

Appropriate Assessment

for

Suffolk Coastal District Council
Core Strategy and Development Management
Policies

August 2011

Quality control

Appropriate Assessment

for

Suffolk Coastal District Council
Core Strategy and Development Management Policies

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Contents

| | | |
|----------|--|-----------|
| 1 | Introduction..... | 1 |
| 1.1 | The plan being assessed..... | 1 |
| 1.2 | Appropriate Assessment requirement..... | 1 |
| 1.3 | Appropriate Assessment process | 2 |
| 1.4 | European sites..... | 3 |
| 1.5 | Impacts in combination with other Land-use Plans..... | 3 |
| 1.6 | Modifications to this Appropriate Assessment | 3 |
| 2 | European sites potentially affected..... | 5 |
| 2.1 | Sites within the Core Strategy and Development Management Policies area | 5 |
| 2.2 | Sites outside the Core Strategy and Development Management Policies area | 5 |
| 2.3 | Other relevant plans or projects affecting these sites | 7 |
| 3 | Likely significant effects..... | 8 |
| 3.1 | Process..... | 8 |
| 3.2 | Results..... | 8 |
| 4 | Policies to be assessed | 9 |
| 4.1 | Introduction | 9 |
| 4.2 | Policy SP2. Housing numbers. | 9 |
| 4.3 | Policy SP5. Employment land. | 9 |
| 4.4 | Policy SP8. Tourism..... | 9 |
| 4.5 | Policy SP13. Nuclear energy..... | 9 |
| 4.6 | Policy SP17. Green space..... | 9 |
| 4.7 | Policy SP20. Area East of Ipswich. | 9 |
| 4.8 | Policy SP21. Felixstowe. | 9 |
| 4.9 | Policy SP22. Aldeburgh..... | 9 |
| 4.10 | Policy SP24. Leiston. | 10 |
| 4.11 | Policy SP26. Woodbridge. | 10 |
| 4.12 | Policy SP27. Allocations in the key service centres. | 10 |
| 4.13 | Policy DC22. Airfields..... | 10 |
| 5 | Methods of assessing European site visitor increases from an increased human population .. | 11 |
| 5.1 | Introduction | 11 |
| 5.2 | Existing condition assessments of European sites | 12 |
| 5.3 | Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data..... | 13 |
| 5.4 | Impact on European sites in Colchester and Tendring Districts, Essex..... | 19 |
| 5.5 | Calculations to predict additional visitors to European sites in the south Sandlings using 2010 visitor survey data..... | 19 |
| 5.6 | Impact on specific sites | 25 |
| 5.7 | Survey of site managers opinion of impacts of additional visitors..... | 26 |
| 5.8 | Other visitor surveys, comparison of visitor surveys and calculation of impact | 27 |
| 6 | Assessment of each policy..... | 31 |
| 6.1 | Introduction to the assessment of each policy | 31 |
| 6.2 | Policy SP2. Housing numbers. | 31 |
| 6.3 | Policy SP5. Employment land. | 39 |
| 6.4 | Policy SP8. Tourism..... | 40 |
| 6.5 | Policy SP13. Nuclear Energy..... | 42 |
| 6.6 | Policy SP17. Green space..... | 42 |

| | | |
|-----------|--|-----------|
| 7 | Mitigation | 44 |
| 7.1 | Introduction to mitigation | 44 |
| 7.2 | Mitigation for Policy SP2. Housing numbers..... | 44 |
| 7.3 | Implementation of the proposed mitigation | 48 |
| 7.4 | Mitigation conclusions | 49 |
| 8 | Conclusions of the Appropriate Assessment | 50 |
| 8.1 | Policy SP2 and related policies | 50 |
| 8.2 | Individually assessed policies | 50 |
| 8.3 | All other policies | 50 |
| 8.4 | Interactions between policies in this plan | 50 |
| 8.5 | In combination with plans from others..... | 50 |
| 8.6 | Final conclusion | 50 |
| 9 | Limitations to the assessment | 51 |
| 9.1 | The evidence base | 51 |
| 9.2 | Further work needed..... | 51 |
| 10 | Iterations and Consultations | 53 |
| 10.1 | Previous versions of this appropriate assessment..... | 53 |
| 10.2 | Consultations with Natural England | 53 |
| 10.3 | Consultations with the Public | 53 |

Figures

1. European sites in the study area
2. Ipswich Policy Area
3. Rights of Way by the Deben Estuary near Waldringfield

Appendices

- 1 European site citations
- 2 Conservation Objectives for SSSI components of European sites
- 3 Condition Assessments for SSSI components of European sites
- 4 Natural England correspondence regarding 'Likely significant effect'
- 5 Key diagram, from Preferred Options report
- 6 Sample of site managers' survey responses
- 7 Bird counts for Deben Estuary SPA 2002/3 – 2006/7
- 8 Bird counts for sector 5 of Deben Estuary SPA 2002/3 – 2006/7
- 9 Natural England advice on Appropriate Assessment addendum April 2011

1 Introduction

1.1 The plan being assessed

- 1.1.1 In December 2008, Suffolk Coastal District Council published its Preferred Options for its Local Development Framework Core Strategy and Development Management Policies. This document sets out the Council's vision for the area to 2025. It then set out the objectives that a planning strategy must work to if the vision is to materialise. Strategic planning policies then followed, with an emphasis on the 'spatial' aspect. Finally, a suite of Development Management policies provided guidance upon any detailed aspects.
- 1.1.2 A draft of the Submission stage Core Strategy was published on Suffolk Coastal District Council's website as part of the agenda for discussion by Cabinet in their meeting on 7th July 2009. The final Core Strategy was adopted by the Council as Interim Policy on 18th March 2010, prior to public consultation and formal submission to the Secretary of State for Examination into its soundness.
- 1.1.3 However, following adoption as Interim Policy, the Government stated its intention to withdraw Regional Spatial Strategies (RSS), so that each Local Authority would determine its housing numbers without the regional framework. In November 2010 Suffolk Coastal District Council published its reviewed Core Strategy and Development Management Policies for public consultation. A significant part of this review work involved revisiting the evidence base for the district housing requirement following the Government's decision to abolish the Regional Spatial strategies. Taking into account all the evidence, the Council decided that a total of 7,590 additional homes would be required in the District between 2010 and 2027 – a small reduction to 446 homes per annum from 510 proposed through the RSS. However, the Reviewed Core Strategy has been written with a commitment to commence a review of the housing requirement by 2015 when further evidence will be available, reflecting the fact that should all the economic growth projected be provided additional housing will be required to support it.
- 1.1.4 The Suffolk Coastal District Council Core Strategy and Development Management Policies are at a slightly earlier stage to the Ipswich Borough Council Core Strategy and Policies. It is considered that this may have effects in combination and consequently both plans were considered together in a joint project, although separate reports were produced for each Local Authority. The respective plan of Babergh District Council was not included in this assessment as it is at an earlier stage, though current planning applications were taken into account.
- 1.1.5 The plan being assessed in this report is Suffolk Coastal District Council's Reviewed Core Strategy & Development Management Policies Development Plan Document, Consultation draft – November 2010.

1.2 Appropriate Assessment requirement

- 1.2.1 Appropriate Assessment of the Development Plan Document is required under the Conservation of Habitats and Species Regulations 2010. These regulations superseded in April 2010 the previous Conservation (Natural Habitats &c.) Regulations 1994 as amended by the Conservation (Natural Habitats &c.) (Amendment) Regulations 2007. The regulations are often abbreviated to, simply, the 'Habitats Regulations'. The 2010 Habitats Regulations consolidate the previous Regulations and amendments and in respect of land-use plans the Regulations are unchanged.
- 1.2.2 Regulation 102 states that
- (1) Where a land use plan—
 - (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
 - (b) is not directly connected with or necessary to the management of the site,

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

(2) The plan-making authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specify.

(3) They must also, if they consider it appropriate, take the opinion of the general public, and if they do so, they must take such steps for that purpose as they consider appropriate.

(4) In the light of the conclusions of the assessment, and subject to regulation 103 (considerations of overriding public interest), the plan-making authority or, in the case of a regional spatial strategy, the Secretary of State must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

(5) A plan-making authority must provide such information as the appropriate authority may reasonably require for the purposes of the discharge of the obligations of the appropriate authority under this chapter.

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

(a) a European site by reason of regulation 8(1)(c); or

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

1.2.3 The plan-making authority, as defined under the Regulations, is Suffolk Coastal District Council and the appropriate nature conservation body is Natural England.

1.2.4 The Appropriate Assessment in this report is carried out on behalf of Suffolk Coastal District Council to allow them to decide whether to give effect to the plan under Regulation 102. The Core Strategy and Development Management Policies will be subject to an Examination in Public, and this Appropriate Assessment will also be open to scrutiny at that Examination.

1.3 Appropriate Assessment process

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

Likely significant effect

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

Connected to management of the site

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

Screening

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

Scoping

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

Consultations

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

1.3.7 Consultation with Natural England and the public is described in Section 10.

Iterations and revision

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

1.3.9 It is normally expected that iterative revisions will continue until it can be ascertained that the plan will not have an adverse effect on the integrity of any European site.

1.3.10 Iterations and revision are referred to within Section 10.

1.4 European sites

1.4.1 European sites, often known as Natura 2000 sites across Europe, are those legally registered as Special Protection Areas (for bird sites) and Special Areas of Conservation (for species except birds, and habitats). These are usually abbreviated as SPA and SAC respectively. Wetlands of International Importance, designated under the Ramsar Convention, are usually abbreviated as Ramsar sites.

1.4.2 Although the Appropriate Assessment process only legally applies to European sites, Government Policy in PPS9¹ is to apply the same protection to Ramsar sites.

1.4.3 As the Ramsar sites largely are similar to SPA and / or SAC designations, both geographically and ecologically, the assessment below for clarity does not always repeat Ramsar site names. The assessment does however consider Ramsar sites fully, and if an assessment would vary for a Ramsar site compared to the respective SPA / SAC, this would be identified.

1.5 Impacts in combination with other Land-use Plans

1.5.1 It is considered that the development proposed within Ipswich Borough may have a cumulative effect on nature conservation sites in the District. The Ipswich Borough Council Core Strategy and Policies Development Plan is at a more advanced stage, and has already been submitted to the Secretary of State and is still undergoing its examination in public. The Examination in Public re-convened in May 2011 with hearings in May 2011 and July 2011. As a consequence of this examination Ipswich Borough Council has published a Schedule of Proposed Focused Changes to its submitted Core Strategy and Policies Development Plan Document (01/08/2011). The Proposed Focused Changes add detail to the Core Strategy but do not make any fundamental changes to it; there is a re-phasing of the timing of housing development in the Ipswich Northern Fringe.

1.6 Modifications to this Appropriate Assessment

1.6.1 A previous version of this Appropriate Assessment dated June 2011 was published by Suffolk Coastal District Council in early June 2011. Comments were received by the Council from Richard Buxton on behalf of NANT (No Adastral New Town) dated 6th July 2011, and from Suffolk Wildlife Trust dated 7th July 2011.

1.6.2 Both sets of comments pointed out an inconsistency relating to car parking at Waldringfield; in one part of the Appropriate Assessment the public car park at Waldringfield was noted but in another part it was stated that there was no public car parking. Suffolk Wildlife Trust also commented that the headings of Table 8 were misnamed as they did not find it clear whether one column contained actual visitor numbers or sampled visitor numbers although the Trust recognised that this was clarified in text.

¹ Planning Policy Statement 9 Biodiversity and Geological Conservation. Office of the Deputy Prime Minister, 2005.

- 1.6.3 NANT also considers that there are numerous inaccuracies / inconsistencies in data and gives examples. Other comments by Richard Buxton and Suffolk Wildlife Trust relate to interpretation of the Appropriate Assessment rather than to any factual inaccuracies. This July 2011 version of the Appropriate Assessment corrects the inaccuracies helpfully pointed out by the respondents as follows.
- 1.6.4 Orfordness to Shingle Street SAC was included in some lists of designated sites and not others; this has been remedied. Natural England's monitoring of designated sites, especially bird populations in relation to human disturbance has been explained in a number of relevant places. Visitor typologies have been further described, with for example the routine use of locally convenient greenspace described in relation to impacts on sites close to housing allocations.
- 1.6.5 The discussions of impacts of strategic allocations have had sub-headings improved to clarify the allocations under discussion in section 6.2.
- 1.6.6 The headings in Table 8 have been modified. The column heading 'Number of existing visitors' has been modified to state 'Number of existing visitors recorded in the survey'. The column heading 'Predicted number of visitors' has been modified to 'Predicted number of visitors on re-survey'. Paragraph 5.5.12 has been modified to emphasise that the numbers of 'existing visitors were those identified in a survey with text added as highlighted here in bold 'The total existing visitor number **identified in the survey** is 517'.
- 1.6.7 A new Section 5.8 discusses various other visitor surveys, including one on the Deben Estuary in 2011, Dorset studies selectively quoted by NANT, and a national visitor survey by Natural England.
- 1.6.8 Paragraph 6.2.30 is edited to emphasise that the statement given, is pre-mitigation.
- 1.6.9 Paragraph 6.2.31 is amended to clarify that it refers to walking visitors rather than car-borne visitors which are discussed in subsequent paragraphs. To remove any inconsistency regarding car parking, paragraph 6.2.33 is amended, with a new paragraph inserted to become 6.2.34, and old paragraph 6.2.34 is renumbered as 6.2.35 and substantially edited. The impact at Waldringfield and at the car park at Martlesham church is recognised as potentially higher without further mitigation. The number of new visitors to Martlesham church car park and Waldringfield are estimated quantitatively, using the behaviour of visitors as measured in the South Sandlings visitor survey.
- 1.6.10 Subsequent paragraphs in Section 6.2 are renumbered accordingly.
- 1.6.11 More detail has been added to Section 7.2, regarding mitigation. For example, paragraph 7.2.4 has been amended to emphasise that wider elements of the mitigation package, such as visitor monitoring and management and a new Country Park, will be needed to avoid the impact of development on the Deben Estuary SPA as well as for the in combination effect of all development in Suffolk Coastal and Ipswich. A summary of mitigation for each proposed policy area, is added to the end of Section 7.2.
- 1.6.12 More detail has been added to Section 7.3 regarding implementation of the mitigation.

2 European sites potentially affected

2.1 Sites within the Core Strategy and Development Management Policies area

2.1.1 All European sites (including Ramsar sites) within the Core Strategy and Development Management Policies area, which is the whole Suffolk Coastal District, are potentially affected.

2.1.2 The European sites wholly or partly within Suffolk Coastal District are

- Minsmere – Walberswick Ramsar site
- Minsmere-Walberswick Heaths and Marshes SAC
- Minsmere – Walberswick SPA
- Sandlings SPA
- Alde-Ore Estuary SPA
- Alde-Ore and Butley Estuaries SAC
- Alde-Ore Estuary Ramsar site
- Orfordness – Shingle Street SAC
- Staverton Park and the Thicks SAC
- Deben Estuary SPA
- Deben Estuary Ramsar site
- Stour and Orwell Estuaries Ramsar site
- Stour and Orwell Estuaries SPA

2.2 Sites outside the Core Strategy and Development Management Policies area

2.2.1 European sites in neighbouring Districts/Boroughs are also potentially affected. These neighbouring Districts/Boroughs are Ipswich Borough, Waveney District and Babergh District. European sites in Tendring District may also be potentially affected. European sites in Mid Suffolk District are considered to be at sufficient distance that there is not likely to be a significant effect on those sites.

2.2.2 These European sites are large and can overlap Local Authority boundaries, so are listed below without reference to specific District / Borough. The European sites potentially affected are

- Hamford Water SPA
- Hamford Water Ramsar site
- Colne Estuary (Mid Essex Coast phase 2) SPA
- Essex Estuaries SAC
- Colne Estuary (Mid Essex Coast phase 2) Ramsar site
- The Broads SAC
- Benacre to Easton Bavents Lagoons SAC
- Dews Ponds SAC
- Broadland SPA
- Broadland Ramsar site

- Benacre to Easton Bavents SPA

2.2.3 Sites with similar names largely overlap, for example the boundaries of Minsmere – Walberswick Ramsar site, Minsmere – Walberswick Heaths and Marshes SAC, and Minsmere – Walberswick SPA are largely the same. The European sites are composed of one or more Sites of Special Scientific Interest as shown in Table 1.

Table 1. Component SSSIs of each European site

| European site name | Component Sites of Special Scientific Interest in Suffolk Coastal District or in adjacent Districts and potentially affected |
|--|---|
| Minsmere - Walberswick Ramsar site, Minsmere - Walberswick Heaths and Marshes SAC, Minsmere – Walberswick SPA | Minsmere – Walberswick Heaths and Marshes SSSI |
| Sandlings SPA | Sandlings Forest SSSI Tunstall Common SSSI Blaxhall Heath SSSI Snape Warren SSSI Sutton and Hollesley Heaths SSSI Leiston – Aldeburgh SSSI |
| Alde-Ore Estuary SPA, Alde-Ore and Butley Estuaries SAC, Alde-Ore Estuary Ramsar site, Orfordness – Shingle Street SAC | Alde-Ore Estuary SSSI |
| Staverton Park and the Thicks SAC | Staverton Park and the Thicks SSSI |
| Deben Estuary SPA, Deben Estuary Ramsar site | Deben Estuary SSSI |
| Stour and Orwell Estuaries SPA, Stour and Orwell Estuaries Ramsar site | Stour Estuary SSSI Orwell Estuary SSSI |
| Hamford Water SPA, Hamford Water Ramsar site | Hamford Water SSSI |
| Colne Estuary (Mid Essex Coast phase 2) SPA, Colne Estuary (Mid Essex Coast phase 2) Ramsar site | Colne Estuary SSSI |
| Essex Estuaries SAC | Colne Estuary SSSI |
| The Broads SAC, Broadland SPA, Broadland Ramsar | Sprat's Water and Marshes, Carlton Colville SSSI, Barnby Broad and Marshes SSSI, Stanley & Alder Carrs, Aldeby SSSI |
| Benacre to Easton Bavents lagoons SAC, Benacre to Easton Bavents SPA | Pakefield to Easton Bavents SSSI |
| Dews Ponds SAC | Dews Ponds SSSI |

2.2.4 The above European sites are shown on Figure 1 and information on their interest features are given in Appendix 1.

- 2.2.5 The Conservation Objectives for these sites, where available from Natural England, are given in Appendix 2.

2.3 Other relevant plans or projects affecting these sites

- 2.3.1 In addition to a potential effect from the Suffolk Coastal District Council Core Strategy and Development Management Policies, the European sites are also affected by a number of plans or projects, including the Local Development Framework documents of neighbouring Local Authorities, the Regional Spatial Strategy, existing developments and proposed developments, management carried out by land managers with the consent of Natural England, third party effects such as recreation, etc.
- 2.3.2 In the context of this Appropriate Assessment, the most relevant other plans or projects to be considered are
- The Ipswich Borough Council Core Strategy and Policies
 - Waveney District Council Development Plan Documents
 - Babergh District Council Development Plan Documents
 - Tendring District Council Development Plan Documents
 - These plans are considered in the Appropriate Assessment of Suffolk Coastal District Council's Core Strategy and Development Management Policies.

3 Likely significant effects

3.1 Process

- 3.1.1 A Screening and Scoping exercise was carried out in 2009 on behalf of Suffolk Coastal District Council to identify if an Appropriate Assessment was required and suggesting a set of policies which were likely to have a significant effect. Natural England was consulted on 6th March 2009.

3.2 Results

- 3.2.1 Natural England confirmed on 16th March 2009 that an Appropriate Assessment would be required and advised on those policies suggested by Suffolk Coastal District Council considered likely to have a significant effect.
- 3.2.2 The policies considered by Suffolk Coastal District Council, having regard to Natural England's advice, to have a likely significant effect or no significant effect at that stage are listed in Appendix 4. Following that consultation, policies may have been re-numbered although the policies themselves have little changed.
- 3.2.3 The policies to be assessed in most detail are listed in Section 4 below.

4 Policies to be assessed

4.1 Introduction

- 4.1.1 The Policies in the Core Strategy and Development Management Policies document to be assessed are listed below. Comments received from Natural England, giving the previous policy numbers used at that time in the Preferred Options document, are also given. Those comments are incorporated into Appendix 4.

4.2 Policy SP2. Housing numbers.

- 4.2.1 Natural England commented on similar policies earlier numbered as SP16, SP17, and SP18 that 'Increased housing allocation in the more sensitive parts of the District, will result in negative impacts'.

4.3 Policy SP5. Employment land.

- 4.3.1 Natural England commented on the similar policy earlier numbered as SP21 that 'The areas identified are Felixstowe Port and Martlesham Heath Business Campus; further development at these sites could result in negative impacts upon the Stour & Orwell Estuaries SPA and Deben Estuary SPA respectively'.

4.4 Policy SP8. Tourism.

- 4.4.1 Natural England commented on the similar policy earlier numbered as SP24 that 'Although this policy does recognise the importance of the AONB designation, no specific mention is made of the suite of European designated sites within the District. Increased tourist pressure within these sites could result in serious negative impacts'.

4.5 Policy SP13. Nuclear energy.

- 4.5.1 Natural England commented on the similar policy earlier numbered as SP14 that 'Construction of a further power station could bring negative impacts to the nearby European sites through, inter alia, coastal protection issues, higher populations and increased construction disturbance. Site-specific Appropriate Assessment will be required by any proposer to a nuclear power station at this location. Anything in the policy not covered by the HRA for the planning application needs to be considered further'.

4.6 Policy SP17. Green space.

- 4.6.1 Natural England commented on the similar policy earlier numbered as SP30 that 'Increased public access activity may result in negative impacts upon the District's European designated sites particularly Heaths and Estuaries'.

4.7 Policy SP20. Area East of Ipswich.

- 4.7.1 Natural England commented on the similar policy earlier numbered as SP3 that 'Any development is likely to bring additional pressure to any of the sites of European interest, however the area near Martlesham identified as a "preferred option" could have particularly negative impacts upon the Deben Estuary SPA/SSSI'.

4.8 Policy SP21. Felixstowe.

- 4.8.1 Natural England commented on the similar policy earlier numbered as SP4 that 'Any development is likely to bring additional pressure to any of the sites of European interest, however the areas north of Candlet Road and Felixstowe town could have particularly negative impacts upon the Deben Estuary SPA/SSSI'.

4.9 Policy SP22. Aldeburgh.

- 4.9.1 Natural England commented on the similar policy earlier numbered as SP5 that 'Although further strategic housing is not envisaged, improving tourism could lead to increased pressures on the Sandlings SPA and Alde/Ore Estuary SAC'.

4.10 Policy SP24. Leiston.

- 4.10.1 Natural England commented on the similar policy earlier numbered as SP7 that 'Further development in and around Leiston could result in increased pressure upon nearby sites such as the Minsmere-Walberswick SPA/SAC/Ramsar and Sandlings SPA'.

4.11 Policy SP26. Woodbridge.

- 4.11.1 Natural England commented on the similar policy earlier numbered as SP10 that 'Increased tourist activity is likely to result in negative impacts upon nearby European designated sites particularly Heaths and Estuaries'.

4.12 Policy SP27. Allocations in the key service centres.

- 4.12.1 Natural England commented on the similar policy earlier numbered as SP20 that 'This policy does not expressly recognise the importance of European designated sites'.

4.13 Policy DC22. Airfields.

- 4.13.1 Natural England commented on the policy earlier numbered as DC22 that 'This policy does not expressly recognise the importance of European designated sites or the effect of powered aircraft flights upon the specific features of interest'.
- 4.13.2 Policy DC22 Airfields was subsequently deleted from the Core Strategy and Policies document and consequently is not assessed.

5 Methods of assessing European site visitor increases from an increased human population

5.1 Introduction

- 5.1.1 This Section discusses the increased population arising from proposed housing in both Ipswich Borough and Suffolk Coastal District.
- 5.1.2 Assessment of the impact on European sites of proposed new housing some distance away is not straightforward; for example there are no generic guidelines on impacts, distance thresholds, etc. The potential impacts of housing at a distance are briefly introduced in Section 4 above. In this Section, the methods of assessing an increased human population near European sites are discussed.
- 5.1.3 The existing human population can cause impacts on European sites through disturbance of birds and other fauna, trampling damage to habitat, litter, fires, interference with management works (e.g. theft of equipment or causing a reluctance to graze when people have free access). Natural England currently monitors the Sites of Special Scientific Interest which form the European sites. If human impacts are currently adverse we would expect those sites, or parts of those sites, to be recorded as being in unfavourable condition even if the cause of the unfavourable condition is not known. Existing condition assessments are discussed in Section 5.2 below.

The amount of housing proposed in Suffolk Coastal District

- 5.1.4 The November 2010 Reviewed Core Strategy, Policy SP2, contains proposals for 7,590 new dwellings, comprising 1,560 dwellings with planning permission and allocations deemed deliverable but not constructed at April 2010, 230 new dwellings on identified brownfield potential sites within existing physical limits boundaries, an estimated windfall of 540 dwellings, and 5,260 new allocations on greenfield land. This gives an annual requirement of 446 new dwellings per year between 2010 and 2027.
- 5.1.5 The total amount of the housing proposed within Suffolk Coastal District is given in the November 2010 Reviewed Core Strategy, in its table 3.3, as 2,320 dwellings in the Eastern Ipswich plan area, 1,760 new dwellings in Felixstowe Walton and the Trimleys, and 3,510 in the remainder of Suffolk Coastal District.

The amount of housing proposed in Ipswich Borough

- 5.1.6 The October 2010 Core Strategy contains proposals for 10,261 new dwellings, comprising 2,058 dwellings with planning permission but not constructed at April 2010, 752 dwellings with a resolution to grant planning permission at April 2010, 3951 new allocations to 2021 and 3500 new allocations 2021 – 2026. These dwellings would be concentrated within the existing built-up area of Ipswich, with farmland to the north of Ipswich being used when the supply of land within the town is exhausted.

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

- 5.1.7 There are three typologies of visitors to European sites which can be used, where data is consistent with these typologies.
- 5.1.8 The first typology is the use of European greenspace by tourists staying overnight in the area, for example on short breaks or longer holidays. It is considered that the holiday use of Suffolk Coastal is not altered greatly by the Core Strategy and Policies, as no major increase in tourist facilities is proposed, and assuming that housing development will not increase or decrease tourist use of European sites.
- 5.1.9 The second typology is the 'day trip' to European sites, often including visits to towns or other tourist facilities within the day. European sites might be visited for the enjoyment of nature (e.g. visitors to Walberswick National Nature Reserve), used as recreational sites (e.g. the shingle beaches within SACs) or simply as a backdrop to walks within a beautiful landscape. 'Day trips' can include people travelling from substantial distances away.

- 5.1.10 There is a limited amount of data regarding the quantity of visitors to European sites. A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing. The impacts of these extra visitors are hard to predict. One study, however, has looked at the impact of recreational disturbance on birds in the Stour and Orwell Estuaries SPA, which gives good evidence of impacts. This is discussed in Section 5.3 below, which concentrates on 'day trips' only.
- 5.1.11 The third typology is the use by people of European sites close to their homes for recreation or other activities. These visits tend to treat the European sites simply as convenient local greenspace. An example might be someone living near an estuary walking or driving a short distance to take a dog for a walk. This is discussed in section 5.6 below, regarding specific sites close to areas of new development.
- 5.1.12 Further studies of visitors to the South Sandlings, and to the Deben Estuary at / near Waldringfield have been made available and include European sites within the influence of the Core Strategy. Natural England has published a national survey of People and the Natural Environment. These are discussed in Sections 5.5 and 5.8.
- 5.1.13 These typologies, using appropriate data, may be used to predict any change in visitors to European sites based on changes in numbers of people in each typology. The change in visitor numbers can be assessed to determine if that change would have an adverse affect upon the integrity of the European site.

Identifying the origin of visitors

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

Site Managers' knowledge of visitor impact and change

- 5.1.15 The managers of European sites, for example those sites managed as nature reserves, may have a significant amount of knowledge about the impacts of visitors on their sites. Often this knowledge is anecdotal, but it can be used to gain an extra understanding of visitor impacts across the wider area. This is discussed in Section 5.7.

5.2 Existing condition assessments of European sites

- 5.2.1 Natural England has a programme of monitoring Sites of Special Scientific Interest (SSSIs) to assess their condition against objectives for each site. The condition of the European sites is therefore referable to the condition of the component SSSIs. As some sites are very large, they are divided into 'units' for monitoring; units may vary in interest feature and/or management from other units on the site.
- 5.2.2 The condition assessments for the relevant component SSSIs (Section 2 above) were downloaded from Natural England's website² on 11th April 2011, and these are tabulated in Appendix 3. The nineteen SSSIs are divided into around 400 units, each of which has been monitored at least once.
- 5.2.3 The outcome of monitoring is a judgement of unit condition into one of a number of categories, such as favourable, unfavourable recovering, unfavourable no change, unfavourable declining or destroyed. Favourable or unfavourable recovering conditions mean that its habitats and species are being conserved. If a unit is found to be in an unfavourable condition, this means there is a current lack of appropriate management, or that there are damaging impacts (which may be outside of the control of the owner) which need to be addressed³.

² www.naturalengland.org.uk

³ Natural England (2009) SSSI condition assessment A guide for owners and occupiers

- 5.2.4 Of the 400 or so SSSI units, nine are assessed as unfavourable for reasons of public access / disturbance. Four of these SSSI units are within Minsmere – Walberswick Heaths and Marshes SSSI, (units 84, 85, 86, 110), two units are within Leiston – Aldeburgh SSSI, and three are within Alde-Ore Estuary SSSI. These units are all shingle beaches where human impact on vegetation is monitored. In 2009, nine units were also recorded as being unfavourable but this comprised eight units at Minsmere – Walberswick SSSI and one unit at Pakefield to Easton Bavents; four of the Minsmere – Walberswick SSSI units and the at Pakefield to Easton Bavents have recovered due to management action but new damage has been recorded at Alde-Ore Estuary SSSI and Leiston – Aldeburgh SSSI. However, the SPA qualifying feature of Leiston – Aldeburgh SSSI is not shingle beach, so the public access there is not harming the European site.
- 5.2.5 The unfavourable condition of the relevant SSSI units is considered to be an existing adverse affect on the integrity of the respective European sites.
- 5.2.6 It is interesting to note that there are no estuary or coastal SSSIs where disturbance to birds from human recreation is recorded as a reason for unfavourable no change or unfavourable declining condition. The condition assessment for unit 3 of the Orwell Estuary SSSI is favourable despite the large current public access from Orwell Country Park. However, Natural England has commented that it does not routinely monitor disturbance to birds on Sites of Special Scientific Interest, and recreational impacts may therefore not be included as a reason for unfavourability in condition assessments.
- 5.2.7 Most units on the Stour Estuary SSSI were recorded in 2009 as unfavourable because of ‘coastal squeeze’, although the comments at that time suggested that there was a ‘possible contribution from recreational disturbance’. Coastal squeeze occurs where the normal processes of coastal erosion are interrupted; the normal erosion of the seaward side of saltmarsh and mudflat continues but the normal erosion of dry land to form new saltmarsh and mudflat is prevented; the natural landward progression of saltmarsh and mudflat therefore does not occur and instead the areas of these habitats shrink. In 2010, nine of the ten units were assessed as favourable and the possible recreational disturbance is no longer mentioned. Research shows that the amount of disturbance on the Stour Estuary SSSI from visitors is significantly less than that in the Orwell Estuary SSSI⁴.

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

- 5.3.1 This section looks at the group of people classified as ‘day visitors’ in the three typologies described in section 5.1 above (i.e. those travelling a significant distance to a destination for recreation on an occasional basis, rather than a local and/or regular use of a place close to home. The survey locations were situated in such places that the majority of people would be day visitors rather than routine users of convenient local greenspace.
- 5.3.2 There is little information available regarding the destinations of Suffolk Coastal and Ipswich residents for their recreation. However, in 2004 the Suffolk Coast and Heaths Unit commissioned East of England Tourist Board to carry out a visitor survey of the AONB (EETB 2004⁵). A snap-shot survey was carried out in summer 2004 by questionnaires of visitors across the AONB.
- 5.3.3 The survey found that 55% of visitors to the AONB were ‘day visitors’ (page 9 of the research). The exact number of people visiting the AONB was not measured, but the proportion of visitors from each location of origin can be identified. The raw data has been obtained from East of England Tourism. A GIS analysis on those 430 ‘day visitors’ who provided a postcode identified the proportion of those who originated from various places as listed in Table 2 below.

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

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

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

Table 2. Proportion of day visitors to Suffolk Coast and Heaths AONB from location of origin (data from EETB 2004 as re-analysed)

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

- 5.3.6 The increase in population is related to the increase in housing available. For Ipswich, the projections in population growth suggest that there will be an average of 1.38 net additional people into the Borough per new dwelling (Ipswich Borough Council pers comm. and based on Suffolk County Council's population projection⁶). This seems low, but is realistic considering the proportion of flats planned, an increase in the student population, and taking into account the continued decline in people per household in Ipswich, and ongoing national decline in average household size.
- 5.3.7 In November 2010, an Outlook for Suffolk Coastal's economy and housing was published as part of the Local Development Framework evidence base⁷. This used Office of National Statistics data and projections, but tailored more closely to the local situation. Existing household size was predicted to decline from around 2.35 people per household in 2001 to around 2.25 people per household in 2027.
- 5.3.8 Overall, a population increase of 17,300 people was predicted by 2027, requiring an increase in 11,000 houses. This is equivalent to 1.57 'new' people in the District for every new dwelling built. The number of people per household is known as the 'occupancy ratio'.
- 5.3.9 This Appropriate Assessment therefore uses an average population increase of 1.38 new people per new dwelling in Ipswich Borough, and 1.57 new people per new dwelling in Suffolk Coastal

⁶ Suffolk County Council (2009) Projected changes in the population. A 2010 update is downloadable from web page <http://www.suffolk.gov.uk/CouncilAndDemocracy/AboutSCC/SpecialistSupportFunctions/BusinessDevelopment/DataSets/DemographyAndPopulation.htm> accessed 5th May 2011

⁷ Oxford Economics (November 2010) Suffolk Coastal Profile and Outlook Report Prepared for the Suffolk Coastal District Council

District. These figures initially seem low but these figures are not occupancy rates for the new dwellings and should not be read as such. This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy. This reflects a trend towards a lower occupancy level per house caused by an increase in split households, an ageing population and the number of second homes across the Borough and District as a whole.

- 5.3.10 In other words some of the residents of those additional dwellings will come from existing dwellings within the area and so not be 'new' additional people. The patterns of births, death, and people moving out of, within, between and into, Ipswich Borough or Suffolk Coastal District are complex, but the population predictions are realistic and there are no better alternatives
- 5.3.11 The proportionate growth in population in new housing development in Suffolk Coastal and elsewhere can be calculated by looking at the existing population, the predicted net increase in people, and therefore the proportionate increase.
- 5.3.12 Table 3 shows the projected increase in population for each of the study areas under consideration.

Table 3. The estimated numerical increase in population for new housing.

| Town / area | Proposed new housing units | Estimated net increase in people ⁸ |
|---------------------------------------|----------------------------|---|
| Ipswich Borough | 10,261 | 14,160 |
| Eastern Ipswich plan area | 2,320 | 3,642 |
| Felixstowe, Walton and the Trimleys | 1,760 | 2,763 |
| Remainder of Suffolk Coastal District | 3,510 | 5,511 |
| Shotley | 404 ⁹ | 606 |
| Totals | 18,255 | 26,682 |

* based on population projections (see above paragraphs 5.3.6 to 5.3.9)

- 5.3.13 Table 4 shows the proportionate increase in population for these areas of new housing. It is important to look at the increases of each development in combination, as well as individually, as each impact might be individually too small to give rise to a significant impact, but in combination could have an adverse affect.

⁸ Based on a net increase of 1.57 and 1.38 people per new dwelling for Suffolk Coastal and Ipswich respectively.

⁹ A 404 person retirement home is planned; assume 1.5 people per dwelling

Table 4. The proportionate increase in population for areas of new housing.

| Town / area | Existing population size | Estimated increase in people (table 2) | Estimated % increase in local population (estimated increase / existing) |
|--|--------------------------|--|--|
| Ipswich Borough, plus adjoining Pinewood ward (Babergh district) | 132,013 | 14,160 | 10.7% |
| Eastern Ipswich plan area | 20,014 | 3,642 | 18.2% |
| Felixstowe, Walton and the Trimleys | 33,735 | 2,763 | 8.2% |
| Remainder of Suffolk Coastal District | 68,251 | 5,511 | 8.1% |
| Shotley | 2483 | 606 | 24.4% |
| Totals | 256,496 | 26,682 | 10.4% |

5.3.14 The data in Tables 3 and 4 above can be used to calculate the extra number of people visiting European sites within the Suffolk Coast and Heaths AONB, subject to the following assumptions

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

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

5.3.16 Table 5 below calculates the increase in total visitors to the AONB based on the calculation above, for each point of origin and for the total. For clarity of calculation, percentages are given as a proportion of 1 e.g. 55% is shown as 0.55. To reduce rounding errors, the total for column D is calculated from the totals for columns B and C.

Table 5. Predicted increase in total visitors to Suffolk Coast and Heath AONB.

| Origin of day visitors to AONB | (A) proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1 | (B) proportion of total AONB visitors (A x 0.55) | (C) increase in local population from table 3 expressed as a fraction of 1 | (D) The overall increase of all visitors to the AONB (B) x (C) |
|--|---|---|---|---|
| Ipswich Borough, plus adjoining Pinewood ward (Babergh district) | 0.116 | 0.064 | 0.107 | 0.007 |
| Eastern Ipswich plan area | 0.067 | 0.037 | 0.182 | 0.007 |
| Felixstowe, Walton and the Trimleys | 0.04 | 0.022 | 0.082 | 0.002 |
| Remainder of Suffolk Coastal District | 0.265 | 0.146 | 0.081 | 0.012 |
| Shotley | 0.002 | 0.001 | 0.244 | 0.0002 |
| Totals | 0.495 | 0.272 | 0.104 | 0.0283 |

5.3.17 Table 6 below shows the Table 5 column D data alone, given as a percentage increase in total visitors to the AONB.

Table 6. The predicted percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal

| Place of origin | The predicted proportionate increase in visitors to the AONB from each place of origin |
|--|--|
| Ipswich Borough, plus adjoining Pinewood ward (Babergh district) | 0.7% |
| Eastern Ipswich plan area | 0.7% |
| Felixstowe, Walton and the Trimleys | 0.2% |
| Remainder of Suffolk Coastal District | 1.2% |
| Shotley | 0.02% |
| Totals | 2.83% |

- 5.3.18 Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.83%. The numbers in Table 6 do not add exactly to 2.83% due to rounding earlier in the calculations but the 2.83% is based on the totals. The increase in visitors can be apportioned as 0.7% for Ipswich Borough and 2.13% for Suffolk Coastal District.
- 5.3.19 To allow for assumptions about people's behaviour patterns, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%.
- 5.3.20 The calculations of increased visitors to European sites are complex. Superficially, one would expect that an 10.4% increase in the combined population of Ipswich Borough and Suffolk Coastal District to cause a 10.4% increase in visitors to European sites in the Suffolk Coast and Heaths AONB. In reality, a 10.4% increase in population will result in a proportionate increase from only those visitors who come from Ipswich Borough and Suffolk Coastal District. Visitor numbers from elsewhere are unchanged, so the increase in the total number of visitors will be less than 10.4%.
- 5.3.21 Data presented in the Appropriate Assessment shows that about half (55%) of visitors to the Suffolk Coast and Heaths AONB were local people on a day trip, with the remainder being holiday makers staying in tourist accommodation. Of the locals on a day trip, about half (49.5%) were from Ipswich Borough and Suffolk Coastal District, with the remainder from elsewhere, for example, from Norwich or Bury St Edmunds. Combining these figures, half the visitors being on day trips, and half of these day trip visitors being from Ipswich Borough and Suffolk Coastal District, the calculation is that roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB.
- 5.3.22 With roughly around one-quarter of the day trips coming from residents in Ipswich Borough and Suffolk Coastal, those day trips are predicted to rise in proportion with the predicted 10.4% population increase i.e. the number of day trips from Ipswich Borough and Suffolk Coastal are expected to rise by 10.4% in the period 2010 – 2026/7. However, other sources of visitors (holidaymakers or day trips from elsewhere) will not rise accordingly, so the total visits from all sources is calculated to rise by around 2.83%. Figure 1, which is drawn to relative scale, is a bar chart where the length of the bar represents the number of visitors in each group. It shows

the effect of the 10.4% increase in day trips from Ipswich Borough / Suffolk Coastal District in relation to the total visits from all sources.

- 5.3.23 There are a number of assumptions made regarding these calculations and people's behaviour, including
- 'New' people in the Borough / District will have the same visiting pattern as 'existing' people
 - Visits by holiday makers will not be affected by any increased use by local visitors
 - Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors
- 5.3.24 The separate breakdown of visits into 'day-trippers' and 'holidaymakers' was undertaken in the school summer holiday period when a greater proportion of 'holidaymakers' may have been present compared to other months
- 5.3.25 To allow for these assumptions, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%.
- 5.3.26 **It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result of the Ipswich Borough Council and Suffolk Coastal District Council Core Strategy proposals.**
- 5.3.27 Not all the European sites under assessment are within the Suffolk Coast and Heaths AONB, specifically the sites in Tendring District which are Hamford Water SPA, Hamford Water Ramsar site, Colne Estuary (Mid Essex Coast phase 2) SPA, Colne Estuary (Mid Essex Coast phase 2) Ramsar site, and Essex Estuaries SAC. The amount of visits to these sites from Suffolk Coastal District and Ipswich Borough are not known. It is considered that the greater distances to these sites from Ipswich / Suffolk Coastal, compared to sites with the Suffolk Coast and Heaths AONB, means that the expected number of visits from Ipswich / Suffolk Coastal to the Essex sites is likely to be much less than to sites in Suffolk. The Essex sites are closer to other towns such as Harwich and Colchester, and the influence of those towns is considered to be much more dominant.

5.4 Impact on European sites in Colchester and Tendring Districts, Essex

- 5.4.1 A report of visitor monitoring on Natura 2000 sites in Colchester and Tendring, Essex¹⁰, was also considered. It showed that only a tiny proportion of visitors to European sites travelled from Ipswich or Suffolk Coastal. However, the sample sizes were so small that it is considered that the results may not have been meaningful.

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

- 5.5.1 A visitor survey was commissioned by a consortium led by Suffolk Wildlife Trust and Forestry Commission, and funded by the Haven Gateway Partnership. The survey was carried out in winter 2009/10 and summer 2010 by Footprint Ecology. Their final report was published on 10th February 2011¹¹ and the use of this report is gratefully acknowledged. It is considered that the visitor survey and data analysis were generally carried out to high standards. The report is referred to as the 2010 South Sandlings Visitor Survey in the remainder of this report.
- 5.5.2 The 2010 South Sandlings Visitor Survey took place in an area east and north-east of Woodbridge, encompassing Tunstall Forest, Rendlesham Forest and surrounding areas. The

¹⁰ Habitat Regulations Assessment Survey and Monitoring. Year 1 Interim Report December 2010. Colchester Borough Council.

¹¹ Cruickshanks K, Liley D and Hoskin R (2011) Suffolk Sandlings Living Landscape Project Visitor Survey Report. Footprint Ecology / Suffolk Wildlife Trust.

study included Sandlings SPA (comprising Sandlings Forest SSSI, Blaxhall Heath SSSI, Sutton and Hollesley Heaths SSSI and Tunstall Common SSSI), Staverton Park and the Thicks SAC, , and small parts of Alde-Ore Estuary (SPA, SAC, Ramsar) and Deben Estuary (SPA, Ramsar). Visitors at a number of points within the study area were counted and many were asked a number of questions about their visit, including where they had come from, where they went on their visit, what they did, how they arrived on site for their visit, and why they had chosen that place to visit.

5.5.3 Key messages from the 2010 South Sandlings Visitor Survey are

- 53% of total visitors entered the study area at just three points; the forest opposite Sutton Heath Estate (housing associated with MoD Woodbridge including some open market housing), Sutton Heath car park, and Iken.
- Visitors were not spread out evenly across the study area; there were 'hotspots' of visitors at Sutton Heath and in Rendlesham Forest at Tangham visitor centre; there were also spots of activity concentrated at the Rendlesham Forest runway car park and by the B1084, and in the north of Tunstall Forest at Tunstall Heath and Blaxhall Common. Heaths were used disproportionately more by visitors compared to equivalent areas of forestry plantation.
- In the study area there were 16 formal car parks providing a total of 261 spaces, and 106 locations used for informal parking providing 256 parking spaces. The density of visitors within the sites was closely related to the location of car parks; the visitor hotspots were close to the bigger and formal car parks; other spots of activity were close to small and/or informal car parks.
- 19% of visitors in summer and 6% of visitors in winter were tourists.
- 63% of visitors had dogs with them; the proportion being slightly higher in the winter than in summer
- Dog walking was undertaken by 52.8% of people interviewed; walking, exercise, family outings and cycling were undertaken by the majority of other visitors.
- 80% of all visitors arrived by car, and 17% of all visitors walked across the road from the Sutton Heath Estate into the adjacent forest.
- Half of all visitors who arrived on foot lived within 420m of the access point, and half of all visitors who arrive by car live less than 8km away. Over 75% of dog walkers lived within 10km of the access point.
- The number of houses within 5km of a site had a positive relationship with the number of visitors entering; the more houses there were, the more visitors there were.
- Most people stayed for 1 – 2 hours.
- 64% of visitors visited the sites at least weekly, and over half of these visited daily.
- Over half the visitors also said that they would visit coastal and estuary sites in the area
- There was a higher density of nightjar nests in the areas with the lowest category of visitor numbers, but no clear relationship between nest density across all categories of visitor numbers; for example the areas with the highest category of visitor numbers had more nightjar nests than those with an intermediate number of visitors.
- Public access had no apparent effect on the current distribution of woodlark nests in the Forest or on heaths.
- For non-SPA species, Dartford warbler nest density was negatively correlated to visitor numbers, but there was no apparent relationship between visitor numbers and silver-studded blue butterflies or ant-lion.

5.5.4 These key messages are extracted from the 2010 South Sandlings Visitor Survey, which gives much more detail.

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

Table 7. Approximate distribution of proposed housing allocations from Sandlings access points

| Location | no. of proposed new dwellings | Approximate distance of housing from South Sandlings study area access points /km |
|--|-------------------------------|---|
| Ipswich Borough | 10,261 | 13.5 - 14 |
| Eastern plan area | 2320 | 4.5 - 5 |
| Felixstowe Walton and Trimleys | 1760 | 12 – 12.5 |
| rest of Suffolk Coastal* | 700 | 4.5 - 5 |
| rest of Suffolk Coastal* | 700 | 9.5 - 10 |
| rest of Suffolk Coastal* | 700 | 14.5 - 15 |
| rest of Suffolk Coastal* | 700 | 19.5 - 20 |
| rest of Suffolk Coastal* | 710 | 24.5 – 25 |
| * 3510 dwellings nominally allocated to five distance bands across the District. | | |

- 5.5.8 The South Sandlings Visitor Survey data for the number of visitors, and the existing number of houses, within 0.5km distance bands up to 50km from access points to sites within the study area were kindly supplied by Steve Aylward of Suffolk Wildlife Trust (the commissioning group's project manager) and Footprint Ecology. The use of this data is gratefully acknowledged.
- 5.5.9 For each distance band up to 50km from the study area access points, Table 8 shows the existing housing numbers and visitor numbers supplied from the South Sandlings Visitor Survey. The proposed housing numbers are also listed, using the distribution given above. For clarity, the distribution of proposed housing within distance bands has been highlighted; there is no change to numbers in other bands. The increase in visitors is calculated by multiplying the existing visitors in each distance band by the proportionate increase in housing. The

proportionate increase in housing is calculated by dividing the proposed housing numbers (existing number plus proposed new dwellings) by existing housing numbers.

5.5.10 To illustrate the calculations, if a distance band had 8 recorded visitors from 100 existing dwellings, and 50 new dwellings were proposed within a Core Strategy, then the proportionate increase in housing is $(100+50)/100 = 1.5$. The predicted number of new visitors is therefore $8 \text{ people} \times (100+50)/100$, giving a predicted number of 12 visitors.

Table 8. Predicted increase in visitor numbers to South Sandlings study area calculated as the number of existing visitors multiplied by the proportionate increase in dwellings (proposed / existing) within each distance band

| Distance from access point (km) | Approximate Location of existing towns in relation to distance from access points | Number of existing dwellings | Number of visitors recorded in the survey | Number of existing and proposed dwellings | Number of predicted visitors on re-survey |
|---------------------------------|---|------------------------------|---|---|---|
| 0 - 0.5 | Sutton Heath estate | 495 | 71 | 495 | 71 |
| 0.5 - 1 | | 305 | 12 | 305 | 12 |
| 1 - 1.5 | | 802 | 26 | 802 | 26 |
| 1.5 - 2 | Rendlesham Melton Woodbridge | 1936 | 55 | 1936 | 55 |
| 2 - 2.5 | | 2211 | 45 | 2211 | 45 |
| 2.5 - 3 | | 2024 | 29 | 2024 | 29 |
| 3 - 3.5 | | 1812 | 44 | 1812 | 44 |
| 3.5 - 4 | | 1471 | 21 | 1471 | 21 |
| 4 - 4.5 | | 716 | 8 | 716 | 8 |
| 4.5 - 5 | SCDC eastern plan area | 653 | 6 | 3673 | 33.7 |
| 5 - 5.5 | | 2164 | 12 | 2164 | 12 |
| 5.5 - 6 | | 2269 | 7 | 2269 | 7 |
| 6 - 6.5 | | 1558 | 7 | 1558 | 7 |
| 6.5 - 7 | Saxmundham Martlesham | 2488 | 16 | 2488 | 16 |
| 7 - 7.5 | | 2826 | 11 | 2826 | 11 |
| 7.5 - 8 | | 3361 | 13 | 3361 | 13 |
| 8 - 8.5 | | 2657 | 7 | 2657 | 7 |
| 8.5 - 9 | | 1765 | 7 | 1765 | 7 |
| 9 - 9.5 | | 1187 | 2 | 1187 | 2 |
| 9.5 - 10 | | 1304 | 2 | 2004 | 3.1 |
| 10 - 10.5 | | 1884 | 4 | 1884 | 4 |
| 10.5 - 11 | | 2376 | 5 | 2376 | 5 |
| 11 - 11.5 | Framlingham, Felixstowe, eastern Ipswich | 5574 | 11 | 5574 | 11 |
| 11.5 - 12 | | 7065 | 8 | 7065 | 8 |
| 12 - 12.5 | | 9048 | 14 | 10808 | 16.7 |
| 12.5 - 13 | | 9848 | 7 | 9848 | 7 |
| 13 - 13.5 | | 8119 | 7 | 8119 | 7 |
| 13.5 - 14 | central Ipswich | 6020 | 7 | 16281 | 18.9 |
| 14 - 14.5 | | 6001 | 1 | 6001 | 1 |
| 14.5 - 15 | | 7289 | 5 | 7989 | 5.5 |
| 15 - 15.5 | | 6961 | 2 | 6961 | 2 |

| Distance from access point (km) | Approximate Location of existing towns in relation to distance from access points | Number of existing dwellings | Number of visitors recorded in the survey | Number of existing and proposed dwellings | Number of predicted visitors on re-survey |
|---------------------------------|---|------------------------------|---|---|---|
| 15.5 - 16 | | 4716 | 2 | 4716 | 2 |
| 16 - 16.5 | western Ipswich | 6573 | 3 | 6573 | 3 |
| 16.5 - 17 | | 5199 | 4 | 5199 | 4 |
| 17 - 17.5 | | 5488 | 2 | 5488 | 2 |
| 17.5 - 18 | | 4601 | 3 | 4601 | 3 |
| 18 - 18.5 | | 2140 | 0 | 2140 | 0 |
| 18.5 - 19 | | 2831 | 1 | 2831 | 1 |
| 19 - 19.5 | | 1421 | 0 | 1421 | 0 |
| 19.5 - 20 | | 1516 | 2 | 2216 | 2.9 |
| 20 - 20.5 | | 1870 | 0 | 1870 | 0 |
| 20.5 - 21 | | 1738 | 0 | 1738 | 0 |
| 21 - 21.5 | | 2076 | 2 | 2076 | 2 |
| 21.5 - 22 | | 1746 | 0 | 1746 | 0 |
| 22 - 22.5 | | 1545 | 0 | 1545 | 0 |
| 22.5 - 23 | | 2483 | 0 | 2483 | 0 |
| 23 - 23.5 | | 2409 | 0 | 2409 | 0 |
| 23.5 - 24 | | 2229 | 1 | 2229 | 1 |
| 24 - 24.5 | | 2287 | 0 | 2287 | 0 |
| 24.5 - 25 | | 1517 | 1 | 2217 | 1.5 |
| 25 - 25.5 | | 3455 | 0 | 3455 | 0 |
| 25.5 - 26 | | 4038 | 1 | 4038 | 1 |
| 26 - 26.5 | | 4762 | 0 | 4762 | 0 |
| 26.5 - 27 | | 4622 | 1 | 4622 | 1 |
| 27 - 27.5 | | 5637 | 0 | 5637 | 0 |
| 27.5 - 28 | | 5694 | 1 | 5694 | 1 |
| 28 - 28.5 | | 4392 | 2 | 4392 | 2 |
| 28.5 - 29 | | 2613 | 0 | 2613 | 0 |
| 29 - 29.5 | | 2684 | 0 | 2684 | 0 |
| 29.5 - 30 | | 3004 | 0 | 3004 | 0 |
| 30 - 30.5 | | 2807 | 0 | 2807 | 0 |
| 30.5 - 31 | | 1549 | 0 | 1549 | 0 |
| 31 - 31.5 | | 1853 | 0 | 1853 | 0 |
| 31.5 - 32 | | 1931 | 0 | 1931 | 0 |
| 32 - 32.5 | | 4916 | 0 | 4916 | 0 |
| 32.5 - 33 | | 7166 | 1 | 7166 | 1 |
| 33 - 33.5 | | 9392 | 0 | 9392 | 0 |
| 33.5 - 34 | | 7896 | 0 | 7896 | 0 |
| 34 - 34.5 | | 6345 | 2 | 6345 | 2 |
| 34.5 - 35 | | 7947 | 1 | 7947 | 1 |
| 35 - 35.5 | | 12714 | 3 | 12714 | 3 |
| 35.5 - 36 | | 11523 | 1 | 11523 | 1 |
| 36 - 36.5 | | 10084 | 0 | 10084 | 0 |
| 36.5 - 37 | | 10980 | 0 | 10980 | 0 |

| Distance from access point (km) | Approximate Location of existing towns in relation to distance from access points | Number of existing dwellings | Number of visitors recorded in the survey | Number of existing and proposed dwellings | Number of predicted visitors on re-survey |
|---------------------------------|---|------------------------------|---|---|---|
| 37 - 37.5 | | 10937 | 2 | 10937 | 2 |
| 37.5 - 38 | | 12992 | 0 | 12992 | 0 |
| 38 - 38.5 | | 11420 | 1 | 11420 | 1 |
| 38.5 - 39 | | 6578 | 0 | 6578 | 0 |
| 39 - 39.5 | | 7071 | 1 | 7071 | 1 |
| 39.5 - 40 | | 7930 | 1 | 7930 | 1 |
| 40 - 40.5 | | 8830 | 0 | 8830 | 0 |
| 40.5 - 41 | | 10081 | 0 | 10081 | 0 |
| 41 - 41.5 | | 8352 | 1 | 8352 | 1 |
| 41.5 - 42 | | 8429 | 0 | 8429 | 0 |
| 42 - 42.5 | | 6388 | 1 | 6388 | 1 |
| 42.5 - 43 | | 5502 | 0 | 5502 | 0 |
| 43 - 43.5 | | 5197 | 1 | 5197 | 1 |
| 43.5 - 44 | | 2623 | 0 | 2623 | 0 |
| 44 - 44.5 | | 3550 | 0 | 3550 | 0 |
| 44.5 - 45 | | 5576 | 0 | 5576 | 0 |
| 45 - 45.5 | | 4676 | 0 | 4676 | 0 |
| 45.5 - 46 | | 4839 | 0 | 4839 | 0 |
| 46 - 46.5 | | 3465 | 0 | 3465 | 0 |
| 46.5 - 47 | | 6665 | 1 | 6665 | 1 |
| 47 - 47.5 | | 8176 | 1 | 8176 | 1 |
| 47.5 - 48 | | 6198 | 1 | 6198 | 1 |
| 48 - 48.5 | | 8790 | 0 | 8790 | 0 |
| 48.5 - 49 | | 6508 | 0 | 6508 | 0 |
| 49 - 49.5 | | 5118 | 0 | 5118 | 0 |
| 49.5 - 50 | | 4319 | 0 | 4319 | 0 |
| Totals | | | 517 | | 562.3 |

5.5.11 For those distance bands with significant housing allocations, the change in visitor numbers is large. For example, the allocation of 10,261 dwellings for Ipswich Borough Council at a nominal distance of 13.5km - 14km from the study area increases the number of visitors from that distance band from 7 to 18.9. Similarly, the allocation of 2,320 dwellings for the Eastern Ipswich plan area, plus 700 further allocations for the 'rest of Suffolk Coastal', increases the number of visitors from the 4.5km - 5km distance band from 6 to 33.7. However, for some distance bands there is no change in visitor numbers.

5.5.12 The total existing visitor number identified in the survey is 517, according to the data received from the South Sandlings Visitor Survey. The predicted number of visitors, following implementation of housing as allocated within the Ipswich and Suffolk Coastal Core Strategies, is 562.3. These are nominal figures based on visitor samples, so the absolute number is of less relevance than the overall change. A change from 517 to 562.3 is **an increase of visitors of 8.8%** (562.3/517).

Assumptions and limitations

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

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

5.5.14 These assumptions are such that the predicted 8.8% increase in visitors is not considered to be precise. It would be reasonable to assume that the increase in visitors to European sites in the South Sandlings study area could be in the range of 6% - 12% as a result of the Ipswich Borough Council and Suffolk Coastal District Council Core Strategy proposals.

5.6 Impact on specific sites

- 5.6.1 This section discusses the third typology in Section 5.1 above, which is the use by people of European sites close to their homes for recreation or other activities. The predicted general increase of visitors to European sites across the area is not necessarily a uniform increase to all sites. It is likely that European sites close to new development (i.e. within walking distance or a short cycle ride, bus trip or drive away) is likely to be used as convenient local greenspace, with routine activities such as recreational dog walking or play undertaken.
- 5.6.2 Studies in Dorset, carried out to investigate the impact of development on European sites there¹², have demonstrated that the average distance walked on heaths by walkers with or without dogs, was 2.2km. Of the people who walked to the site, 75% had walked less than 500m to reach the heath, and 89% had walked less than 1km. Half the people who arrived at the site by car came from up to 3.7km away and most who arrived by car had come from up to 8km away.
- 5.6.3 The 2010 South Sandlings Visitor Survey showed that half of all visitors who arrived on foot lived within 420m of the access point, and 75% of visitors walked 500m or less to reach the access point. The median distance travelled to reach the access point by car was less than 8km away. Over 75% of dog walkers lived within 10km of the access point. These data are reasonably consistent with the Dorset studies.
- 5.6.4 These studies indicate that housing development is likely to result in people living in that new housing walking to any European site within 1km, and driving to any European site within 8km, for walking or other recreation where facilities such as open access or rights of way exist. Car parks were necessary to provide for those people arriving by car.
- 5.6.5 The new housing provisions within Ipswich Borough or Suffolk Coastal District are therefore likely to result in an increase in visitor recreation on European sites within 1km (for people walking) and 8km (for people driving to a car parking location). This would be a greater increase than that increase on day trips to the AONB generally, as regular visits to places near home tend to be much more frequent (e.g. for daily dog walking) than visits to attractive sites at some distance. It is therefore necessary to identify European sites within the 1km and 8km distances of proposed housing allocations, and assess whether any increase in visitors is likely to occur there. To assess if an increase in visitors is likely to occur, the proportionate increase

¹² Clarke, R., Liley, D., Underhill-Day, J. & Rose, R. 2005. Visitor Access patterns on the Dorset heathlands. *English Nature Research Reports*, No. 683

in population in those distance bands can be looked at, the provision of alternative sites for recreation needs to be taken into account, and the availability of the European sites for access needs to be identified.

- 5.6.6 The cumulative impacts of several developments are considered in Sections 5.3 and 5.5 above, and only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur whilst considering specific site impact. Distance bands are in reality the distance that people travel, rather than straight-line distances. Obstructions to travel, such as railways or rivers with no crossing points therefore reduce the straight-line distance from which people will not travel to a European site.
- 5.6.7 The Suffolk Coastal Core Strategy and Development Management Policies has two major allocations that could cause an increase of visitor pressure on European sites. The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA. The allocation at Felixstowe and the Trimleys could be close to the Stour and Orwell Estuaries SPA. The effect of developments on specific European sites within 1km and 8km radii should be considered in combination with the additional visitors expected across the whole suite of European sites.
- 5.6.8 In addition to the major allocations, a number of smaller allocations across the District could also cause an increase of visitor pressure on the suite of European sites in the District. The combined effect of these smaller allocations is included in Sections 5.3 and 5.5 above.

5.7 Survey of site managers opinion of impacts of additional visitors

- 5.7.1 As noted above, the managers of European sites, for example of those managed as nature reserves, have a significant amount of knowledge about the impacts of visitors on their sites. Often this knowledge is anecdotal, but it can be used to gain an extra understanding of visitor impacts across the wider area. Land managers from organisations responsible for various European sites were asked for their views on the current impacts of visitors on the European sites they managed. The organisations with land managers asked for views, via a survey form, are listed below in Table 9.

Table 9. Organisations where land managers were asked for views on visitor impacts

| Organisation | Number of land managers asked for views | European site (s) |
|---------------------------------------|---|--|
| Suffolk Wildlife Trust | 3 | Sandlings SPA, Stour and Orwell Estuaries SPA, |
| Suffolk Coast and Heaths AONB Unit | 1 | AONB-wide remit |
| Natural England | 2 | Colne Estuary (Mid Essex Coast phase 2) SPA Essex Estuaries SAC Minsmere – Walberswick SPA and SAC |
| Royal Society for Protection of Birds | 3 | Sandlings SPA, Minsmere – Walberswick SPA and SAC, Stour and Orwell Estuaries SPA |
| Management Committee | 1 | Colne Estuary (Mid Essex Coast phase 2) SPA Essex Estuaries SAC |
| Forestry Commission | 1 | Sandlings SPA |

- 5.7.2 The request of views, using a form for response, was not designed to provide quantitative results. In most cases, it was considered that visitor surveys and precise impacts have never been measured. Land managers may not have had the time, particularly in June which is often a busy month, to carry out studies or even prolonged thought about the issues, so it is accepted that the replies may not be precise in all cases. With this in mind, each land manager was able to request that their reply would not be published, and all land managers were informed that replies would not commit themselves or their organisation to any particular view or course of action.
- 5.7.3 The quality of the replies needs to be considered in this light, treating them as a good indication of views, on an anecdotal basis, rather than as a comprehensive scientific study. It is considered that the qualitative evidence is of use in this assessment.
- 5.7.4 Four replies were received using the survey form. Two respondents were happy for their replies to be made public (given in Appendix 6), whilst two others preferred their responses to be not made public due to the provisional nature of the information. Further information was received by email in a free format from a fifth site manager of an estuarine site.
- 5.7.5 All respondents understood the SAC and SPA designations on their land but there was little detailed knowledge of visitor numbers; the 2004 Suffolk Coast and Heaths report was referred to on a number of occasions.
- 5.7.6 All respondents highlighted disturbance to birds and other species as being the main impact of visitors. Dogs in particular were reported as the biggest source of disturbance, especially dogs off leads which were rarely under control. Visitors were also reported to destroy interpretation signs, cut fences, leave litter and leave gates open so that livestock escape. Visitors, or at least some of them, were believed to ignore signs requesting certain behaviours such as dog control or remaining on paths. On one estuarine site, disturbance to birds from boats was thought to be the biggest problem.
- 5.7.7 Three out of the four respondents who filled in the survey form reported that they thought that a 1% increase in visitors to their sites would cause harm to SPA / SAC features. The fourth respondent thought that a 10% increase would cause harm.
- 5.7.8 All the site managers who filled in the survey form agreed that additional money could help to reduce or remove the impact of additional visitors, for example by moving or upgrading footpaths, providing additional wardening, moving or upgrading car parks, providing leaflets and signage, etc. Three of the respondents, unprompted by the design of the survey form, suggested that alternative recreation facilities should be provided close to new developments, with new Country Parks being mentioned twice.
- 5.7.9 One site manager thought that the emphasis on recreation such as dog walking, was not appropriate for his site and that traditional coastal recreation such as wildfowling, fishing and clay pigeon shooting were normally not considered during studies of recreational harm to wildlife sites.
- 5.7.10 The results of this survey are considered to be indicative rather than a conclusive evidence base. The results are however consistent with research on heathlands showing that increased visitor numbers have an impact on heathland birds on some sites in the UK and that high numbers of people can disturb estuary birds so that bird populations decrease (see references in Section 6.2). The results therefore are helpful as indicative that robust evidence of human impacts on wildlife elsewhere could with caution be referable to European sites in the Suffolk Coast and Heaths.

5.8 Other visitor surveys, comparison of visitor surveys and calculations of impact

Comparison of AONB and South Sandlings impacts

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

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

Deben Estuary Visitor Survey report, July 2011

5.8.3 A Deben Estuary Visitor Survey report was made available in July 2011 by No Adastral New Town, a campaign group. The report gives details of a visitor survey carried out in April and May 2011 to provide detailed local information on recreational activities in the Waldringfield area (including Martlesham church car park and Hemley). The visitor survey methodology used a similar but reduced methodology to the South Sandlings Visitor Survey. Although the methodology and report have some fundamental problems (for example it is unclear if all survey points were surveyed simultaneously, people at Waldringfield may have been double-counted at the car park and beach, and some data looks anomalous), the results have some consistency with the South Sandlings Visitor survey and so are helpful.

5.8.4 The average size of groups of people was similar, and the proportion of people walking with or without dogs is similar between the Deben Estuary and South Sandlings surveys. The proportion of dog walkers compared to walkers without dogs was however much less in the Deben Estuary survey. The overall proportion of people who travelled by car was very similar in both surveys, although people tended to stay longer on the Deben Estuary perhaps because of the pub at Waldringfield.

5.8.5 The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings. This is a key point because wintering birds are vulnerable to disturbance in the estuary, yet visitor numbers are lowest in winter according to the Deben Estuary survey.

5.8.6 The distances people travelled to reach the survey points on the Deben Estuary survey are very different to the distances people travelled to the South Sandlings. For example, the arithmetic mean of the distance travelled on foot to the Deben Estuary survey points was 3.8km, with a number of people recorded as walking to the survey area from Ipswich, Woodbridge and from even further away such as Trimley St Mary near Felixstowe. The South Sandlings in comparison used medians to work out where most people came from, with a median distance of 400m travelled on foot to an access point to the South Sandlings.

5.8.7 The Deben Estuary survey did not question people about their walks, for example where they went or how far they went. Data on estuary-side walks is absent; whether people simply walked a short distance along the beach at Waldringfield, walked a circular route along the estuary returning inland, or other route, is not known. The number of people walking away from the busy beach area at Waldringfield is not known. Fifteen groups of people out of 510 groups were interviewed across the 16 days of interviews at Manor Farm, away from car parks and a point on one circular walk from Waldringfield car park, suggesting that few people walk that particular circular route.

5.8.8 The Deben Estuary visitor survey is helpful in pointing out the activities which visitors carry out, (primarily walking, sailing, outing with family, pub, dog walking) and giving a general picture of the survey area, but does not have the data or analysis to predict changes in visitor numbers.

Natural England national visitor survey

5.8.9 Natural England has published the results of a 2010 / 2011 national visitor survey¹³ which gives a national picture of visitor use of the countryside, urban greenspaces and the sea coast. The findings included

- Just over half of visits to the natural environment were taken to the countryside (53%), while 37% were to green spaces within towns and cities. In total, 11% of visits were taken in coastal locations of which seven per cent were taken to a green space in a seaside town and four per cent to another coastal location.
- While parks in towns and cities continued to be the most visited location, representing 22% of all visits (558 million visits), these visits decreased from the levels recorded in 2009/10 when 24% of all visits were taken to this type of location (679 million visits). Forests and woodlands received 13 per cent of all visits, an increased share from 11% in 2010.
- Two-thirds of visits (66%) were taken within two miles (3.2km) of the respondents home (or other start point e.g. their workplace or holiday accommodation) highlighting the importance of accessible green space that is close to home.
- Visits to coastal areas were more likely to be taken by car, while the majority of countryside visits were taken on foot by people living locally in rural or urban fringe areas.
- The average visit to the natural environment lasted for just under 2 hours (1 hour 58 minutes). This finding is not significantly different from that found in the 2009/10 survey.
- Around half of all visits (51%) involved walking with a dog.
- The average group size was 2.4 people.
- The largest proportion of visits involved walking (63%). A car or van was used in 30% of visits and public transport was used for only 2% of visits.
- The vast majority of visits involving a journey of less than one mile were taken on foot (92%) while 79% of visits where the journey was 5 miles or more featured a car or van as the main mode of transport used. Urban locations were most likely to have been visited on foot (67%). Seaside resorts or towns and other coastal areas were the type of place most likely to involve travelling by car (40% and 45% respectively).
- 82% of all journeys to a greenspace were under 8km.

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

Further Dorset studies

5.8.11 A study of visitors to heaths and the sea coast in Dorset in 2008¹⁴ unsurprisingly found that the closer their home location is to a greenspace, the more likely they are to visit it. All greenspace types, except coastal, showed a rapid decline in the proportion of respondents who visit them

¹³ Natural England (2011) Monitor of Engagement with the Natural Environment: The national survey on people and the natural environment Annual Report from the 2010-11 survey NECR083

¹⁴ Liley, D., Sharp, J. & Clarke, R. T. (2008). Access Patterns in South-east Dorset. Dorset Household Survey and Predictions of Visitor Use of Potential Greenspace Sites. Dorset Heathlands Development Plan Document. Unpublished report, Footprint Ecology

as the distance increases to around 5 km. There was a negative relationship between the mean number of visits per respondent to a particular greenspace and the distance from that greenspace to their home postcode, with a steeper decline in the number of visits within the first 3 km and then a plateau thereafter. This was observed across all of the greenspace types. This confirms that those respondents living close to a greenspace sites tend to visit them more frequently than those who live further away.

- 5.8.12 Comparing greenspace types, the "catchment" is smallest for parks and gardens with 50 % of visits to them made by respondents living within approximately 1 km, while for other non-coastal sites, including heathland, this value is 1.5 to 2 km. A greater visitation to urban rather than rural heaths may reflect the lower size and availability of greenspace alternatives in urban areas and small/no access to gardens in urban areas.
- 5.8.13 This report, part 1 of which is downloadable for the internet, contains no comparisons of people's use of heaths and greenspaces. Part 2 of the report, which is hard to source but has been summarised in a Council report¹⁵, says that the area of greenspace within the vicinity did not affect the amount of visits to a heath, but the number of greenspaces within the vicinity did – the more choice of greenspaces there were, the fewer people visited heaths.

¹⁵ <http://www.eastdorsetdc.gov.uk/democracy/docstore/0904/090424155344-a66bf96d-279a-4f50-918f-002361845217.pdf>, accessed on 5th August 2011

6 Assessment of each policy

6.1 Introduction to the assessment of each policy

- 6.1.1 In this section, each policy is individually assessed in relationship to each European site mentioned in sections 2.1 and 2.2 above. Policies and the justification of them can be found in the Policy document.
- 6.1.2 It is assumed that the policy document is available to the reader of this Appropriate Assessment and large amounts of text are not repeated here.

6.2 Policy SP2. Housing numbers.

Policy overview

- 6.2.1 Policy SP2 sets the amount of housing to be allocated in Suffolk Coastal District over the period to 2027. Policy is

Strategic Policy SP2 – Housing Numbers

The Core Strategy will make provision for the creation of up to 7,590, new homes across the district in the period 2010 to 2027 as set out in Table 3.1

Land for new housing will be distributed in accordance with the principle of a settlement hierarchy, itself drawn up on the principles of sustainable development.

New homes will be phased in order to ensure a continuous supply of housing land but at a rate commensurate with anticipated employment growth and the provision of any necessary associated new and improved infrastructure provision.

Further provision of new homes is expected to come forward across the plan period by means of small scale rural community led schemes for example via the new Community Right to Build. These types of schemes do not require specific allocation through the LDF, but have the potential to provide a mix of affordable and open market housing. It is anticipated that this could amount to around 50 homes per year but as a new initiative will be closely monitored.

- 6.2.2 The distribution of housing throughout Suffolk Coastal District is described in a range of other policies for geographic parts of the District, in particular **SP20 Eastern Ipswich Plan Area, SP21 Felixstowe, SP22 Aldeburgh, SP23 Framlingham, SP24 Leiston, SP25 Saxmundham, SP26 Woodbridge, SP27 Key and Local Service Centres, and SP28 other villages**. Supporting text to these policies give figures for housing allocations in the various parts of the District. All these policies are considered within this assessment of policy SP2 Housing Numbers.
- 6.2.3 In the Eastern Ipswich Plan Area, around Martlesham, 2320 housing allocations are proposed, and 1760 housing allocations are proposed in the Felixstowe and Trimley peninsula. There are smaller allocations in small towns such as Woodbridge and Leiston, smaller allocations in Key Service Centres, and a number of existing planning permissions not yet built, 'urban potential', and some existing Local Plan allocations. Including all these, 7,590 new dwellings are planned for the period up to 2027.
- 6.2.4 These allocations are shown on the Key Diagram as shown in Appendix 5.
- Impact on the suite of European sites in the wider area***
- 6.2.5 It is estimated (Section 5 above) that there will be a general increase in visitors to the European sites within Suffolk Coast and Heaths AONB of around 2% – 5%, and a general increase in visitors to European sites in the South Sandlings study area of 6% - 12%, as a result of

implementation of existing permissions since 2010 and new housing allocations, in the Suffolk Coastal District Core Strategy and Development Management Policies in combination with allocations in the Ipswich Borough Core Strategy.

- 6.2.6 This increase may have varying impacts on the European sites in the study area.
- 6.2.7 The European sites in Essex are considered to be further away and less often visited from Suffolk Coastal District than the European sites in the Suffolk Coast and Heaths, and so the increase is ascertained to have no adverse effect on the European sites in Essex listed in Section 2.2 above.
- 6.2.8 Staverton Park and the Thicks SAC is not open to public access. There is a public footpath running through part and alongside the SAC, but there is little car parking availability nearby and the right-of-way is not well used. It is considered that a small increase in use of the public footpath will have no impact upon it, so it is ascertained that there will be no adverse effect upon the integrity of the Staverton Park and The Thicks SAC.
- 6.2.9 Dews Ponds SAC is not open to public access. There will be no increase in visitor pressure upon it, so it is ascertained that there will be no adverse effect upon the integrity of the Dews Ponds SAC.
- 6.2.10 The Broads SAC and Broadland SPA are considered to be at sufficient distance from proposed new development that the amount of housing in Suffolk Coastal would have little impact on these sites. The proximity of the sites to Norwich and Great Yarmouth, the existing high numbers of visitors¹⁶ and the great proportion of visitors from across the UK and beyond, indicate that the contribution of Suffolk Coastal to visitor pressure is relatively small. It is considered that there will be no adverse effect upon the integrity of the Broads SAC and Broadland SPA.
- 6.2.11 Benacre to Easton Bavents Lagoons SAC and Benacre to Easton Bavents SPA are the furthest European sites from Suffolk Coastal District in the Suffolk Coast and Heaths AONB. It is not thought that the lagoons are harmed by visitor pressure, as visitors tend to avoid entering the lagoons, which contain brackish water, and Natural England does not record it as a current reason for unfavourable condition. The use of the beach by users of a nearby holiday camp and other tourists is such that the relative impact of any residential visitors from Suffolk Coastal is thought to be insignificant. It is also relevant that the larger concentrations of housing allocations are in Martlesham and Felixstowe, which are at some distance from these European sites. It is considered that it can be ascertained that there will be no adverse effect upon the integrity of the Benacre to Easton Bavents Lagoons SAC and Benacre to Easton Bavents SPA.
- 6.2.12 However, there is a possibility that other European sites may be affected by a small increase in visitors. Some parts of European sites have good visitor management, such as Minsmere nature reserve and Walberswick National Nature Reserve, both within Minsmere – Walberswick SPA and SAC. However, several monitoring units of this site is unfavourable and declining condition (Section 5.2 and Appendix 3) due to shingle beach trampling with consequent damage to vegetation and disturbance to Little Tern breeding colonies over the whole shingle beach SAC feature. The vast majority of this trampling is believed to be caused by visitors to the European site.
- 6.2.13 The Sandlings SPA is wholly in favourable or unfavourable recovering condition according to Natural England (Section 5.2 and Appendix 3), although it is known that visitors, especially those with dogs, can disturb nightjar and woodlark on the heaths¹⁷. The condition assessments by Natural England are evidence that the Sandlings SPA is not currently harmed by recreational activities i.e. the existing activity is below a threshold where harm would be caused. However, Natural England has commented that it does not routinely monitor disturbance to birds on Sites

¹⁶ <http://www.broads-authority.gov.uk/managing/recreation.html>

¹⁷ for example, Liley D and Clarke RT (2003) The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation*, 114, 219 – 230, and Mallord JW, Dolman PM, Brown AF and Sutherland WJ (2006) Linking recreational disturbance to population size in a ground-nesting passerine. *Journal of Applied Ecology*, 44, 185 – 195.

of Special Scientific Interest, and recreational impacts may therefore not be included as a reason for unfavourability in condition assessments. However, anecdotal evidence from land managers in the survey (Section 5.7) suggests that the current visitor levels are causing harm, with dogs off leads having the greatest impact. The predicted increases in visitors are not an insignificant amount in this context. The threshold value at which visitor numbers switch from being having minimal impact to harmful is not known. It is possible that a simple threshold does not exist, but that disturbance may be proportional to visitor activity over a wide range of activity levels. An increase in disturbance could result in the loss of one or more breeding woodlark or nightjar, depending upon the distribution of these extra visitors through the component parts of the SPA.

- 6.2.14 It is consequently not possible to ascertain that there will be no adverse effect upon the integrity of the Sandlings SPA in the absence of mitigation.
- 6.2.15 There is visitor access to a varying degree across all estuarine / coastal European sites within the Suffolk Coast and Heaths AONB, particularly the Alde-Ore Estuary SPA, Alde-Ore and Butley SAC, Orfordness – Shingle Street SAC, Deben Estuary SPA, Minsmere - Walberswick Heaths and Marshes SAC, Minsmere – Walberswick SPA and Stour and Orwell Estuaries SPA. Visitors are known to disturb birds and trample saltmarsh¹⁸ through various mechanisms and at various times of year. However, none of these are currently recorded by Natural England as being unfavourable as a result of visitor activity.
- 6.2.16 The limited results of the Site Managers' survey indicated that several respondents believed that even a 1% increase in visitors would be harmful. This view is inconsistent with the organisations which employ the site managers, which continue to promote visits to their sites, for example through leaflets or web-based advertising¹⁹. Visitor management across European sites is partly driven by encouragement of visitors to visit designated places, such as the car park beside the Orwell Estuary at Nacton, to relieve pressure at other more remote undisturbed parts of European sites. This is a legitimate management style, but when the recreation at designated sites starts to cause damage to the European site in question, further management is required to reduce impacts.
- 6.2.17 An increase in visitors may exacerbate trampling damage to shingle vegetation on Minsmere – Walberswick (para 6.2.12 above) and decrease the likelihood of successful Little Tern breeding on the affected units or nearby. The increase in visitors may increase disturbance to birds which form part of the qualifying interest of any of the SPAs, such as overwintering waders and wildfowl on the estuaries. Well-managed (in terms of visitor management) parts of SPAs are likely to deal with visitors so that they are not disturbing. However, other parts of the SPAs and SACs do not manage visitors in the sense that numbers are not restricted, dogs are not controlled, or visitors are not offered alternatives to sensitive areas. An example of 'unmanaged' access would be public rights of way alongside estuaries, which remain open all year round to as many people as would like to use them.
- 6.2.18 At the present state of knowledge it is not possible to be certain that the increase of visitors would not result in an increase of disturbance or trampling damage to qualifying features on estuarine / coastal sites. It is consequently not possible to ascertain that there will be no adverse effect upon the integrity of the Alde-Ore Estuary SPA, Alde-Ore and Butley SAC, Orfordness – Shingle Street SAC, Deben Estuary SPA, Minsmere - Walberswick Heaths and Marshes SAC, Minsmere – Walberswick SPA and Stour and Orwell Estuaries SPA in the absence of mitigation.

Impact on specific nearby European sites alone or in combination

- 6.2.19 It is considered that major areas of new housing may impact upon nearby European sites, if the European sites are used by residents from the new housing to such a level that disturbance or

¹⁸ Ravenscroft, Parker, Vonk and Wright 2007 *Disturbance to waterbirds wintering in the Stour-Orwell Estuaries SPA* Commissioned by Suffolk Coast and Heaths Unit.

¹⁹ see, for example, <http://www.suffolkcoastandheaths.org/downloads.asp?PageId=2>

trampling damage is initiated. The major housing allocations which need to be considered are at Martlesham, Ipswich, and Felixstowe.

6.2.20 In a study of recreational disturbance of birds on the Stour and Orwell Estuaries by Ravenscroft, Parker, Vonk and Wright (2007)²⁰ the most visited parts of both estuaries were at Nacton, Pin Mill and Bridge Wood, part of Orwell Country Park, all of which had around ten or more visitors per hour. The level of visitors was correlated with a low number of birds, indicating that birds had been disturbed and therefore those parts of the estuary were effectively unavailable to the SPA qualifying birds. This result is readily applicable to other estuaries; where visitor numbers are high, bird numbers are low. However, following the report Natural England has assessed those units with high visitor numbers as in favourable condition. The study was not designed to quantify a threshold at which visitor numbers switch from being benign to damaging. However, Natural England has commented that it does not routinely monitor disturbance to birds on Sites of Special Scientific Interest, and recreational impacts may therefore not be included as a reason for unfavourability in condition assessments.

6.2.21 Sections 5.5 and 5.6 above explain that housing development is likely to result in people living in that new housing walking to any European site within 1km, and driving to any European site within 8km, for walking or other recreation where facilities such as open access or rights of way exist.

Impact of the strategic allocation east of Ipswich on Deben Estuary alone or in combination

6.2.22 The Deben Estuary near Martlesham is believed to have a low to moderate level of terrestrial recreational activity at present. There is no data to confirm this belief, but the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk. There is no nearby visitor parking, with the nearest public car parks being in Woodbridge to the north and Waldringfield to the south. The car park for Martlesham church is also available for casual parking. A boatyard in the creek may cause localised disturbance to birds. The Natural England condition assessments for mudflats supporting SPA qualifying species in this part of the Deben Estuary SSSI (units 6,8 and 9) are unfavourable declining (Appendix 3) but due to saltmarsh erosion rather than due to visitor disturbance or trampling. However, Natural England has commented that it does not routinely monitor disturbance to birds on Sites of Special Scientific Interest, and recreational impacts may therefore not be included as a reason for unfavourability in condition assessments.

6.2.23 The Deben Estuary SPA has up to 22,000 birds at any one time, with numbers usually peaking in the winter. This reflects the use of the estuaries by birds from further north, such as Scandinavia, which come south to the UK for the relatively warmer winter climate and extensive mudflats for feeding. Data obtained from the British Trust for Ornithology, based on monthly counts by volunteers, is available for the years 2002/03 to 2006/07, and is shown in the table below.

| Year | Peak Monthly Total | Autumn Peak | Winter Peak | Spring Peak |
|-------|--------------------|-------------|-------------|-------------|
| 02/03 | 15016 (JAN) | 7846 | 19511 | 4348 |
| 03/04 | 15051 (JAN) | 7687 | 20598 | 3142 |
| 04/05 | 21389 (JAN) | 11998 | 22342 | 4300 |
| 05/06 | 15905 (JAN) | 9857 | 21020 | 4282 |
| 06/07 | 13505 (JAN) | 8917 | 17654 | 3484 |
| MEAN | | 9081 | 20225 | 3911 |

²⁰ Ravenscroft, Parker, Vonk and Wright 2007 *Disturbance to waterbirds wintering in the Stour-Orwell Estuaries SPA* Commissioned by Suffolk Coast and Heaths Unit.

6.2.24 A more detailed breakdown of bird numbers by species for the whole SPA is given in Appendix 7. The bird counts are made by dividing the estuaries into 'count sectors', with counts made for each sector separately.

6.2.25 The count sector of the SPA adjacent to Martlesham Creek is called 'count sector 5'. Bird counts for this sector alone are given in the table below.

| Year | Peak Monthly Total | Autumn Peak | Winter Peak | Spring Peak |
|-------|--------------------|-------------|-------------|-------------|
| 02/03 | 1575 (DEC) | 931 | 2237 | 515 |
| 03/04 | 845 (NOV) | 685 | 1262 | 130 |
| 04/05 | 1145 (JAN) | 186 | 1653 | 305 |
| 05/06 | 759 (FEB) | 340 | 956 | 159 |
| 06/07 | 854 (MAR) | 944 | 1417 | 66 |
| MEAN | | 617 | 1505 | 235 |

6.2.26 A more detailed breakdown of bird numbers per month is given in Appendix 8.

6.2.27 An allocation of 2320 houses at Martlesham could potentially cause problems to the Deben Estuary, from increased visitor use causing significant disturbance to SPA birds; trampling of water-edge habitat in Martlesham Creek containing a rare snail might also occur, although this would be an impact upon the component SSSI rather than a SPA issue.

6.2.28 The key diagram shows the Ipswich Policy Area in an indicative location at Martlesham, but there no definitive area boundaries are proposed. The master-planning of new housing may also include a desire for new footpath links to the estuary. It is therefore possible that visitor recreation activity would substantially increase on the foreshore of Deben Estuary SPA, bringing in high levels of disturbance to what is currently little disturbed and a 'refuge' area for SPA-qualifying birds (see 6.2.29 below). It is not possible with the current state of knowledge to be able to quantify the new amounts of disturbance or the impact caused. These matters will relate to the location of housing, its distance from the SPA and ease of access to the SPA. It is noted that there is a small network of public footpaths to the SPA in the vicinity of Martlesham Church.

6.2.29 The location of high tide bird roosts has been kindly explained by Nick Mason, a local birdwatcher who co-ordinates bird counts on the Deben Estuary. When the tide rises, mudflats are covered and birds must leave the mudflats to roost on drier land until the tide falls. Some birds fly to the wet grassland of Kingston Marshes, between Martlesham Creek and Woodbridge. Other birds fly to roost in the wet grassland a short distance to the south of Martlesham Creek, east of Hill Farm. Some birds fly further south to the main Deben Estuary high tide roost on saltmarsh at Hemley. It is possible that on occasion that some birds might fly further inland, towards Martlesham village, but this is not thought to be common.

6.2.30 It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham, given the current level of detail available within the Core Strategy and Development Management Policies and before the application of mitigation.

6.2.31 Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance from this typology of visitors to what is currently little disturbed and a 'refuge' area for SPA-qualifying birds.

6.2.32 The combination of the allocations at Martlesham with other allocations in Suffolk Coastal and Ipswich will not change this conclusion.

6.2.33 There are car parks at Woodbridge, Martlesham church and Waldringfield within 8km of the indicative housing area, and it is possible that these will receive an increase of visitors for

recreation alongside the estuary. Recreation beside the estuary at Woodbridge is already great, so it is considered that there will be no extra impact on the SPA at that point from increased visitor numbers from new dwellings at Martlesham.

- 6.2.34 The Martlesham church car park is believed to be used at present as the starting point for an approximate 2.3km circular walk which includes the estuary wall and grazing marsh north of Hill Farm. No data on visitor numbers is known. The data in table 8 shows the number of visitors in the survey arising from households at a particular distance from access points to the study area. It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 – 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km). Table 8 shows that for the 2221 dwellings at that distance from access points within the study area, 45 visitors were noted during survey. This is equivalent to 2.0 visitors surveyed per 100 dwellings. For 2320 new dwellings, 2.0 visitors surveyed per 100 dwellings would have generated, proportionately, 46.4 additional visitors in the survey. This number of new visitors using the Martlesham church car park is not trivial. Without the further mitigation of provision of local greenspace convenient for routine use by residents of the strategic allocation at Martlesham, a new Country Park or similar high quality facility, and a visitor management programme it would not be possible to ascertain that there would be no adverse affect upon the integrity of the Deben Estuary at that point.
- 6.2.35 The car park at the Deben Estuary at Waldringfield is privately operated for users of the pub and sailing club, with some public pay and display parking. It is noted that the Waldringfield Parish Plan of 2004 commented that there was at that time no public car park and advocated the provision of a car park. Waldringfield Parish Council, in its website <http://Waldringfield.onesuffolk.net> says that parking is limited. This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield. The Parish's 2008 Tourism and Visitors Policy also mentions the lack of a public car park and a need to resolve the status of the 'old car park'; so subsequent provision of public car parking may have met this policy. It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2.5 – 3km from the Deben estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km). Table 8 shows that for the 2024 dwellings at that distance from access points within the study area, 29 visitors were noted during survey. This is equivalent to 1.4 visitors surveyed per 100 dwellings. For 2320 new dwellings, 1.4 visitors surveyed per 100 dwellings would have generated, proportionately, 33.4 additional visitors in the survey. This number of new visitors to Waldringfield is not trivial. Without the further mitigation of provision of local greenspace convenient for routine use by residents of the strategic allocation at Martlesham, a new Country Park or similar high quality facility, and a visitor management programme it would not be possible to ascertain that there would be no adverse affect upon the integrity of the Deben Estuary at that point. Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted. A comparison with the town of Woodbridge, further upstream on the Deben Estuary, shows that Woodbridge has a much larger resident and visitor population, greater parking facilities, well used estuary-side paths and yet the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance although the assessment process is limited as explained previously.
- 6.2.36 Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield.
- Impact of the strategic allocation at Felixstowe on Stour and Orwell Estuaries SPA and Deben SPA alone or in combination*
- 6.2.37 For the Felixstowe area, there is a proposed strategy of 1,760 additional dwellings to be allocated in a dispersed manner in the Core Strategy & Development Management Policies document. This growth is to be organic and evolutionary in the Felixstowe & Trimleys area over a mixture of sites immediately abutting existing built up areas, whilst preserving as far as possible prime agricultural land for essential food production.

- 6.2.38 The Orwell Estuary (part of the Stour and Orwell Estuaries SPA) has a relatively low level of visitor access as it approaches Felixstowe, compared to higher reaches nearer Ipswich (Ravenscroft et al 2007). Consequently, bird disturbance is low and the condition on the northern bank as assessed by Natural England in units 13 and 16 are unfavourable because of erosion. However, Natural England has commented that it does not routinely monitor disturbance to birds on Sites of Special Scientific Interest, and recreational impacts may therefore not be included as a reason for unfavourability in condition assessments. It is considered that current visitor levels are not harmful, not least because of the distance in reaching the north bank of the Orwell in the vicinity of the Trimleys from any public area or car park. It is also noted that Trimley Marshes nature reserve is well managed to successfully reduce any visitor impact to acceptable levels.
- 6.2.39 If housing allocations were to be within 1km of the estuary, for example around Thorpe Common, it would be within walking distance of the estuary. It is noted that there is a small network of public footpaths to the Orwell Estuary at that location. The master-planning of new housing may also include a desire for new footpath links to the estuary. It is therefore likely that without mitigation visitor recreation activity would substantially increase on the foreshore of Stour and Orwell Estuaries SPA, bringing in high levels of disturbance to what is currently little disturbed and a 'refuge' area for SPA-qualifying birds. It is not possible with the current state of knowledge to be able to quantify the new amounts of disturbance or the impact caused.
- 6.2.40 Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the local greenspace provision convenient for routine use is adequate, it is unlikely that visitor recreation activity would substantially increase on the foreshore of the Stour & Orwell Estuaries SPA, so there is expected to be no new high levels of disturbance to what may be currently little disturbed and a 'refuge' area for SPA-qualifying birds.
- 6.2.41 There is one existing car park on the Orwell Estuary within 8km of the indicative housing allocation area which could have an increased use and bring extra visitors to cause more disturbance to SPA-qualifying birds. This is at Nacton and it already results in high levels of visitor disturbance, but many of the visitors are perceived to come from Ipswich (Ravenscroft et al 2007). It is considered that in combination with allocations in Ipswich there may be greater visitor pressure on the Stour-Orwell Estuaries SPA at Nacton causing greater disturbance to birds.
- 6.2.42 It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision.
- 6.2.43 The Deben Estuary SPA is further than 1km away from the indicative housing area at Felixstowe so it is unlikely that there will be an additional visitor recreation resulting from people walking from the housing allocations to the Deben. There are car parks at Felixstowe Ferry and Waldringfield, within 8km of the indicative housing area, and it is possible that these will receive an increase of visitors for recreation alongside the estuary. Recreation at Felixstowe Ferry is primarily based around the harbour, and the North Sea beach, so it is considered that there will be little extra impact on the SPA from increased visitor numbers. The Deben Estuary visitor survey has identified that some of the visitors to that survey area do come from Felixstowe and nearby areas. It is considered that the nearest point of the strategic allocation at Felixstowe / The Trimleys would be, say, 7 – 7.5km from the Deben estuary at Waldringfield. Table 8 shows that for the 2826 dwellings at that distance from access points within the study area, 11 visitors were noted during survey. This is equivalent to 0.4 visitors surveyed per 100 dwellings. For 1440 new dwellings, 0.4 visitors surveyed per 100 dwellings would have generated, proportionately, 5.6 additional visitors in the survey. This number of new visitors to Waldringfield is low but not trivial. Without the further mitigation of provision of local greenspace convenient for routine use by residents of the strategic allocation at Felixstowe / The Trimleys, a new Country Park or similar high quality facility, and a visitor management programme it would not be possible to ascertain that there would be no adverse affect upon the integrity of the Deben Estuary at that point.

Summary of initial conclusions

- 6.2.44 The Suffolk Coastal Core Strategy and Development Management Policies is predicted to result in an increase in visitors to the Alde-Ore Estuary SPA, Alde-Ore and Butley SAC, Orfordness – Shingle Street SAC, Deben Estuary SPA, Minsmere - Walberswick Heaths and Marshes SAC, Minsmere – Walberswick SPA, Sandlings SPA, and Stour and Orwell Estuaries SPA. The increase could be in the range 2 – 5% or 6 – 12% (Section 5.8) and it is not possible to ascertain that there will be no affect upon the integrity of those European sites, in the absence of mitigation. This conclusion is for the Suffolk Coastal Core Strategy and Development Management Policies alone, as well as in combination with the Ipswich Core Strategy and Policies. Each individual development site will require the process of the Conservation of Habitats and Species Regulations 2010 to be followed, including Appropriate Assessments in many cases, at the planning application stage. Section 7 describes strategic mitigation for the impacts.
- 6.2.45 Provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary and Orwell Estuary respectively, together with improvements in accessibility to greenspace provision, it is unlikely that visitor recreation activity would substantially increase on the foreshore of those estuaries. It is therefore concluded that there would be no adverse affect upon the integrity of the respective European sites.
- 6.2.46 The Suffolk Coastal Core Strategy and Development Management Policies is predicted to result in little difference, at an insignificant level, in visitor pressure upon Hamford Water SPA, Hamford Water Ramsar site, Colne Estuary (Mid Essex Coast phase 2) SPA, Colne Estuary (Mid Essex Coast phase 2) Ramsar site, Essex Estuaries SAC, Staverton Park and the Thicks SAC, Dews Ponds SAC, The Broads SAC, Broadland SPA, Benacre to Easton Bavents Lagoons SAC and Benacre to Easton Bavents SPA. It is ascertained that there will be no affect upon the integrity of those European sites either alone or in combination with the Ipswich Core Strategy and Policies.

Comparison with RSS conclusions

- 6.2.47 This conclusion differs from the initial ‘Habitats Regulations Assessment’ for the Regional Spatial Strategy²¹. That assessment concluded that there was likely to be no significant effect of the housing allocation for Ipswich Borough / Suffolk Coastal District because:
- the [RSS] policies will not result in any development;
 - the policies make provision for development, but the exact location is to be selected following the consideration of options in lower tier plans (ie by local development plans, programmes and strategies);
 - the policy concentrates the development in urban areas away from Natura 2000 and Ramsar sites;
 - the policies specifically state that development should avoid any adverse effects on the integrity of Natura 2000 or Ramsar sites; and
 - Policy ENV3 states that local planning authorities should ‘ensure that.....development does not have adverse effects on the integrity of sites of European or international importance’
 - Generic provisions have been made within the policies in the RSS (eg ENV3) supported by more specific provisions to ensure that the integrity of Natura 2000 and Ramsar sites are not adversely affected by development.
 - The initial RSS assessment did not specifically consider the increased amount of visitors to European sites from an increased population, regardless of the exact location of the housing allocations.

²¹ Fulton (2006) East of England Regional Spatial Strategy: Habitats Regulations Assessment. ERM, for Government Office for the East of England.

- 6.2.48 A second Appropriate Assessment of the Regional Spatial Strategy²² assessed housing policies very briefly and, without analysis, concluded that there would be no affect upon the integrity of European sites. An example paragraph, assessing the impact of recreation on the Deben Estuary SPA, simply states *Policy HG1 aims to regenerate the sub-region and provide for major housing growth at the Key Centres of Colchester and Ipswich, providing for 20,000 net additional dwellings in the Ipswich Policy Area. This will lead to increased recreational access to the surrounding area, including to the coast and coastal waters. It is not considered that there is potential for the increased level of recreational access to have an effect on the populations of the wintering Avocet and Dark-bellied Brent Goose that are the European site and Ramsar site international interest. The increase in recreational access is not predicted to be at an intensity or coincide with the locations where adverse effects will occur. We concluded that policy HG1 (and SS3 and H1) would have no adverse effect on the integrity of the Deben Estuary SPA and Ramsar Site bird interest.*
- 6.2.49 It is considered that the Appropriate Assessment of the Regional Spatial Strategy did not assess the effects of its housing provision to the level of detail necessary at this stage, which is why the conclusions differ. Furthermore, the Government has announced its intention to abolish the Regional Spatial Strategies.

6.3 Policy SP5. Employment land.

Policy overview

- 6.3.1 The policy makes provision for 8.5ha of employment land, particularly at the strategic sites at Felixstowe Port, Martlesham Heath business campus, including Adastral Park and Ransomes Europark. Other employment land will be identified at other, smaller sites, at the Site Specific Local Development Document.
- 6.3.2 Policy SP5 states:

Strategic Policy SP5 – Employment Land

The Core Strategy will make provision for at least 8.5 hectares of new employment land within the district in support of business and to help facilitate the provision of new jobs. This represents its contribution towards the creation of in the region of 30,000 new jobs identified previously in the RSS within the Suffolk part of the Haven Gateway.

Three areas are identified as Strategic Employment Areas. The first two have a regional significance and are identified as key economic drivers for the Haven Gateway. The third is of strategic significance due to its overall size and mix of uses and the number of jobs it supports. The Council will support the retention, expansion and consolidation of these areas subject to conformity with the remainder of the strategy:

- **Felixstowe Port;**
- **Martlesham Heath Business Campus, including Adastral Park; and**
- **Ransomes Europark as part of a wider employment corridor extending into Ipswich Borough.**

With regard to Felixstowe Port, in addition to the Felixstowe South reconfiguration works that are currently underway, this includes provision of additional sites for necessary supporting port-related uses.

In respect of Martlesham Heath, the opportunity is available to create a high-tech business cluster, building on BT's research and development headquarters at Adastral Park. Specific encouragement will be given to the location of other

²² RPS (2007) Government Office for the East of England Draft Revision to Regional Spatial Strategy for the East of England: Secretary of State's Proposed Changes and Further Proposed Changes Report of the Habitats Directive Assessment (under the Habitats Regulations)

high tech information, communication and technology sector businesses in this area that would benefit from co-existence over other more general uses.

Elsewhere across the district there are a number of employment areas that are significant at the district level. These are identified as General Employment Areas and will be identified in the Site Allocations and Area Specific Policies Development Plan Document and will be shown on the Proposals Map. The appropriate uses in General Employment Areas will normally be B1, B2 and B8 uses unless specified in specific policies. Other ancillary uses such as take away food, nurseries/crèche, and leisure may be appropriate if the primary purpose is to provide a service to local workers and not a wider area.

The strategy of creating new employment land will be complemented by one of protecting existing employment sites.

Impact upon European sites

- 6.3.3 The strategic provision at Felixstowe port does not allocate any particular land but says that the provision will occur on unidentified 'vacant' land. This land might include brownfield land within the port, or arable land in the vicinity of the port. It is unlikely that the Stour and Orwell Estuaries SPA would be treated as 'vacant land', although there is potential for development to take place on brownfield land close to the SPA.
- 6.3.4 The provisions of policy SP14 Biodiversity and Geodiversity specifically prevent the SPA from being harmed by developments, so the aggregate effect of the policies prevents employment land at Felixstowe Port from causing harm to the adjacent SPA, during construction or from land-take. Any development proposal which might arise will be subject to its own Appropriate Assessment.
- 6.3.5 Adastral Park, and the Martlesham Heath business campus, are over 2km from the Deben Estuary SPA. Direct effects from construction or operation of the employment facilities are very unlikely to have an impact upon the SPA. Indirect effects are expected to be absent; there is no known effect of the existing business park upon the estuary and, for example, no extra visits to the estuary are expected as a result of the employment facilities.
- 6.3.6 Ransomes Europark is sufficiently far from the Stour and Orwell Estuaries SPA that direct effects from construction or operation of the employment facilities are very unlikely to have an impact upon the SPA. Indirect effects are expected to be absent; there is no known effect of the existing business park upon the estuary and, for example, no extra visits to the estuary are expected as a result of the employment facilities

Conclusion

- 6.3.7 It is ascertained that policy SP5 will have no adverse affect upon the integrity of any European sites.

6.4 Policy SP8. Tourism

Policy overview

- 6.4.1 Policy SP8 describes all areas of the District and their capacity to absorb new tourism development and additional visitors. The policy gives a hierarchical approach to development, targeting it to larger towns and away from the Heritage Coast and AONB.
- 6.4.2 Policy SP8 is

Strategic Policy SP8 – Tourism

Tourism is an important element of the district economy. Suffolk Coastal possesses a high quality built and natural environment, rich in history and culture, within easy reach of large numbers of people from within and outside of the area. In order to manage tourism in a way which protects the features which

make the district attractive to visitors, proposals for tourism-related development will be determined by the areas capacity to absorb new development and additional activity.

The areas are:

- **The resort of Felixstowe, located on the coast and adjacent to the AONB, which is a priority for new tourist activity;**
- **The market towns of Framlingham, Leiston and Saxmundham. These are considered to have the capacity to absorb some modest development thereby taking pressure off the more sensitive areas;**
- **Aldeburgh and Woodbridge. Two small towns in sensitive locations within and adjacent to the AONB respectively. The protection of their settings will be of prime importance;**
- **The Heritage Coast. The environment is of national significance and the only development to be permitted will be individual conversions to tourist accommodation to a high standard of design;**
- **The Suffolk Coast and Heaths AONB. Development will be restricted to conversions and improvements/minor extensions to existing facilities within sustainable surroundings where a landscape assessment shows these could be accommodated with no adverse impact;**
- **The remaining area east of the A12. In addition to new facilities through conversions or extensions to existing facilities, modest new developments in sustainable locations; and**
- **The area west of the A12. This area has the potential to absorb additional tourist pressure and subject to the implications for the environment, including the generation of traffic, the Council will support and promote tourism west of the A12.**

Applicants will be expected to undertake biodiversity and habitat assessments and to ensure that any development of tourism related facilities does not result in noise and/or air pollution and that it conforms to other environmental protection policies. 'Green' tourism and the use of public transport will be encouraged. Where necessary the Council will support the introduction of local management solutions to the problems created by tourism/visitors.

Impact on European sites

- 6.4.3 All the European sites within Suffolk Coastal District are within the existing Suffolk Coast and Heaths AONB, where development is strictly limited, so there will be no direct impact of development and little change in visitor pressure.
- 6.4.4 However, there is potential for indirect effects of tourism, such as an increase of visitors to the European sites causing harm such as trampling of shingle vegetation or disturbance to birds.
- 6.4.5 In 2006, there were 420,700 staying trips to the Suffolk Coast and Heaths AONB (i.e. tourists who stayed overnight) with a total of 1,570,000 staying nights²³. There is no compulsory registration of tourism accommodation, but it is estimated that there are 511 establishments providing 11,289 bed spaces of tourism accommodation in Suffolk²⁴. The proportion of these in Suffolk Coastal is unknown but it might be expected to have more than the average for Suffolk; perhaps 150 establishments and 125,000 staying trips.
- 6.4.6 Much of any new tourism-related accommodation development is expected to cater for summer visitors. In winter, where wintering birds are SPA qualifying features, tourism is reduced and existing capacity would be sufficient. Many tourists who wish to 'experience nature' are

²³ East of England tourist board (undated) Economic Impact of Tourism. East of England Protected Landscapes and The Brecks.

²⁴ East of England Tourism (undated) Serviced accommodation stock in the East of England 2008.

expected to travel to 'visitor destinations' within European sites, such as the RSPB Minsmere nature reserve, where visitors are well managed to avoid any harm to designated features. Smaller sites, such as Blaxhall Heath (part of Sandlings SPA) for example, are less likely to be used by tourists.

- 6.4.7 The priority for tourism development is given in the Core Strategy as Felixstowe, where people enjoy traditional beach holidays, with entertainments provided within the town. The second location in the policy where more than modest development might take place is west of the A14. Tourism development here would require a car journey to a European site, reinforcing the view that tourists are likely to go to a site with a car park and facilities already in place. The 'protection of the settings' of Aldeburgh and Woodbridge indicates that large developments in those towns would not be permitted under this policy.

Conclusions

- 6.4.8 The lack of a minimum target for development, lack of allocations, and the locations suggested for development, indicate that tourism development can be ascertained to have no adverse affect upon the integrity of any European sites.

6.5 Policy SP13. Nuclear Energy.

Policy overview

- 6.5.1 Policy SP13 considers the local issues which would have to be addressed as part of proposals for a new nuclear power station at Sizewell, including nature conservation.
- 6.5.2 The policy does not propose, promote or allocate a new nuclear power station. Any new power station would require an application under the Electricity Act to the Secretary of State at the Department of Energy and Climate Change.
- 6.5.3 The policy therefore does not influence whether or not a nuclear power station is built.

Conclusion

- 6.5.4 It is ascertained that policy SP13 will have no adverse affect upon the integrity of any European sites.

6.6 Policy SP17. Green space.

Policy overview

- 6.6.1 The policy advocates provision of well-managed access to green space, including countryside and coast. The Haven Gateway Green Infrastructure Strategy²⁵ will form the basis of the implementation. However, the Haven Gateway Green Infrastructure Strategy itself was not subject to an Appropriate Assessment. A Green Infrastructure Strategy was published in May 2011²⁶, also not subject to an Appropriate Assessment.
- 6.6.2 Policy SP17 is

The Council will seek to ensure that communities have well-managed access to green space within settlements and in the countryside and coastal areas, in order to benefit health, community cohesion and greater understanding of the environment, without detriment to wildlife and landscape character. Where adequate green space is not provided as part of a development, developer contributions will be sought to fund the creation of appropriate green space and/or management and improvement of access to green space. In particular, the Council will work on green infrastructure opportunities with partners in strategic housing growth areas in order to suitably complement development proposals.

²⁵ The Landscape Partnership (2008) A Green Infrastructure Strategy for the Haven Gateway.

²⁶ The Landscape Partnership (2011) Green Infrastructure Strategy for Suffolk Coastal District Council

Impact on European sites

6.6.3 Provision of additional greenspace through developer contributions has a beneficial effect upon European sites, by providing alternative areas for recreation so that visitor pressure on European sites for 'local' use is reduced. The greenspace standards, in the Haven Gateway Green Infrastructure Strategy and repeated in the text for policy SP17, do not necessarily meet the needs for residents as set out in Section 5.4 regarding lengths of walks through greenspace rather than a simple site area, but they do recognise the need for local recreation and larger sites within driving distance for activities such as dog walking. Policy SP17 provides mitigation to a large degree for the impacts of additional housing.

6.6.4 The policy does not allocate land in or adjacent to European sites for an increase in access to greenspace. Any such project which might arise will be subject to its own Appropriate Assessment, either as part of a planning application or within the Site of Special Scientific Interest / European site consenting procedure operate by Natural England. The policy itself will therefore not cause harm to any European site.

Conclusion

6.6.5 It is ascertained that policy SP17 will have no adverse affect upon the integrity of any European sites.

7 Mitigation

7.1 Introduction to mitigation

- 7.1.1 The aim of mitigation is to reduce impacts until they no longer have an adverse effect upon the integrity of European sites. The preferred solution is to avoid proposing elements of the plan which would have an adverse effect, followed by a solution to permit the impacts but carry out measures which will reduce the impacts to an acceptable level.
- 7.1.2 The assessment in Section 6 above showed that there was no adverse effect upon the integrity of any European sites for some policies and therefore no mitigation is necessary. These policies are
- SP5 Employment land.
 - SP8 Tourism.
 - SP13 Nuclear energy.
 - SP17 Green Space.
- 7.1.3 There was one policy which was identified in Section 6 above for which it could not be ascertained that there would be no adverse effect upon the integrity of Alde-Ore Estuary SPA, Alde-Ore and Butley SAC, Orfordness – Shingle Street SAC, Deben Estuary SPA, Minsmere - Walberswick Heaths and Marshes SAC, Minsmere – Walberswick SPA, Sandlings SPA, and Stour and Orwell Estuaries SPA. This was Policy SP2 'Housing numbers', together with SP20 Area East of Ipswich, SP21 Felixstowe, SP22 Aldeburgh, SP24 Leiston, SP26 Woodbridge, and SP27 Allocations in the key service centres. The impact was due to a predicted increase of visitors to all those European sites. The impact included an affect in combination with development in Ipswich Borough. All these policies are included with policy SP2 discussions below.
- 7.1.4 Mitigation for policy SP2 is given in Section 7.2 below.

7.2 Mitigation for Policy SP2. Housing numbers.

- 7.2.1 The November 2010 Reviewed Core Strategy, Policy SP2, contains proposals for 7,590 new dwellings, comprising 1,560 dwellings with planning permission and allocations deemed deliverable but not constructed at April 2010, 230 new dwellings on identified brownfield potential sites within existing physical limits boundaries, an estimated windfall of 540 dwellings, and 5,260 new allocations on greenfield land. This gives an annual requirement of 446 new dwellings per year between 2010 and 2027.
- 7.2.2 The total amount of the housing proposed within Suffolk Coastal District is given in the November 2010 Reviewed Core Strategy, in its table 3.3, as 2,320 dwellings in the Eastern Ipswich plan area, 1,760 new dwellings in Felixstowe Walton and the Trimleys, and 3,510 in the remainder of Suffolk Coastal District.
- 7.2.3 The principle of mitigation remains as that described in the 2009 Appropriate Assessment, which is to reduce demand for visits to the European sites at risk of impact, and to manage existing sites with a specific high risk to re-distribute visitors from sensitive areas.
- 7.2.4 Detailed aims of such mitigation are
- To prevent a damaging increase in visitor number to all European sites across the Suffolk Coast and Heaths AONB
 - To prevent a damaging increase in visitor numbers to specific parts of European sites likely to be particularly affected, especially in relation to proposed housing allocations at Martlesham and Felixstowe.
- 7.2.5 Detailed objectives are
- To provide new locations for countryside recreation, especially dog walking, for residents of existing and proposed housing, as a preferred alternative to visiting European sites

- To improve visitor infrastructure and management, including wardening, on existing sites to reduce the impact of increased visitors
- To quantify reductions in visitor harm achieved by mitigation projects

Mitigation for strategic allocations east of Ipswich and at Felixstowe

7.2.6 Provided that strategic housing proposals for development to the east of Ipswich at Martlesham are greater than 1km from the Deben estuary (thus reducing the likelihood of many walkers), and improvements to locally accessible natural greenspace are made (thus providing alternative recreation), visitor recreation would be lesser than if those measures had not been taken. However, there may still be some increase in visitor activity on the foreshore of the Deben Estuary SPA. Further mitigation to reduce harm, as described in paragraphs 7.2.7 – 7.2.15 below remains to be required. A planning application Appropriate Assessment would be needed to look at site- and plan-specific issues. Natural England advised in its email of 15th February 2011 to Suffolk Coastal District that it believes *'that any adverse effects on N2K sites could be mitigated by the use of planning conditions/obligations/legal agreements (S106) to allow us to conclude no adverse effect on integrity. Suitable strategies are detailed in our letter to SCDC of 12 February 2010 which could be employed following AA at project level.'*

7.2.7 Provided that strategic housing proposals for development at Felixstowe Peninsula are greater than 1km from the Orwell estuary, and improvements to locally accessible natural greenspace are made, it is possible that visitor recreation activity would not substantially increase on the foreshore of the Stour & Orwell estuaries. Therefore it is expected that there are to be no new high levels of disturbance to what is currently little disturbed and a 'refuge' area for SPA-qualifying birds. However, a planning application Appropriate Assessment could be needed to look at site- and plan-specific issues.

7.2.8 The developments should deliver sufficient greenspace to accommodate the increased requirement for local recreation opportunities, so that there are no impacts upon the respective SPAs. The provision of adequate public open space within strategic developments, to provide alternative recreational opportunities for routine use, will include areas which are suitable and attractive for walking dogs off leads. The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites.

Natural England's national visitor study (see Section 5.8) showed that 37 per cent of all visits were to green spaces within towns and cities, with parks in towns and cities being the most visited location. This shows the value of urban greenspace to many people. Two-thirds of visits (66 per cent) were taken within two miles (3.2km) of the respondents' home highlighting the importance of accessible green space that is close to home. Greenspace provision close or within residential development, with characteristics of urban parks and of countryside, is therefore likely to be very well used and a good method of reducing pressure on European sites. Studies in Dorset (Section 5.8) have shown that the more choice of greenspace was available to people, the less demand there was for visits to heathland, suggesting that this mitigation would be effective.

Mitigation for all proposed housing in Ipswich Borough and Suffolk Coastal District

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

7.2.10 A new Country Park or similar high-quality provision is proposed for a location to the north or north-east of Ipswich as mitigation for future housing development. This would provide an alternative to European sites and therefore attract existing and proposed residents who might otherwise visit a European site. A new Country Park has been under discussion for some time,

and was suggested by the Haven Gateway Green Infrastructure Project²⁷ independently of this Appropriate Assessment, in order to provide strategic green space for the population of greater Ipswich, particularly the northern part of the Borough. A suitable location would be accessible from major routes out of Ipswich, Woodbridge, and Felixstowe and therefore providing a facility for people from those towns. The Ipswich Borough Core strategy contains provision for a Country Park, which would supply this need.

- 7.2.11 The new Country Park or similar high-quality provision should be free to enter, contain areas for dog walking, children's play, and possibly more formal recreation such as orienteering, events such as Country Fairs, and a ranger service. A mixture of habitats including grassland, woodland and open water would make it more attractive and would also provide opportunities for delivery of BAP targets.
- 7.2.12 Information within the South Suffolk Visitor Survey suggest that a car park (preferably free) is essential, and that visitors would be likely to appreciate a café, toilets, a shop, a staffed information point, wildlife viewing areas, bins and benches, marked routes, children's facilities, and shelter for bad weather days. Substantial areas where dogs may be let off leads would be important to attract dog-walkers away from the heathland sites. This new Country Park must be attractive to dog walkers and include adequate provision for car parking, visitor facilities, dog bins, dogs off leads areas etc.
- 7.2.13 The three existing Suffolk County Council country parks currently attract a considerable number of people; in 2009/10 Brandon Country Park (13ha with access to over 1000ha of forest) attracted 175,000 visitors, Clare Country Park (13ha) attracted 180,000 people, and Knettishall Heath (158ha) attracted 75,000 people²⁸. This demonstrates that Country Parks successfully attract recreational users, many of whom would otherwise have used other sites for recreation. It is therefore reasonable to assert that a new Country Park would also attract a large number of visitors.
- 7.2.14 As the new Country Park or similar alternative provision is necessary for the 'in-combination' impact of development within Ipswich Borough and Suffolk Coastal, it is appropriate that the arrangements for its implementation are shared equally by Ipswich Borough Council and Suffolk Coastal District Council, and could at least in part be funded by a tariff on new housing.
- 7.2.15 It is expected that the new Country Park or similar high quality provision will form a substantial part of the mitigation requirements for development within both Ipswich Borough and Suffolk Coastal District. However, evidence from Site Manager's surveys (Section 5.5), the Stour and Orwell Estuaries SPA disturbance report²⁹ discussed in 6.2 above, and studies of heathland in Dorset (see 6.2 above) indicate that there may still be some residual disturbance of birds, probably caused by local people engaging in low-key recreational activities on European sites near their homes, such as dog-walking. These people would not necessarily always be attracted to Country Parks. This residual disturbance would be an impact referable in particular to the aggregation of smaller provisions across Suffolk Coastal District.
- 7.2.16 Visitor management on European sites within the Suffolk Coast and Heaths AONB requires the provision of wardening and visitor management measures, guided by a visitor management plan, to manage and monitor recreational access and birds on designated sites. The designated sites include the Deben Estuary SPA/Ramsar and Sandlings SPA. These measures would be co-ordinated across the Coast & Heaths Area, and are likely to require a capital works programme, and on-site wardening. The programme, as identified in the 2009 Appropriate Assessment, will include
- identifying key sites where visitor pressure is currently, or close to, causing harm
 - identifying the origin of visitors to those identified key sites

²⁷ available at <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/evidence/studies/default.htm>

²⁸ Suffolk County Council (January 2011) The future of country parks and recreation sites in Suffolk. Brandon Country Park. Clare Country Park. Knettishall Heath Country Park.

²⁹ Ravenscroft, Parker, Vonk and Wright 2007 *Disturbance to waterbirds wintering in the Stour-Orwell Estuaries SPA* Commissioned by Suffolk Coast and Heaths Unit

- writing and implementing a visitor management plan for key sites without such a plan, or revising existing plans, to reduce visitor impact. Reduction in visitor impact might mean changes to visitor infrastructure (e.g. car parks, paths), new or revised interpretation, wardening, provision of alternative recreation opportunities in less sensitive locations, etc, bylaws, identification of parts of sites where recreation will not be encouraged, etc.
- A monitoring programme, to determine visitor numbers and allow the impact of the visitor numbers to be identified, throughout time. The impact of visitor numbers may be difficult to determine and would rely on specialist studies as well as Natural England's programme of SSSI Condition assessment.

7.2.17 The implementation body for this exercise is to be decided. The Suffolk Coast and Heaths Unit would be in a good position to carry this out, as they have an AONB-wide role, but others such as Suffolk County Council (e.g. Rights of Way Improvement Plan, Open Access), Natural England, Suffolk Coastal District Council, and the Sandlings Project would have an important role. However, it is expected that funding should be directly related to housing provision, and at least in part funded for example by a tariff on new housing.

Mitigation for housing allocation by Ipswich Borough Council

7.2.18 It is considered that the increased population of Ipswich, from housing allocations, would increase the visitor pressure on the Stour and Orwell Estuaries SPA, in particular with the number of visitors to Orwell Country Park adjacent to the SPA. The Appropriate Assessment for Ipswich Borough Council's Core Strategy includes mitigation proposals, including better visitor management, to reduce this impact; this mitigation requirement remains unchanged.

7.2.19 The implementation body for this exercise is to be decided. The Suffolk Coast and Heaths Unit would be in a good position to carry this out, as they have an AONB-wide role, but others such as Suffolk County Council (e.g. Rights of Way Improvement Plan, Open Access), Natural England, Suffolk Coastal District Council, and the Sandlings Project would have an important role. However, it is expected that funding should be directly related to housing provision, and at least in part funded for example by a tariff on new housing.

7.2.20 The mitigation proposals are consistent with the Haven Gateway Green Infrastructure Strategy³⁰.

7.2.21 A summary of mitigation is provided in Table 10 below.

³⁰ The Landscape Partnership (2008) Haven Gateway Green Infrastructure Strategy.

Table 10. Summary of mitigation

| Impact | Mitigation | Strategic allocation east of Ipswich | Strategic allocation at Felixstowe | all proposed housing in Suffolk Coastal and Ipswich |
|---|--|--------------------------------------|------------------------------------|---|
| New large-scale usage of European sites as convenient local greenspace for routine use, causing harm to features of European interest. | 1km separation of strategic allocations from European sites thus preventing regular walks from home to the sites Improvements to convenient local greenspace for routine use thus reducing the demand for visits to European sites. | ✓ | ✓ | |
| New large-scale increase in car-borne trips for recreation on European sites causing harm to features of European interest; primarily for sites with car parking within 8km. | Improvements to convenient local greenspace for routine use thus reducing the demand for visits to European sites. | ✓ | ✓ | |
| | The provision of a new Country Park (or similar high quality provision) to provide an alternative attraction for recreational activity for residents of existing and proposed new dwellings. This new Country Park will be attractive to dog walkers and others and include adequate provision for car parking, visitor facilities, dog bins, dogs off leads areas etc | ✓ | ✓ | ✓ |
| Harm to features on European sites (such as trampling, disturbance to birds etc) from a residual increase of visitors to the proportion of European sites sensitive to a small increase in visitor numbers. | The provision of wardening and visitor management measures, guided by a visitor management plan, to manage and monitor recreational access and birds on designated sites. The designated sites include the Deben Estuary SPA/Ramsar and Sandlings SPA. These measures would be co-ordinated across the Coast & Heaths Area, and are likely to require a capital works programme, and on-site wardening | ✓ | ✓ | ✓ |

7.3 Implementation of the proposed mitigation

Suffolk Coastal District

7.3.1

Strategic Policy SP17 – Green Space says that ‘The Council will seek to ensure that communities have well-managed access to green space within settlements and in the countryside and coastal areas, in order to benefit health, community cohesion and greater understanding of the environment, without detriment to wildlife and landscape character. Where adequate green

space is not provided as part of a development, developer contributions will be sought to fund the creation of appropriate green space and/or management and improvement of access to green space. In particular, the Council will work on green infrastructure opportunities with partners in strategic housing growth areas in order to suitably complement development proposals.' Policy SP20 of the Core Strategy, referring to the Martlesham Area Action Plan, states that the strategy 'maximises opportunities to achieve access to green space, including the countryside', thus demonstrating that the provision of convenient local greenspace for routine use will be achieved at Martlesham.

- 7.3.2 Green infrastructure provision at Martlesham and Felixstowe, and working with Ipswich Borough, is clearly set out in the Implementation and Monitoring chapter of the Core Strategy. Visitor management and monitoring on European sites is also described. The District Council is currently investigating the use of Community Infrastructure Levy to pay for the necessary measures.
- 7.3.3 Natural England previously had concerns regarding this policy's effectiveness on mitigation³¹. Following a change to this policy for the November 2010 Reviewed Core Strategy and Development Management Policies document, Natural England was able to withdraw that concern.
- 7.3.4 It is clear that Suffolk Coastal District is committed to providing the necessary mitigation for the impacts caused by its housing allocations.

Ipswich Borough

- 7.3.5 Policy CS 16 of the Ipswich Borough Core Strategy and Policies contains a strong commitment for the Council to adjust its management of Orwell Country Park, giving good confidence that it would be carried out. The policy also includes support to the Greenways Project in its management of green infrastructure, which includes the Gipping path. The mitigation proposed in the September 2009 Appropriate Assessment is therefore contained within this policy.
- 7.3.6 Policy CS16 of the Core Strategy and Policies commits Ipswich Borough Council to the implementation of a Country Park as required for mitigation as described in the September 2009 Appropriate Assessment. Policy CS16 also contains a commitment for the Council to work with partners on the implementation of visitor management plans for European sites, giving good confidence that it would be carried out. The mitigation proposed in the September 2009 Appropriate Assessment is therefore contained within this policy.
- 7.3.7 A focussed change to Policy CS10 (October 2010) has strengthened the reference to providing a Country Park at the Ipswich northern fringe, thus further strengthening the confidence that this feature will be created as a measure to divert a proportion of recreational activity away from European sites. It is clear that Ipswich Borough is committed to providing the necessary mitigation. Suffolk Coastal District is working with Ipswich Borough regarding this provision.

7.4 Mitigation conclusions

- 7.4.1 It is considered that, if the mitigation in section 7.2 is implemented to suitable standards, the impacts of additional housing provisions in Policy SP2 and related policies, alone or in combination with provision in the Ipswich Borough Core Strategy and Policies, will be reduced to an insignificant level. It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site.

³¹ Letter of 10th February 2010 to Suffolk Coastal District Council

8 Conclusions of the Appropriate Assessment

8.1 Policy SP2 and related policies

- 8.1.1 It is not possible to ascertain that Policy SP2 has no adverse affect upon the integrity of a number of European sites (without mitigation), because of increased visitor pressure on those sites.
- 8.1.2 However, it is considered that, if the mitigation in Section 7.2 is implemented, the impacts of additional housing provisions in Policy SP2 and related housing policies, alone or in combination with provision in the Ipswich Borough Core Strategy and Policies, will be reduced to an insignificant level. It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site.

8.2 Individually assessed policies

- 8.2.1 The assessment in Section 6 above showed that there was no adverse affect upon the integrity of any European sites for the policies
- SP5 Employment land.
 - SP8 Tourism.
 - SP13 Nuclear energy.
 - SP17 Green Space.

8.3 All other policies

- 8.3.1 All other policies in the Reviewed Suffolk Coastal Core Strategy and Development Management Policies document are not likely to have a significant effect on any European site.

8.4 Interactions between policies in this plan

- 8.4.1 Policies have initially been assessed individually. It is possible that policies may interact, and a combination of policies may have a greater effect than separately. Interactions between policies have been fully considered and no further assessment or changes to conclusions are required.

8.5 In combination with plans from others

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

8.6 Final conclusion

- 8.6.1 It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies. Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site.

9 Limitations to the assessment

9.1 The evidence base

- 9.1.1 The evidence base for the amount of visitors to European sites is poor for a number of Europe sites, as data is very sparse. Available data from the Tourist Board in 2004 was used but it was a snapshot survey during one summer and did not cover all European sites or take account of seasonal differences. In a meeting with Natural England on 7th December 2009, it was agreed that the Appropriate Assessment was written using the best evidence available at that time. Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected.
- 9.1.2 The level of evidence within the 2009 Appropriate Assessment met or was above the minimum needed to support the assessments at that time, so the conclusions were still adjudged to be sound.
- 9.1.3 However, subsequent visitor data for the South Sandlings study area was of excellent quality and was well analysed by Footprint Ecology (Section 5.5). The findings of the study are strong and provide good evidence regarding the predicted increase in visitors to European sites in the study area. The visitor data in the South Sandlings study area is not necessarily exactly transferable to other European sites, but it does act as good pointers to shared impacts. A national visitor survey by Natural England, a local survey by No Adastral New Town, and further studies in Dorset have also been considered.
- 9.1.4 The evidence base for the impact of visitors on bird disturbance, and on population impacts of birds, is moderately good. There was one good disturbance report for the Stour and Orwell Estuaries SPA, but not for other estuaries. Natural England's interpretation of the parts of the Stour and Orwell Estuaries with highest visitor pressure is that they are in favourable condition notwithstanding the conclusions of that disturbance report. The evidence base for disturbance to SPA bird species on the Sandlings heaths is good, at least for the South Sandlings heaths.
- 9.1.5 There is an apparent inconsistency in interpretation of current levels of disturbance / impact caused by visitors. Site managers who responded to a survey reported that current visitor levels were already causing damaging disturbance, but this was not reflected in current access policy. Natural England condition assessments show that visitor trampling to shingle beach vegetation is the only damage caused to designated site features caused by excess public disturbance.
- 9.1.6 Natural England's condition assessments have been updated since the 2009 version of this Appropriate Assessment was published. Despite the raising of public access as an issue, no parts of any relevant Site of Scientific Interest forming a component of European sites are assessed as unfavourable due to public access with the exception of beach trampling. This suggests that public access is not causing excess disturbance to birds or other fauna or flora of European interest at the present time although Natural England does say that it does not measure human disturbance as a component of the factors affecting habitat or species.
- 9.1.7 This assessment is founded on the best evidence base which is available but it is considered that a stronger evidence base would result in a more precise assessment, particularly in respect of the impacts of additional housing provision. Section 9.2 describes improvements to the evidence base that would be of most help.

9.2 Further work needed

- 9.2.1 Understanding the impact of visitors on European sites is not solely an issue for this Appropriate Assessment, as site condition and visitor management would rely on this understanding, even in the absence of housing provision.
- 9.2.2 It is important to be able to identify any parts of European sites where current disturbance is causing a reduction in bird numbers and loss of site condition. This requires a visitor survey, to

identify numbers and their use of the site, and detailed work to relate visitor numbers to bird use of sites. The origin of visitors is also needed, to be able to identify uses made of the sites (e.g. local walks versus visitor destination) and determine appropriate mitigation. This would also help Natural England in their assessment of site condition.

- 9.2.3 This further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. It is mentioned to raise the issue that was uncovered by the process of writing this assessment, that the impact of existing visitors is patchily known. The mitigation mentioned in Section 7 would encompass a significant proportion of this further work.
- 9.2.4 It is suggested that Natural England might consider contributing to further studies, because it is the statutory regulator and adviser for these sites. There are a number of other nature conservation and/or recreation providers active in the area who could be expected to take an active part in supporting further work, including Suffolk Coast and Heaths Unit, Suffolk County Council (e.g. Rights of Way Improvement Plan, Open Access), Natural England, Suffolk Coastal District Council, the Sandlings Project and third sector nature conservation organisations. The Suffolk Coast and Heaths Unit may be the appropriate body to take forward implementation, particularly for parts of European sites not currently managed as nature reserves, or for off-site alternative provision of access facilities. Estuary Management groups and user groups such as other local walking groups; Deben estuary partnership; sailing club etc may also desire to become involved.
- 9.2.5 Representatives of users should be involved in any studies so that there is understanding of the need for mitigation and partnership working. Examples of user representatives might include Parish Councils, local Ramblers Association groups, etc.
- 9.2.6 The time and cost to carry out these studies, and plan implementation, is not to be underestimated.
- 9.2.7 Natural England has the power under Section 30 of the Conservation of Habitats and Species Regulations 2010 to make bylaws for prohibiting or restricting the entry into, or movement within, European sites of persons, vehicles, boats or animals. If Natural England believes that disturbance is a serious issue at any European site, it has the option to make such bylaws to demonstrate that point, should it so wish. Omission of bylaws to restrict dogs, for example, indicates to the general public that unrestricted dogs are not causing any impact. Although bylaws are unlikely to be actively enforced by Natural England, they provide a strong educational message and emphasise to visitors the reasons for any management activities or restrictions.

10 Iterations and Consultations

10.1 Previous versions of this appropriate assessment

- 10.1.1 There has been a number of previous Appropriate Assessments.
- 10.1.2 The first Appropriate Assessment was published in September 2009³², assessing Suffolk Coastal District Council's Core Strategy & Development Management Policies Development Plan Document, Consultation draft – July 2009.
- 10.1.3 Following comments from consultees, notably Natural England, a Clarification Summary was published in January 2010³³. The Clarification Summary did not alter the content of the Appropriate Assessment but explained some of the technical detail in a different way so that it was clearer. In March 2010 the Consultation Draft was adopted as Interim policy by the Council.
- 10.1.4 Subsequently, the Core Strategy was reviewed, and in November 2010 a Reviewed Core Strategy and Development Management Policies document was published. An Appropriate Assessment of the Reviewed Core Strategy was published in June 2011.
- 10.1.5 Following comments from consultees, primarily Natural England and No Adastral New Town, the Appropriate Assessment has been revised to this version of August 2011.

10.2 Consultations with Natural England

- 10.2.1 Natural England was consulted on 6th March 2009 with a list of policies to be considered for 'likely significant effect'. Natural England confirmed on 16th March 2009 that an Appropriate Assessment would be required and advised on those policies suggested by Suffolk Coastal District Council considered likely to have a significant effect.
- 10.2.2 Natural England was consulted on a draft assessment of a draft Core Strategy in July 2009 and an email response was received dated 7th July 2009. A meeting was subsequently held in August 2009. Useful comments were received from Natural England, which were used to revise the Appropriate Assessment. Natural England's comments in May 2009 on a planning application also were briefly considered as to the wider strategic implications for the Core Strategy.
- 10.2.3 Following publication of the September 2009 Appropriate Assessment, a meeting was held with Natural England to discuss issues, although Natural England were broadly in agreement with the Appropriate assessment. This meeting was on 7th December. The outcome of the meeting was that a Clarification Summary was produced, and published in January 2010.
- 10.2.4 Following publication of the Reviewed Core Strategy and Development Management Policies document in November 2010, focussed changes to Ipswich Borough Council's Core Strategy, and availability of the South Sandlings Visitor Study as a draft in November 2010, a revised Appropriate Assessment was needed. A draft of the Appropriate Assessment, presented as an Addendum to highlight changes, was used to consult Natural England on these changes and a reply was received on 6th April 2011 (Appendix 9). Natural England was broadly in agreement with the changes. Subsequently, this document was produced to consolidate all previous versions of the Appropriate Assessments into one single document dated June 2011. Natural England then had further comments on the June 2011 document which were used for this current document.

10.3 Consultations with the Public

- 10.3.1 The public has previously been consulted by providing the September 2009 Appropriate Assessment and January 2010 Clarification Summary on the Council's website.

³² The Landscape Partnership (September 2009) Appropriate Assessment for Suffolk Coastal District Council Core Strategy and Development Management Policies

³³ The Landscape Partnership (January 2010) Clarification Summary for Suffolk Coastal District Council Proposed Submission Core Strategies and Policies

- 10.3.2 A meeting was also held with Deben Estuary Partnership on 13th April 2010 to discuss issues.
- 10.3.3 Site Managers of European sites were consulted as to their view on visitor increases (Section 5.7). Nick Mason kindly provided information about the distribution of birds within Deben Estuary SPA in 2009.
- 10.3.4 The June 2011 Appropriate Assessment received comments from No Adastral New Town, acting through Richard Buxton in a letter of 6th July 2011, and with comments added within the Deben Estuary Visitor Survey July 2011.
- 10.3.5 These comments were used in this update of the Appropriate Assessment.

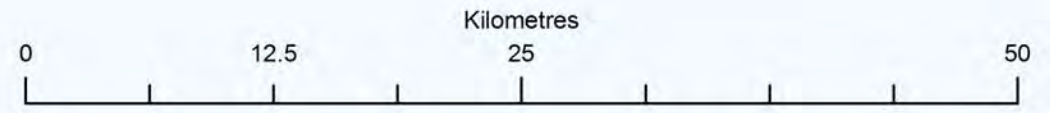
Part 2: Figures

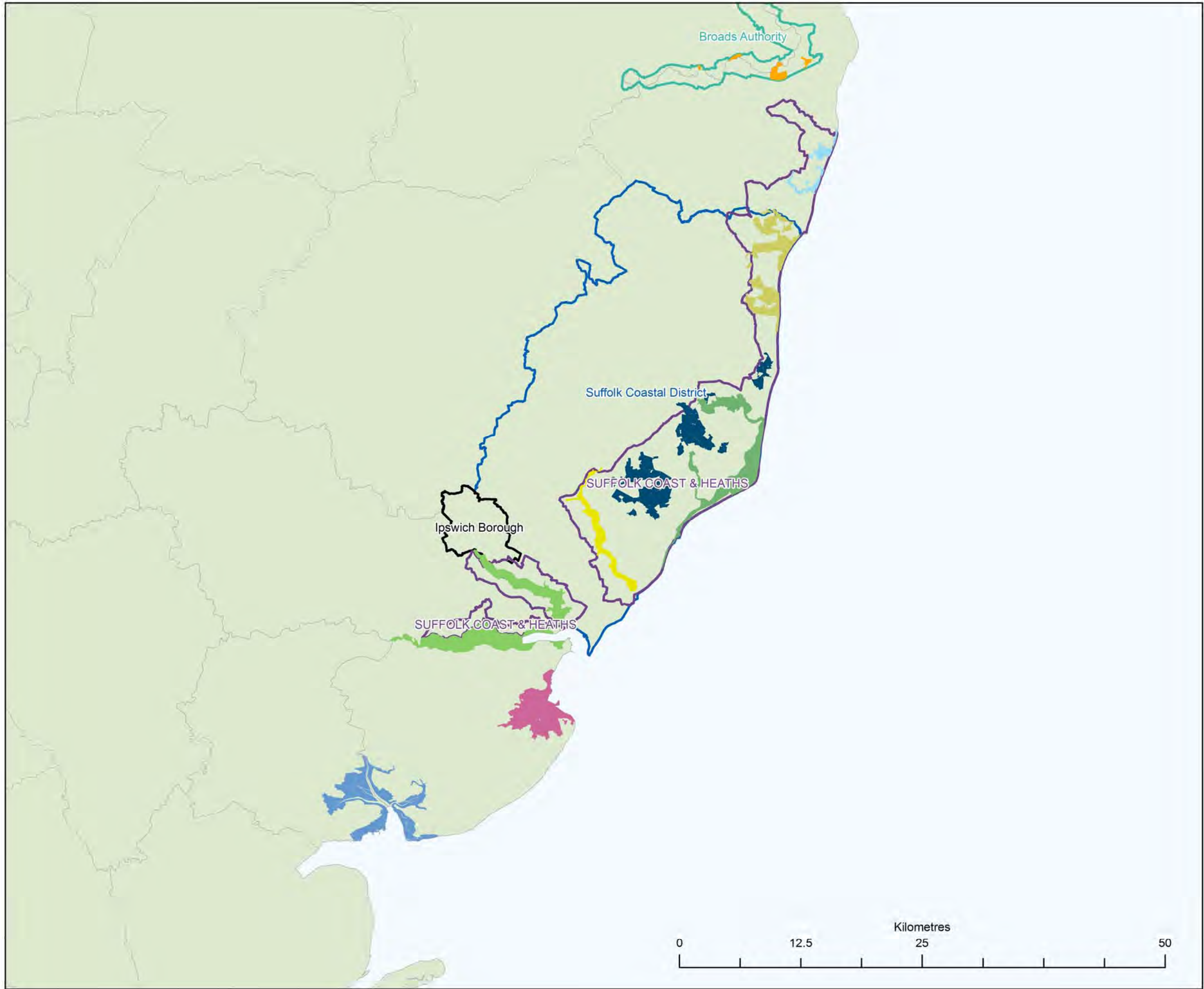


- Key**
- SAC name:**
- Alde-Ore and Butley Estuaries
 - Benacre to Easton Bavents Lagoons
 - Dew's Ponds
 - Essex Estuaries
 - Minsmere to Walberswick Heaths and Marshes
 - Orfordness-Shingle Street
 - Staverton Park and The Thicks Wantisden
 - The Broads
- 'Other' boundaries:**
- Ipswich Borough
 - Suffolk Coastal
 - Broads Authority
 - SCH AONB

**W09219 Suffolk Coastal District Council
Core Strategy and DC Policies
Appropriate Assessment**

**Figure 1a
SAC in the study area
June 2009**





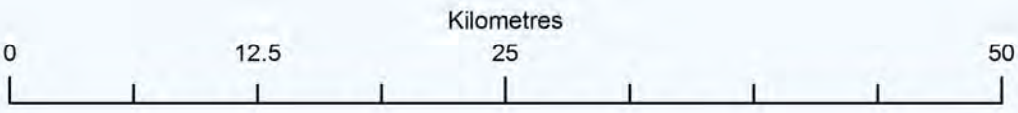
Key

- SPA name:**
- Alde-Ore Estuary
 - Benacre to Easton Bavents
 - Colne Estuary
 - Mid Essex Coast Phase 2
 - Deben Estuary
 - Minsmere/Walberswick
 - Hamford Water
 - Sandlings
 - Stour and Orwell Estuaries
 - Broadland

- 'Other' boundaries:**
- Ipswich Borough
 - Suffolk Coastal
 - Broads Authority
 - SCH AONB

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Appropriate Assessment**

**Figure 1b
SPA in the study area
June 2009**

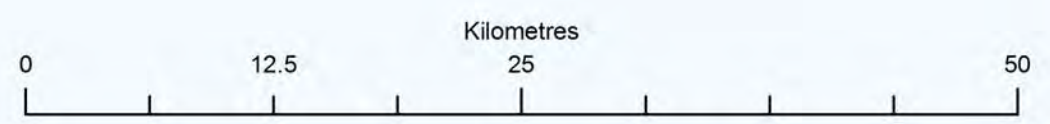


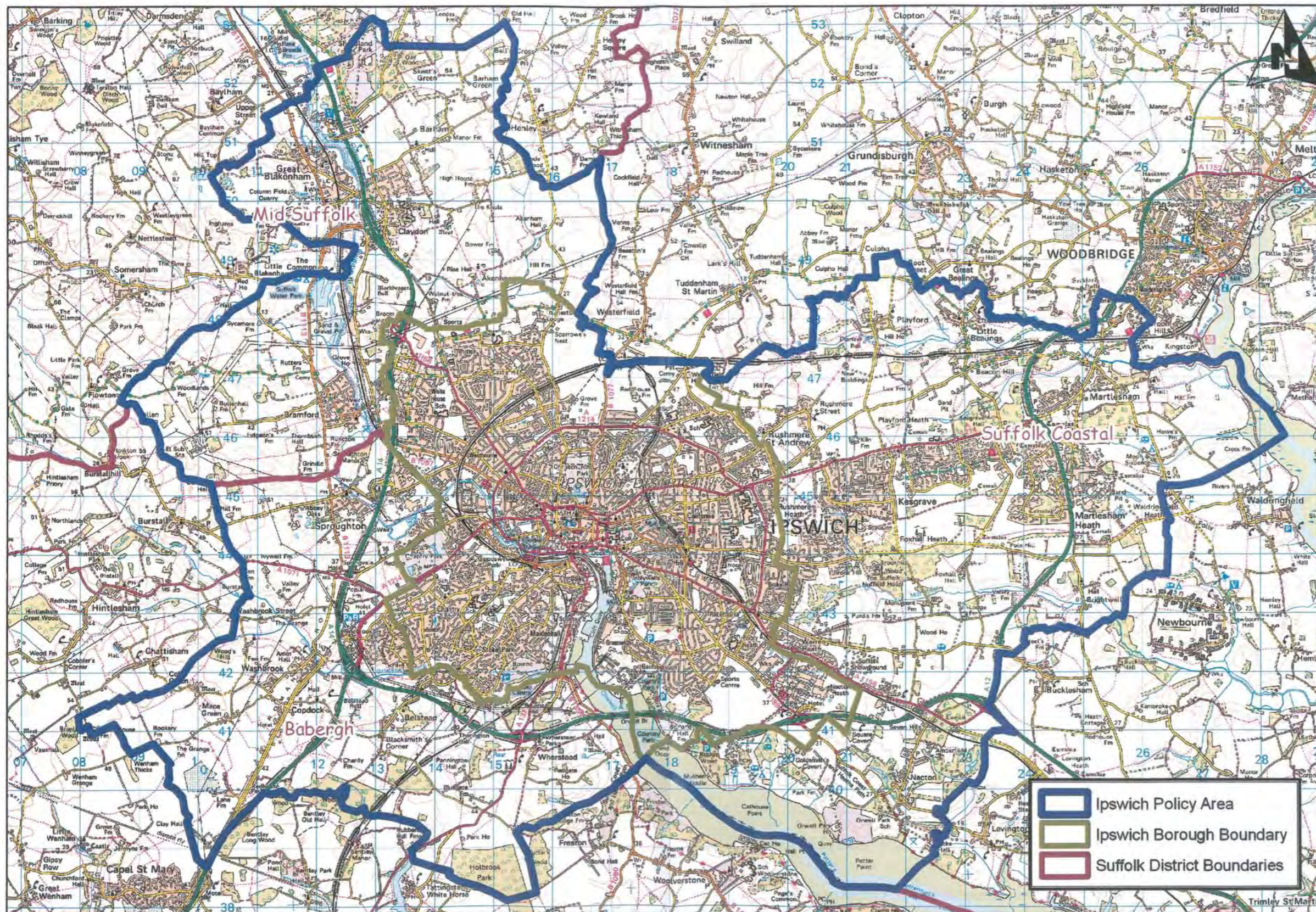


- Key**
- RAMSAR name:**
- Alde-Ore Estuary
 - Colne Estuary
 - Mid Essex Coast Phase 2
 - Deben Estuary
 - Minsmere/Walberswick
 - Hamford Water
 - Stour and Orwell Estuaries
 - Broadland
- 'Other' boundaries:**
- Ipswich Borough
 - Suffolk Coastal
 - Broads Authority
 - SCH AONB

W09219 Suffolk Coastal District Council
 Core Strategy and DC Policies
 Appropriate Assessment

Figure 1c
 RAMSAR in the study area
 June 2009





Project Name: 11204 Suffolk Coastal District Council, Core Strategy and Development Control Policies appropriate assessment.

Figure: 02 Ipswich Area

Scale: NTS

Date: 24/06/2009



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Note: Rights of Way data supplied by Suffolk County Council.

W11204 SCDC Appropriate Assessment Core Strategy



Figure 03 - Rights of Way by the Deben Estuary near Waldringfield

1:25,000@A3

August 2011



KEY

-  Rights of Way
-  Section lost due to erosion