africa	1740 individuals, representing an average of 2.3% of the population (5 year peak mean 1998/9-2002/3)
	Sanderling , <i>Calidris alba</i> , Eastern Atlantic	1303 individuals, representing an average of 1% of the population (5 year peak mean 1998/9- 2002/3)
	Bar-tailed godwit , <i>Limosa lapponica lapponica</i> , W Palearctic	3933 individuals, representing an average of 3.2% of the population (5 year peak mean 1998/9-2002/3)
	Threats and Pressures at European site which may be affected by VCHAP:	

None identified in Ramsar Information Sheet.

Southern North Sea SAC⁵⁹

Conservation objectives:

To ensure that the integrity of the site is maintained and that it makes the best possible contribution to maintaining Favourable Conservation Status (FCS) for Harbour Porpoise in UK waters:

In the context of natural change, this will be achieved by ensuring that:

- 1. Harbour porpoise is a viable component of the site;
- 2. There is no significant disturbance of the species; and
- 3. The condition of supporting habitats and processes, and the availability of prey is maintained.

Qualifying Features:

1351: Harbour porpoise (*Phocoena phocoena*)

Threats and Pressures at European site which may be affected by VCHAP⁶⁰:

- Public access and disturbance (boating).

Outer Thames Estuary SPA⁶¹

Conservation objectives:

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.

Qualifying Features:

A001 *Gavia stellata*; Red-throated diver (Non-breeding)

A193 *Sterna hirundo*; Common tern (Breeding)

A195 *Sternula albifrons*; Little tern (Breeding)

⁵⁹ JNCC (2019) Southern North Sea SAC Conservation Objectives. Available at:

<http://data.jncc.gov.uk/data/206f2222-5c2b-4312-99ba-d59dfd1dec1d/SouthernNorthSea-conservation-advice.pdf>

[Date Accessed: 23/09/20]

⁶⁰ JNCC. Natural England. March 2019. Harbour Porpoise (*Phocoena phocoena*) Special Area of Conservation: Southern North Sea Conservation Objectives and Advice on Operations. Available at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-002860-ExA%3B%20ISH6%3B%2010.D7.12%20Harbour%20Porpoise%20SAC%20Conservation%20Objectives%20and%20Advice.pdf> [Date Accessed: 23/09/20]

⁶¹ Natural England (2019) Outer Thames Estuary SPA Conservation Objectives. Available at:

<http://publications.naturalengland.org.uk/file/5184120712069120> [Date Accessed: 23/09/20]

Threats and Pressures at European site which may be affected by VCHAP⁶²:

- No threats identified that could be increased / effected by VCHAP.

Hainsborough, Hammond and Winterton SAC⁶³

Conservation objectives:

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

Qualifying Features:

1170 Reefs

1110 Sandbanks which are slightly covered by sea water all the time

Threats and Pressures at European site which may be affected by VCHAP⁶⁴:

- Recreation.

Minsmere to Walkerswick SAC⁶⁵

Conservation objectives:

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

Qualifying Features:

⁶² Natural England (2015) Outer Thames Estuary SPA SIP. Available at:

<http://publications.naturalengland.org.uk/file/5877617494327296> [Date Accessed: 24/09/20]

⁶³ JNCC Hainsborough, Hammond and Winterton SAC. Available at: <https://jncc.gov.uk/our-work/haisborough-hammond-and-winterton-mpa/> [Date Accessed: 23/09/20]

⁶⁴ Natural England. Hainsborough, Hammond and Winterton SAC. Available at:

<https://designatedsites.naturalengland.org.uk/Marine/FAPMatrix.aspx?SiteCode=UK0030369&SiteName=hais&SiteNameDisplay=Haisborough%2c+Hammond+and+Winterton+SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=0> [Date Accessed: 24/09/20]

⁶⁵ Natural England (2018) Minsmere to Walkerswick SAC Conservation Objectives. Available at:

<http://publications.naturalengland.org.uk/file/4943448310546432> [Date Accessed: 23/09/20]

H1210. Annual vegetation of drift lines
 H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves
 H4030. European dry heaths

Threats and Pressures at European site which may be affected by VCHAP^{66,67}:

- Public access and disturbance;
- Air pollution; and
- Water pollution.

Minsmere to Walkerswick SPA⁶⁸

Conservation objectives:

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.

Qualifying Features:

A021 *Botaurus stellaris*; Great bittern (Breeding)
 A051 *Anas strepera*; Gadwall (Non-breeding)
 A051 *Anas strepera*; Gadwall (Breeding)
 A052 *Anas crecca*; Eurasian teal (Breeding)
 A056 *Anas clypeata*; Northern shoveler (Breeding)
 A056 *Anas clypeata*; Northern shoveler (Non-breeding)
 A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)
 A082 *Circus cyaneus*; Hen harrier (Non-breeding)
 A132 *Recurvirostra avosetta*; Pied avocet (Breeding)
 A195 *Sterna albifrons*; Little tern (Breeding)
 A224 *Caprimulgus europaeus*; European nightjar (Breeding)
 A394 *Anser albifrons albifrons*; Greater white-fronted goose (Non-breeding)

Threats and Pressures at European site which may be affected by VCHAP⁶⁹:

- Public access and disturbance;
- Air pollution; and
- Water pollution.

⁶⁶ Natural England (2014) Minsmere to Walkerswick (covers both SPA and SAC) SIP. Available at: <http://publications.naturalengland.org.uk/file/5768976999120896> [Date Accessed: 24/09/20]

⁶⁷ Natural England (2019) Minsmere to Walkerswick SAC. Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/5537398570352640> [Date Accessed: 24/09/20]

⁶⁸ Natural England (2019) Minsmere to Walkerswick SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4811128974868480> [Date Accessed: 23/09/20]

⁶⁹ Natural England (2014) Minsmere to Walkerswick (covers both SPA and SAC) SIP. Available at: <http://publications.naturalengland.org.uk/file/5768976999120896> [Date Accessed: 24/09/20]

Minsmere-Walberswick Ramsar⁷⁰

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
1	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.
2	Ramsar criterion 2 - This site supports nine nationally scarce plants and at least 26 red data book invertebrates. Supports a population of the mollusc <i>Vertigo angustior</i> (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: <i>Botaurus stellaris</i> , <i>Anas strepera</i> , <i>Anas crecca</i> , <i>Anas clypeata</i> , <i>Circus aeruginosus</i> , <i>Recurvirostra avosetta</i> , <i>Panurus biarmicus</i>

Threats and Pressures at European site which may be affected by VCHAP:

- Public access and disturbance.

Roydon Common & Dersingham Bog SAC⁷¹

Conservation objectives:

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.

Qualifying Features:

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath H4030. European dry heaths
 H7150. Depressions on peat substrates of the *Rhynchosporion*

⁷⁰ JNCC. 2008. Information Sheet on Ramsar Wetlands. Minsmere-Walberswick Ramsar. <https://jncc.gov.uk/jncc-assets/RIS/UK11044.pdf> [Date Accessed: 23/10/20].

⁷¹ Natural England (2018) Roydon Common & Dersingham Bog SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6321525921939456> [Date Accessed: 24/09/20]

Threats and Pressures at European site which may be affected by VCHAP^{72,73}:

- Hydrological Changes;
- Air Pollution; and
- Water pollution.

Roydon Common Ramsar⁷⁴

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
1	Ramsar criterion 1 The site is the most extensive example of valley mire-heathland biotope within East Anglia.- It is a mixed valley mire holding vegetation communities which reflect the influence of both base-poor and base-rich water
3	Ramsar criterion 3 The vegetation communities have a restricted distribution within Britain. – It also supports a number of acidophilic invertebrates outside their normal geographic range and six British Red Data Book invertebrates.

Threats and Pressures at European site which may be affected by VCHAP:

- Public access and disturbance.

Dersingham Bog Ramsar⁷⁵

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
------------------	---

⁷² Natural England (2018) Roydon Common & Dersingham Bog SAC SIP. Available at: <http://publications.naturalengland.org.uk/file/5943433074049024> [Date Accessed: 24/09/20]

⁷³ Natural England (2019) Roydon Common & Dersingham Bog SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/5015299997040640> [Date Accessed: 24/09/20]

⁷⁴ JNCC. 2008. Information Sheet on Ramsar Wetlands. Roydon Common Ramsar. <https://jncc.gov.uk/jncc-assets/RIS/UK11061.pdf> [Date Accessed: 24/10/20].

⁷⁵ JNCC. 2008. Information Sheet on Ramsar Wetlands. Dersingham Bog Ramsar. <https://jncc.gov.uk/jncc-assets/RIS/UK11019.pdf> [Date Accessed: 24/10/20].

2	Ramsar criterion 2 Supports an important assemblage of invertebrates - nine British Red Data Book species have been recorded
<p>Threats and Pressures at European site which may be affected by VCHAP:</p> <ul style="list-style-type: none"> • None identified 	
Alde-Ore Estuary SPA⁷⁶	
<p>Conservation objectives: Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features; • The structure and function of the habitats of the qualifying features; • The supporting processes on which the habitats of the qualifying features rely; • The population of each of the qualifying features; and • The distribution of the qualifying features within the site. <p>Qualifying Features: A081 <i>Circus aeruginosus</i>; Eurasian marsh harrier (Breeding) A132 <i>Recurvirostra avosetta</i>; Pied avocet (Non-breeding) A132 <i>Recurvirostra avosetta</i>; Pied avocet (Breeding) A151 <i>Philomachus pugnax</i>; Ruff (Non-breeding) A162 <i>Tringa totanus</i>; Common redshank (Non-breeding) A183 <i>Larus fuscus</i>; Lesser black-backed gull (Breeding) A191 <i>Sterna sandvicensis</i>; Sandwich tern (Breeding) A195 <i>Sterna albifrons</i>; Little tern (Breeding)</p> <p>Threats and Pressures at European site which may be affected by VCHAP⁷⁷:</p> <ul style="list-style-type: none"> • Hydrological Changes; • Public access and disturbance; and • Air pollution. 	
Alde-Ore & Butley Estuaries SAC⁷⁸	
<p>Conservation objectives: Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p>	

⁷⁶ Natural England (2019) Alde-Ore Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4654016386826240> [Date Accessed: 24/09/20]

⁷⁷ Natural England (2014) Alde-Ore Estuaries SIP (to cover Alde-Ore & Butley Estuaries SAC, Alde-Ore Estuary SPA and Orfordness-Shingle Street SAC). Available at: <http://publications.naturalengland.org.uk/file/4785471632703488> [Date Accessed: 24/09/20]

⁷⁸ Natural England (2018) Alde-Ore & Butley Estuaries SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/5068291173515264> [Date Accessed: 24/09/20]

- 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.

Qualifying Features:

H1130. Estuaries

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

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

Threats and Pressures at European site which may be affected by VCHAP⁷⁹:

- Hydrological Changes;
- Public access and disturbance; and
- Air pollution.

Orfordness-Shingle Street SAC⁸⁰

Conservation objectives:

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.

Qualifying Features:

H1150. Coastal lagoons*

H1210. Annual vegetation of drift lines

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

Threats and Pressures at European site which may be affected by VCHAP⁸¹:

- Hydrological Changes;
- Public access and disturbance; and
- Air pollution.

Alde-Ore Estuary Ramsar⁸²

⁷⁹ Natural England (2014) Alde-Ore Estuaries SIP (to cover Alde-Ore & Butley Estuaries SAC, Alde-Ore Estuary SPA and Orfordness-Shingle Street SAC). Available at: <http://publications.naturalengland.org.uk/file/4785471632703488> [Date Accessed: 24/09/20]

⁸⁰ Natural England (2018) Orfordness-Shingle Street SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/5269138339790848> [Date Accessed: 24/09/20]

⁸¹ Natural England (2014) Alde-Ore Estuaries SIP (to cover Alde-Ore & Butley Estuaries SAC, Alde-Ore Estuary SPA and Orfordness-Shingle Street SAC). Available at: <http://publications.naturalengland.org.uk/file/4785471632703488> [Date Accessed: 24/09/20]

⁸² JNCC. 2008. Information Sheet on Ramsar Wetlands. Alde-Ore Estuary. <https://jncc.gov.uk/jncc-assets/RIS/UK11002.pdf> [Date Accessed: 24/10/20].

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion										
2	Ramsar criterion 2 The site supports a number of nationally-scarce plant species and British Red Data Book invertebrates										
3	Ramsar criterion 3 The site supports a notable assemblage of breeding and wintering wetland birds.										
6	<p>Ramsar criterion 6 – species/populations occurring at levels of international importance.</p> <table border="1"> <tr> <td colspan="2"> Qualifying Species/populations (as identified at designation): Species regularly supported during the breeding season: Species regularly supported during the breeding season: </td></tr> <tr> <td> Lesser black-backed gull , Larus fuscus graellsii, W Europe/Mediterranean/W Africa </td><td> 5790 apparently occupied nests, representing an average of 3.9% of the breeding population (Seabird 2000 Census) </td></tr> </table> <table border="1"> <tr> <td colspan="2"> Species with peak counts in winter: </td></tr> <tr> <td> Pied avocet , Recurvirostra avosetta, Europe/Northwest Africa </td><td> 1187 individuals, representing an average of 1.6% of the population (5 year peak mean 1998/9-2002/3) </td></tr> <tr> <td> Common redshank , Tringa totanus totanus, </td><td> 2368 individuals, representing an average of 2% of the GB population (5 year peak mean 1998/9- 2002/3) </td></tr> </table>	Qualifying Species/populations (as identified at designation): Species regularly supported during the breeding season: Species regularly supported during the breeding season:		Lesser black-backed gull , Larus fuscus graellsii, W Europe/Mediterranean/W Africa	5790 apparently occupied nests, representing an average of 3.9% of the breeding population (Seabird 2000 Census)	Species with peak counts in winter:		Pied avocet , Recurvirostra avosetta, Europe/Northwest Africa	1187 individuals, representing an average of 1.6% of the population (5 year peak mean 1998/9-2002/3)	Common redshank , Tringa totanus totanus,	2368 individuals, representing an average of 2% of the GB population (5 year peak mean 1998/9- 2002/3)
Qualifying Species/populations (as identified at designation): Species regularly supported during the breeding season: Species regularly supported during the breeding season:											
Lesser black-backed gull , Larus fuscus graellsii, W Europe/Mediterranean/W Africa	5790 apparently occupied nests, representing an average of 3.9% of the breeding population (Seabird 2000 Census)										
Species with peak counts in winter:											
Pied avocet , Recurvirostra avosetta, Europe/Northwest Africa	1187 individuals, representing an average of 1.6% of the population (5 year peak mean 1998/9-2002/3)										
Common redshank , Tringa totanus totanus,	2368 individuals, representing an average of 2% of the GB population (5 year peak mean 1998/9- 2002/3)										

Threats and Pressures at European site which may be affected by VCHAP:

- None of relevance to VCHAP.

Sandlings SPA⁸³

Conservation objectives:

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.

Qualifying Features:

A224 *Caprimulgus europaeus*; European nightjar (Breeding)

A246 *Lullula arborea*; Woodlark (Breeding)

Threats and Pressures at European site which may be affected by VCHAP^{84,85}:

- Public access and disturbance; and
- Air pollution.

Debden Estuary SPA⁸⁶

Conservation objectives:

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.

Qualifying Features:

A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding) A132

Recurvirostra avosetta; Pied avocet (Non-breeding)

Threats and Pressures at European site which may be affected by VCHAP⁸⁷:

⁸³ Natural England (2019) Sandlings SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6246575764668416> [Date Accessed: 24/09/20]

⁸⁴ Natural England (2015) Sandlings SPA SIP. Available at: <http://publications.naturalengland.org.uk/file/5509308278112256> [Date Accessed: 24/09/20]

⁸⁵ Natural England (2019) Sandlings SPA Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/5201677619822592> [Date Accessed: 24/09/20]

⁸⁶ Natural England (2019) Debden Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/5126427842445312> [Date Accessed: 24/09/20]

⁸⁷ Natural England (2014) Debden Estuary SPA SIP. Available at: <http://publications.naturalengland.org.uk/publication/4751452748644352> [Date Accessed: 24/09/20]

- Public access and disturbance;
- Water pollution; and
- Air pollution.

Debden Estuary Ramsar⁸⁸

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion				
2	Ramsar criterion 2 Supports a population of the mollusc <i>Vertigo angustior</i> (Habitats Directive Annex II (S1014); British Red Data Book Endangered). Martlesham Creek is one of only about fourteen sites in Britain where this species survives				
6	<p>Ramsar criterion 6 – species/populations occurring at levels of international importance.</p> <table border="1"> <tr> <th colspan="2">Qualifying Species/populations (as identified at designation): Species with peak counts in winter:</th></tr> <tr> <td>Dark-bellied brent goose, <i>Branta bernicla bernicla</i>,</td><td>1953 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9-2002/3)</td></tr> </table>	Qualifying Species/populations (as identified at designation): Species with peak counts in winter:		Dark-bellied brent goose, <i>Branta bernicla bernicla</i> ,	1953 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9-2002/3)
Qualifying Species/populations (as identified at designation): Species with peak counts in winter:					
Dark-bellied brent goose, <i>Branta bernicla bernicla</i> ,	1953 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9-2002/3)				

Threats and Pressures at European site which may be affected by VCHAP:

- None of relevance to VCHAP.

Stour and Orwell Estuary SPA⁸⁹

Conservation objectives:

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;

⁸⁸ JNCC. 2008. Information Sheet on Ramsar Wetlands. Debden Estuary. <https://jncc.gov.uk/jncc-assets/RIS/UK11017.pdf> [Date Accessed: 24/10/20].

⁸⁹ Natural England (2019) Stour and Orwell Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4580524865880064> [Date Accessed: 24/09/20]

- 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.

Qualifying Features:

A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)
 A054 *Anas acuta*; Northern pintail (Non-breeding)
 A132 *Recurvirostra avosetta*; Pied avocet (Breeding)
 A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
 A143 *Calidris canutus*; Red knot (Non-breeding)
 A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
 A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
 A162 *Tringa totanus*; Common redshank (Non-breeding) Waterbird assemblage

Threats and Pressures at European site which may be affected by VCHAP⁹⁰:

- Public access and disturbance;
- Planning permission (general); and
- Air pollution.

Stour and Orwell Estuary Ramsar⁹¹

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
2	<p>Ramsar criterion 2 Contains seven nationally scarce plants: stiff saltmarsh-grass <i>Puccinellia rupestris</i>; small cord-grass <i>Spartina maritima</i>; perennial glasswort <i>Sarcocornia perennis</i>; lax-flowered sea lavender <i>Limonium humile</i>; and the eelgrasses <i>Zostera angustifolia</i>, <i>Z. marina</i> and <i>Z. noltei</i></p> <p>Contains five British Red Data Book invertebrates: the muscid fly <i>Phaonia fusca</i>; the horsefly <i>Haematopota grandis</i>; two spiders, <i>Arctosa fulvolineata</i> and <i>Baryphema duffeyi</i>; and the Endangered swollen spire snail <i>Mercuria confusa</i>.</p>
5	<p>Assemblages of international importance:</p> <p>Species with peak counts in winter:</p> <p>63017 waterfowl (5 year peak mean 1998/99-2002/2003)</p>

⁹⁰ Natural England (2015) Stour and Orwell Estuary SPA SIP. Available at: <http://publications.naturalengland.org.uk/file/6285857692581888> [Date Accessed: 24/09/20]

⁹¹ JNCC. 2008. Information Sheet on Ramsar Wetlands. Stour and Orwell Estuary. <https://jncc.gov.uk/jncc-assets/RIS/UK11067.pdf> [Date Accessed: 24/10/20].

6	Ramsar criterion 6 – species/populations occurring at levels of international importance.	
	Qualifying Species/populations (as identified at designation):	
	Species with peak counts in spring/autumn:	
	Common redshank , Tringa totanus totanus,	2588 individuals, representing an average of 2% of the population (5-year peak mean 1995/96-1999/2000)
	Species with peak counts in winter:	
	Dark-bellied brent goose, Branta bernicla bernicla	2627 individuals, representing an average of 1.2% of the population (5-year peak mean 1995/96-1999/2000)
	Northern pintail , Anas acuta, NW Europe	741 individuals, representing an average of 1.2% of the population (5-year peak mean 1995/96-1999/2000)
	Grey plover , Pluvialis squatarola, E Atlantic/W Africa -wintering	3261 individuals, representing an average of 1.3% of the population (5-year peak mean 1995/96-1999/2000)
	Red knot , Calidris canutus islandica, W & Southern Africa (wintering)	5970 individuals, representing an average of 1.3% of the population (5-year peak mean 1995/96-1999/2000)
	Dunlin , Calidris alpina alpina, W Siberia/W Europe	19114 individuals, representing an average of 1.4% of the population (5-year peak mean 1995/96-1999/2000)
	Black-tailed godwit , Limosa limosa islandica, Iceland/W Europe	2559 individuals, representing an average of 7.3% of the population (5-year peak mean 1995/96-1999/2000)
	Common redshank , Tringa totanus totanus,	3687 individuals, representing an average of 2.8% of the population (5-year peak mean 1995/96-1999/2000)
Threats and Pressures at European site which may be affected by VCHAP:		
<ul style="list-style-type: none"> • None of relevance to VCHAP. 		

Staverton Park & The Thicks Wantisden SAC⁹²

Conservation objectives:

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

Qualifying Features:

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

Threats and Pressures at European site which may be affected by VCHAP⁹³:

- Public access and disturbance;
- Hydrological change; and
- Air pollution.

⁹² Natural England (2018) Staverton Park & The Thicks Wantisden SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/5704868543332352> [Date Accessed: 24/09/20]

⁹³ Natural England (2015) Staverton Park & The Thicks Wantisden SAC SIP. Available at: <http://publications.naturalengland.org.uk/file/6395641255165952> [Date Accessed: 24/09/20]

Appendix B: Scoping: European site threats and pressures

Table B.1: Scoping of Pressures and threats at European sites that may be affected by the VCHAP.*Key: Yellow shading = European site / threat scoped into HRA process**Note: Only threats and pressures which are likely to be affected by VCHAP have been included in this element of the scoping exercise*

European sites	Air Pollution	Hydrology	Public Access and Disturbance	Habitat Loss and Fragmentation
River Wensum SAC	SAC located within Plan area. SIP and NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located within national statistics commuter zones. A number of strategic road links are located within 200m of SAC: A1065, A1067, B1110, B1154, B1535. European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.	SAC located within Plan area. SIP and NE Supplementary Advice identify SAC as being sensitive to water pollution and water abstraction. SAC hydrologically connected to Plan area. European site scoped in and will be included in HRA screening of allocations and policies in terms of hydrology impacts.	SIP and NE Supplementary Advice does not identify public access and disturbance as a threat to the SAC. Given the location of the SAC within the Plan area this site has been screened in in terms of potential urbanisation impacts.	SAC located within Plan area. SIP and NE Supplementary Advice identify SAC as being sensitive to impacts on riparian zone habitat. European site scoped in and will be included in HRA screening of allocations and policies in terms of habitat loss and fragmentation impacts.
Norfolk Valley Fens SAC	SAC located within and adjacent to Plan area. SIP and NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located within national statistics commuter zones. A number of strategic road links are located within 200m of SAC: A47; B1149; B1075; B1153; A149. European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.	SAC located within and adjacent to Plan area. SIP and NE Supplementary Advice identify SAC as being sensitive to water pollution, water abstraction and hydrological change. SAC hydrologically connected to Plan area. European site scoped in and will be included in HRA screening of allocations and policies in terms of hydrology impacts.	SIP and NE Supplementary Advice does not identify public access and disturbance as a threat at the SAC. However, impacts associated with public access and disturbance impacts are being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SAC. European site scoped in and will be included in HRA screening of allocations and policies in terms of public access and disturbance impacts.	SAC located within Plan area. European site scoped in due to location within the Plan area and will be included in HRA screening of allocations and policies in terms of habitat loss and fragmentation impacts.

The Broads SAC	<p>SAC located within and adjacent to Plan area.</p> <p>SIP and NE Supplementary Advice identifies SAC as being sensitive to changes in air quality.</p> <p>SAC located within national statistics commuter zones.</p> <p>A number of strategic road links are located within 200m of SAC: B1150; A149; A47; A1064; and A146.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.</p>	<p>SAC located within and adjacent to Plan area.</p> <p>SIP and NE Supplementary Advice identify SAC as being sensitive to water pollution, water abstraction and hydrological change.</p> <p>The broads and marshes (including Broadland SPA and The Broads SAC) are functionally linked to the River Yare and the River Bure.</p> <p>SAC hydrologically connected to Plan area.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of hydrology impacts.</p>	<p>SIP and NE Supplementary Advice does not identify public access and disturbance as a threat at the SAC.</p> <p>However, impacts associated with public access and disturbance impacts are being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SAC.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of public access and disturbance impacts.</p>	<p>SAC located within Plan area.</p> <p>European site scoped in due to location within the Plan area and will be included in HRA screening of allocations and policies in terms of habitat loss and fragmentation impacts.</p>
Broadland SPA	<p>SPA located within and adjacent to Plan area.</p> <p>SIP and NE Supplementary Advice identifies SPA as being sensitive to changes in air quality.</p> <p>SPA located within national statistics commuter zones.</p> <p>A number of strategic road links are located within 200m of SPA: B1150; A149; A1064; A1062; and A146.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.</p>	<p>SPA located within and adjacent to Plan area.</p> <p>SIP and NE Supplementary Advice identified SPA as being sensitive to water pollution, water abstraction and hydrological change.</p> <p>The broads and marshes (including Broadland SPA and The Broads SAC) are functionally linked to the River Yare and the River Bure.</p> <p>SPA hydrologically linked to Plan area.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of hydrology impacts.</p>	<p>SIP and NE Supplementary Advice identify public access and disturbance as a threat at the SPA.</p> <p>Impacts associated with public access and disturbance impacts are being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SPA.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of public access and disturbance impacts.</p>	<p>SPA located within Plan area.</p> <p>European site scoped in due to location within the Plan area and will be included in HRA screening of allocations and policies in terms of habitat loss and fragmentation impacts.</p>

Broadland Ramsar	<p>Ramsar located within and adjacent to Plan area.</p> <p>Ramsar information sheet does not identify any threats and pressures. However, it is noted that this is dated 2008 and information available for Broadland SPA and The Broads SAC has been used to inform this scoping decision.</p> <p>Ramsar located within national statistics commuter zones.</p> <p>A number of strategic road links are located within 200m of Ramsar: B1150; A149; A1064; A1062; and A146.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.</p>	<p>Ramsar located within and adjacent to Plan area.</p> <p>Ramsar information sheet does not identify any threats and pressures. However, it is noted that this is dated 2008 and information available for Broadland SPA and The Broads SAC has been used to inform this scoping decision.</p> <p>Ramsar hydrologically linked to Plan area.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of hydrology impacts.</p>	<p>Ramsar located within and adjacent to Plan area.</p> <p>Ramsar information sheet does not identify any threats and pressures. However, it is noted that this is dated 2008 and information available for Broadland SPA and The Broads SAC has been used to inform this scoping decision.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of public access and disturbance impacts.</p>	<p>Ramsar located within Plan area.</p> <p>European site scoped in due to location within the Plan area and will be included in HRA screening of allocations and policies in terms of habitat loss and fragmentation impacts.</p>
Breydon Water SPA	<p>SIP and NE Supplementary Advice do not identify the SPA as being sensitive to changes in air quality.</p> <p>Site scoped out in terms of air quality impacts.</p>	<p>SPA located adjacent to Plan area.</p> <p>SIP and NE Supplementary Advice identified SPA as being sensitive to hydrological change.</p> <p>SPA hydrologically linked to Plan area.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of hydrology impacts.</p>	<p>SIP and NE Supplementary Advice identify public access and disturbance as a threat at the SPA.</p> <p>Impacts associated with public access and disturbance impacts are being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SPA.</p> <p>European site scoped in and will be included in HRA Screening of allocations and policies in terms of public access and disturbance impacts.</p>	<p>SIP and NE Supplementary Advice does not identify the SPA as being sensitive to habitat loss and fragmentation threats.</p> <p>Site scoped out in terms of habitat loss and fragmentation impacts.</p>
Breydon Water Ramsar	As above	As above	As above	As above

Great Yarmouth North Deans SPA	SIP and NE Supplementary Advice identifies SPA as being sensitive to changes in air quality. SPA located within national statistics commuter zones. There are no strategic road links within 200m of the SPA European site scoped out of HRA for further consideration in terms of air pollution impacts.	SIP notes that hydrological threats at the SPA are associated with “ <i>Changes in the hydro-chemistry of the dune slacks has been observed over a number of years that is potentially impacting the dune slacks</i> ”. The VCHAP may increase nutrient loading from WRC discharges to shallow coastal waters (which is identified in the Regulation 33 advice as a vulnerability). However, given the location of the SPA in a northerly direction up the coast (approx. 15km to the north of the where the River Yare discharges into the sea) the SPA is not considered to be hydrologically linked and this European site is therefore scoped out of further consideration in the HRA in terms of hydrology impacts.	SIP and NE Supplementary Advice identify public access and disturbance as a threat at the SPA. Impacts associated with public access and disturbance impacts are being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SPA. European site scoped in and will be included in HRA Screening of allocations and policies in terms of public access and disturbance impacts.	SPA located outside the Plan area. European site scoped out of HRA due to location in terms of habitat loss and fragmentation impacts.
Winterton-Horsey Dunes SAC	SIP and NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located within national statistics commuter zones. There are no strategic road links within 200m of the SAC European site scoped out of HRA for further consideration in terms of air pollution impacts.	SIP notes that hydrological threats at the SAC are associated with “ <i>Changes in the hydro-chemistry of the dune slacks has been observed over a number of years that is potentially impacting the dune slacks</i> ”. The VCHAP may increase nutrient loading from WRC discharges to shallow coastal waters (identified in the Regulation 33 advice as a vulnerability).	SIP and NE Supplementary Advice identify public access and disturbance as a threat at the SAC. Impacts associated with public access and disturbance impacts are being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SAC. European site scoped in and will be included in HRA Screening of allocations and policies in terms of public access and disturbance impacts.	SAC located outside the Plan area. European site scoped out of HRA due to location in terms of habitat loss and fragmentation impacts.

		However, given the location of the SAC in a northerly direction up the coast (approx. 15km to the north of the where the River Yare discharges into the sea) the SAC is not considered to be hydrologically linked and this European site is scoped out of further consideration in the HRA in terms of hydrology impacts.		
Paston Great Barn SAC	SAC located approx. 25.5km from Plan area. SIP and NE Supplementary However, given the location of the SPA in a northerly direction up the coast identifies SAC as being sensitive to changes in air quality. SAC located within commuter zones, however the only strategic road within 200m of SAC (B1159) ends to the east of the SAC (and before it reaches it) and is therefore unlikely to form a key commuter route associated with development set out in the VCHAP. European site scoped out of the HRA in terms of air pollution impacts.	SIP and NE Supplementary Advice identified SAC as not being sensitive to hydrological impacts. European site scoped out of HRA in terms of hydrology impacts.	SIP and NE Supplementary Advice identifies SAC as being sensitive to public access and disturbance due to a permissive path to the south of the site. Impacts are likely to be local given the nature of the SAC. Given the location of the SAC from the Plan area it is considered that impacts associated with public access and disturbance threats from VCHAP are unlikely. As such this site is scoped out of the HRA in terms of public access and disturbance threats.	SAC located approx. 25.5km from Plan area. The SAC is noted to be sensitive to impacts on foraging habitat for the Barbastelle bat. Impacts on potentially functionally linked bat habitat have taken into consideration current best practice including that available from the Bat Conservation Trust in respect of Core Sustenance Zones (CSZ). For the Barbastelle bat the CSZ is noted to be 6km (with a precautionary buffer of 7km applied) ^{1,2} . Given the distance of the SAC from the Plan area impacts on habitat loss / fragmentation from the VCHAP have been scoped out of the HRA.
Overstrand Cliffs SAC	NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located within national statistics commuter zones. There are no strategic road links within 200m of the SAC.	NE Supplementary Advice notes that the SAC is vulnerable to water quality impacts. The SAC is located on the north Norfolk coast and is not hydrologically linked to the Plan area. As such this	The SIP and NE Supplementary Advice does not identify public access and disturbance threats at this SAC. As such this European site is scoped out of further consideration in the HRA in terms of public access and disturbance threats.	The SIP and NE Supplementary Advice do not identify habitat loss and fragmentation as a threat at this SAC – noting that the site's main vulnerability is to inappropriate coastal management. Given the location of this SAC approx. 28.6km to the north of the Plan area this European site is scoped out of further consideration in the HRA in terms of habitat loss / fragmentation threats.

¹ Bat Conservation Trust. 2016. Bat Surveys for Professional Ecologist. Good Practice Guidelines. Third Edition.

² Bat Conservation Trust. 2016. Core Sustenance Zone. https://cdn.bats.org.uk/pdf/Resources/Core_Sustenance_Zones_Explained_04.02.16.pdf?mtime=20190219173135&focal=none

	European site scoped out of HRA for further consideration in terms of air pollution impacts.	European site is scoped out of further consideration in the HRA in terms of hydrology impacts.		
Waveney & Little Ouse Valley Fens SAC	SAC located adjacent to Plan area. SIP and NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located within national statistics commuter zones. B1113 is located within 200m of SAC. European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.	SAC located adjacent to Plan area to the west. SIP and NE Supplementary Advice identify SAC as being sensitive to water pollution, and water levels. SAC is located upstream of Plan area and therefore not hydrologically connected to European site and scoped out of further HRA screening in terms of hydrology impacts.	SIP and NE Supplementary Advice does not identify public access and disturbance as a threat at the SAC. European site scoped out of further HRA screening in terms of public access and disturbance impacts.	SIP and NE Supplementary advice does not identify habitat loss and fragmentation as a threat at the SAC. European site scoped out of further HRA screening in terms of habitat loss and fragmentation impacts.
Redgrave and South Lopham Fens Ramsar	Ramsar information sheet does not identify air quality as a threat – however the potential impact will be considered further as noted above.	Ramsar information sheet notes that site is sensitive to changes in water quality. Ramsar is located upstream of Plan area and therefore not hydrologically connected to European site scoped out of further HRA screening in terms of hydrology impacts.	Ramsar information sheet does not identify public access and disturbance as a threat at the Ramsar. European site scoped out of further HRA screening in terms of public access and disturbance impacts.	Ramsar information sheet does not identify habitat loss and fragmentation as a threat at the Ramsar. European site scoped out of further HRA screening in terms of habitat loss and fragmentation impacts.
Breckland SAC	NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located to the west of the Plan area and within national statistics commuting zone. A number of strategic road links are located within 200m of SAC: A1065; A11; B1112; A1101; A134; and A1075. European site scoped in and will be included in HRA screening of	SAC is located upstream of the Plan area and as such is not hydrologically linked. European site scoped out of further HRA screening in terms of hydrology impacts.	SIP and NE Supplementary Advice identify public access and disturbance as a threat at the SAC. Public access and disturbance impacts is being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SAC. European site scoped in and will be included in HRA screening of allocations and policies in terms of public access and disturbance impacts.	SIP and NE Supplementary Advice identify SPA as vulnerable to habitat loss. The SPA is located 10km from the Plan area and as such this European site scoped out in terms of habitat loss and fragmentation impacts.

	allocations and policies in terms of air pollution impacts.			
Breckland SPA	NE Supplementary Advice identifies SPA as being sensitive to changes in air quality. SPA located to the west of the Plan area and within national statistics commuting zone. A number of strategic road links are located within 200m of SPA: A1065; B1112; B1111; A14; B1108; B1101; A134; A1075; A1066; B1107; B1106; and A1122. European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.	SPA is located upstream of the Plan area and as such is not hydrologically linked. European site scoped out of further HRA screening in terms of hydrology impacts.	SIP and NE Supplementary Advice identify public access and disturbance as a threat at the SPA. Public access and disturbance impacts is being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SPA. European site scoped in and will be included in HRA screening of allocations and policies in terms of public access and disturbance impacts.	SIP and NE Supplementary Advice identify SPA as vulnerable to habitat loss. The SPA is located 9km from the Plan area and as such this European site scoped out in terms of habitat loss and fragmentation impacts.
Benacre to Easton Bavents Lagoons SAC	NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located to the south east of the Plan area and within national statistics commuting zone. The B1127 is located within 200m of SPA. European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.	The SAC is located approx. 8.5km to the south east of the Plan area. It is located in the catchment of the Hundred River and is not hydrologically linked to the Plan area. European site scoped out of further HRA screening in terms of hydrology impacts.	Habitats for which the SAC is designated are not identified to be vulnerable to recreation impacts in SIP. As such can be scoped out from further consideration in the HRA in terms of public access and disturbance impacts.	SIP and NE Supplementary Advice do not identify the SAC as being vulnerable to habitat loss / fragmentation. Due to the location of the SAC 8.5km from the Plan area this European site scoped out in terms of habitat loss and fragmentation impacts.
Benacre to Easton Bavents Lagoons SPA	NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located to the south east of the Plan area and within national statistics commuting zone. The B1127 is located within 200m of SPA.	The SPA is located approx. 8.5km to the south east of the Plan area. It is located in the catchment of the Hundred River and is not hydrologically linked to the Plan area. European site scoped out of further HRA Screening in terms of hydrology impacts.	The SIP notes that the popularity of the beaches and the Ness for walking and dog-walking means the suitability of these areas for terns is greatly reduced. The SPA is located 8.5km from the Plan area. It is recognised that there are closer sections of coastline to the plan area.	SIP and NE Supplementary Advice do not identify the SPA as being vulnerable to habitat loss / fragmentation. Due to the location of the SPA 8.5km from the Plan area this European site scoped out in terms of habitat loss and fragmentation impacts.

	European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.		It is noted that a strategic Mitigation Strategy has been put in place by Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and East Suffolk Council ³ . This strategy includes specific measures for Benacre to Easton Bavents, which are intended to complement the management measures being implemented for North Denes. The Plan area is located outside the zone of influence of this Mitigation Strategy and as such this site has been scoped out of further HRA screening in terms of public access and disturbance impact.	
Dew's Ponds SAC	NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located within national statistics commuter zones. There are no strategic road links within 200m of the SAC European site scoped out of HRA for further consideration in terms of air pollution impacts.	SAC is located approximately 16km to the south east of the Plan area. The SAC is not hydrologically connected to the Plan area. European site scoped out of further HRA screening in terms of hydrology impacts.	The SAC is not considered in the SIP or NE Supplementary Advice as being sensitive to public access and disturbance threats. European site scoped out of further HRA Screening in terms of public access and disturbance impacts.	SIP and NE Supplementary Advice do not identify the SAC as being vulnerable to habitat loss / fragmentation. Due to the location of the SPA 16km from the Plan area this European site scoped out in terms of habitat loss and fragmentation impacts.
The Wash and North Norfolk Coast SAC	NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located to the south east of the Plan area and within national statistics commuting zone.	The SIP notes that structures which control water along the North Norfolk Coast have fallen into disrepair. The issue is preventing appropriate water level controls for breeding birds.	SIP and NE Supplementary Advice identify public access and disturbance as a threat at the SAC. Public access and disturbance impacts are being considered through Footprint Ecology	SIP and NE Supplementary Advice do not identify the SAC as being vulnerable to habitat loss / fragmentation. Given it is located approx. 33km to the north of the Plan area, this European site is scoped out in terms of habitat loss and fragmentation impacts.

³ Hoskin, R., Liley, D. & Panter, C. (2019). Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils – Technical Report. Footprint Ecology.

	The A149 and B1161 are located within 200m of SAC. European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.	The SAC is not hydrologically connected to the Plan area. European site scoped out of further HRA Screening in terms of hydrology impacts.	commission and emerging GIRAMS strategy at this SAC. European site scoped in and will be included in HRA screening of allocations and policies in terms of public access and disturbance impacts.	
The Wash SPA	NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located to the south east of the Plan area and within national statistics commuting zone. The B1161 is located within 200m of SAC. European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.	The SIP notes that structures which control water along the North Norfolk Coast have fallen into disrepair. The issue is preventing appropriate water level controls for breeding birds. The SPA is not hydrologically connected to the Plan area. European site scoped out of further HRA screening in terms of hydrology impacts.	SIP and NE Supplementary identify public access and disturbance as a threat at the SPA. Public access and disturbance impacts are being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SPA. European site scoped in and will be included in HRA screening of allocations and policies in terms of public access and disturbance impacts.	SIP and NE Supplementary Advice do not identify the SAC as being vulnerable to habitat loss / fragmentation. Gives it is located approx. 33km to the north of the Plan area, this European site is scoped out in terms of habitat loss and fragmentation impacts.
The Wash Ramsar	No threats and pressures are identified in the Ramsar Information Sheet. However, consideration will be given to the above threats and pressures as per SAC and SPA scoping.	No threats and pressures are identified in the Ramsar Information Sheet. However, consideration will be given to the above threats and pressures as per SAC and SPA scoping.	No threats and pressures are identified in the Ramsar Information Sheet. However, consideration will be given to the above threats and pressures as per SAC and SPA scoping.	No threats and pressures are identified in the Ramsar Information Sheet. However, consideration will be given to the above threats and pressures as per SAC and SPA scoping.
The Greater Wash SPA	The landward boundary of this SPA is mean high water at the coast, and the seaward boundary lies approximately 14 nautical miles from the shore. Given the Plan area is located approx. 9km from the closest section of coastline to this SPA, and its designation for sea birds, it is considered that this site can be scoped out from further consideration in the HRA as LSEs are unlikely.	The landward boundary of this SPA is mean high water at the coast, and the seaward boundary lies approximately 14 nautical miles from the shore. Given the Plan area is located approx. 9km from the closest section of coastline to this SPA, and its designation for sea birds, it is considered that this site can be scoped out from further consideration	The landward boundary of this SPA is mean high water at the coast, and the seaward boundary lies approximately 14 nautical miles from the shore. Given the Plan area is located approx. 9km from the closest section of coastline to this SPA, and its designation for sea birds, it is considered that this site can be scoped out from further consideration in the HRA as LSEs are unlikely.	The landward boundary of this SPA is mean high water at the coast, and the seaward boundary lies approximately 14 nautical miles from the shore. Given the Plan area is located approx. 9km from the closest section of coastline to this SPA, and its designation for sea birds, it is considered that this site can be scoped out from further consideration in the HRA as LSEs are unlikely.

		in the HRA as LSEs are unlikely.		
North Norfolk Coast SPA	<p>The SPA is part of The Wash and North Norfolk Coast European Marine Site (EMS). NE Supplementary Advice identifies SPA as being sensitive to changes in air quality. SPA located to the south east of the Plan area and within national statistic commuting zones.</p> <p>The A149 is located within 200m of SPA.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.</p>	The SPA is not hydrologically linked to the Plan area. It is therefore considered that this site can be scoped out from further consideration in the HRA as hydrology impacts are unlikely.	The SPA is noted to be vulnerable to public access and disturbance threats with high levels of visitor pressure along this stretch of coastline. Public access and disturbance impacts are being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SPA. European site scoped in and will be included in HRA screening of allocations and policies in terms of public access and disturbance impacts.	Given the location of the SPA approx. 31km to the north of the Plan area it is considered that this site can be scoped out from further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.
North Norfolk Coast SAC	<p>The SAC is part of the North Norfolk Coast European Marine Site. NE Supplementary Advice identifies SAC as being sensitive to changes in air quality. SAC located to the south east of the Plan area and within national statistic commuting zones.</p> <p>The A149 is located within 200m of SAC.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.</p>	The SAC is not hydrologically linked to the Plan area. It is therefore considered that this site can be scoped out from further consideration in the HRA as hydrology impacts are unlikely.	The SAC is noted to be vulnerable to public access and disturbance threats with high levels of visitor pressure along this stretch of coastline. Public access and disturbance impacts are being considered through Footprint Ecology commission and emerging GIRAMS strategy at this SAC. European site scoped in and will be included in HRA screening of allocations and policies in terms of public access and disturbance impacts.	Given the location of the SPA approx. 31km to the north of the Plan area it is considered that this site can be scoped out from further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.
North Norfolk Coast Ramsar	No threats and pressures are identified in the Ramsar Information Sheet. However, consideration will be given to the above threats and pressures as per SAC and SPA scoping.	No threats and pressures are identified in the Ramsar Information Sheet. However, consideration will be given to the above threats and pressures as per SAC and SPA scoping.	No threats and pressures are identified in the Ramsar Information Sheet. However, consideration will be given to the above threats and pressures as per SAC and SPA scoping.	No threats and pressures are identified in the Ramsar Information Sheet. However, consideration will be given to the above threats and pressures as per SAC and SPA scoping.

Southern North Sea SAC	The landward boundary of this SAC is mean high water at the coast, and the seaward boundary lies approximately 14 nautical miles from the shore. The majority of this site lies offshore, though it does extend into coastal areas of Norfolk and Suffolk crossing the 12 nautical mile boundary. JNCC and NE advice does not identify air quality as a threat. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of air quality.	The landward boundary of this SAC is mean high water at the coast, and the seaward boundary lies approximately 14 nautical miles from the shore. The majority of this site lies offshore, though it does extend into coastal areas of Norfolk and Suffolk crossing the 12 nautical mile boundary. JNCC and NE advice does not identify hydrology as a threat. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of hydrology.	The landward boundary of this SAC is mean high water at the coast, and the seaward boundary lies approximately 14 nautical miles from the shore. The majority of this site lies offshore, though it does extend into coastal areas of Norfolk and Suffolk crossing the 12 nautical mile boundary. The SAC is an area of importance for harbour porpoise. JNCC and NE identify that this SAC is vulnerable to increased boating activity. It is unlikely that development in the VCHAP will increase boating recreational pressure and therefore this SAC has been scoped out of further consideration in the HRA in terms of public access and disturbance impacts.	The landward boundary of this SAC is mean high water at the coast, and the seaward boundary lies approximately 14 nautical miles from the shore. The majority of this site lies offshore, though it does extend into coastal areas of Norfolk and Suffolk crossing the 12 nautical mile boundary. JNCC and NE advice does not identify habitat loss as a threat. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of habitat loss / fragmentation.
Outer Thames Estuary SPA	The SPA is a European Marine Site. NE note that the Outer Thames Estuary SPA is located on the southeast coast of England, stretching from Caister-on-Sea in Norfolk down the Suffolk coast to Sheerness on the Kent coastline, and reaching as far as Canvey Island into the Thames Estuary. The SPA is divided into three discreet areas: the outer estuary of the Thames (including Kent and Essex coastal waters); the Suffolk and south Norfolk coastal waters; and an offshore area further northeast. The site crosses the 12 nautical mile boundary along the Norfolk coast	The SPA is a European Marine Site. NE note that the Outer Thames Estuary SPA is located on the southeast coast of England, stretching from Caister-on-Sea in Norfolk down the Suffolk coast to Sheerness on the Kent coastline, and reaching as far as Canvey Island into the Thames Estuary. The SPA is divided into three discreet areas: the outer estuary of the Thames (including Kent and Essex coastal waters); the Suffolk and south Norfolk coastal waters; and an offshore area further	The SPA is a European Marine Site. NE note that the Outer Thames Estuary SPA is located on the southeast coast of England, stretching from Caister-on-Sea in Norfolk down the Suffolk coast to Sheerness on the Kent coastline, and reaching as far as Canvey Island into the Thames Estuary. The SPA is divided into three discreet areas: the outer estuary of the Thames (including Kent and Essex coastal waters); the Suffolk and south Norfolk coastal waters; and an offshore area further northeast. The site crosses the 12 nautical mile boundary along the Norfolk	The SPA is a European Marine Site. NE note that the Outer Thames Estuary SPA is located on the southeast coast of England, stretching from Caister-on-Sea in Norfolk down the Suffolk coast to Sheerness on the Kent coastline, and reaching as far as Canvey Island into the Thames Estuary. The SPA is divided into three discreet areas: the outer estuary of the Thames (including Kent and Essex coastal waters); the Suffolk and south Norfolk coastal waters; and an offshore area further northeast. The site crosses the 12 nautical mile boundary along the Norfolk coast and therefore lies partly in territorial and partly in offshore waters. The SIP does not identify habitat loss as a threat. It is therefore considered that this site can be scoped out from further consideration in the

	and therefore lies partly in territorial and partly in offshore waters. The SIP does not identify air quality as a threat. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of air quality.	northeast. The site crosses the 12 nautical mile boundary along the Norfolk coast and therefore lies partly in territorial and partly in offshore waters. The SIP does not identify hydrology as a threat. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of hydrological impacts.	coast and therefore lies partly in territorial and partly in offshore waters. The SIP does not identify recreation as a threat. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of public access and disturbance.	HRA in terms of habitat loss / fragmentation threats.
Hainsborough, Hammond and Winterton SAC	The SAC is predominantly located beyond 12 nautical miles out to sea. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of air quality.	The SAC is predominantly located beyond 12 nautical miles out to sea. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of hydrology.	The SAC is predominantly located beyond 12 nautical miles out to sea and boating activity is unlikely to be increased due to development set out in the VCHAP. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of public access and disturbance.	The SAC is predominantly located beyond 12 nautical miles out to sea. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of habitat loss / fragmentation.
Minsmere to Walkerswick SAC	The SIP and NE Supplementary Advice identifies the SAC as being sensitive to changes in air quality. The SAC located to the south east of the Plan area and within the national statistics commuting zone. The B1387 and B1125 are located within 200m of SAC. European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.	The SAC is not hydrologically linked to the Plan area. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of hydrology impacts.	The SAC is noted to be vulnerable to public access and disturbance threats with high levels of visitor pressure. The SAC is located 15.3km from the Plan area. It is recognised that there are closer sections of coastline to the plan area to its immediate east. It is noted that a strategic Mitigation Strategy has been put in place by Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and East Suffolk Council ⁴ . This	Given the location of the SAC approx. 15.3km to the south of the Plan area it is considered that this site can be scoped out from further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.

⁴ Hoskin, R., Liley, D. & Panter, C. (2019). Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils – Technical Report. Footprint Ecology.

			strategy includes specific measures for minsmere to walkerswick. The Plan area is located outside the zone of influence of the mitigation strategy and as such this site has been scoped out of further HRA screening in terms of public access and disturbance impacts.	
Minsmere to Walkerswick SPA	The SIP and NE Supplementary Advice identifies SPA as being sensitive to changes in air quality. SAC located to the south east of the Plan area and within the national statistics commuting zone. The B1387, B1125, A12 and A1095 are located within 200m of SPA. European site scoped in and will be included in HRA Screening of allocations and policies in terms of air pollution impacts.	The SPA is not hydrologically linked to the Plan area. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of hydrology impacts.	The SPA is located 13.8km from the Plan area. It is recognised that there are closer sections of coastline to the plan area. It is noted that a strategic mitigation strategy has been put in place by Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and East Suffolk Council (noted above). This strategy includes specific measures for minsmere to walkerswick. The Plan area is located outside the zone of influence of the mitigation strategy and as such this site has been scoped out of further HRA screening in terms of public access and disturbance impacts.	Given the location of the SPA approx. 13.8km to the south of the Plan area it is considered that this site can be scoped out from further consideration in the HRA as LSEs due to habitat loss / fragmentation are unlikely.
Minsmere to Walkerswick Ramsar	Whilst air pollution is not identified as a threat in the Ramsar Information Sheet for this site, air quality impacts will be considered further at this Ramsar in line with SPA and SAC scoping conclusions.	As above.	As above	As above.
Roydon Common & Dersingham Bog SAC	The SAC located approx. 37km from Plan area. The SAC is considered to be vulnerable to air pollution and is	The SAC located approx. 37km from Plan area. SAC is not hydrologically linked to Plan area.	The SAC is not identified as being vulnerable to recreation / urbanisation impacts. Given the size of the SAC, such impacts are considered likely to	Given location of SAC from Plan area it is considered that this site can be scoped out from further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.

	<p>within national statistics commuting zone.</p> <p>The A149 and B1440 are located within 200m of SPA.</p> <p>European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.</p>	It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of hydrology impacts.	be local. Given distance of SAC from Plan area European site is scoped out in terms of public access and disturbance threats.	
Roydon Common Ramsar	<p>Ramsar located approx. 37km from Plan area.</p> <p>European site scoped in on basis of SAC threats (above) and will be included in HRA screening of allocations and policies in terms of air pollution impacts.</p>	<p>Ramsar located approx. 37km from Plan area.</p> <p>Ramsar is not hydrologically linked to Plan area.</p> <p>It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of hydrology impacts.</p>	<p>Ramsar is identified as being vulnerable to recreation / urbanisation impacts.</p> <p>Given size of site such impacts are considered likely to be local.</p> <p>Given distance of Ramsar from Plan area European site is scoped out in terms of public access and disturbance threats.</p>	Given location of Ramsar from Plan area it is considered that this site can be scoped out from further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.
Dersingham Bog Ramsar	<p>Ramsar located approx. 42km from Plan area. No threats or pressures identified in Ramsar Information Sheet.</p> <p>European site scoped in on basis of SAC threats (above) and will be included in HRA screening of allocations and policies in terms of air pollution impacts.</p>	<p>Ramsar located approx. 42km from Plan area.</p> <p>Ramsar is not hydrologically linked to Plan area.</p> <p>It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of hydrology impacts.</p>	<p>Ramsar not identified as being vulnerable to recreation / urbanisation impacts.</p> <p>Given size of site such impacts are considered likely to be local.</p> <p>Given distance of Ramsar from Plan area European site is scoped out in terms of public access and disturbance threats.</p>	Given location of Ramsar from Plan area it is considered that this site can be scoped out from further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.
Alde-Ore Estuary SPA	<p>Whilst the SIP identifies that the SPA is vulnerable to air quality impacts and it is located within the national statistics commuting zone, there is only one strategic road link within 200m, the B1084.</p> <p>The B1084 however terminates at the SPA and does not link to potential key housing / employment areas that may link this European site to the Plan area. In addition, the SPA is located approx. 28.8km to the south east of the Plan area.</p>	This European site is not hydrologically linked to the Plan area and as such can be scoped out from further consideration in the HRA in terms of hydrology impacts.	<p>The SPA is located approx. 28.8km to the south east of the Plan area. A strategic approach has been adopted to recreational at a number of European sites along the south Norfolk coastline.</p> <p>This SPA is located outside the recreational zone of influence established by Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy (HRA RAM</p>	Given the distance of this site to the south of the Plan area this site can be scoped out of further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.

	Therefore, it is unlikely that growth in the Local Plan will result in an alone / in-combination air quality impacts at this location. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of air quality.		Strategy) ⁵ . As such it will be scoped out of the HRA in terms of public access and disturbance impacts.	
Alde-Ore & Butley Estuaries SAC	Whilst the SIP identifies that the SAC is vulnerable to air quality impacts and it is located within the national statistics commuting zone, there is only one strategic road link within 200m, the B1084. The B1084 however terminates at the SAC and does not link to potential key housing / employment areas that may link this European site to the Plan area. In addition, the SAC is located approx. 28.8km to the south east of the Plan area. Therefore, it is unlikely that growth in the Local Plan will result in an alone / in-combination air quality impacts at this location. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of air quality.	This European site is not hydrologically linked to the Plan area and as such can be scoped out from further consideration in the HRA in terms of hydrology impacts.	The SAC is located approx. 28.8km to the south east of the Plan area. A strategic approach has been adopted to recreational at a number of European sites along the south Norfolk coastline. This SAC is located outside the recreational zone of influence established by Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy (HRA RAM Strategy) ⁶ . As such it will be scoped out of the HRA in terms of public access and disturbance impacts.	Given the distance of this site to the south of the Plan area this site can be scoped out of further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.
Orfordness-Shingle Street SAC	Whilst the SIP identifies that the SAC is vulnerable to air quality impacts and it is located within the national statistics commuting zone, there is only one strategic road link within 200m, the B1084. The B1084 terminates at the SAC and does not link to potential key housing / employment areas that	This European site is not hydrologically linked to the Plan area and as such can be scoped out from further consideration in the HRA in terms of hydrology impacts.	The SAC is located approx. 35km to the south east of the Plan area. A strategic approach has been adopted to recreational at a number of European sites along the south Norfolk coastline. This SAC is located outside the recreational zone of influence established by Habitats	Given the distance of this site to the south of the Plan area this site can be scoped out of further consideration in the HRA as LSEs due to habitat loss / fragmentation are unlikely.

⁵ Ibid.⁶ Ibid.

	may link this European site to the Plan area. The SAC is located approx. 35km to the south east of the Plan area. Therefore, it is unlikely that growth in the Local Plan will result in an alone / in-combination air quality impacts. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of air quality.		Regulations Assessment Recreational Avoidance and Mitigation Strategy (HRA RAM Strategy) ⁷ . As such it will be scoped out of the HRA in terms of public access and disturbance impacts.	
Alde-Ore Estuary Ramsar	The B1084 terminates at the Ramsar and does not link to potential key housing / employment areas that may link this European site to the Plan area. The Ramsar is located approx. 28.8km to the south east of the Plan area. Therefore, it is unlikely that growth in the Local Plan will result in an alone / in-combination air quality impacts. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of air quality.	This European site is not hydrologically linked to the Plan area and as such can be scoped out from further consideration in the HRA in terms of hydrology impacts.	The Ramsar is located approx. 28.8km to the south east of the Plan area. A strategic approach has been adopted to recreational at a number of European sites along the south Norfolk coastline. This Ramsar is located outside the recreational zone of influence established by Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy (HRA RAM Strategy) ⁸ . As such it will be scoped out of the HRA in terms of public access and disturbance impacts.	Given the distance of this site to the south of the Plan area this site can be scoped out of further consideration in the HRA as impact due to habitat loss / fragmentation are unlikely.
Staverton Park & The Thicks Wantisden SAC	Whilst the SIP identifies that the SAC is vulnerable to air quality impacts and it is located within the national statistics commuting zone, there is only one strategic road link within 200m, the B1084. The B1084 terminates at the SAC and does not link to potential key housing / employment areas that may link this European site to the Plan area. The SAC is located	This European site is not hydrologically linked to the Plan area and as such can be scoped out from further consideration in the HRA in terms of hydrology impacts.	The SIP notes that the site is vulnerable to illegal access leading to an increased risk of damage and fires on the site. Given the distance of the site to the Plan area and the fact that it is privately owned, it is not considered that this is likely to be an affect and as such public access and disturbance threats are scoped out.	Given the distance of this site to the south of the Plan area this site can be scoped out of further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.

⁷ Ibid.⁸ Ibid.

	approx. 31km to the south east of the Plan area. Therefore, it is unlikely that growth in the Local Plan will result in an alone / in-combination air quality impacts. It is therefore considered that this site can be scoped out from further consideration in the HRA in terms of air quality.			
Sandlings SPA	The SPA is located approximately 27.7km to the south east of the Plan area at its closest point. The SIP notes that is vulnerable to air pollution. A number of B grade roads (B1084, B1122, B1343, B1083) link the plan area to the coastal location and Woodbridge Airfield close to this SAC link to. Council to confirm that there are no key employment areas associated with Woodbridge Airfield. TBC – however it is anticipated that, due to the above reasons, there will be no adverse effect of the Local Plan alone or in-combination on traffic related air quality at this location. Until traffic data has been reviewed it is considered that this site cannot be scoped out from further consideration in the HRA in terms of air quality.	This European site is not hydrologically linked to the Plan area and as such can be scoped out from further consideration in the HRA in terms of hydrology impacts.	Whilst the SIP notes that this SPA is vulnerable to public access and disturbance threats it notes that recreational pressure could be increased by new housing developments in the area. NE's Supplementary Advice notes that recreational pressures are local. Given the location of the SPA approx. 27.7km to the south east of the Plan area and the nature of the site, it is not considered that VCHAP will create recreational impacts at this SPA and as such public access and disturbance threats are scoped out. In addition, it is noted that the SPA is located outside the zone of influence established by Footprint Ecology in the HRA RAM Strategy ⁹ .	Given the distance of this site to the south of the Plan area this site can be scoped out of further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.
Debden Estuary SPA	The SIP identifies the SPA as being sensitive to changes in air quality. The SPA located approx. 29km to the south of the Plan area but within a commuting area which links towards Ipswich and surrounding areas.	This European site is not hydrologically linked to the Plan area and as such can be scoped out from further consideration in the HRA in terms of hydrology impacts.	The SPA located approx. 29km to the south of the Plan area. Site outside zone of influence established by Habitats Regulations Assessment Recreational Avoidance and	Given the distance of this site to the south of the Plan area this site can be scoped out of further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.

⁹ Ibid.

	The A1153, B1438, and B1083 are located within 200m of SAC. European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts. Until traffic data has been reviewed to determine commuting zones, it is considered that this site cannot be scoped out from further consideration in the HRA in terms of air quality.		Mitigation Strategy (HRA RAM Strategy) ¹⁰ .	
Debden Estuary Ramsar	Whilst the Ramsar Information Sheet does not identify any threats likely to be exacerbated by growth set out in the VCHAP, air quality impacts will be considered further in the HRA as per SPA scoping above.	As above.	As above	As above.
Stour and Orwell Estuary SPA	The SIP identifies the SPA as being sensitive to changes in air quality. The SPA located approx. 36km to the south of the Plan area The A14 is located within 200m of SAC. Suffolk Coastal and Ipswich are noted by national statistics to be key commuter destinations from / to the Plan area and therefore the components of the SPA located within these authority areas only have been the subject of this scoping exercise. European site scoped in and will be included in HRA screening of allocations and policies in terms of air pollution impacts.	This European site is not hydrologically linked to the Plan area and as such can be scoped out from further consideration in the HRA in terms of hydrology impacts.	The SPA located approx. 36km to the south of the Plan area Site outside zone of influence established by Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy (HRA RAM Strategy) ¹¹ .	Given the distance of this site to the south of the Plan area this site can be scoped out of further consideration in the HRA as impacts due to habitat loss / fragmentation are unlikely.

¹⁰ Ibid.¹¹ Ibid.

	Until traffic data has been reviewed to determine commuting zones, it is considered that this site cannot be scoped out from further consideration in the HRA in terms of air quality.			
Stour and Orwell Estuary Ramsar	Whilst the Ramsar Information Sheet does not identify any threats likely to be exacerbated by growth set out in the VCHAP, air quality impacts will be considered further in the HRA as per SPA scoping above.	As above.	As above	As above.

Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

© Lepus Consulting Ltd

1 Bath Street Cheltenham GL50 1YE

T: 01242 525222

E: enquiries@lepusconsulting.com

www.lepusconsulting.com

CHELtenham



Lepus Consulting
1 Bath Street
Cheltenham
Gloucestershire GL50 1YE

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com

Planning Enforcement Plan and Strategy

Report Author(s): Stuart Pontin
Business Improvement Team Manager
01508 533796
spontin@s-norfolk.gov.uk

Portfolio: Planning

Ward(s) Affected: All

Purpose of the Report:

To outline the background to the review of the Planning Enforcement Service for South Norfolk Council to provide a high quality and customer focussed service and to establish an Enforcement Plan which sets out details of the service for Members and customers

Recommendations:

1. To agree the use of the Enforcement Plan at Appendix 1 for the Planning Enforcement Service at South Norfolk Council.
2. To agree the use of the Enforcement Strategy at Appendix 2 for the Planning Enforcement Service at South Norfolk Council.

1 SUMMARY

- 1.1 Following an internal review of the Planning Enforcement Service offered by South Norfolk Council, it is proposed to update the Enforcement Policy used by SNC to form an Enforcement Plan to be used in order to provide a high quality, customer focused service. In conjunction with this it is also proposed to publish an "Enforcement Strategy" to support the Enforcement Plan which provides more information about the enforcement service for customers.

2 BACKGROUND

- 2.1 An Audit review was undertaken in early 2020 which identified a number of actions be taken to improve the completeness of enforcement records including

correspondence to developers including timescales to address breach, together with an audit trail to provide an overview of the case including key dates such as dates of complaint received, dates of correspondence and site visits. In conjunction with this it was recommended to instigate the implementation of electronic files for the entire enforcement process, including filing of documents to the Document Management System. The audit also highlighted the need to review and update the Planning Enforcement Policy.

- 2.2 The Development Plan also identifies the need to scope a review of the enforcement plan to be undertaken in Quarter 1. This review has been undertaken during July 2020 and has considered the Audit recommendations.
- 2.3 South Norfolk Council has a Corporate Compliance and Enforcement Policy 2015, with an appendix which specifically relates to Development Management.
- 2.4 The National Planning Policy Framework (NPPF) (March 2012) issued by the Department for Communities and Local Government sets out that : ‘Effective enforcement is important as a means of maintaining public confidence in the planning system’. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. Local planning authorities should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where it is appropriate to do so’.
- 2.5 At present, South Norfolk Council does not have an “Enforcement Plan” and as part of the enforcement review it is proposed to develop a Planning Enforcement Plan which updates the current policy to be used to provide a high quality, customer focused service. South Norfolk Council has a Corporate Compliance and Enforcement Policy which will be reviewed and updated at a later date, and the Planning Enforcement Plan appended to this report will form part of any review of the Corporate Policy.

3 CURRENT POSITION/FINDINGS

- 3.1 The Enforcement Policy currently seek as far as possible to achieve positive compliance with the law and to respond proportionately, taking account of the circumstances of the case, to provide a customer focussed service and work holistically with other service areas.
- 3.2 The South Norfolk service currently updates customers at key stages during the investigation and liaises with Members where it is proposed to take no further action. Quarterly reports are presented to the Development Management Committee relating to compliance where formal action has been taken. The monitoring of condition compliance is focused on major developments with a reactive service to smaller developments.

4 PROPOSED ACTION

- 4.1 It is proposed to retain the key elements of the existing Enforcement Policy and to enhance these by confirming the Council's priorities and service standards that the customer can expect in terms of the types of complaints that will be investigated and to define a timeline for the key actions, together with updates on how matters are progressing and to identify the next steps. These are set out in the Enforcement Plan and expanded on in the Enforcement Strategy, which will also form the basis of information available online for customers.
- 4.2 It is also proposed that a proactive approach is taken towards the monitoring of the commencement of developments which have planning permission.
- 4.3 To ensure that Members have an over view of current cases it is also proposed that a monthly report is provided to all members which highlights the key stages which have been undertaken. It is also suggested that these could be provided to Parish Council for their information. In association with the provision of this information, it is proposed that training is provided to ensure that this information is used appropriately.

5 OTHER OPTIONS

- 5.1 To continue to operate the current Enforcement Policy.

6 ISSUES AND RISKS

- 6.1 This is an update to the existing enforcement policy and does not raise any additional risks. Without an up to date enforcement plan our course of action in relation to enforcement cases could be challenged.

6.2 Resource Implications

- 6.3 Recommendations from the Audit report, together with remote working during Covid have highlighted the need to work more electronically and for files to be available electronically. To facilitate this, a Sparks project has been identified to include an additional category in the Idox Document Management System (DMS).
- 6.4 As part of the review it is recommended that a proactive approach is taken towards the monitoring of the commencement of developments which have planning permission to ensure compliance with associated conditions. This monitoring can be linked with existing commencement monitoring which is undertaken in connection with Building Control, Community Infrastructure Levy, Section 106 legal agreements and Planning Policy, together with other teams in the Council (ie Council tax).
- 6.5 **Legal Implications** – This is an update to the existing enforcement policy and does not raise any additional legal implications. We will take specific legal advice in relation to individual cases as appropriate.

- 6.6 **Equality Implications** – Where formal enforcement action is proposed in relation to specific cases an appropriate assessment will be undertaken at that time.
- 6.7 **Environmental Impact** – The proposals will have a positive environmental impact by ensuring that development does not have an adverse impact.
- 6.8 **Crime and Disorder** – The proposals will work in a positive way to ensure compliance with appropriate legislation.
- 6.9 **Risks** – No.

7 CONCLUSION

- 7.1 The review of the Planning Enforcement service has highlighted a number of enhancements to the current service. The proposed Enforcement Plan will develop the existing Enforcement Policy to provide a high quality, customer focused service and will be supplemented by the Enforcement Strategy.

8 RECOMMENDATIONS

1. To agree the use of the Enforcement Plan at Appendix 1 for the Planning Enforcement Service at South Norfolk Council.
2. To agree the use of the Enforcement Strategy at Appendix 2 for the Planning Enforcement Service at South Norfolk Council.

Background Papers

South Norfolk Council – Compliance and Enforcement Policy

Planning enforcement plan

The purpose of this plan

This plan sets out how the authority will respond to suspected breaches of planning and related controls in its area; how it will monitor the implementation of permissions; investigate alleged cases of unauthorised development and take action where it is appropriate to do so.

The Council is firmly committed to the effective enforcement of planning control. It views the harmful effects of any breach of planning control very seriously and has a compliance team based within the Planning Service area.

Introduction

The Town & Country Planning Act provides Local Authorities with the legislative background to exercise control over unauthorised development and non-compliance with any condition or limitation attached to a planning permission. Controls relating to advertisements, listed buildings, trees and conservation areas are found in separate legislation.

This document sets out the Council's plan for planning enforcement and the approach the Council will take in investigating and remedying breaches of planning control.

The National Planning Policy Framework (NPPF) states "*The purpose of planning is to help achieve sustainable development*". Enforcement is an integral part of the planning system and "*is important as a means of maintaining public confidence in the planning system*" (para. 207 of the NPPF).

There is a duty on planning authorities to investigate alleged breaches of planning controls and resolve issues effectively in accordance with the Development Plan, any Supplementary Planning Guidance and the National Planning Policy Framework (NPPF). However, any subsequent enforcement action is discretionary.

What is planning enforcement?

The overall objective of the planning enforcement function is to maintain the integrity of the planning system.

The main functions of planning enforcement are:-

- To maintain public confidence in the planning system:

The integrity of the Council's development management function depends on the Council's readiness to take enforcement action when it is considered expedient to do so. Parliament has given this Council the primary

responsibility for taking whatever enforcement action is necessary within the area for which it is Local Planning Authority.

The Broads Authority is the Local Planning Authority for enforcement matters within its area. The enforcement of matters relating to waste management and mineral workings is the responsibility of Norfolk County Council.

- To investigate alleged cases of unauthorised development both reactively and proactively:

The Planning enforcement team has both a proactive as well as a reactive role in monitoring the progress of development on sites and ensuring compliance with planning conditions. The team also responds to third party complaints and allegations about possible breaches of planning control.

- To act proportionately

Ensuring any enforcement action is commensurate with the breach of planning control to which it relates. Enforcement action will not normally be taken to remedy trivial or technical breaches of control which are considered to cause no harm to amenity or the public interest.

- To take action where it is appropriate to do so

Although nothing in this plan should be taken as condoning a wilful breach of planning law, the Council's enforcement powers are discretionary and will only be exercised when it is considered expedient to do so.

The following principles underpin the functioning of the service:

An emphasis on customer focus

- Allegations of suspected breaches of planning control can be reported to the Compliance team in person, by telephone, by email, by letter or via the Council's website.
- All complaints will be acknowledged within 3 working days and the complainant given the name of the officer assigned to investigate the particular case
- The identity of persons reporting suspected breaches of planning control will be treated as confidential. However, where the success of an appeal or prosecution is dependent on evidence being provided by the person who reported the breach, the Council will discuss with the individual concerned whether they are willing to relinquish their confidentiality and provide the required evidence before proceeding with formal enforcement action or a prosecution.
- Parish and Town Councils and Ward members will be provided with an update on a monthly basis as to the progress made on all the complaints received and planning permissions monitored within their respective areas.

- Updates will be given to a complainant at key stages and of the outcome of an enforcement investigation when the matter reaches a conclusion.

Effective decision making

- Upon receipt of a complaint an assessment will be made as to whether a breach of planning control exists. This may involve carrying out a site visit.
- We will prioritise:
 - Unauthorised development which is causing or threatening significant harm to public health and safety.
 - Cases where there is ongoing or immediate threat of irreversible harm to amenity or the environment.
 - Harm to areas protected by statutory designations such as Sites of Special Scientific Interest (SSIs), Conservation Areas Archaeological sites.
 - Harm to listed buildings and their setting.
 - Harm to trees and hedges, especially where protected by Tree Preservation Orders (TPO's) or Regulations.
 - Unauthorised development likely to harm protected species or habitats.
 - Monitoring of major developments.
- The Council's enforcement powers are discretionary and will only be exercised when it is considered expedient to do so.
- The majority of decisions as to whether and how to proceed with an enforcement investigation are vested in the Officers with only a very few cases being reported to members for consideration and for a course of action to be agreed.
- Development Plan policies, appeal decisions, case law, individual site circumstances and the level of harm likely to be caused will all be taken into account in respect of an individual case in order to ensure consistency in decision making.

Flexibility in applying procedures

- In most instances an attempt to persuade an owner or occupier of a site to voluntarily remedy the harmful effects of unauthorised development will be made. We will aim for this to be undertaken within 6 weeks of the initial site visit
- Lengthy negotiations however will not be allowed to hamper or delay whatever formal enforcement action may be required to make the development acceptable on planning grounds, or to compel it to stop
- In seeking to remedy a breach by negotiation regard is had to the statutory time limits beyond which the Council would be precluded from taking enforcement action together with relevant planning policies and other material considerations

- Each case is progressed as far as possible with the information available at that time
- Where a retrospective planning application is refused relating to an existing breach of the planning regulations the associated planning decision notice will be accompanied by an enforcement notice setting out what needs to be done to remedy the breach of planning control

Applying the most appropriate measures

- The council has a range of enforcement measures available and will have regard to which power (or mix of powers) is best suited to dealing with any particular breach of control to achieve a satisfactory, lasting and cost-effective remedy. This may result in some instances in letting the legislative powers of colleagues from other departments or even other agencies taking precedence to resolve issues which cross departmental boundaries.
- Wherever possible and appropriate the Council will seek to remedy breaches of planning control through negotiation and mediation.

Proactive enforcement

- The Compliance team proactively monitors planning conditions imposed on planning and other permissions both at the time of commencement of development and where appropriate at subsequent development stages
- The Compliance , in conjunction with colleagues in other departments, will explore avenues of collaborative working which could include the issuing of fixed penalty notices to secure the remedying of breaches of planning and other related offences which cause harm to the public realm.
- The Compliance team will, when called upon to do so, provide advice to prospective and newly established businesses to ensure that they will not fall foul of planning and related legislation.

Planning Enforcement Strategy

This Enforcement Strategy supports the Enforcement Plan and explains the planning enforcement function. It will clarify the various breaches of planning control and criminal offences that planning enforcement can address and detail the powers given to the Council and how and when these powers may be employed.

The strategy gives clear guidance on what we can do and how complaints are prioritized. It explains how complaints can be made, and sets out what can reasonably be expected from the Council once a complaint has been made.

The document has been prepared in accordance with the advice contained in the National Planning Policy Framework (NPPF) (March 2012) issued by the Department for Communities and Local Government which states: 'Effective enforcement is important as a means of maintaining public confidence in the planning system'. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. Local planning authorities should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where it is appropriate to do so'.

What will we investigate...?

A breach of planning control is defined in the Town and Country Planning Act 1990 as "the carrying out of the development without the required planning permission, or failing to comply with any condition or limitation subject to which planning permission has been granted". Whether something requires planning permission is not straightforward and while there are some fairly obvious breaches, such as building a new house without planning permission, many others are more difficult to define or less well known.

For example:

- Building work, engineering operations and material changes of use that are carried out without first obtaining planning permission;
- Development that has planning permission but is not carried out in accordance with the approved plans;
- Failure to comply with conditions or the terms of a legal agreement attached to a permission or consent;
- The unauthorised demolition of a building within a conservation area without planning permission;
- Works carried out to a listed building (both internal as well as external), which affect its historic character or setting, without listed building consent being granted;
- The unauthorised felling or carrying out of works to a tree which is protected by a Tree Preservation Order (TPO) or which is within a Conservation Area (CA);
- Unauthorised Advertisements;
- Failure to properly maintain land so that it detrimentally affects the amenity of the area;

- Failure to comply with the requirements of enforcement notices, breach of conditions notices and stop notices.

It should be noted that a breach of planning control becomes immune from enforcement action if no formal action has been taken within the time limits set out in the Town and Country Planning Act 1990 (as amended).

Essentially these time limits are: Four years from the substantial completion of a building or other operational development and for the change of use of any building to a dwelling house; and ten years for a continued use of land or breach of planning condition

Similarly, planning enforcement action can only be pursued where works have taken place without the benefit of, or are inconsistent with, planning permission. Therefore, domestic extensions, regardless of their impact on neighbours, are immune from planning enforcement action if they fall within permitted development rights; and those commenced with permission and built as approved also are beyond further control, even though a neighbour, perhaps new to the area, was not consulted.

In addition to investigating complaints which we receive relating to breaches of planning control, we will also undertake proactive investigations to ensure that development is built in accordance with its planning approval and associated conditional requirements.

Whilst it is not possible to check all developments, the combination of responsive and a proactive approach should raise awareness of the need for compliance, so maintaining a culture of compliance. This is likely to involve working more closely with other Council departments to ensure a co-ordinated and targeted approach which has the maximum impact.

What will we not investigate...?

What is not a breach of planning control?

Many issues that arise the council cannot get involved in as they are issues that are between two private parties, as those are considered to be civil matters. Other matters may be covered by other legislation but are not issues that the council as Local Planning Authority can get involved with. Some of these are:

- Internal works to a non-listed building;
- Matters controlled by other legislation such as Building Regulations / public nuisance / Highways / or the Environment Agency;
- Competition from another business;
- On street parking of commercial vehicles in residential areas;
- Obstruction of a highway or public right of way (the Police or Highways Authority may be able to get involved);
- Parking a caravan within the residential boundary of a property provided that its use is ancillary to the dwelling;
- Clearing land of undergrowth, bushes and trees (provided they are not subject to Tree Preservation Order, within a Conservation Area or owned by the council);
- Operating a business from home where the residential use remains the primary use;
- Boundary disputes – disputes about ownership are a private matter and cannot be controlled under planning legislation;

- Deeds and covenants which are a private matter between the signatories to the documents;
- Loss of value to a neighbouring property;
- Insertion of windows in dwellings – once a building has been occupied windows can normally be inserted into existing walls provided that there is not a planning condition to prevent the insertion of additional windows;
- Where development is ‘permitted development’ under the Town and Country Planning (General Permitted Development)(England) Order 2015.

How will the matter be investigated..?

Allegations about suspected breaches of planning control will be investigated thoroughly and accurately in accordance with the principles of Good Enforcement set out within the Local Government Concordat, and the principles contained within the Regulators Code.

The five principles of good regulation are:

- Transparency
- Accountability and Openness
- Proportionality
- Consistency
- Targeted (at cases where action is needed)

The integrity of the process depends on the Council’s readiness to take proportionate enforcement action when it is required to do so. Parliament has given local planning authorities the primary responsibility for taking whatever enforcement action is necessary within their area and the council will exercise its planning enforcement powers rigorously when it is considered expedient to do so. This means that any action taken must be in the wider public interest and the action must be proportionate to the level of the breach. We will consider this by thorough assessment of the relevant facts in each case. Our consideration will be no different to those when considering the merits of an application for planning permission before the development started. For instance, if a development would have received planning permission, it will not be enforced against simply because it was carried out before planning permission was granted. Formal enforcement powers will not be used against trivial or technical breaches of planning control which cause no harm. The Council will always seek to ‘remedy’ a breach before considering formal action, often breaches can be resolved through negotiation, for example by working with the developer to alter a building so that it no longer requires consent, or by the submission of a retrospective application to seek consent.

When would formal action be considered?

- Where the breach presents significant harm to amenity, or the existing use of the land and buildings merits protection in the public interest.
- Where attempts to negotiate regularisation of the breach have failed, and the harmful effects of the development require enforcement action to make the development acceptable.
- Where planning permission for the development has been refused and the development is not acceptable in terms of planning policies or other material considerations.

Where formal planning enforcement action is taken, we will take steps to publicise this to act as a deterrent to other offenders.

The council has delegated authority to its officers to exercise the legislative powers available to it for breaches of planning control, the tools available are :

- **Planning Contravention Notice** – this requires persons to provide information in respect of the development and/or activities taking place on the land. These notices are often served as a first step to gain information from the person carrying out the development and/or activity before determining whether other notices should be served.
- **Enforcement Notice** – this is the principal tool to remedy a breach of planning control. It will specify what the alleged breach is, the steps that must be taken to remedy it, and a time period in which to carry out those steps.
- **Listed Building Enforcement Notice**- This is the equivalent Notice available under the listed building legislation
- **Breach of Condition Notice** – this is used to require full or part compliance with the conditions on the grant of a planning permission.
- **Stop Notice/Temporary Stop Notice** –these Notices requires activities to stop immediately on the land and are most commonly used to deal with breaches of planning control that are seriously affecting the amenity of nearby residents or to prevent serious or irreversible harm to the environment.
- **Untidy Land (s.215) Notice** – where the condition of buildings or land causes serious harm to the visual amenity of an area, the Council can serve a Notice on the owner and occupier, under Section 215 of the Town and Country Planning Act 1990, to remedy the condition of the land and buildings.
- **Court Injunction** – Although they are rarely used, legal powers are available for the council to apply to the High Court or the County Court for an injunction to stop an actual or alleged breach of planning control.
- **Prosecution** – the council can pursue prosecution proceedings against any person who carries out unauthorised works to trees that are protected by a Tree Preservation Order or are within a Conservation Area, unauthorised works to Listed Buildings, and certain unauthorised works of demolition works within Conservation Areas. Additionally, offenders may be prosecuted for non-compliance with a temporary stop notice, stop notice, enforcement notice and breach of condition notice.
- **Direct Action (with costs recovery)** – failure to comply with the requirements of a Notice may result in the council using powers available to it to enter land and carry out such works that are required by an Enforcement Notice. All costs incurred in carrying out such works can be recovered from the landowner. Where costs are not recovered, they can be registered as a charge on the land.
- **Advertisements** – the legislation (Town and Country Planning (Control of Advertisements) Regulations 2007) which deals with advertisements is separate from that dealing with general planning matters. The display of an advertisement without formal consent is an offence, and the council does have the power to prosecute the person displaying it, if it considered that it harms the amenity of the area or public safety. There is no need for an enforcement notice, or similar, to be served. If a person is found guilty of an offence, he or she could be liable to a fine.

Priorities

It is usually necessary to give priority to those issues where the greatest harm is being caused, as it would be inappropriate to investigate and pursue all allegations with equal priority and intensity. Therefore each case is prioritised according to the seriousness of the alleged breach. This priority is decided by officers, and subsequently reviewed after an initial site visit.

We will prioritise:

- Unauthorised development which is causing or threatening significant harm to public health and safety.
- Cases where there is ongoing or immediate threat of irreversible harm to amenity or the environment.
- Harm to areas protected by statutory designations such as Sites of Special Scientific Interest (SSIs), Conservation Areas Archaeological sites.
- Harm to listed buildings and their setting.
- Harm to trees and hedges, especially where protected by Tree Preservation Orders (TPO's) or Regulations.
- Unauthorised development likely to harm protected species or habitats.
- Monitoring of major developments.

What level of service can a complainant expect..?

We will promptly register every case and acknowledge receipt either by letter or by email within three working days. You will be given the name of the Compliance Officer dealing with your complaint so you know who to contact, together with a reference number.

We will then carry out some initial checks (usually including a site visit) in accordance with the priority given to the case, but in any event within ten working days.

Complainants will be updated by telephone, email, or by letter on completion of the site visit and/or initial assessment investigations as to whether -

- No breach was identified
- That there is a need for further investigations
- That a breach of planning control has occurred

Where there is an identified breach of planning control the following assessment will be made –

- What is the planning harm – how serious is it ?
- Would it be likely to be granted planning permission (with or without conditions)?
- Is it a minor breach (technical) or more serious?
- Can we resolve it simply by negotiation or modification?
- Is action needed quickly because the development or activity is harmful and not acceptable?

The decided actions will need to be proportional to the breach and balanced with the available resources. Dealing with enforcement cases can be a lengthy and complex process. The different types of enforcement cases vary considerably in complexity as does the time taken for their resolution. Where cases take a long time to resolve we will ensure complainants are updated at each significant stage of the process. For instance, complainants will be advised if a retrospective planning application is submitted and will be notified if an enforcement notice is issued and the relevant dates for compliance.

If the investigations indicate that a breach of control has occurred that justifies enforcement action an Enforcement Notice will be served. The Notice takes a minimum period of 1 month to come into effect during which time the person(s) served with the notice can appeal against it to the Secretary of State for Housing, Communities & Local Government via the Planning Inspectorate. An Enforcement Notice may be quashed or revised by the Planning Inspector appointed by the Secretary of State.

Where an appeal is lodged the Council can take no further action until the appeal has been decided. It is not unusual for the appeal process to take several months. If a person decides to appeal against an enforcement notice; this will add to the time taken to resolve the case. In consequence it is not possible to give a standard time for dealing with enforcement cases.

Where a Breach of Planning control causes serious harm the Council can seek immediate remedial action. This action may involve the serving of a Stop Notice when an Enforcement Notice has already been issued. Temporary Stop Notices may be served when an immediate cessation of the harmful activity is required, usually before an enforcement notice comes into effect. They can only last a maximum of 28 days and may only be served once. These should only be served to prohibit what is essential to safeguard amenity of public safety in the neighbourhood; or to prevent serious or irreversible harm to the environment in the surrounding area.

Notwithstanding the above we will regularly review all our cases to ensure the most effective action plan is in place to secure a satisfactory outcome as quickly as possible. Complainants will be advised when cases are closed, and the reason. We will endeavour to resolve enquiries within six months of their receipt. However should further action be required, such as the issue of Enforcement Notices, clearly this timescale will not be possible.

What happens when someone complains about you ?

If you are contacted about an alleged breach of planning control, you are entitled to know what the allegation is (but not who made it) and to have the opportunity to explain your side of the case. We are aware that sometimes people make complaints due to neighbour disputes, as such we will always seek to work with you to understand the true facts of the case.

Initially a council officer will visit the site. This is usually without any prior warning to the owner or any tenants / employees at the site. Officers are authorised to visit a site to investigate and will show identification when they arrive.

Council officers also have powers to obtain a warrant of entry where access is refused or refusal is anticipated. Wilful obstruction of a person exercising a right of entry is an offence so you should always seek to work with the council officer. However, we are required to give

24 hours notice to insist on entry to a residential house but if you are happy to allow us access then we will usually take up that offer.

In the event of a breach being established, your co-operation will be sought to correct the breach either by removing or modifying the unauthorised development or by ceasing the unauthorised use or activity prohibited by a planning condition. A reasonable period of time, which will depend on the nature of the breach, will be allowed for you to do this.

In some circumstances you may be invited to submit a retrospective planning application or other appropriate application if it is considered that consent may be granted, or an application for a Certificate of Lawfulness of Use or Development may be invited in the event that you can show that the breach is immune from enforcement action and therefore lawful. You may be served with a Planning Contravention Notice which requires information concerning the development carried out. This Notice is used to establish the facts of what has occurred so that we can determine whether a breach of control has occurred and whether formal action is appropriate. The implications of not completing and returning the Notice will be explained to you, and the officer dealing with the case will be available to answer any questions you have on the matter.

If you are running a business which is threatened by enforcement action, you will be directed to our Economic Development section to see whether alternative premises can be found to minimise the possible impact on the business, this does not mean that the enforcement action will be delayed or stopped.

If you are issued with an Enforcement Notice you will be given the precise details of the breach, the reasons for the action, the steps required to overcome the problem and the time period for compliance. You will also be advised of your right to appeal any notice issued.

The Compliance officers aim is to resolve breaches of planning control and they will work with you to achieve this in a positive and pragmatic way. Most breaches are resolved through negotiation and discussion, and we encourage you to cooperate positively. It is in the interests of all parties if an identified breach can be addressed and then resolved at an early stage.

What to do if you are unhappy with our service

The council aims to provide an efficient and effective service for everyone it deals with and to maintain good relations with those who use our services. Planning enforcement is a complicated area of law and care must be taken to arrive at a correct and appropriate course of action related to alleged breaches of planning control. If you are aggrieved with the service offered to you, there is a complaints procedure, where complaints can be investigated. Details of this procedure are available on the council's website. If you remain dissatisfied, the matter can be investigated by the Local Government Ombudsman. They will make an independent investigation of whether maladministration has occurred by the district council and if it has, recommend what remedy ought to take place. The Ombudsman will not normally deal with a complaint unless it has first been through the Council's own complaint procedures and deals only with aspects concerning the conduct of the investigation.

We always welcome constructive feedback and any ideas on how we can improve our services. Please contact us if you can suggest ways of improving the service.

Links

https://www.planningportal.co.uk/info/200125/do_you_need_permission

https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

<https://www.gov.uk/government/publications/regulators-code>