



Tendring District Local Plan – Submission Version (Reg 19) **Habitats Regulations Assessment** **Appropriate Assessment**

August 2026





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Glossary of Acronyms

AA	Appropriate Assessment
AEOI	Adverse Effect On site Integrity
AMR	Annual Monitoring Report
CEMP	Construction Environmental Management Plan
CLEUD	Certificate of Lawful Existing Use or Development
DC	District Council
EA	Environment Agency
EC	European Commission
EMS	European Marine Site
EU	European Union
Ha	Hectare
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
JLP	Joint Local Plan
Km	Kilometre
LPA	Local Planning Authority
LTP	Local Transport Plan
LSE	Likely Significant Effect
NE	Natural England
NPPF	National Planning Policy Framework
NSIP	Nationally Strategic Infrastructure Project
PRoW	Public Right of Way
RAMS	Recreational disturbance Avoidance and Mitigation Strategy
RIS	Ramsar Information Sheet
SAC	Special Area of Conservation
SACO	Supplementary Advice on Conservation Objectives
SIP	Site Improvement Plan
SPA	Special Protection Area
SSSI	Site of Specific Scientific Interest
WFD	Water Framework Directive
WRC	Water Recycling Centres
ZOI	Zone of Influence



Summary

A Habitats Regulations Assessment (HRA) has been prepared by Place Services for the Tendring District Local Plan – Submission Version to enable Tendring District Council to comply with Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended).

As the policies contained in the Local Plan cannot rule out Likely Significant Effects on Habitats (European) sites identified at Stage 1 HRA Screening, there is a need for further assessment of impacts and Stage 2 Appropriate Assessment is therefore necessary.

This report includes the first stage of the HRA process: it aims to consider the elements of the Local Plan Full Update which need to be screened in as having the potential for Likely Significant Effect (LSE) and hence requiring further assessment of their potential to result in adverse effects on the integrity of one of more Habitats (European) sites.

The following Habitats sites have been scoped in as it has been identified that they may be affected by impacts resulting from the Tendring District Local Plan - Submission Version:

SPA	SAC	Ramsar site
Abberton Reservoir SPA	Essex Estuaries SAC	Abberton Reservoir Ramsar site
Blackwater Estuary SPA	Hamford Water SAC	Blackwater Estuary Ramsar site
Colne Estuary SPA		Colne Estuary Ramsar site
Dengie SPA		Dengie Ramsar site
Hamford Water SPA		Hamford Water Ramsar site
Outer Thames Estuary SPA		Stour and Orwell Estuaries Ramsar site
Stour and Orwell Estuaries SPA		

There are a wide range of potential impacts upon Habitats sites which could arise as a result of components of the Local Plan Full Update; the following have been considered most likely to cause a Likely Significant Effect:

- Impacts on protected species outside the designated site



- Disturbance (including recreational disturbance)
- Water quality
- Air quality

The Screening of Likely Significant Effects stage of the Plan has been included in Chapter 3 of this report, with the complete list of policies screened in for further assessment set out within Appendix 1 and 2. This includes 6 policies, 45 proposed allocated sites have been screened into the Appropriate Assessment (Stage 2).

The Appropriate Assessment stage of the Plan is set out in Chapter 4 of this report and Appendix 3. At this stage, the policies and Site Allocations screened in were considered in more detail and the mitigation measures proposed within the Plan were taken into account. The Key Vulnerabilities / Factors Affecting Site Integrity of the Habitats sites were considered for the assessment and are summarised in Appendix 4 of this report.

The Appropriate Assessment stage also considered impacts in combination with other plans and projects.

The requirement for project level HRAs is included as part of the Plan. This is to ensure that developers and decision-makers are aware of the need for project-level HRAs (even if only to confirm no likely significant effect) for the allocations identified for further assessment, and that HRAs must consider effects from development alone or in combination with other plans and projects.

Embedded mitigation measures secured as part of the Tendring Local Plan need to be considered in project-level HRA reports and secured by way of any planning consent. This ensures that Plan can demonstrate compliance with the Conservation of Habitats and Species Regulations 2017 (as amended).



1. Introduction

1.1 The Purpose of This Report

- 1.1.1 This report is to provide a Habitats Regulations Assessment (HRA) for the Tendring District Local Plan – Submission Version in accordance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This includes considerations of the Full modifications, which have been completed following the Pre-Submission stage.
- 1.1.2 The Conservation of Habitats and Species Regulations 2017 (as amended) require the Competent Authority (in this instance Tendring District Council) to undertake a HRA before making a decision about permission for any plan or project that may result in an adverse effect on the integrity of a Habitats site¹ as defined in the National Planning Policy Framework (NPPF, December 2024).
- 1.1.3 In line with the Court judgement (CJEU People Over Wind v Coillte Teoranta C- 323/17), mitigation measures cannot be taken into account when carrying out a HRA Screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats (Natura 2000) site. As the policies relate to land within the Zone of Influence (ZOI) for a number of Habitats sites, it is not possible to rule out Likely Significant Effects, without mitigation in place.
- 1.1.4 The Court judgement (CJEU Holohan C- 461/17) imposes more detailed requirements on the competent authority at Appropriate Assessment stage:
2. [...] an 'Appropriate Assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.
 3. [...] the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted

¹ Habitats site: Any site which would be included within the definition at Regulation 8 of the Conservation of Habitats and Species Regulations 2017 (as amended) for the purpose of those regulations and those listed in paragraph 194 of the NPPF (December 2024). This includes potential Special Protection Areas and possible Special Areas of Conservation; listed or proposed Ramsar sites; and sites identified, or required, as compensatory measures for adverse effects on Habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.



establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

4. [...] where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'Appropriate Assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.
- 1.1.5 This report therefore provides an updated (plan level) Stage 1 HRA Screening and Stage 2 Appropriate Assessment as required by Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended).
- 1.1.6 The Conservation of Habitats and Species Regulations 2017 (as amended) are commonly known as the 'Habitats Regulations'. Requirements are set out within Regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect Habitats sites. The steps and tests set out within Regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process. The Government has produced core guidance for competent authorities and developers to assist with the HRA process. This can be found on the Defra website².
- 1.1.7 It demonstrates how the Plan or Project is compatible with UK obligations, which includes the need to undertake a HRA and forms a plan level HRA as required by Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended).
- 1.1.8 At HRA stage 2 Appropriate Assessment, plans and projects should only be permitted when it has been proven beyond scientific doubt that there will be no adverse effects on the integrity of Habitats sites. The legal process can allow projects that may result in negative impacts on the integrity of a site if the competent authority is satisfied that, there are no alternative solutions, the plan or project must be carried out for Imperative Reasons of Overriding Public Interest (IROPI) (Regulation 64). However, this will require suitable compensation to ensure that the overall coherence of the series of such sites is retained.
- 1.1.9 The HRA should be undertaken by the 'competent authorities' - in this case Tendring District Council - and Place Services has been commissioned to complete this on behalf of the Council. The HRA also requires close working with Natural England as the statutory nature conservation body.
- 1.1.10 This HRA report aims to:

² <http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/>



- Consider the elements of the Plan screened in as having potential for Likely Significant Effect (LSE) for further assessment of their potential to result in adverse effects on the integrity of the Habitats sites at stage 2 Appropriate Assessment.
- Assess the potential for effects from the Plan alone
- Assess the potential for in combination effects from other projects and plans in the area.
- Identify if there are any outstanding issues that need further investigation.

1.1.11 It is not considered that there are any serious limitations to this HRA.

1.2 Overview of the Tendring District Local Plan

- 1.2.1 The Tendring District Local Plan 2013-2033 and Beyond has been adopted in two parts: Section 1 (which was prepared jointly by Tendring District, Colchester City, and Braintree District Councils, and contains strategic policies that are common between all three authorities) was adopted January 2021, and Section 2 (which contains policies that are specific to the Tendring District) was adopted in January 2022.
- 1.2.2 To ensure that Plans remain effective, Tendring District Council is required to review the adopted local plans and provide an update at least every five years. This aim for the updated local plan is to manage development in the Tendring District up to 2043.

1.3 Habitats (European) sites

- 1.3.1 Habitats sites are the term used in the NPPF (December 2024) to describe any sites which would be included within the definition at Regulation 8 of the Conservation of Habitats and Species Regulations 2017 (as amended) for the purpose of those regulations. These now form part of the UK national network of sites for nature protection. The aim of the network is to assure the long-term survival of UK's most valuable and threatened species and habitats.
- 1.3.2 All Special Protection Areas (SPAs) are designated for birds and Special Areas of Conservation (SACs) are designated for other species, and for Habitats. Wetlands of International Importance (Ramsar sites) are also part of the National Network of sites. This is because all SPAs and SACs are comprised of Sites of Special Scientific Interest (SSSIs) and all Ramsar sites in England are SSSIs. Together, SPAs, SACs and Ramsar Sites make up the Habitats sites in England.
- 1.3.3 The following table (Table 1) offers a description and explanation of SPAs, SACs and Ramsar sites.

**Table 1. Description and Explanation of SPAs, SACs and Ramsar sites****Special Protection Areas (SPAs)**

SPAs are areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries. Example: Stour and Orwell Estuaries SPA. straddle the eastern part of the Essex/Suffolk border and include extensive mudflats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches *Legislation: Conservation of Habitats and Species Regulations 2017 (as amended)*.

Special Areas of Conservation (SACs)

SACs are areas designated to protect habitat types that are in danger of disappearance, have a small natural range, or are highly characteristic of the region; and to protect species that are endangered, vulnerable, rare, or endemic. Example: Hamford Water SAC. Designated for its important Fisher's estuarine moth populations. *Legislation: Conservation of Habitats and Species Regulations 2017 (as amended)*.

Ramsar sites (Wetlands of International Importance)

Ramsar sites are designated to protect the biological and physical features of wetlands, especially for waterfowl habitats. Ramsar sites often overlap with SACs and SPAs and UK planning policy determines that they should be accorded the same importance when developments are proposed. Example: Stour and Orwell Estuaries Ramsar site. straddle the eastern part of the Essex/Suffolk border and include extensive mudflats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches *Legislation: Ramsar Convention (1971) – Wetlands of International Importance*.



2. Method and Approach

2.1 Four Stage Approach

- 2.1.1 The legislation does not require a fixed method for preparing a HRA report, but case law has shaped the way it should be undertaken. The HRA is a sequential process and it is generally divided into four stages. The stages are set out below, as well as Table 2. Each of the stages contains a number of sequential steps, comprising the tests or procedures required by the Conservation of Habitats and Species Regulations 2017 (as amended).
- 2.1.2 This HRA includes the first sequential stage, i.e., screening. The four stages are outlined here and Stage 1 is explored in further detail below.

Stage 1 - Screening

- 2.1.3 The process identifies whether a Plan, either alone or in combination with other plans or projects, is likely to have a significant effect on a Habitats site. Current guidance on HRA recommends that the screening stage should comprise the following elements:
- Determining whether the Plan is directly connected with or necessary to the management of the site – if it is then no further assessment is necessary,
 - Identify Habitats (European) sites in and around the Plan area,
 - Review the policies and proposals in the Plan and consider the potential effects on Habitats (European) sites (magnitude, duration, location, extent),
 - Examine other plans and projects that could, 'in combination', have the potential to have significant effects on a Habitats (European) site,
 - Produce screening assessment – record of screening analysis.
- 2.1.4 The screening exercise should be approached on a precautionary basis. If the screening stage concludes that there are likely to be no significant impacts on Habitats (European) sites, then there will be no need to progress to Stage 2. If effects are judged likely or uncertain, the precautionary principle is applied, and the Plan is then considered under Stage 2.

Stage 2 - Appropriate Assessment (AA)

- 2.1.5 Where a plan may cause Likely Significant Effects, the second stage is to undertake an 'Appropriate Assessment' of the implications of the Plan (either alone or in combination with other plans or projects) and establish whether there may be an Adverse Effect on Integrity (AEIOI) of any Habitats sites in view of their Conservation Objectives.



- 2.1.6 An AA assesses the impacts of the proposed plan against the conservation objectives of the qualifying features of the relevant Habitats sites. Should the AA identify adverse effects, then alternatives, such as changes to the Plan, should be examined to avoid any potential damaging effects. If no alternative exists, mitigation measures are identified and evaluated.
- 2.1.7 Some policies of a plan can be used to mitigate some of the potential Likely Significant Effects identified. These can be considered at Appropriate Assessment. This stage thus becomes an iterative process as avoidance and reduction measures can be incorporated in order to be able to ascertain that there is no Adverse Effect on Integrity on any Habitats site, before making a final assessment.
- 2.1.8 Appropriate Assessment should be undertaken by the competent authority and should assess every aspect of the Local Plan which can by itself, or in combination with other plans and projects, affect the Habitats sites' Conservation Objectives. The assessment must consider the implications for each qualifying feature of each potentially affected Habitats site.
- 2.1.9 If effects remain after all alternatives and mitigation measures have been considered, the HRA proceeds to Stage 3.

Stage 3 - Assessment of Alternative Solutions

- 2.1.10 A HRA only moves to Stage 3 when significant effects on the integrity of Habitats sites remain, following the consideration of alternatives and development of mitigation measures in Stage 2.

Stage 4 - Imperative Reasons of Overriding Public Interest and Compensatory Measures

- 2.1.11 Stage 4 involves the process of identifying 'imperative reasons of overriding public interest' ('IROPI'). It must demonstrate that no alternatives exist and identify potential compensatory measures. This stage is a last resort and should be avoided if at all possible. If significant negative effects remain, a Plan may only be adopted under such circumstances if there are imperative reasons of overriding public interest, where it is deemed that the Plan should proceed.

**Table 2. Stages of the Habitats Regulations Assessment Process**

Stage	Tasks	Outcome
Stage 1 HRA Screening (Regulation 63)	- List the policies and Nominated Sites. - Identify potential effects to a Habitats site from the Local Plan. - Assess if any significant effects on a Habitats site from the Plan, either alone or in combination, with other plans or projects.	Where significant effects are unlikely, prepare a 'finding of no significant effect' report and Local Plan can be adopted. Where significant effects are judged likely, either alone or in combination or there is a lack of information to prove otherwise, go to Stage 2. <i>People over Wind CJEU ruling (April 2018) means that it is not possible to consider mitigation measures when screening for impacts.</i>
Stage 2 Appropriate Assessment (Regulation 63)	- List policies and allocations within scope. - List Habitats sites within scope. - Set out methodology of the AA and agree with Natural England. - Assess the implication of the policies and allocations against the designated features and species not listed but which could be using the habitat features. - Apply the integrity test. - Where there may be adverse effects on the ecological integrity of Habitats sites, in view of the Site's conservation objectives, consider mitigation measures.	If no adverse effect on site integrity either alone or in combination, the Local Plan can be adopted. If it is not possible to ascertain no adverse effect on site integrity, go to Stage 3. Holohan CJEU ruling (November 2018) now imposes more detailed requirements on the competent authority at Appropriate Assessment stage.



Stage	Tasks	Outcome
	- Ensure mitigation is embedded into the Local Plan. - Assess in combination effects with other plans and projects. - Reapply the integrity test. Where there may be adverse effects on the ecological integrity of Habitats sites, in view of the Site's conservation objectives, consider mitigation measures. - Formally Consult Natural England.	
Stage 3 Assessment of alternative solutions (Regulation 64)	- Identify whether alternative solutions exist that would achieve the objectives of the Local Plan and have no or a lesser effect on the integrity of a Habitats site(s). - If effects remain after alternative solutions have been considered, consider whether the policies and/or projects should proceed with modification or the policies (and projects) be removed from the Local Plan.	If there are alternative solutions to the Local Plan, it cannot be adopted without modification. If not financially, legally, or technically viable alternatives exist, go to Stage 4.
Stage 4 IROPI (Regulation 64)	- Consider if the risk and harm to the Habitats site is over-ridden by Imperative Reasons of Over-riding Public Interest. - Identify and prepare delivery of compensatory measures to protect the overall coherence of the UK national network and notify Government.	If there are IROPI and compensatory measures, the Local Plan can be adopted If there are no IROPI the Local Plan cannot be adopted.



2.2 Screening Methodology - Assessment of Likely Significant Effects

2.2.1 The screening stage identifies whether the Local Plan may result in a Likely Significant Effect to any Habitats site, alone or in combination with other plans or projects. The screening process should identify all aspects of the Local Plan that are:

- Exempt from assessment
- Excluded from assessment
- Eliminated from further assessment
- Judged to have no Likely Significant Effects, alone or in combination with other plans or projects and can therefore be screened out
- Screened in as it is not possible to rule out Likely Significant Effects.

2.2.2 In line with the 2018 Court judgment (CJEU People Over Wind v Coillte Teoranta C-323/17) mitigation measures cannot be taken into account when carrying out a screening assessment. Consequently, any aspect of the Development Plan Document Submission Version Plan which cannot be ruled out as having Likely Significant Effects should continue to Stage 2 Appropriate Assessment.

2.2.3 It has been established that this Plan requires an HRA for the following reasons, outlined in Table 3 below:

Table 3. Can the plan be exempt, excluded or eliminated from requiring a HRA

Stage	Outcome
Can the plan be exempt?	No, the is not directly connected with or necessary to management of any Habitats sites.
Can the plan be excluded?	No, the Local Plan cannot be excluded as it falls within the definition of being a plan within the Habitats Regulations.
Can the plan be eliminated?	No, the Local Plan as a whole cannot be eliminated as it proposes a number of policies which may have a Likely Significant Effect on one or more Habitats site. However, individual polices can be eliminated.



- 2.2.4 Plans should not contain proposals that would be vulnerable to failure under the Habitats Regulations at project assessment stage, as this would be regarded as ‘faulty planning’.
- 2.2.5 ‘Significant effects’ has been defined through case law. A significant effect is any effect that would undermine the conservation objectives for the qualifying features of Habitats sites potentially affected, alone or in combination with other plans or projects. There must be a causal connection or link between the Local Plan and the qualifying features of the site (s) which could result in possible significant effects on the site (s). Effects may be direct or indirect and a judgement must be taken on a case-by-case basis. The decision as to whether or not a potential impact is significant depends on factors such as: magnitude of impact, type, extent, duration, intensity, timing, probability, cumulative effects and the vulnerability of the habitats and species concerned. So, what may be significant in relation to one site may not be in relation to another.
- 2.2.6 An effect which is not significant can be described as ‘insignificant’, ‘de minimis’ or ‘trivial’- *i.e.* it would not undermine the conservation objectives.
- 2.2.7 A risk-based approach involving the application of the precautionary principle has been used in the assessment. A conclusion of ‘no significant effect’ was only reached where it was considered very unlikely, based on current knowledge and the information available, that a proposal in the Local Plan would have a significant effect on the integrity of a Habitats site.
- 2.2.8 Key advice guidance and information have also come from the following sources:
- HRAs of neighbouring authorities Local Plans
 - Extensive experience of producing other HRAs
 - Government information regarding Habitats sites and their ‘zones of influence’ or ‘Impact Risk Zone’, e.g. www.magic.gov.uk

2.3 Identifying Habitats sites, their Conservation Objectives and Qualifying Features

- 2.3.1 The qualifying features and conservation objectives of the Habitats sites, together with current pressures on and potential threats, was drawn from the Standard Data Forms for SACs and SPAs and the Information Sheets for Ramsar Wetlands as well as Natural England’s Site Improvement Plans (SIP) and the most recent conservation objectives. An understanding of the designated features of each Habitats site and the factors contributing to its integrity has informed the assessment of the potential Likely Significant Effects of the Local Plan.
- 2.3.2 Key sources of the Habitats sites information were found at:



- JNCC: <http://jncc.defra.gov.uk/>
- Site Designation features and Conservation Objectives- Designated Sites View: <https://designatedsites.naturalengland.org.uk/>
- Site Improvement Plans, e.g.: <http://publications.naturalengland.org.uk/publication/6270737467834368>
- MAGIC (the Multi Agency Geographic Information website): www.magic.gov.uk
- "Managing Natura 2000 sites- The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/Provisions_Art_6_nov_2018_endocx.pdf

2.3.3 The Local Plan has the potential to impact areas that are beyond the Plan's area boundary. As a starting point, a distance of 20km from the district boundary was used to identify Habitats sites which could be affected by impacts relating to the Local Plan; these are listed below. They include all Habitats sites within Tendring and those within 20km of Tendring, to take into account any windfall sites that may arise. These are listed in Table 4 below.

Table 4. Habitats sites within 20 km of Tendring

Site	Location
Abberton Reservoir SPA	The Habitats site is located within the boundary of Colchester City, situated 5km to the West of Tendring.
Abberton Reservoir Ramsar site	The Habitats site is located within the boundary of Colchester City, situated 5km to the West of Tendring.
Alde-Ore Estuary SPA	The Habitats site is located within the boundary of East Suffolk District, situated 11.8km to the North-East of Tendring.
Alde-Ore Estuary Ramsar site	The Habitats site is located within the boundary of East Suffolk District, situated 11.8km to the North-East of Tendring.
Alde, Ore and Butley Estuaries SAC	The Habitats site is located within the boundary of East Suffolk District, situated 15.2km to the North-East of Tendring.
Blackwater Estuary SPA	The Habitats site is located within the boundary of Colchester City and Maldon District, situated 5km to the South-West of Tendring.



Site	Location
Blackwater Estuary Ramsar site	The Habitats site is located within the boundary of Colchester City and Maldon District, situated 5km to the South-West of Tendring.
Colne Estuary SPA	The Habitats site is located to south of the Tendring district, with the site also located within the boundary of Colchester City.
Colne Estuary Ramsar site	The Habitats site is located to south of the Tendring district, with the site also located within the boundary of Colchester City.
Crouch & Roach Estuaries SPA	The Habitats site is located within the boundary of Rochford District, Maldon District and Chelmsford City, situated 18.1km to the South-West of Tendring.
Crouch & Roach Estuaries Ramsar site	The Habitats site is located within the boundary of Rochford District, Maldon District and Chelmsford City, situated 18.1km to the South-West of Tendring.
Deben Estuary SPA	The Habitats site is located within the boundary of East Suffolk District, situated 7.8km to the North-East of Tendring.
Deben Estuary Ramsar site	The Habitats site is located within the boundary of East Suffolk District Council, situated 7.8km to the North-East of Tendring.
Dengie SPA	The Habitats site is located within the boundary of Maldon District, situated 5.9km to the South-West of Tendring.
Dengie Ramsar site	The Habitats site is located within the boundary of Maldon District, situated 5.9km to the South-West of Tendring.
Essex Estuaries SAC	The Habitats site is located across the majority of the Essex coast, with part of the site within the South of Tendring.
Foulness SPA	The Habitats site is located within the boundary of Rochford District, situated 12.5km to the South of Tendring.
Foulness Ramsar site	The Habitats site is located within the boundary of Rochford District, situated 12.5km to the South of Tendring.
Hamford Water SPA	The Habitats site is located within Tendring, located to the East of the authority.
Hamford Water Ramsar site	The Habitats site is located within Tendring, located to the East of the authority.
Hamford Water SAC	The Habitats site is located within Tendring, located to the East of the authority.



Site	Location
Orfordness - Shingle Street SAC	The Habitats site is located within the boundary of East Suffolk District, situated 11.8km to the North-East of Tendring.
Outer Thames Estuary SPA	The Habitats site is located to the East of Tendring, approximately 0.56km from the coast.
Sandlings SPA	The Habitats site is located within the boundary of East Suffolk, situated 13.9km to the North-East of Tendring.
Southern North Sea	The Habitats site is located to the North-East of Tendring, approximately 8.82km from the coast.
Staverton Park and The Thicks SAC	The Habitats site is located within the boundary of East Suffolk, situated 19.4km to the North-East of Tendring.
Stour and Orwell Estuaries SPA	The Habitats site is located within Tendring, located to the North of the authority.
Stour and Orwell Estuaries Ramsar site	The Habitats site is located within Tendring, located to the North of the authority.

2.3.4 A map of all 28 Habitats sites with the 20 km radius of the district boundary can be found in Appendix 5.

2.4 Identifying potential effects to a Habitats site from the Local Plan and Use of Impact Pathways

2.4.1 There are a wide range of potential impacts upon Habitats sites and the following potential pathways for unmitigated effects arising from the Local Plan are grouped into categories, and these are summarised below:

- **Land take** - Direct or indirect impacts to a Habitats site causing habitat loss, degradation or fragmentation.
- **Impacts on protected species outside the designated site** - e.g. loss of functionally linked land (outside Habitats sites). The impact on site features (species) which travel outside the protected sites may be relevant where a development could result in effects on qualifying interest species within the Habitats sites, for example through the loss of feeding grounds for an identified species.
- **Disturbance** - Increase of any type of disturbance from construction and operation phases, such as those arising from dust, noise and lights, as well as from increased recreational disturbance during operation phases.



- **Water quality** - Changes in water quality to water-dependent Habitats sites e.g. nutrient increases
- **Water quantity** - Changes in surface or ground water availability from increased surface runoff or increased groundwater extraction.
- **Air quality** - Changes in localised atmospheric pollution levels from vehicle emissions or dust during the construction phase.

- 2.4.2 During the Screening stage each policy is screened for Likely Significant Effects, based upon the above categories. Where it is not possible to rule out Likely Significant Effects without mitigation, it is necessary to progress to Appropriate Assessment stage.
- 2.4.3 There are many uncertainties associated with using trigger distances as there are very few standards available as a guide to how far impacts will travel. When considering the potential for effects on Habitats sites, distance itself is not a definitive guide to the likelihood or severity of an impact. There are other factors that will influence the relative distance at which an impact can occur, such as the prevailing wind or river flow direction. This means that development proposed in a plan that is some distance away from a Habitats site could potentially affect the site, and therefore should be considered as part of HRA screening.
- 2.4.4 Rather than rely on distance alone, best practice is to use a 'source-pathway-receptor' model which focuses on whether there is a potential link or causal connection (pathway) from the source (the direct or indirect change occurring as a result of development) by which impacts from a plan can affect the vulnerabilities/sensitivities of a Habitats site's features to the predicted changes. The pathway is the route or mechanism by which any Likely Significant Effect would be manifest in the environment and would reach the receptor (i.e. the Habitats site). Therefore, during the screening stage a number of assumptions based on professional judgement have been applied in relation to assessing the Likely Significant Effects on Habitats sites that may result from the Local Plan, as described below.
- 2.4.5 The risks of effects to occur are predicted in light of assumptions, limitations and confidence in predictions. Then, taking no account of the mitigation measures incorporated into the Local Plan, the potential effects on qualifying features are determined and assessed on whether they are likely to be 'significant'.
- 2.4.6 The Impact Risk Zones (IRZ) which are provided on the MAGIC website (www.magic.gov.uk) have been used as a starting point in determining Likely Significant Effect on Habitats sites and spatial data has been used to determine the proximity of potential development locations to the Habitats sites.
- 2.4.7 Each potential impact pathway is considered in more detail below.



Land Take

- 2.4.8 Direct or indirect impacts to a Habitats site could cause habitat loss, degradation or fragmentation.
- 2.4.9 Loss of land may have the potential to result in Likely Significant Effects to Habitats sites where the habitat affected contributes towards maintaining the interest feature for which the Habitats sites are designated.
- 2.4.10 Land take is therefore within scope of the HRA screening.

Impacts on protected species outside the designated site

- 2.4.11 Functionally linked land is land situated outside the Habitats site which supports designated features of Habitats sites. Loss of land may have the potential to result in Likely Significant Effects to Habitats sites where the habitat affected contributes towards maintaining the interest feature for which the Habitats site is designated, for example through the loss of feeding grounds for an identified species.
- 2.4.12 Mobile interest features listed in the relevant Habitats sites- i.e. the birds- may use off-site habitat (land outside of the SPA and Ramsar site boundary) for feeding, roosting, foraging and loafing, especially large fields comprising arable and pastoral land uses and coastal habitats, for example, Hen Harrier, Brent Geese, Lapwing and Golden Plover.
- 2.4.13 Natural England has previously advised that their recognised foraging distance threshold for the majority of wetland birds (excluding Lapwing and Golden Plover) species is 2km from a Habitats site. However, Lapwing and Golden Plover can be found considerably further from the coastal sites.
- 2.4.14 Impacts on protected species outside the designated site is therefore within scope of the HRA screening.

Disturbance

- 2.4.15 Disturbance concerns species, rather than habitats e.g. wetland birds and it may be limited in time (noise, source of light etc.). The intensity, duration and frequency of repetition of disturbance are therefore important parameters. The following factors can be regarded as significant disturbance. Any event, activity or process contributing to the:
- The long-term decline of the population of the species on the site.
 - The reduction, or to the risk of reduction, of the range of the species within the site.
 - The reduction of the size of the available habitat of the species.



- 2.4.16 Managing Natura 2000 Sites states that: *“Disturbance of a species occurs on a site from events, activities or processes contributing, within the site, to a long-term decline in the population of the species, to a reduction or risk of reduction in its range, and to a reduction in its available habitat. This assessment is done according to the site’s conservation objectives and its contribution to the coherence of the network.”*
- 2.2.1 Increase of any type of disturbance from construction phases, such as those arising from noise, light and vibration and visual disturbance are capable of causing significant disturbances for species, e.g. wintering waterfowl populations.
- 2.4.17 In addition, recreation can create increased pressure on the qualifying features. Potentially disturbing activities could include visual and noise disturbance of bird populations by walkers, especially those with dog. Localised damage to vegetation and soils by frequent pedestrian traffic, mountain bikes and trail bikes could also result in adverse effects, particularly if there are qualifying habitats which are sensitive to erosion.
- 2.4.18 Disturbance, including from recreational impacts, is therefore within scope of the HRA screening. A precautionary distance of 2km from an allocation site has been used for the purpose of this screening assessment for non-recreational related disturbance.

Water Quality

- 2.4.19 An important determinant of the nature of wetland Habitats sites and the species that they support is the quality of the water that feeds them. Poor water quality can have a range of environmental impacts.
- 2.4.20 High levels of toxic chemicals and metals can result in immediate death of aquatic life and have detrimental effects even at lower levels, including changes in wildlife behaviour and increased vulnerability to disease. Therefore, any discharge from construction sites into water sources which are functionally linked to designated sites could therefore result in a Likely Significant Effect if management plans or discharge consents from Environment Agency are not provided to support schemes.
- 2.4.21 The enrichment of plant nutrients in water by any high nutrient discharges can also cause eutrophication, which increases plant growth and consequently results in oxygen depletion. In the marine environment, nitrogen is the limiting plant nutrient, so eutrophication is often associated with discharges containing available nitrogen. Algal blooms, which commonly occur due to eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, increasing the oxygen-depleting effects of eutrophication.



- 2.4.22 Any sewage or industrial waste discharges can also contribute to increased nutrients levels in Habitats sites, particularly to phosphate levels in watercourses leading into them. Some components of sewage effluent, pesticides, and industrial chemicals, are suspected to interfere with hormones, possibly having negative effects on the reproduction and development of aquatic life. Diffuse pollution, including that from urban run-off, is considered to be a major factor in the unfavourable condition of some Habitats sites. Tidal mudflats, on which many SPA bird species depend, are vulnerable to smothering by increased macroalgal growth due to treated effluent discharge and scouring by increased flow volumes.
- 2.4.23 Furthermore, greater pressure on water treatment services due to new development, especially housing, may increase the risk of effluent entering aquatic environments. This is because the allocation of large numbers of new homes in certain locations may result in the capacity of existing available infrastructure being exceeded, a situation that could potentially cause service failures to water and wastewater customers.
- 2.4.24 The Water Cycle Study (AECOM 2026) has identified that the following Wastewater Recycling Centres has no further capacity to address increased growth as a result of the Local Plan:
- Clacton Holland Haven WRC
 - Great Bromley WRC
 - Manningtree WRC
 - St Osyth WRC
- 2.4.25 Therefore, development within the catchment of these WRC, which flows directly into Habitats sites, could result in adverse impacts from water quality. Clacton Holland Haven WRC is not considered to be significantly hydrologically linked to any Habitats sites, but the remaining three WRC could result in impacts if investment is not secured to cope within additional housing. As a result, any housing within the catchment of these WRC, will need to be screened in to appropriate assessment stage.
- 2.4.26 In addition, due to the very nature of watercourses, it is indicated that hydrological connectivity can continue for considerable distances. However, Natural England have advised that professional judgement is required when looking at hydrological impacts and greater than 20km is considered over precautionary. Therefore, allocation sites will be screened in where there is clear impact pathway within a Habitats site with water quality sensitivities.
- 2.4.27 Water quality is therefore within scope of the HRA screening.



Water Quantity

- 2.4.28 Changes in the depth, duration, frequency, magnitude and timing of water supply or flow, can have significant implications for some waterbirds in sensitive habitats. Such changes may affect the quality and suitability of habitats used by birds for drinking, preening, feeding or roosting.
- 2.4.29 Increased water usage can have wide ranging effects on river and wetland habitat parameters, including increased temperatures and nutrient concentrations and reduced oxygen concentrations. Such impacts can be significantly detrimental to rivers' floristic characteristics and to notable species.
- 2.4.30 Increased use of water sources by a proposal also has the potential to affect terrestrial habitats. Excessive abstraction from underlying aquifers could cause a lowering of the water table and affect the water quality of sensitive wetland habitats. Therefore, Quarries that are below the water table will require dewatering on a regular basis. Dewatering can lead to a reduction in the water table and "draw down" from hydraulically linked groundwater dependent habitats (including streams and rivers).
- 2.4.31 Due to the very nature of watercourses, hydrological connectivity can continue for considerable distances. Natural England have advised on project level HRAs that it requires professional judgement when looking at hydrological impacts. Sites are screened in where there is a potential risk of significant of increased or reduction of water resources affecting a Habitats site.
- 2.4.32 Water quantity is therefore within scope of the HRA screening.

Air Quality

- 2.4.33 There are number of atmospheric pollutants which can result in direct or indirect impacts to Habitats sites. These impacts are usually caused when the qualifying features are plants, soils and wetland habitats. However, some species may also be indirectly impacted from air pollution causing changes in habitat composition. Potential impacts from pollutants and their sources have been highlighted within Table 5.

Table 5. Main sources and effects of air pollutants on Habitats sites

Pollutants	Source	Effects on habitats and species
Acid Deposition	SO ₂ , NO _x and ammonia all contribute to acid deposition. Although future trends in sulphur emissions and subsequent deposition to terrestrial and aquatic	Can affect habitats and species from acid rain, as well as dry deposition. Some habitats will be more susceptible depending on soil



Pollutants	Source	Effects on habitats and species
	ecosystems will continue to decline, it is likely that increased nitrogen emissions may cancel out any gains produced by reduced sulphur levels	type, geology, weathering rate and buffering capacity.
Ammonia (NH ₃)	Ammonia is released following decomposition and volition of animal wastes. It is naturally occurring trace gas, but levels have increased considerably within increased agricultural practices (primarily pig or poultry farming). Ammonia reacts with acid pollutants such as the products of SO ₂ and NO _x emissions to produce fine ammonium (NH ₄) containing aerosol which may be transferred much longer distances (Can therefore be a significant trans-boundary issue).	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH ₃ is rapidly deposited, some of the most acute problems of NH ₃ are for small relict nature reserves located near to intensive agricultural landscapes.
Nitrogen oxides (NO _x)	Nitrogen oxides are mostly primarily produced in combustion processes, such as coal fire power stations.	Deposition of nitrogen compounds (nitrates, nitrogen dioxide and nitrous oxide), can lead to both soil and freshwater acidification. In addition, nitrogen compounds can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen deposition (N)	The pollutants that contribute to nitrogen deposition are derived mainly from NO _x and NH ₃ emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow growing perennial species and bryophytes are most at risk from nitrogen eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels



Pollutants	Source	Effects on habitats and species
		of N. N disposition can also increase the risk of damage from abiotic factors e.g. drought and frost.
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions from NO _x and volatile organic compounds. These are mainly released by the combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O ₃ above 40 ppb can be toxic to humans and wildlife and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops decreased forest production and altered species composition in semi-natural plant communities.
Sulphur Dioxide SO ₂	Main sources of sulphur dioxide emission are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total sulphur dioxide emissions have decreased substantially in the UK since the 1980's.	Wet and dry depositions of sulphur dioxide acidify soils and freshwater, and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.

2.4.34 Nitrogen deposition (*i.e.* primarily NO_x and NH₃ emissions) has been included as a key vulnerability/ factor affecting site integrity as part of the Site Improvement Plans for the following Habitats sites:

- Abberton Reservoir SPA
- Alde-Ore Estuary SPA
- Alde, Ore and Butley Estuaries SAC
- Deben SPA



- Hamford Water SPA
- Hamford Water SAC
- Sandlings SPA
- Staverton Park and The Thicks SAC
- Stour and Orwell Estuaries SPA

- 2.4.35 This is because nitrogen deposition exceeds relevant 'critical loads' for these sites. Critical Loads are defined as: *"a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge"*³.
- 2.4.36 Therefore, where nitrogen deposition exceeds relevant critical loads there is a possibility that eutrophication, acidification and changes to habitat type will be caused, which could affect qualifying features of a Habitats site. Critical loads for nitrogen deposition are in units of kilogrammes of nitrogen per hectare per year (kg N/ha/year) and vary with habitat sensitivity⁴.
- 2.4.37 The leading cause of increased nitrogen deposition at Habitats sites are typically locally intensive agricultural practices, *i.e.*, land spreading, outdoor pigs, high nutrient inputs on fields. This may result in protected habitats being altered, which may in turn, may impact the supporting species / qualifying features which rely on these specific habitats.
- 2.4.38 In addition, the creation of new site allocation and infrastructure within the district could result in increases of traffic on roads, which may result in increases in air pollution (ammonia NH₃, nitrogen oxides NO_x and sulphur dioxide SO₂) from traffic emissions upon Habitats sites, if increases of traffic are caused within 200m as referenced within the Highways Agency Design Manual for Road and Bridges (DMRB)⁵.
- 2.4.39 Furthermore, construction can also generate dust. Effects of dust on vegetation will depend on the prevailing wind direction and the distance the dust can travel is related to particle size. It is likely that the large and intermediate size particles would create more harm by smothering vegetation and preventing light to reach chloroplasts.

³ Air Pollution Information System. Critical Loads and Critical Levels - a guide to the data provided in APIS. Available from http://www.apis.ac.uk/critical-loads-and-critical-levels-guide-data-provided-apis#_Toc279788052 [Accessed October 2023].

⁴ IAQM (June 2019). Available from <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2019.pdf> [Accessed April 2024].

⁵ Design Manual for Roads and Bridges (DMRB) (2019). Sustainability & Environment Appraisal LA 105 Air quality. Available at: <https://www.standardsforhighways.co.uk/dmrbs/search/10191621-07df-44a3-892e-c1d5c7a28d90> [Accessed April 2024]



- 2.4.40 Any potential impacts upon specific Habitats sites identified will need to consider habitat / pollution impacts information from the Air Pollution Information System (APIS), as well as professional judgement on the proposed likely impacts upon the habitats associated with the relevant Habitats site.
- 2.4.41 Consequently, adverse air quality has been included within the scope for the HRA screening.

2.3 Screening categorisation

- 2.4.42 Screening is set out in Chapter 3 of this report and Appendices 1 and 2 consider each policy and proposed site allocation in the Local Plan and the results of the screening exercise recorded, using the precautionary principle. Each policy and allocation site included in the Local Plan has been categorised using criteria in Table 6 below. This system has been used to record the potential policies and proposed allocation sites to have a Likely Significant Effect.

Table 6. Habitats Regulations Assessment Screening Categorisation

Category A: Significant effects not likely
Category A identifies those policies that would not result in a Likely Significant Effect and are considered to have no adverse effect. These policies can be 'screened out' and no further assessment is required. This is because, if there are no adverse effects at all, there can be no
Category B: Significant effects uncertain
Category C: Likely Significant Effect
Category C identifies those policies which cannot be ruled out as having a Likely Significant Effect upon a Habitats site, alone, that is the effect could undermine the conservation



objectives. In this case an Appropriate Assessment is triggered without needing to consider in-combination effects at screening stage, although they may need to be considered at Appropriate Assessment.

3. Screening of Likely Significant Effects

3.1 Screening Policies for Likely Significant Effect

- 3.1.1 The key Habitats sites information (i.e. the qualifying features and conservation objectives of the Habitats sites) together with current pressures and potential threats have been referenced. Impact Risk Zones (IRZ) have been interrogated on MAGIC and these help to show which elements may have an effect.
- 3.1.2 The Habitats sites scoped in or out are set out in Table 7 below. Impacts on Habitats sites over 20km from the Plan's area have been scoped out for Likely Significant Effects due to the distance and the identified Impact Risk Zones on the MAGIC Map. This distance is considered to be over precautionary for a water pollution and air quality impact pathways. This is based on previous advice from Natural England.
- 3.1.3 The list of Habitats sites, their qualifying features and conservation objectives can be found in Appendix 4 including web links to further information.
- 3.1.4 The list of key vulnerabilities / factors affecting site integrity can also be found in Appendix 4.
- 3.1.5 A map of the Habitats sites within 20km of the Tendring District boundary has been included in Appendix 5.

Table 7. Lists of Habitats sites within the scope of the assessment

Site	Scoping assessment	Included within screening assessment?
Abberton Reservoir SPA	The Habitats site is located only 5km from the Tendring district border. Whilst there will be no direct impacts or clear impact pathways to the Habitats site, proposals within Tendring could result in impacts to the over wintering bird qualifying features and conservation objectives of the SPA, via impacts to functionally linked land.	Yes
Abberton Reservoir Ramsar site	The Habitats site is located only 5km from the Tendring district border. Whilst there will be no direct impacts or clear impact pathways to the Habitats site, proposals within Tendring could result in impacts to the	Yes



Site	Scoping assessment	Included within screening assessment?
	over wintering bird qualifying features of the Ramsar site, via impacts to functionally linked land.	
Alde-Ore Estuary SPA	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Alde-Ore Estuary Ramsar site	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Alde, Ore and Butley Estuaries SAC	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Blackwater Estuary SPA	The Habitats site is located 5km from the Tendring district border. The LPA is located within the Zone of Influence for the Habitat site. Therefore, it is considered likely that proposals could potentially affect the qualifying features and conservation objectives of the Habitats site.	Yes
Blackwater Estuary Ramsar site	The Habitats site is located 5km from the Tendring district border. The LPA is located within the Zone of Influence for the Habitat site. Therefore, it is considered likely that proposals could potentially affect the qualifying features of the Habitats site.	Yes
Colne Estuary SPA	The Habitats site is located within district boundary with potential impact pathways from new site allocations.	Yes
Colne Estuary Ramsar site	The Habitats site is located within district boundary with potential impact pathways from new site allocations.	Yes



Site	Scoping assessment	Included within screening assessment?
Crouch & Roach Estuaries SPA	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Crouch & Roach Estuaries Ramsar site	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Deben Estuary SPA	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Deben Estuary Ramsar site	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Dengie SPA	The Habitat is located 5.9km from the Tendring district border. The LPA is located within the Zone of Influence for the Habitats site. Therefore, it is considered likely that proposals could potentially affect the qualifying features and conservation objectives of the Habitat site.	Yes
Dengie Ramsar site	The Habitats site is located 5.9km from the Tendring district border. The LPA is located within the Zone of Influence for the Habitats site. Therefore, it is considered likely that proposals could potentially affect the qualifying features and conservation objectives of the Habitats site.	Yes
Essex Estuaries SAC	The Habitats site is located within district boundary with potential impact pathways from new site allocations.	Yes



Site	Scoping assessment	Included within screening assessment?
Foulness SPA	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Foulness Ramsar site	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Hamford Water SPA	The Habitats site is located within district boundary with potential impact pathways from new site allocations.	Yes
Hamford Water Ramsar site	The Habitats site is located within district boundary with potential impact pathways from new site allocations.	
Hamford Water SAC	The Habitats site is located within district boundary with potential impact pathways from new site allocations.	
Orfordness - Shingle Street SAC	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Outer Thames Estuary SPA	The Habitats site is located only 0.56km from the Tendring district border. Therefore, it is considered necessary to include the Habitats site within the scope of the assessment.	Yes
Sandlings SPA	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	No
Southern North Sea SAC	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered	No



Site	Scoping assessment	Included within screening assessment?
	unlikely that proposals could affect the qualifying features of the Habitats site.	No
Staverton Park and The Thicks SAC	The Habitats site is located a sufficient distance away from the district boundary and no impact pathways have been identified. Therefore, it is considered unlikely that proposals could affect the qualifying features of the Habitats site.	
Stour and Orwell Estuaries SPA	The Habitats site is located within district boundary with potential impact pathways from new site allocations.	Yes
Stour and Orwell Estuaries Ramsar site	The Habitats site is located within district boundary with potential impact pathways from new site allocations.	Yes

3.2 Screening of Policies and Nominated Sites for Likely Significant Effect

- 3.2.1 This chapter summarises the potential for Likely Significant Effects identified, based upon Chapter 2 and using Categories A, B and C above. It advises as to where Likely Significant Effects can be ruled out. The need for an 'Appropriate Assessment' is triggered where the HRA Screening stage identifies policies which may have a Likely Significant Effect on any Habitats sites (see Appendix 1).
- 3.2.2 A number of impact pathways have been identified in Chapter 2 above and these have been screened in below. 15 Habitats sites have been scoped in for HRA screening. Where this is likely to result in a significant effect, or where there is uncertainty, in line with the precautionary approach being applied in the HRA, until significant effects can be ruled out, they are treated as giving rise to Likely Significant Effects.
- 3.2.3 A summary of the assessment is set out in Appendix 1 and Appendix 2. Conclusions take into account the potential effects of other plans and projects. Each policy and proposed allocation site were considered in the context of the policy Screening criteria above.



- 3.2.4 The locations of the site allocations and employment sites considered within this HRA are shown in Appendices 6 to 9, providing an overview of their distribution across the Tendring District and their distances to Habitats sites.
- 3.2.5 Table 8, below, lists the policies to consider if any have the potential to cause a Likely Significant Effect, before taking mitigation into account and therefore require Appropriate Assessment.

Table 8. Policies and Allocation sites that may Cause a Likely Significant Effect

Policy Reference	Land take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Pollution	Screening Categorisation
Proposed Policies							
LP1 - Housing Supply		Yes	Yes	Yes		Yes	Screen In, Category B
LP9 - Gypsy and Traveller Sites			Yes				Screen In, Category B
PP6a - Extensions to Existing Employment Sites in the Countryside			Yes	Yes			Screen In, Category B
PP7 - Employment Allocations		Yes		Yes		Yes	Screen In, Category B
PP8 - Tourism			Yes				Screen In, Category B



Policy Reference	Land take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Pollution	Screening Categorisation
PP16 - St Osyth Village Centre		Yes	Yes				Screen In, Category B
Proposed Site Allocations							
							Screen In, Category C
SAMU6 – Weeley Green Garden Village		Yes	Yes				Screen In, Category B
SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree			Yes	Yes		Yes	Screen In, Category C
SAMU8 – Development of Hare Green Garden Village		Yes	Yes	Yes			Screen In, Category C
SAMU9 – Development of Horsley		Yes	Yes				Screen In,



Policy Reference	Land take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Pollution	Screening Categorisation
Cross Garden Village							Category B
SAH1 – Development at Vicarage Farm Off Main Road and South of A120, Harwich			Yes				Screen In, Category B
SAH2 - Land north of Thorpe Road, Kirby Cross.			Yes				Screen In, Category B
SAH 6 - Land east of Cockaynes Lane, Alresford		Yes	Yes				Screen In, Category B
SAH7 - Land east of Admirals Green and north of Weeley Road, Great Bentley			Yes				Screen In, Category B
SAH8 - Land East of Amerells Road, Little Clacton			Yes				Screen In, Category B



Policy Reference	Land take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Pollution	Screening Categorisation
SAH9 - Land south of Clacton Road, St Osyth			Yes	Yes			Screen In, Category C
SAH11 - Land North of Lifehouse Spa & Hotel, Thorpe-le-Soken		Yes	Yes				Screen In, Category B
MSA1 - Durite Works, Valley Road, Harwich			Yes				Screen In, Category B
MSA2 - Land adjacent Branscombe Close, Frinton.			Yes				Screen In, Category B
MSA3 - Affinity Water, Mill Hill, Manningtree			Yes	Yes			Screen In, Category C
MSA4 - Crisp Malting, School Lane, Mistley			Yes	Yes		Yes	Screen In, Category C
MSA5 - Brightlingsea Telephone			Yes				Screen In,



Policy Reference	Land take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Pollution	Screening Categorisation
Exchange, 16 New Street, Brightlingsea							Category B
MSA6 - Land at Pannell Place, Brightlingsea			Yes				Screen In, Category B
MSA7 - Land south-west of Colchester Main Road, Alresford		Yes	Yes				Screen In, Category B
MSA8 - Land adj Village Hall, Harwich Road, Beaumont			Yes				Screen In, Category B
MSA9 - Land south of Windmill Road and east of Straight Road, Bradfield			Yes	Yes			Screen In, Category C
MSA10 - Land south of Weeley Road, Great Bentley			Yes				Screen In, Category B
MSA11 - Land west of Parsons Hill,			Yes	Yes			Screen In,



Policy Reference	Land take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Pollution	Screening Categorisation
Great Bromley							Category C
MSA12 - Land south of Hall Road, Great Bromley			Yes	Yes			Screen In, Category C
MSA13 - Land west of Main Road, Great Holland			Yes				Screen In, Category B
MSA14 - Land east of Kirby Road, Great Holland			Yes				Screen In, Category B
MSA15 - Land north east of Wix Road, Great Oakley			Yes				Screen In, Category B
MSA16 - Land south of Orchard Close, Great Oakley			Yes				Screen In, Category B
MSA17 - Land north of Walton Road, Kirby-le-Soken			Yes				Screen In, Category B
MSA19 - Land west of			Yes				Screen In,



Policy Reference	Land take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Pollution	Screening Categorisation
Manningtree Road, Little Bentley							Category B
MSA20 - Land south of Shop Road, Little Bromley			Yes				Screen In, Category B
MSA21 - Land east of Heckfords Road, Great Bentley			Yes				Screen In, Category B
MSA22 - Haulage Depot, Heath Road, Tendring Green			Yes				Screen In, Category B
MSA23 - Land at Avocet Place, Thorrington			Yes				Screen In, Category B
MSA24 - Land east of Bentley Road, Weeley Heath			Yes				Screen In, Category B
MSA25 - Land south of Mill Lane, Weeley Heath			Yes				Screen In, Category B
MSA26 - Land south of			Yes				Screen In,



Policy Reference	Land take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Pollution	Screening Categorisation
Colchester Road, Wix							Category B
MSA28 - Land North of Rectory Road, Wrabness			Yes				Screen In, Category B
MSA29 - Land at Weeley Council Offices			Yes				Screen In, Category B
MSA30 - Former Tendring Hundred Waterworks Site, Clacton			Yes				Screen In, Category B
MSA31 - Land adjoining Harwich & Parkeston Football Club, Dovercourt			Yes				Screen In, Category B
MSA32 - Station Yard / Avon Works, Walton			Yes				Screen In, Category B
MSA33 - Former Wellhouse			Yes				Screen In,



Policy Reference	Land take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Pollution	Screening Categorisation
Site, Chestnut Way, Brightlingsea							Category B
MSA34 - Vicarage Field, Church Road, Brightlingsea			Yes				Screen In, Category C
MSA35 - Land North of Robinson Road, Brightlingsea			Yes				Screen In, Category B
MSA36 - Land North of Wix Road, Bradfield			Yes		Yes		Screen In, Category C
MSA37 - Paddock Site South of Bradfield Playing Field, East of the Street, Bradfield			Yes		Yes		Screen In, Category C
Proposed Employment Sites							
SAE 2 - Freeport East, Bathside Bay and the A120 Corridor						Yes	Screen In, Category B



Policy Reference	Land take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Pollution	Screening Categorisation
SAE3 - Collierswood Farm A120 Strategic Business Park		Yes					Screen In, Category B

3.3 Policies carried forward to Appropriate Assessment Stage

- 3.3.1 All policies are shown in the HRA Screening Table in Appendix 2 and those marked red or amber are screened in as having the potential for Likely Significant Effects, alone or in combination with other plans and projects, before taking mitigation into account and therefore require Appropriate Assessment (AA).

3.4 Habitats sites Screened in for Appropriate Assessment

- 3.4.1 The screening assessment has identified 8 policies and 43 proposed allocation sites which will need to be taken forward to AA should they be considered for incorporation as proposed sites in the next stage of the Local Plan.

Land take

- 3.4.2 There are no policies or allocations sites which will result in a direct land take of a Habitats site.

Impacts on protected species outside the designated site

- 3.4.3 There are 3 policies and 7 allocations sites, which have the potential to support qualifying bird species outside of the Habitats site for which they are listed.

- 3.4.4 This includes the following proposed policies:

- LP1 - Housing Supply
- PP7 - Employment Allocations
- PP16 - St Osyth Village Centre



3.4.5 This includes the following proposed allocation and employment sites:

- SAMU5 - Land South of Oakley Road, Harwich and Dovercourt
- SAMU6 - Land South of Colchester Road, Weeley
- SAMU8 - Development of Hare Green Garden Village
- SAMU9 - Horsley Garden Community, Horsley Cross GV
- SAH6 - Land east of Cockaynes Lane, Alresford
- SAH11 - Land North of Lifehouse Spa & Hotel, Thorpe-le-Soken/Thorpe Station and Maltings
- MSA7 - Land south-west of Colchester Main Road, Alresford
- SAE3 - Collierswood Farm A120 Strategic Business Park

3.4.6 This is because the policies, allocation sites and employment sites contain large open areas of arable land which may potentially contain habitat which is suitable for foraging overwintering birds which are listed as qualifying features of the relevant Habitats sites. Therefore, a Likely Significant Effect cannot be ruled out for the policies and allocations.

Disturbance

3.4.7 There are 6 policies which have the potential to result in disturbance (including recreational disturbance) upon a Habitats site based on their proximity. This includes:

- LP1 - Housing Supply
- LP9 - Gypsy and Traveller Sites
- PP6a - Extensions to Existing Employment Sites in the Countryside
- PP8 -Tourism
- PP16 - St Osyth Village Centre

3.4.8 It is indicated that policies 'LP1 – Housing Supply' and 'LP9 – Gypsy Travellers Sites' have been screened in due to potentially containing development which will result in an increased recreational disturbance, within consideration of the Essex Coast RAMS. This is because all development will likely fall within the Essex Coast RAMS Zone of Influence and will meet the criteria of the strategic mitigation measures.

3.4.9 Policy 'PP8 – Tourism' has also been screened in as a Likely Significant Effect from increased recreational disturbance upon coastal Habitats sites within Tendring could not be ruled out. This is because the policy wording actively promotes tourism to coastal Habitats sites, which could result in impacts without further measures to ensure compliance with the Habitats Regulations.



- 3.4.10 The Policies 'PP6a - Extensions to Existing Employment Sites in the Countryside', 'PP16 - St Osyth Village Centre' have been screened in, as it is not certain whether the policies will result in visual or noise disturbance impacts, due to the potential development being located in close proximity of coastal Habitats sites within Tendring.
- 3.4.11 All 45 proposed allocations sites have been screened in, as the proposals will result in an increased recreational disturbance, within consideration of the Essex Coast RAMS, as the developments fall within the Essex Coast RAMS Zone of Influence.
- 3.4.12 Furthermore, development over 500 units within the Local Plan or major development (<9 units) within 1km of Coastal Habitats sites will also likely result in impacts from increased recreational disturbance from the development alone.
- 3.4.13 Only the site allocations 'SAMU5 - Development Off Deane's Lane And Oakley Road, Dovercourt' and 'SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree' have the potential to result in a Likely Significant Effect from visual or noise disturbance. This is because SAMU5 is located immediately adjacent to the Hamford Water SPA and Ramsar site, whereas SAMU7 is located immediately adjacent to the Stour and Orwell Estuaries SPA and Ramsar site.

Water Quality

- 3.4.14 There are 3 policies and 11 allocations sites, which have the potential to result in adverse water quality upon a Habitats site based on their proximity to potential impact pathways.
- 3.4.15 This includes the following proposed policies:
- LP1 - Housing Supply
 - PP6a - Extensions to Existing Employment Sites in the Countryside
 - PP7 - Employment Allocations
- 3.4.16 This includes the following proposed allocations sites:
- SAMU5 - Development Off Deane's Lane And Oakley Road, Dovercourt
 - SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree
 - SAMU8 - Development of Hare Green Garden Village
 - SAH9 - Land south of Clacton Road, St Osyth
 - MSA3 - Affinity Water, Mill Hill, Manningtree
 - MSA4 - Crisp Malting, School Lane, Mistley, Manningtree
 - MSA9 - Land south of Windmill Road and east of Straight Road, Bradfield



- MSA11 - Land west of Parsons Hill, Great Bromley
- MSA12 - Land south of Hall Road, Great Bromley
- MSA36 - Land North of Wix Road, Bradfield
- MSA37 - Paddock Site South of Bradfield Playing Field, East of the Street, Bradfield

3.4.17 These policies and allocations sites have been screened in because they may include development which contains a potential impact pathway to a coastal Habitats site due to being in close proximity to main rivers.

3.4.18 Alternatively, the policies and allocations have been screened in, because they include development which is within the catchment of Great Bromley WRC, Manningtree WRC or St Oysth WRC. These Wastewater Recycling Centres feed into the Stour and Orwell Estuaries SPA and Ramsar site, Colne Estuary SPA and Ramsar site and the Essex Estuaries SAC and do not have sufficient headroom capacity to cope within new development within the catchment.

3.4.19 It is considered that 'SAMU5 – Land South of Oakley Road, Harwich and Dovercourt' could also have impacts from adverse water quality upon Hamford Water SPA, Ramsar site and SAC due to the close proximity of the development to the Habitats sites.

Water Quantity

3.4.20 None of the Habitats sites within the scope of the Habitats Regulations Assessment, that have hydrological connections to potential development coming forward as part of the Local Plan, are considered sensitive to impacts arising from increased water abstraction, water consumption, or additional water inputs. This is because the only Habitats sites with direct hydrological connectivity are estuarine habitats, whose qualifying features are not reliant on the maintenance of local freshwater inputs. Consequently, no likely significant effects are anticipated through this impact pathway.

Air Quality

3.4.21 There are 3 policies and 4 allocation and employment sites which have the potential to result in a Likely Significant Effect from adverse air quality upon a Habitats site based on their proximity to potential impact pathways.

3.4.22 This includes the following proposed policies:

- LP1 - Housing Supply
- PP7 - Employment Allocations

3.4.23 This includes the following site allocations and employment sites:

- SAMU5 - Development Off Deane's Lane And Oakley Road, Dovercourt



- SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree, Mistley and Lawford
- MSA4 - Crisp Malting, School Lane, Mistley, Manningtree, Mistley and Lawford
- SAE 2 - Freeport East, Bathside Bay and the A120 Corridor

3.4.24 These policies and allocation sites have been screened in for potential impacts from air quality, as they include development within 200m of the Stour and Orwell Estuaries SPA and Ramsar site, Hamford Water SPA, SAC and Ramsar site, Colne Estuary SPA and Ramsar site, as well as the Essex Estuaries SAC.

3.5 HRA Screening Conclusion and Considering the Next Stage

- 3.5.1 The range of potential impacts on Habitats sites has been considered and assessed. In line with the *recent Court judgment (CJEU People Over Wind v Coillte Teoranta C-323/17)*, mitigation measures can no longer be taken into account when carrying out a HRA screening assessment to decide whether a plan or project is likely to result in Likely Significant Effects on a Habitats site. Consequently, HRA screening has concluded that it is not possible to rule out the potential for Likely Significant Effects without further assessment and possible mitigation for the indicated policies.
- 3.5.2 An Appropriate Assessment is therefore required under the UK Conservation of Habitats and Species Regulations 2017 (as amended). The Local Plan may only be adopted after having ascertained that it will not result in adverse effect on integrity of the Habitats sites within scope of this assessment.
- 3.5.3 The screening stage is an iterative process as measures can be incorporated in order to be able to ascertain that there is no significant adverse effect on the integrity, before re-screening and making a final assessment.
- 3.5.4 The Appropriate Assessment stage shall also consider impacts in combination with other plans and projects, thus no detailed consideration on cumulative effects have been considered as part of this screening assessment.



4. Appropriate Assessment and Considering Adverse Effects on Integrity of Habitats Sites

4.1 Introduction and Outline Methodology

- 4.1.1 As policies within the Tendring Local Plan have been screened in as having the potential to cause Likely Significant Effects without considering mitigation measures, Tendring District Council, as the competent authority, need to undertake further assessment.
- 4.1.2 This should involve an 'Appropriate Assessment' of the implications of the Local Plan, either alone or in combination with other plans or projects, in order to establish whether there may be an Adverse Effect on the Integrity of any Habitats sites in view of their Conservation Objectives. This stage is to undertake objective scientific assessment of the implications of the Local Plan on the Qualifying Features of the listed Habitats sites using the best scientific knowledge in the field. It should apply the best available techniques and methods to assess the extent of the effects of the Local Plan on the integrity of the Habitats sites. The description of the site's integrity and the impact assessment should be based on the best possible indicators specific to the Habitat sites' qualifying features, which can also be useful in monitoring the impact of the Local Plan implementation.
- 4.1.3 The Appropriate Assessment should assess all aspects of the Local which can by themselves, or in combination with other plans and projects, affect the Conservation Objectives of one or more Habitats sites although these are not set for Ramsar sites. The assessment must consider the implications for each qualifying feature of each potentially affected Habitats site. The focus of the appropriate assessment is therefore on the species and / or the habitats for which the Habitats site is designated.
- 4.1.4 The best scientific knowledge⁶ should be used when carrying out the Appropriate Assessment in order to enable the competent authority to conclude with certainty that there will be no Adverse Effect on the Integrity of any Habitats site. This will therefore support a conclusion that is "beyond scientific doubt".
- 4.1.5 It is important that the Appropriate Assessment provides a better understanding of potential effects and can therefore assist in the identification of mitigation measures where possible to avoid, reduce or cancel significant effects on Habitats sites which could be applied when undertaking the 'integrity test'. All mitigation measures built into the Local Plan can be taken into account. The Appropriate Assessment is an iterative

⁶ Waddenzee ruling (C-127/02 paragraphs 52-54, 59)



process, re-assessing changes and new or different mitigation measures before making its final conclusion. It must be clear which mitigation measures are being relied upon in order to meet the integrity test.

- 4.1.6 The integrity test must apply the precautionary principle. However, plan assessments are less precise than project assessments, and so it is important for the assessment process to eliminate the prospect of adverse effects integrity insofar as it is possible, given the level of specificity of this Local Plan.
- 4.1.7 In order to fulfil the above requirements, this Appropriate Assessment will therefore use the following process, and will be structured by the potential impact pathways.
- 4.1.8 It is also highlighted that advice has been provided from the European Court of Justice regarding the 'tiering' of HRAs where there are multiple levels of plan-making, recognising that the purpose of a high-level plan is to set out broad policies and intentions without going into any detail. When the UK was first required to undertake HRA of plans, Advocate-General Kokott commented on the apparent tension between the requirements of the Habitats Directive and the intentionally vague nature of high-level strategic plans. She responded that to address this apparent tension 'It would ...hardly be proper to require a greater level of detail in preceding plans [rather than lower tier plans or planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan [emphasis added]. This assessment is to be updated with increasing specificity in subsequent stages of the procedure' [i.e. for planning applications or lower tier plans] (Opinion of Advocate-General Kokott, 2005).
- 4.1.9 Explicitly enshrining the requirement for project-level HRA in the plans – since it is not possible to rule out adverse effects on the integrity of many Habitats (European) sites due simply to the high-level nature of the plan policies, 'down-the-line' assessment becomes essential.
- 4.1.10 A monitoring and Iterative Plan Review (IPR) provision therefore needs to be embedded in the Local Plan. Monitoring is not mitigation; however, where there is a lack of detail over the precise effects of a plan (because, as in this case, the purpose of the plan is to set over-arching policy, not present specific proposals), an Iterative Plan Review process enables the delivery of development to be managed and the plan (and its HRA) to be updated in future reviews. It involves recognising the fact that development associated with policies in the plan will not be delivered all at once but piecemeal over the entire plan timetable. This process will involve a phased and iterative approach to plan-implementation which is linked to ongoing project developments and their associated monitoring work and with the findings from such project-level work feeding back into the next phases of plan-implementation. This is done so that results from



monitoring data from consented projects and on-going research programmes can be fed into subsequent developments in order for lessons to be learnt and evidence gaps filled, thus reducing potential impacts to Habitats sites.

4.2 Policies / Allocations and Habitats sites within Scope

- 4.2.1 The Likely Significant Effects considered at screening stage have been carried forward for consideration at Appropriate Assessment. The policies and their potential to have adverse effects on any Habitats site through a variety of impact pathways are now considered in more detail, for example disturbance, direct and indirect effects; extent of the effects (habitat area, species numbers or areas of occurrence); importance and magnitude (e.g. considering the affected area or population in relation to the total area and population size).
- 4.2.2 Table 7 lists the Habitats sites identified at screening stage and shows the potential impact pathways and key Likely Significant Effects identified.
- 4.2.3 The policies and allocations listed in Table 8 have the potential to cause a likely significant effect upon the Habitats sites and are within the scope of this assessment.
- 4.2.4 Key vulnerabilities of each Habitats site are set out in Appendix 4 using the relevant Site Improvement Plans. Site Improvement Plans have been developed for each Habitats (Natura 2000) Site in England as part of the 'Improvement Programme for England's Natura 2000 sites (IPENS)' but they do not include Ramsar sites. Each Site Improvement Plan provides a high-level overview of the issues (both current and predicted) affecting the condition of the Natura 2000 features on the site(s) and outlines the priority measures required to improve the condition of the features

4.3 Court Judgements and their consideration in this Report

CJEU People Over Wind v Coillte Teoranta C-323/17

- 4.3.1 As previously mentioned, in line with the Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats site. This HRA Appropriate Assessment therefore considers mitigation measures for the assessment of Likely Significant Effects resulting from the Tendring Local Plan.
- 4.3.2 In accordance with this Judgement, all mitigation measures already built into the Tendring Local Plan can now be taken into account for the Appropriate Assessment. At this stage other policies of the Plan can be considered in order to mitigate some of the potential Likely Significant Effects which have been identified. This stage is an iterative



process as avoidance and reduction measures can be incorporated in order to be able to avoid the potential impacts identified in the Appropriate Assessment or reduce them to a level where they will no longer adversely affect the site's integrity.

- 4.3.3 An example may include a requirement for Sustainable Drainage Schemes (SuDS) for new housing and employment sites which can help to mitigate for surface water flooding and prevent water pollution.
- 4.3.4 Where there may still be adverse effects on the ecological integrity of Habitats sites, in view of the Site's conservation objectives, additional mitigation measures may also need to be proposed. Generic mitigation is used where possible. This should help to address water quality, air pollution, noise, and other (non-recreational) forms of disturbance. Construction Environment Management Plans (CEMP - Biodiversity) – often a condition of consent - can help to direct seasonal working, damping down of dust and measures to alleviate noise pollution.

CJEU Holohan C- 461/17

- 4.3.5 Court rulings include CJEU Holohan C-461/17 (7 November 2018) which now imposes more detailed requirements on the competent authority at Appropriate Assessment stage:
- 1. [...] an 'Appropriate Assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.*
 - 2. [...] the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.*
 - 3. [...] where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'Appropriate Assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.*
- 4.3.6 It is therefore necessary to consider species likely to be present on the Habitats sites, but for which that site has not been listed – e.g. birds which are designated features of the underpinning SSSI – and to consider the implications for habitat types and species



to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site. Those species found outside the European designated site boundary are likely to be covered by the consideration of impacts on functionally linked land.

CJEU Joined Cases C-293/17 and C-294/17 Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu

4.3.7 These Dutch cases concerned authorisations schemes for agricultural activities in Habitats sites which cause nitrogen deposition and where levels already exceeded the critical load. These are not directly connected with or necessary for the management of a Habitats site and “highlights” of the ruling include:

1. Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that the grazing of cattle and the application of fertilisers on the surface of land or below its surface in the vicinity of Natura 2000 sites may be classified as a ‘project’ within the meaning of that provision, even if those activities, in so far as they are not a physical intervention in the natural surroundings, do not constitute a ‘project’ within the meaning of Article 1(2)(a) of Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment.

2. Article 6(3) of Directive 92/43 must be interpreted as meaning that a recurring activity, such as the application of fertilisers on the surface of land or below its surface, authorised under national law before the entry into force of that directive, may be regarded as one and the same project for the purposes of that provision, exempted from a new authorisation procedure, in so far as it constitutes a single operation characterised by a common purpose, continuity and, inter alia, the location and the conditions in which it is carried out being the same. If a single project was authorised before the system of protection laid down by that provision became applicable to the site in question, the carrying out of that project may nevertheless fall within the scope of Article 6(2) of that directive.

...

6. Article 6(3) of Directive 92/43 must be interpreted as meaning that an ‘appropriate assessment’ within the meaning of that provision may not take into account the existence of ‘conservation measures’ within the meaning of paragraph 1 of that article, ‘preventive measures’ within the meaning of paragraph 2 of that article, measures specifically adopted for a programme such as that at issue in the main proceedings or ‘autonomous’ measures, in so far as those measures are not part of that programme, if the expected benefits of those measures are not certain at the time of that assessment.



7. Article 6(3) of Directive 92/43 must be interpreted as meaning that measures introduced by national legislation, such as that at issue in the main proceedings, including procedures for the surveillance and monitoring of farms whose activities cause nitrogen deposition and the possibility of imposing penalties, up to and including the closure of those farms, are sufficient for the purposes of complying.

- 4.3.8 This ruling is relevant to projects which trigger appropriate assessment before any consents are issued so should be considered when identifying other plans and projects for an in- combination assessment.

(R (on the Application of Preston) v Cumbria County Council [2019] EWCA 1362)

- 4.3.9 This case relates to a High Court verdict which quashed a County Council's decision to vary a planning permission for a water company to construct a sewage outfall on a Special Area of Conservation (SAC). Therefore, planning authorities and other competent authorities cannot, in appropriate assessments, simply rely on the competence of other regulators to avoid conducting their own assessments. They must instead themselves satisfy their own HRA duties. The judgement concluded:

Regulation 63(1) provides that the trigger for making an appropriate assessment is that the relevant plan or project 'is likely to have a significant effect on a European site.

Regulation 63(3) envisages consultation with the appropriate nature conservation body taking place at the stage of the appropriate assessment and accordingly after the initial view that there is likely to be significant effect has been formed. The conclusion as to whether the integrity of the relevant site will be adversely affected is to be made 'in the light of the conclusions of the assessment'

Regulation 63(5) and it is at that stage that regard is to be had to the manner in which the project is to be carried out and to the conditions or restrictions which the authority is minded to impose.

Regulation 63(6) The effect of restrictions imposed by another regulatory body is seen as an aspect of the manner in which a project is to be carried out and so falling for consideration under Regulation 63(6) at the end of the assessment process rather than as removing the need for an appropriate assessment.

4.4 Applying the Integrity Test

- 4.4.1 Following the Appropriate Assessment and the consideration of all mitigation measures, the competent authority needs to make a judgement on whether any of the policies will have an Adverse Effect on Integrity on any Habitats site, either alone or in combination



with other plans and projects. This will be set out in Chapter 4 and summarised in Appendix 3. This test incorporates the precautionary principle.

4.5 In Combination Effects with other Plans and Projects

- 4.5.1 The Appropriate Assessment also includes a comprehensive identification of all the potential effects of the Local Plan likely to be significant, taking into account the combination of the effects of the Local Plan with those of other plans or projects.

4.6 Embedding Mitigation into the Tendring Local Plan

- 4.6.1 The local planning authority, as the competent authority, should consider the manner in which the Local Plan is to be implemented and any mitigation measures which could be relied upon when deciding whether it would have an Adverse Effect on Integrity, including when and how they can be embedded into the Local Plan. It needs to ensure that mitigation is embedded into the Plan through amendments to policies where necessary. It is not sufficient to rely on a general policy aimed at protecting Habitats sites. Instead, explicit caveats need to be included where there may be conflicts between a general policy to protect Habitats sites from development and another policy.
- 4.6.2 Each impact is assessed e.g. air quality, water quality, disturbance, and has a summary of the additional mitigation measures required to avoid Adverse Effect On site Integrity (AEOI) and the recommendations are set out to embed the mitigation into the Local Plan.

4.7 Re-applying the Integrity Test

- 4.7.1 At this stage the integrity test should be re-applied. Where there may still be adverse effects on the ecological integrity of Habitats sites, in view of the Site's conservation objectives, additional mitigation measures should be considered.
- 4.7.2 This AA provides tables for each potential impact pathway where it considers individual policies, how they might be mitigated and whether embedded mitigation is sufficient to avoid Adverse Effect On site Integrity.

4.8 Consulting Natural England

- 4.8.1 Natural England will be formerly consulted on the Tendring Local Plan during the public consultation process.



4.9 Impacts upon protected species outside of the designated site

- 4.9.1 This section of the report considers the potential for adverse effects to the site integrity of Habitats sites through loss of functionally linked land as a result of proposed policies and site allocations.

Policies / Allocations and Habitats sites within Scope

- 4.9.2 At screening stage, the following Habitats sites were listed as having potential to result in adverse effect as having the potential for Likely Significant Effects because of potential functionally linked land (FLL) issues from the development alone:

- Stour and Orwell Estuaries SPA and Ramsar site
- Hamford Water SPA and Ramsar site
- Colne Estuary SPA and Ramsar site
- Blackwater Estuary SPA and Ramsar site
- Dengie SPA and Ramsar site
- Abberton Reservoir SPA and Ramsar site

- 4.9.3 The risk of potential impacts from FLL was identified from the following policies:

- LP1 - Housing Supply
- PP7 - Employment Allocations
- PP16 - St Osyth Village Centre

- 4.9.4 The risk of potential impacts from FLL was identified from the following site allocation and employment sites:

- SAMU5 - Land South of Oakley Road, Harwich and Dovercourt
- SAMU6 - Land South of Colchester Road, Weeley
- SAMU8 - Development of Hare Green Garden Village
- SAMU9 - Horsley Garden Community, Horsley Cross GV
- SAH6 - Land east of Cockaynes Lane, Alresford
- SAH11 - Land North of Lifehouse Spa & Hotel, Thorpe-le-Soken/Thorpe Station and Maltings
- MSA7 - Land south-west of Colchester Main Road, Alresford



- SAE3 - Collierswood Farm A120 Strategic Business Park

- 4.9.5 These policies, site allocations and employment sites contain or promote development which will contain large open areas of open arable land and / or grassland, which may provide important foraging, loafing and roosting habitat for overwintering birds. These birds may include qualifying features of the above Habitats sites, as well as species that form part of the wider waterbird assemblage. Therefore, impacts to these habitats could result in adverse impacts on the integrity of a Habitats site, where a site provides an important resource for the relevant qualifying features.
- 4.9.6 Potential impacts are considered likely where qualifying feature populations, or the overall waterbird assemblage, are present at levels exceeding 1% of the relevant Habitats site population. Thresholds are determined using the latest available Wetland Bird Survey (WeBS) low-tide count data published by the British Trust for Ornithology (BTO), based on a five-year average. The most recent available reporting period is 2020/21 to 2024/25.
- 4.9.7 Where overwintering bird surveys identify qualifying feature populations, or the overall waterbird assemblage exceeding a 1% significance threshold, it is important that further ecology interpretation should be used to justify where the site is functionally linked to the relevant Habitats sites.
- 4.9.8 The relevant qualifying features of the Habitats sites are outlined as part of Table 9 below, as well as Appendix 4. This includes consideration of any additional notable features of the underpinning Sites of Special Scientific Interest (SSSI) which are not listed as part of the Habitats sites:

Table 9. Qualifying features of Habitats sites with consideration of impacts upon Functionally Linked Land

Habitats site	Qualifying features	Key Species Considerations
Stour and Orwell Estuaries SPA	• Black-tailed Godwit, <i>Limosa limosa islandica</i> • Dunlin, <i>Calidris alpina alpina</i> • Grey Plover, <i>Pluvialis squatarola</i> • Pintail, <i>Anas acuta</i> • Redshank, <i>Tringa totanus</i> • Ringed Plover, <i>Charadrius hiaticula</i> • Shelduck, <i>Tadorna tadorna</i> • Turnstone, <i>Arenaria interpres</i>	The following qualifying features of the Stour and Orwell Estuaries SPA and Ramsar site are known to utilise arable land and grassland during the over wintering period: • Lapwing – The species will form large flocks on arable fields and grasslands and will use the site for roosting, foraging and loafing.



Habitats site	Qualifying features	Key Species Considerations
	• Cormorant, <i>Phalacrocorax carbo</i> • Pintail, <i>Anas acuta</i> • Ringed Plover, <i>Charadrius hiaticula</i> • Grey Plover, <i>Pluvialis squatarola</i> • Dunlin, <i>Calidris alpina alpina</i> • Black-tailed Godwit, <i>Limosa limosa islandica</i> • Redshank, <i>Tringa totanus</i> • Shelduck, <i>Tadorna tadorna</i> • Great Crested Grebe, <i>Podiceps cristatus</i> • Curlew, <i>Numenius arquata</i> • Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i> • Wigeon, <i>Mareca penelope</i> • Goldeneye, <i>Bucephala clangula</i> • Oystercatcher, <i>Haematopus ostralegus</i> • Lapwing, <i>Vanellus vanellus</i> • Knot, <i>Calidris canutus</i> • Turnstone, <i>Arenaria interpres</i>	• Oystercatcher - The species will use inland arable land or grassland for nesting where short vegetation is present. • Dark-bellied Brent Goose – The species will use arable land roosting, foraging and loafing. However, larger populations of the tend to be situated near to coastal habitats. • Redshank – The species will utilize coastal grazing marshes and damp inland fields for high-tide roosting. The species is likely to be present in numbers in further inland cropland / winter stubble. • Ringed plover – The species will utilize newly ploughed or sparsely vegetated arable fields, usually when these fields lie adjacent to estuaries, rivers, or wetland staging areas. No other qualifying features or notable species are considered likely to use inland arable land or grasslands for roosting, foraging and loafing during the overwintering period.
Stour and Orwell Estuaries Ramsar site	• Redshank, <i>Tringa totanus totanus</i> • Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i> • Northern Pintail, <i>Anas acuta</i> • Grey Plover, <i>Pluvialis squatarola</i> • Red Knot, <i>Calidris canutus islandica</i> • Dunlin, <i>Calidris alpina alpina</i> • Black-tailed Godwit, <i>Limosa limosa islandica</i> • Redshank, <i>Tringa totanus totanus</i>	



Habitats site	Qualifying features	Key Species Considerations
Stour Estuary SSSI	All referenced species are listed as qualifying features of the Stour and Orwell Estuaries SPA and Ramsar.	
Hamford Water SPA		
Hamford Water Ramsar site		
Hamford Water SSSI	Species below are included within the Hamford Water SSSI citation, but are not included within the qualifying features of Hamford Water SPA and Ramsar: • Wigeon, <i>Mareca penelope</i> • Pintail, <i>Anas acuta</i> • Dunlin, <i>Calidris alpina alpina</i> • Bewick's Swan, <i>Cygnus columbianus bewickii</i> • Knot, <i>Calidris canutus islandica</i> • Turnstone, <i>Arenaria interpres</i>	



Habitats site	Qualifying features	Key Species Considerations
	• Mallard, <i>Anas platyrhynchos</i> • Common Goldeneye, <i>Bucephala clangula</i> • Common Eider, <i>Somateria mollissima</i> • Lapwing, <i>Vanellus vanellus</i> • Golden Plover, <i>Pluvialis apricaria</i> • Bar-tailed Godwit, <i>Limosa lapponica</i> • Hen Harrier, <i>Circus cyaneus</i> • Marsh Harrier, <i>Circus aeruginosus</i> • Black-headed Gull, <i>Chroicocephalus ridibundus</i>	for roosting, foraging and loafing. • Golden Plover – The species will form large flocks on arable fields and grasslands and will use the site for roosting and foraging. • Bewick's Swan – The species will use arable land for foraging or loafing outside of freshwater and estuarine habitats. • Mallard – Widespread duck species which could be present within arable land or grassland. However, impacts from the loss of arable or grassland is unlikely to result in significant impacts upon this species. Therefore, no further consideration is required. • Marsh Harrier - The species will use arable land for foraging, albeit mostly near to suitable coastal or other inland marsh habitats. • Black-headed gull – The species will frequently forage far inland across freshly ploughed arable land and pastures during the over wintering period. No other qualifying features or notable species are considered likely to use inland arable land or grasslands for roosting, foraging and loafing during the overwintering period.



Habitats site	Qualifying features	Key Species Considerations
Colne Estuary SPA		
Colne Estuary Ramsar site	• Dark-bellied brent goose, <i>Branta bernicla bernicla</i> • Redshank, <i>Tringa totanus</i> • Black-tailed Godwit, <i>Limosa limosa islandica</i>	
Colne Estuary SSSI		
Blackwater Estuary SPA	• Dark-bellied brent goose, <i>Branta bernicla bernicla</i> • Pochard, <i>Aythya ferina</i> • Hen harrier, <i>Circus cyaneus</i>	



Habitats site	Qualifying features	Key Species Considerations
	• Ringed plover, <i>Charadrius hiaticula</i> • Grey Plover, <i>Pluvialis squatarola</i> • Dunlin, <i>Calidris alpina alpina</i> • Black-tailed Godwit, <i>Limosa limosa islandica</i> • Little tern, <i>Sternula albifrons</i>	arable land and grassland during the over wintering period: • Dark-bellied Brent Goose – The species will use arable land roosting, foraging and loafing. However, larger populations of the tend to be situated near to coastal habitats.
Blackwater Estuary Ramsar site	• Grey Plover, <i>Pluvialis squatarola</i> • Dunlin, <i>Calidris alpina alpina</i> • Black-tailed Godwit, <i>Limosa limosa islandica</i> • Shelduck, <i>Tadorna tadorna</i> • Golden Plover, <i>Pluvialis apricaria apricaria</i> • Redshank, <i>Tringa totanus</i>	• Golden Plover – The species will form large flocks on arable fields and grasslands and will use the site for roosting and foraging. • Redshank – The species will utilize coastal grazing marshes and damp inland fields for high-tide roosting. The species is unlikely to be present in numbers in further inland cropland / winter stubble.
Blackwater Estuary SSSI	Species below are included within the Blackwater Estuary SSSI citation, but are not included within the qualifying features of Blackwater Estuary SPA and Ramsar site: • Gadwall, <i>Mareca strepera</i> • Eurasian Teal, <i>Anas crecca</i> • Common Goldeneye, <i>Bucephala clangula</i> • Eurasian Curlew, <i>Numenius arquata</i> • Spotted Redshank, <i>Tringa erythropus</i>	• Ringed plover – The species will utilize newly ploughed or sparsely vegetated arable fields, usually when these fields lie adjacent to estuaries, rivers, or wetland staging areas. • Hen Harrier - The species will use arable land for foraging. The following species included in the Blackwater Estuary SSSI are also known to utilise arable land and grassland during the over wintering period: • Curlew – The species will forage and nest within inland grasslands and arable lands. In these circumstances, the



Habitats site	Qualifying features	Key Species Considerations
		species is likely present in low numbers. No other qualifying features or notable species are considered likely to use inland arable land or grasslands for roosting, foraging and loafing during the overwintering period.
Dengie SPA	• Dark-bellied brent goose, <i>Branta bernicla</i> bernicla • Grey Plover, <i>Pluvialis squatarola</i> • Hen harrier, <i>Circus cyaneus</i> • Knot, <i>Calidris canutus</i>	The following qualifying features of the Dengie SPA and Ramsar site are known to utilise arable land and grassland during the overwintering period: • Dark-bellied Brent Goose – The species will use arable land roosting, foraging and loafing. However, larger populations of the tend to be situated near to coastal habitats.
Dengie Ramsar site	• Redshank, <i>Tringa totanus</i> • Black-tailed Godwit, <i>Limosa limosa islandica</i> • Eurasian oystercatcher, <i>Haematopus ostralegus ostralegus</i> • Grey Plover, <i>Pluvialis squatarola</i> • Bar-tailed godwit, <i>Limosa lapponica lapponica</i> • Red Knot, <i>Calidris canutus islandica</i>	• Redshank – The species will utilize coastal grazing marshes and damp inland fields for high-tide roosting. The species is unlikely to be present in numbers in further inland cropland / winter stubble.
Dengie SSSI	Species below are included within the Dengie SSSI citation, but are not included within the qualifying features of Dengie SPA and Ramsar site: • Turnstone, <i>Arenaria interpres</i> • Wigeon, <i>Mareca penelope</i> • Northern Pintail, <i>Anas acuta</i> • Curlew, <i>Numenius Arquata</i> • Dunlin, <i>Calidris alpina alpina</i>	• Hen Harrier - The species will use arable land for foraging. • Oystercatcher – The species will use inland arable land or grassland for nesting where short vegetation is present. The following species included in the Dengie SSSI are also known to



Habitats site	Qualifying features	Key Species Considerations
	• Shelduck, <i>Tadorna tadorna</i> • Golden Plover, <i>Pluvialis apricaria</i> • Little tern, <i>Sternula albifrons</i> • Ringed plover, <i>Charadrius hiaticula</i>	
Abberton Reservoir SPA		



Habitats site	Qualifying features	Key Species Considerations
		The following species included in the Abberton Reservoir SSSI are also known to utilise arable land and grassland during the overwintering period: • Lapwing – The species will form large flocks on arable fields and grasslands and will use the site for roosting, foraging and loafing. • Golden Plover – The species will form large flocks on arable fields and grasslands and will use the site for roosting and foraging. • Curlew – The species will forage and nest within inland grasslands and arable lands. In these circumstances, the species is likely present in low numbers. • Yellow Wagtail – The species is not a waterbird species, but will use arable land for foraging or nesting. • Redshank – The species will utilize coastal grazing marshes and damp inland fields for high-tide roosting. The species is unlikely to be present in numbers in further inland cropland / winter stubble. No other qualifying features or notable species are considered likely to use inland arable land or grasslands for roosting, foraging
Abberton Reservoir Ramsar site		
Abberton Reservoir SSSI		



Habitats site	Qualifying features	Key Species Considerations
		and loafing during the overwing wintering period.

4.9.9 Therefore, for all site allocations and employment sites screened in for potential impacts on functionally linked land, surveys and/or supporting evidence should be used to establish the presence or likely absence of the referenced qualifying features or notable bird species, together with the extent of their use of the affected land and their relative abundance.

4.9.10 The potential risk for functionally linked land being present within site allocations and employment sites is considered high, particularly for large garden village proposals or development within 1km of the coastal Habitats sites.

Use of Mitigation Measures

4.9.11 Given the potential for site allocations, employment sites screened into the assessment, and associated growth-promoting policies to affect functionally linked land supporting the qualifying features of the coastal Habitats sites, the Council has embedded mitigation measures within the Local Plan to avoid, reduce and manage impacts on potential functionally linked land.

4.9.12 This includes the following wording embedded within Strategic Policy PPL4 - Biodiversity And Geodiversity, advised by Natural England:

For any major development within 10km of a Habitats Site, a Habitats Regulations Assessment will be required to assess the likelihood of the application site and adjacent land being Functionally Linked Land for designated bird species and/or assemblages of a Habitats Site, to avoid adverse effect on the integrity of the Habitats Sites.

In accordance with Natural England's most recent guidance a desk-based study covering the last 5 years of bird surveys, using local records, shall be undertaken and unless FLL can be ruled out, a wintering bird survey (including nocturnal surveys) will be required for all suitable adjacent fields both within the application site and adjacent, to either rule out FLL or inform the requirement for mitigation. Mitigation will require an equivalent amount of land to be managed for the relevant SPA/Ramsar bird species/assemblages in perpetuity and without public access.

4.9.13 Furthermore, additional policy wording has been included within all Strategic Allocation Mixed-Use (SAMU) and Strategic Allocation Housing (SAH) policies, covering all site allocations of more than 100 dwellings within the Local Plan:

Where present, Functionally Linked Land shall be protected and any impacts appropriately avoided, mitigated or compensated for;



- 4.9.14 It also includes the following additional wording with regard to financial contributions towards strategic solutions for Functionally Linked Land:

The masterplan and planning applications will be expected to address the following, alongside other relevant requirements of this Local Plan:

...financial contributions towards social, community, health, education, emergency services, utilities, waste, transport, green and blue infrastructure, flood risk mitigation and environmental mitigation measures, including Suitable Alternative Natural Greenspace (SANG), Essex RAMS measures, biodiversity enhancements and any mitigation required for functionally linked land.

- 4.9.15 Therefore, this embedded mitigation ensures that appropriate scoping assessments, wintering bird surveys following appropriate methodology and proportionate mitigation measures will be secured for site allocations and employment sites where necessary, as well as any other development coming forward during the lifetime of the Local Plan.

Re-applying the Integrity Test

- 4.9.16 It is concluded that the embedded mitigation measures identified through this Appropriate Assessment will ensure that an adverse effect on the integrity of the Abberton Reservoir SPA and Ramsar site, Stour and Orwell Estuaries SPA and Ramsar site, Hamford Water SPA and Ramsar site, Colne Estuary SPA and Ramsar site, Blackwater Estuary SPA and Ramsar site, and Dengie SPA and Ramsar site can be avoided in relation to the potential loss of functionally linked land associated with the policies, site allocations and employment allocations assessed. Accordingly, it is considered that the conservation objectives of these Habitats sites can now be maintained and that the Tendring Local Plan will not result in an adverse effect on site integrity in respect of this impact pathway.

4.10 Disturbance

- 4.10.1 This section of the report considers the potential for adverse effects to the site integrity of Habitats sites through direct disturbance (noise and visual disturbance) or from recreational disturbance from the proposed policies and site allocations from the development alone.

Policies / Allocations and Habitats sites within Scope

- 4.10.2 At screening stage, the following Habitats sites were listed as having potential to result in adverse effect as having the potential for Likely Significant Effects because of potential recreational disturbance or other direct disturbance issues from the development alone:

- Stour and Orwell SPA and Ramsar site



- Hamford Water SPA and Ramsar site
- Colne Estuary SPA and Ramsar site

4.10.3 The risk of potential impacts from recreational or direct disturbance was identified from the following policies:

- LP1 - Housing Supply
- LP9 - Gypsy and Traveller Sites
- PP6a - Extensions to Existing Employment Sites in the Countryside
- PP8 -Tourism
- PP16 - St Osyth Village Centre

4.10.4 The risk of potential impacts from recreational disturbance from the development alone was identified from the following policies, due to containing either development over 500 residential units or major development within 1km of the coastal Habitats sites:

Allocation sites over 500 units within the Essex Coast RAMS ZOI:

- SAMU5 - Development Off Deane's Lane And Oakley Road, Dovercourt
- SAMU6 - Land South of Colchester Road, Weeley
- SAMU8 - Development of Hare Green Garden Village
- SAMU9 - Horsley Garden Community, Horsley Cross GV

Allocation sites over 9 units within 1km of coastal Habitats sites:

- SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree, Mistley and Lawford
- SAH1 – Development at Vicarage Farm Off Main Road and South of A120, Harwich
- MSA1 - Durite Works, Valley Road, Harwich
- MSA3 - MSA3 - Affinity Water, Mill Hill, Manningtree
- MSA4 - Crisp Malting, School Lane, Mistley, Manningtree
- MSA6 - Land at Pannell Place, Brightlingsea
- MSA17 - Land north of Walton Road, Kirby-le-Soken
- MSA28 - Land North of Rectory Road, Wrabness
- MSA33 - Former Wellhouse Site, Chestnut Way, Brightlingsea



- MSA34 - Vicarage Field, Church Road, Brightlingsea
- MSA35 - Land North of Robinson Road, Brightlingsea

4.10.5 The risk of potential impacts from other direct disturbance was identified from the following policies, due to close proximity of the site allocation sites to Habitats sites:

- SAMU5 - Development Off Deane's Lane And Oakley Road, Dovercourt
- SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree, Mistley and Lawford

4.10.6 As a result, a summary of recreational disturbance and direct disturbance impacts from the development alone are outlined below:

Recreational disturbance

- 4.10.7 With regard to potential recreational disturbance impacts from the development alone, the revised Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS), adopted by the Council on 26 June 2026, identifies a growing body of evidence demonstrating the effectiveness of Suitable Alternative Natural Greenspaces (SANGs) in reducing recreational pressure on coastal designated sites from the development alone. The requirement for additional SANGs has also been identified following the Essex Coast RAMS Visitor Survey 2025 (Footprint Ecology), which has supported the revised Essex Coast RAMS (2026).
- 4.10.8 Therefore, the Essex Coast RAMS (2026) outlines the need for greater certainty regarding the quantity and quality of SANG provision required from different scales of residential development proposals across Essex, which needs to be supported by clear guidance on their design, management and intended function.
- 4.10.9 In particular, developments of 500 dwellings or more are generally those most likely to generate recreational disturbance effects on Habitats sites from the development alone. In addition, smaller developments situated in close proximity to a designated site may also present a particular risk of adverse effects. Where a proposal is identified as having the potential to result in significant recreational disturbance effects alone, additional mitigation measures, including the provision of formal SANG, may be required in consultation with Natural England.
- 4.10.10 As a result, additional guidance on a formal SANG requirement in Essex is forthcoming, following the adoption of the Essex Coast RAMS (2026). This will likely include a requirement for formal SANGs based on the following trigger distances in Table 10, in line with Natural England's interim advice to Tendring District Council.

**Table 10. Expected formal SANG mitigation distances**

Scale (No. of dwellings)	Distance from sites	
	>1km	<1km (close proximity)
1-9	RAMS only	RAMS only
10-499	RAMS only (suggest ANG)	SANG required
500+	SANG required – but flexibility depending on distance from SPA boundary	SANG required

4.10.11 Accordingly, site allocations have been screened into the Appropriate Assessment where there is potential for recreational disturbance effects on Habitats Sites arising from the development alone. This includes allocations capable of delivering 500 or more dwellings, as well as major residential developments of 10 or more dwellings located within 1 km of a coastal Habitats site.

4.10.12 The Essex Coast RAMS (2026) states that, pending the publication of updated guidance on the provision of Suitable Alternative Natural Greenspace (SANG) within Essex, Natural England advises that the SANG Guidelines (2021) should be followed when designing and delivering new SANGs associated with development proposals. These guidelines were originally developed to mitigate recreational disturbance impacts on the Thames Basin Heaths SPA and establish a number of key requirements for SANG provision, including:

- The provision of accessible natural greenspace for recreational use at a size of at least 8 hectares per 1,000 new residents, secured and managed in perpetuity (taken to be a minimum of 80 years).
- The inclusion of a circular walking route of approximately 2.3 km in length.
- The provision of a car park for users living more than 400 m from the SANG boundary, at a rate of one parking space per hectare of SANG.

4.10.13 In circumstances where sufficient on-site SANG provision cannot be achieved, alternative strategic greenspace provision will need to be identified and secured by Tendring District Council. Development proposals identified as having the potential to result in adverse effects on the integrity of Habitats sites from recreational disturbance from the development alone should not be permitted unless appropriate mitigation has been secured. This would include a proportionate financial contribution, secured through a planning obligation, towards the provision, enhancement and long-term management of off-site SANGs.



4.10.14 It is highlighted that Natural England previously issued advice to Local Planning Authorities through the original Essex Coast RAMS in 2018 to ensure that new residential development, and the associated recreational disturbance arising from it, is compliant with the requirements of the Habitats Regulations. This advice included additional recommendations for larger-scale residential developments located within the Essex Coast RAMS ZOI, comprising 100 or more dwellings. The guidance advised that such developments should broadly follow the principles established within the Thames Basin Heaths guidance relating to SANG. However, as a minimum, the following measures were, at that time, expected to be provided:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km within the site and/or with links to surrounding public rights of way (PRoW)
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

4.10.15 This previous recommendation was not a formal SANG requirement, but a best practice measure to minimise the risk of impacts from recreational disturbance upon coastal Habitats from large scale new development from the development alone. Therefore, it is indicated that any forthcoming SANG guidance will supersede this previously recommended approach. However, it is likely that developments consisting of 9 – 499 dwellings over 1km from coastal Habitats sites will still be required to deliver accessible nature greenspace (ANGs) as part of the landscape masterplan, which should be in line with Natural England's Accessible Greenspace Standard User Guide (September 2024).

4.10.16 Where development requires formal SANGs provision or informal ANGs, a financial contribution in line with the Essex Coast RAMS (2026) to avoid adverse impacts from recreational disturbance upon coastal Habitats sites in combination with other plans and projects will still be required. This is because no amount of on-site or off-site SANG or ANG can prevent all visits to the Essex Coast Habitats sites by new residents, nor would this be a desirable outcome.

4.10.17 With regard to the policies screened in for disturbance, it is indicated that the following policies could result in impacts from recreational disturbance.

- LP1 - Housing Supply
- LP9 - Gypsy and Traveller Sites



- PP8 -Tourism
- PP16 - St Osyth Village Centre

4.10.18 Policy 'LP1 - Housing Supply' has been included because it sets out the Council's 5-year housing supply proposals, which will result in adverse effects on site integrity on coastal Habitats sites without SANG / Essex Coast RAMS contributions secured.

4.10.19 Similarly, Policy LP9: Gypsy and Traveller Sites has been included within the assessment as it identifies the locations where the provision or expansion of Gypsy and Traveller accommodation will be supported, together with the number of additional pitches or pitch equivalents proposed. None of the identified pitches are located within 1 km of a coastal Habitats site and, therefore, likely significant effects arising from recreational disturbance on an 'alone' basis can be ruled out. Nevertheless, as outlined in the Essex Coast RAMS (2026), any increase in Gypsy and Traveller pitches or plots (sui generis) has the potential to contribute to recreational pressure on coastal Habitats Sites in combination with other plans and projects. Consequently, whilst adverse effects from the policy alone are not anticipated, the policy will be considered further within the in-combination assessment section of this HRA.

4.10.20 Policy 'PP8 -Tourism' has been screened in because it sets out the Council's support for tourism development which could increase recreational pressure on coastal Habitats sites, depending on the type of tourism development. Tourism attractions (F1, Sui Generis) are identified as an issue within the Essex Coast RAMS (2026), these are not formally included as development that will trigger a financial contribution in the Essex Coast RAMS, but that impacts will need to be determined at a case-by-case basis where potential impacts have been identified.

4.10.21 Policy 'PP16 - St Osyth Village Centre' also sets out that the Council will support the provision of a car park and housing within St Osyth village centre. This settlement is extremely close to the Colne Estuary SPA and Ramsar site and the Essex Estuaries SAC and there the car park and new housing could result in increased accessibility to the Habitats sites and potential recreational impacts. As the location of the car park and new housing has not been identified, the likely impacts of the proposals upon the Habitats site can not be fully determine and will need to be assessed at application stage. However, at a minimum, it is expected that a financial contribution detailed in the Essex Coast RAMS will be required.

Direct Disturbance

4.10.22 Direct disturbance may occur during both the construction and operational phases of development. During construction, disturbance could result from increased noise, vibration and visual stimuli affecting qualifying bird species, notably overwintering waterbirds. During operation, disturbance pathways may arise from development-related activities other than recreational use, including external lighting, vehicle movements and



increased levels of human activity. Where significant effects are present, the development has the potential to disturb sensitive species and alter the ecological functioning of nearby Habitats sites.

- 4.10.23 The site allocation 'SAMU5 - Development Off Deane's Lane And Oakley Road, Dovercourt' was screened into to Appropriate Assessment stage due to the red line boundary of the development being located immediately adjacent to the Hamford Water SPA and Ramsar site.
- 4.10.24 The site allocation SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree, Mistley and Lawford was screened into to Appropriate Assessment stage due to the red line boundary of the development being located immediately adjacent to the Stour and Orwell Estuaries SPA and Ramsar site.
- 4.10.25 As a result, both allocation sites have the potential to result disturbance impacts both the construction and operational phases.
- 4.10.26 It is considered likely that the development masterplan for SAMU5 can be designed in a way that avoids significant disturbance. This is because visual disturbance impacts are unlikely at an extent of over 300m and development could be designed in a way to ensure that significant hard landscaping is not located within this location. Furthermore, if development can limit regular noise levels to less than 55dB at the coastal Habitats sites, then it is unlikely that any waterbird species will be affected by the proposals. This is based on guidance contained within the Waterbird Disturbance Mitigation Toolkit⁷.
- 4.10.27 It is also considered likely that a strategy can also be secured for SAMU7. This development will be located in the town of Manningtree and any waterbirds will already be habituated to constant noise levels and visual disturbances.
- 4.10.28 Both development proposals will require a project-level Habitats Regulations Assessment at the planning application stage to determine whether direct disturbance effects on the relevant Habitats sites can be avoided or adequately mitigated. The assessment should consider potential disturbance arising during both the construction and operational phases of development, including noise, vibration, visual disturbance and artificial lighting. To enable the development to proceed without adverse effects on site integrity, appropriate avoidance and mitigation measures will need to be secured through a Construction Environmental Management Plan (CEMP). Such measures may include restrictions on construction activities during the overwintering bird period, controls on noise-generating activities, the implementation of sensitive lighting design to minimise light spill, and the avoidance of high-noise works during periods of severe

⁷ Cutts N, Hemingway K and Spencer J (2013) *The Waterbird Disturbance Mitigation Toolkit Informing Estuarine Planning and Construction Projects*. Produced by the Institute of Estuarine and Coastal Studies (IECS). Version 3.2.



weather or 'cold weather warnings' issued by the Met Office, when qualifying bird species may be particularly vulnerable to disturbance.

4.10.29 In addition, it is indicated that the following policies were considered to have the potential to result in adverse impacts upon Habitats sites:

- PP6a - Extensions to Existing Employment Sites in the Countryside

4.10.30 This policy supports the extension of existing employment sites, where appropriate sustainable economic growth options have been identified, or allocates new employment areas. However, existing employment sites within Manningtree and Harwich are located immediately adjacent to the Stour and Orwell Estuaries SPA and Ramsar site. As a result, extension proposals could result in adverse impacts and project Habitats Regulations Assessments may be required depending on the locations of any employment extensions.

Use of Mitigation Measures

4.10.31 Given the potential for site allocations and associated growth-promoting policies causing recreational disturbance from the development alone, it is indicated that the Council has embedded mitigation measures within the Local Plan to minimise impacts from increased recreational pressure on coastal Habitats sites.

4.10.32 This includes the following wording embedded within Strategic Policy PPL4 - Biodiversity And Geodiversity, advised by Natural England:

"There will be a formal requirement for Suitable Alternative Greenspace (SANG) where necessary to avoid adverse effects on Habitat Sites. Any SANG provision must accord with Natural England's SANG Guidelines 2021 (or any subsequent replacement guidance).

Where the Habitats Regulations Assessment process identifies that a development is likely to result in significant recreational impacts on a Habitat Site, appropriate mitigation will be required. Where SANG is identified as necessary mitigation, it shall be provided either on-site and/or through financial contributions towards suitable off-site provision within a reasonable proximity of the development.

As a guide, SANG provision will normally be required in the following circumstances:

- 1 to 9 dwellings: no SANG required;
- 10 to 499 dwellings: SANG required where the site is within 1km of a Habitat Site; and
- 500 or more dwellings: SANG required.

Whilst SANG is not an automatic delivery mechanism for BNG, the two can exist on the same site. BNG on SANG is only attributable to such habitat creation or enhancement



that proves measurable additionality over and above the minimum requirements of the SANG, demonstrated using the Biodiversity Metric.

- 4.10.33 Furthermore, additional policy wording has been included within all Strategic Allocation Mixed-Use (SAMU) and Strategic Allocation Housing (SAH) policies, covering all site allocations of more than 100 dwellings within the Local Plan:

development shall provide Suitable Alternative Natural Greenspace (SANG) mitigation, where necessary, in accordance with Natural England guidance and Policy PPL4 of this Plan, and shall deliver any measures required to avoid or mitigate adverse effects on Habitats Sites.”

- 4.10.34 Additionally, all Strategic Allocation Mixed-Use (SAMU) development includes the following additional guidance with site allocation policy wording, setting out the Council’s expectations that financial contributions will be secured for SANG provision, where required:

“Financial contributions towards social, community, health, education, emergency services, utilities, waste, transport, green and blue infrastructure, flood risk mitigation and environmental mitigation measures, including Suitable Alternative Natural Greenspace (SANG), Essex RAMS measures, biodiversity enhancements and any mitigation required for functionally linked land.”

- 4.10.35 In relation to direct disturbance effects, Strategic Policy PPL4: Biodiversity and Geodiversity incorporates mitigation by requiring the submission of a project-level Habitats Regulations Assessment where likely significant effects on a Habitats site cannot be excluded:

Where proposals for development are likely to significantly impact International and European sites, applications must be supported by a Habitats Regulation Assessment (HRA) to provide sufficient information to the Council to establish the likelihood and nature of impacts before a decision can be made. If necessary, this may need to be followed by a more detailed ‘Appropriate Assessment’ of the impacts.

- 4.10.36 Therefore, this is considered a sufficient embedded mitigation to ensure that appropriate considerations on direct disturbance are undertaken for any planning applications in relation to SAMU5 and SAMU7.

- 4.10.37 In addition, policy PP6a also includes reference to reference to Habitats sites within its Protection of Countryside Character and Sensitive Areas, following advice from Place Services:

“Where located adjacent to sensitive landscapes, such as Strategic Green Gaps, Local Wildlife Sites, a National Landscape, Habitat Sites or areas of historic significance, applicants must show how adverse impacts will be avoided, mitigated, or, where necessary, compensated;”



4.10.38 Therefore, this ensures that any employment extensions near to Stour and Orwell Estuaries will need to consider impacts from direct disturbance upon the qualifying features of the coastal Habitats sites.

Re-applying the Integrity Test

4.10.39 Taking account of the mitigation measures embedded within the Tendring Local Plan and those that will be secured at the project level, it is considered that adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar site, Hamford Water SPA and Ramsar site, and the Colne Estuary SPA and Ramsar site can now be excluded. This conclusion applies to potential effects arising from recreational disturbance associated with development alone and direct disturbance linked to the policies, site allocations and employment allocations considered at the Appropriate Assessment stage. The Plan is therefore considered capable of maintaining the structure, function and supporting processes of the relevant Habitats sites and ensuring conservation objectives can be maintained.

4.11 Water Quality

4.11.1 This section of the report considers the potential for adverse effects to the site integrity of Habitats sites through change in water quality as a result of proposed policies and site allocations.

Policies / Allocations and Habitats sites within Scope

4.11.2 At screening stage, the following Habitats sites were listed as having potential to result in adverse effect as having the potential for Likely Significant Effects because of potential water quality issues:

- Stour and Orwell SPA and Ramsar site
- Hamford Water SAC, SPA and Ramsar site
- Colne Estuary SPA and Ramsar site
- Essex Estuaries SAC

4.11.3 The risk of potential impacts from adverse water quality was identified from the following policies:

- LP1 - Housing Supply
- PP6a - Extensions to Existing Employment Sites in the Countryside
- PP7 - Employment Allocations



4.11.4 The risk of potential impacts from adverse water quality was identified from the following site allocations and employment allocations:

- SAMU5 - Development Off Deane's Lane And Oakley Road, Dovercourt
- SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree
- SAMU8 - Development of Hare Green Garden Village
- SAH9 - Land south of Clacton Road, St Osyth
- MSA3 - Affinity Water, Mill Hill, Manningtree
- MSA4 - Crisp Malting, School Lane, Mistley, Manningtree, Mistley and Lawford
- MSA9 - Land south of Windmill Road and east of Straight Road, Bradfield
- MSA11 - Land west of Parsons Hill, Great Bromley
- MSA12 - Land south of Hall Road, Great Bromley
- MSA36 - Land North of Wix Road, Bradfield
- MSA37 - Paddock Site South of Bradfield Playing Field, East of the Street, Bradfield

4.11.5 Site allocations SAMU8 and SAH9 have been screened into the Appropriate Assessment stage due to their proximity to main river catchments that ultimately discharge into the Colne Estuary SPA and Ramsar site and the Essex Estuaries SAC. Site allocation SAMU5 has also been screened into the Appropriate Assessment as its boundary lies immediately adjacent to Hamford Water SAC, SPA and Ramsar site. Accordingly, there is potential for these allocations to affect the relevant coastal Habitats sites through alterations to water quality and hydrological processes, either during construction or operation.

4.11.6 To minimise the risk of adverse effects on Habitats sites during the construction phase, site allocations SAMU8, SAMU5 and SAH9 will be required to implement best practice pollution prevention and control measures through a site CEMP. The CEMP should include measures to prevent the accidental release of sediments, fuels, chemicals, concrete washings and other pollutants to nearby watercourses and hydrologically connected habitats. Such measures should be consistent with current Government guidance⁸ on pollution prevention and environmental management during construction activities.

4.11.7 To minimise the risk of adverse water quality effects during the operational phase, including the discharge of urban runoff containing pollutants such as heavy metals, hydrocarbons, microplastics and nutrients, developments at SAMU8, SAMU5 and SAH9

⁸ <https://www.gov.uk/guidance/pollution-prevention-for-businesses>



should incorporate appropriate Sustainable Drainage Systems (SuDS). SuDS should be designed in accordance with best practice principles and utilise natural treatment processes to intercept, attenuate and remove pollutants before surface water is discharged to the main rivers. This will assist in maintaining the water quality and ecological functioning of downstream habitats that support the Colne Estuary SPA and Ramsar site, Hamford Water SAC, SPA and Ramsar site, and the Essex Estuaries SAC.

- 4.11.8 To minimise the risk of urban runoff (heavy metals, hydrocarbons, microplastics, and nutrients into water bodies) during the operation phase into main rivers. It will be necessary for these developments to have appropriate Sustainable Drainage Systems (SuDS) which use natural processes to treat pollutants before they reach natural watercourses.
- 4.11.9 The remaining site allocations and employment-related policies have been screened into the Appropriate Assessment due to their location within the wastewater catchments served by Great Bromley WRC, Manningtree WRC or St Osyth WRC. These Wastewater Recycling Centres discharge to watercourse that are hydrologically connected to the Stour and Orwell Estuaries SPA and Ramsar site, Colne Estuary SPA and Ramsar site, and the Essex Estuaries SAC. The evidence available from the Water Cycle Study (AECOM 2026) indicates that these above listed wastewater treatment works currently have limited capacity to accommodate the forecast increase in wastewater flows associated with new development as part of the Local Plan. As a result, there is potential for adverse effects on the relevant Habitats sites through changes to water quality from these allocations and policies without appropriate mitigation embedded.
- 4.11.10 In order to fully mitigate the potential effects of increased wastewater flows on the Stour and Orwell Estuaries SPA and Ramsar site, Colne Estuary SPA and Ramsar site, and the Essex Estuaries SAC, development proposals will be required to demonstrate, through a project-level Habitats Regulations Assessment at application stage and consultation with the relevant wastewater infrastructure provider, that sufficient wastewater treatment capacity will be available prior to the occupation of development. Where capacity constraints are identified within the existing network or at the receiving WRC, appropriate mitigation measures will need to be secured and implemented. Such measures may include upgrades to the relevant WRC to increase available treatment capacity and operational headroom, or the provision of alternative foul drainage solutions that can be demonstrated to avoid adverse effects on the integrity of the Habitats sites. Development should not be occupied until the necessary mitigation measures and infrastructure improvements have been delivered and are operational.



Use of Mitigation Measures

4.11.11 Given the potential for site allocations and associated growth-promoting policies causing water quality from the development alone, it is indicated that the Council has embedded mitigation measures within the Local Plan to minimise impacts from water quality on coastal Habitats sites.

4.11.12 To ensure that appropriate impacts from water quality can be avoided during the construction phase, it is considered that Strategic Policy PPL4: Biodiversity and Geodiversity incorporates mitigation by requiring the submission of a project-level Habitats Regulations Assessment where likely significant effects on a Habitats site cannot be excluded:

“Where proposals for development are likely to significantly impact International and European sites, applications must be supported by a Habitats Regulation Assessment (HRA) to provide sufficient information to the Council to establish the likelihood and nature of impacts before a decision can be made. If necessary, this may need to be followed by a more detailed ‘Appropriate Assessment’ of the impacts.”

4.11.13 In addition, it is considered that any impacts can be easily addressed via CEMPs following best practice guidance, which would be a standard condition secured for large scale major development, including site allocations SAMU8, SAMU5 and SAH9.

4.11.14 To ensure that appropriate impacts from water quality impacts from runoff can be avoided during the operation phase of development, it is indicated that Strategic Policy PPL5: Water Conservation, Drainage And Sewerage incorporates the appropriate SUDs requirements for new developments:

“New development should include Sustainable Drainage Systems (SuDS) as a means of reducing flood risk, improving water quality, enhancing the green and blue infrastructure network and providing amenity and biodiversity benefits in line with the Essex Water Strategy and the SuDS Design Guide. Applicants should explain and justify the reasons for not using SuDS if not included in their proposals, which should include water inputs and outputs designed to protect and, where possible, enhance the natural environment.”

4.11.15 Therefore, with this embedded mitigation it is considered that water quality impacts can be avoided upon the relevant Habitats sites from site allocations SAMU8, SAMU5 and SAH9.

4.11.16 To ensure that appropriate impacts from water quality impacts from inadequate sewage disposal facilities, it is indicated that Strategic Policy PPL5: Water Conservation, Drainage And Sewerage also requires the following for new developments:

“Proposals for development must demonstrate that adequate provision exists, or can be provided in time, for sewage disposal to a public sewer and water recycling centre



(sewage treatment works). Private sewage treatment facilities will not be permitted if there is an accessible public foul sewer. Where private sewage treatment facilities are the only practical option for sewage disposal, they will only be permitted if there is existing capacity and where there would be no harm to the environment, having regard to preventing pollution of groundwater and any watercourses and odour.”

4.11.17 This policy requires development proposals, including employment allocations, within the catchments of Great Bromley WRC, Manningtree WRC or St Osyth WRC to demonstrate that adequate wastewater treatment capacity can be provided to accommodate the additional demand generated by the development prior to occupation. Therefore, this embedded mitigation ensures no development within these catchments will be permitted unless an appropriate mitigation strategy is secured to ensure that increased wastewater flows will not result in adverse effects on water quality within the coastal Habitats sites.

Re-applying the Integrity Test

4.11.18 Taking account of the mitigation measures embedded within the Tendring Local Plan and those that will be secured at the project level, it is now considered that adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar site, Hamford Water SAC, SPA and Ramsar site, the Colne Estuary SPA and Ramsar site and the Essex Estuaries SAC can now be excluded. This conclusion applies to potential effects arising from water quality associated with development alone linked to the policies, site allocations and employment allocations considered at the Appropriate Assessment stage. The Plan is therefore considered capable of maintaining the structure, function and supporting processes of the relevant Habitats sites and ensuring conservation objectives can be maintained.

4.12 Air Quality

4.12.1 This section of the report considers the potential for adverse effects to the site integrity of Habitats sites through change in air quality as a result of proposed policies and site allocations.

Policies / Allocations and Habitats Sites within Scope

4.12.2 At screening stage, the following Habitats sites were listed as having potential to result in adverse effect as having the potential for Likely Significant Effects because of potential air quality issues:

- Stour and Orwell SPA and Ramsar site
- Hamford Water SAC, SPA and Ramsar site
- Colne Estuary SPA and Ramsar site



- Essex Estuaries SAC

4.12.3 The risk of potential impacts from adverse air quality was identified from the following policies:

- LP1 - Housing Supply
- PP7 - Employment Allocations

4.12.4 The risk of potential impacts from adverse air quality was identified from the following site allocations and employment allocations:

- SAMU5 - Development Off Deane's Lane And Oakley Road, Dovercourt
- SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree, Mistley and Lawford
- MSA4 - Crisp Malting, School Lane, Mistley, Manningtree, Mistley and Lawford
- SAE 2 - Freeport East, Bathside Bay and the A120 Corridor

4.12.5 This assessment considers only the potential air quality effects arising from development proposals on the development alone. Accordingly, it does not assess the potential cumulative effects associated with increases in traffic generated by development over the plan period, including the potential for changes in atmospheric nitrogen deposition and nitrogen oxide concentrations along road corridors located within 200 m of coastal Habitats Sites. These potential in-combination effects, arising from the cumulative growth proposed through the Local Plan and other relevant plans and projects, are considered separately within the in-combination assessment section of this HRA.

4.12.6 Policy SAMU5 has been screened into the Appropriate Assessment stage because the allocation is located immediately adjacent to Hamford Water SAC, SPA and Ramsar site. Due to the proximity of the proposed development to these Habitats sites, there is potential for air quality effects arising from construction and operational activities to affect the qualifying habitats and species. The allocation is therefore considered further at the Appropriate Assessment stage in relation to air quality impacts arising from the development alone.

4.12.7 Policies SAMU7 and MSA4 have been screened into the Appropriate Assessment stage as they are located immediately adjacent to the Stour and Orwell Estuaries SPA and Ramsar site. In addition, Policy SAE2 includes provision for road infrastructure that may be delivered as part of the wider Bathside Bay development, which is also situated immediately adjacent to these Habitats sites. Given this proximity, there is also potential for construction and operational air quality effects to arise from the development proposals on an 'alone' basis. These policies have therefore been taken forward for further assessment.



4.12.8 The referenced policies have been screened into the Appropriate Assessment stage solely because they include reference to the site allocations or employment allocations. As such, any potential air quality effects associated with these policies are intrinsically linked to the implementation of the relevant allocations and are considered further through the assessment of those proposals.

4.12.9 As a result, it is considered that the following adverse impacts from air quality could arise during the construction phase and operation phase of any development:

Construction phase - Dust Emissions

4.12.10 Dust emissions can result in potential air quality impacts during the construction phase. This is because dust settling on vegetation can coat plant foliage, reducing light interception and adversely affecting photosynthesis and other physiological functions. Although rainfall can remove deposited dust from leaf surfaces, it may also facilitate the rapid transfer of dust-associated contaminants into the soil.

4.12.11 For plant communities located adjacent to short-term construction activities, any effects from dust deposition are generally expected to be temporary, with recovery likely to occur within a year of the cessation of dust-generating activities. However, where construction works are extensive, prolonged, or involve large-scale earthworks, elevated levels of dust deposition over an extended period may result in more significant adverse effects on vascular plant communities.

4.12.12 Guidance has been issued by IAQM⁹ on how this should be assessed during demolition and construction. This sets out that a detailed assessment should be provided depending on the type of work during the construction phase, the dust emission magnitude and the sensitivity of the area. All Habitats sites would be considered a 'high sensitivity receptor', albeit the sensitivity of the Habitats sites may vary depending on the qualifying features. For ecological receptors, impacts should be assessed from 50m of the boundary of the site and potentially further depending on the dust emission magnitude.

Construction and operation phase – Vehicle emissions

4.12.13 Any development within 200m of Habitats sites could result in adverse impacts from air quality from vehicle emissions. This 200m screening distance for potential adverse air quality upon ecological receptors is referenced for applications within Government's guidance to LPAs on air quality emissions¹⁰. This distance is based on Natural England

⁹ IAQM (January 2024) Guidance on the assessment of dust from demolition and construction (Version 2.2). Available At: [Construction-Dust-Guidance-Jan-2024.pdf](#)

¹⁰ [Air pollution and development: advice for local authorities - GOV.UK](#)



guidance on air quality assessment¹¹ and Highways Agency Design Manual for Road and Bridges (DMRB) - LA 105 Air quality¹², with impacts from traffic emissions considered unlikely over a 200m distance.

4.12.14 The 'Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations' outlines the following direct and in-direct effects from air pollution upon qualifying features:

a) The direct effects which arise when a pollutant which is dispersed in the air is taken up by vegetation (through pores on the surface called stomata). Pollutants taken up by vegetation can cause adverse impacts to plant health and viability. The relevant assessment benchmark for pollutant concentrations 'in the air' is referred to as a critical level expressed in units of $\mu\text{g}/\text{m}^3$ (micrograms per cubic metre).

b) There are indirect effects which arise when the pollutant settles onto the ground (referred to as 'deposition') causing nutrient enrichment of the soil ('eutrophication') or changes to the soil pH ('acidification'). These effects can decrease the ability of a plant to compete with other plants and can hinder the inherent capacity for self-repair and self-renewal under natural conditions. In other words, nitrogen acts as a fertiliser for plants that can thrive on high nitrogen levels and can dominate plant communities. The speed with which a given pollutant settles (or deposits) after it is released into the atmosphere is different for each pollutant, and is influenced by how dense (or heavy) the particles are. Some pollutants travel a long distance before deposition occurs whilst others will settle much closer to their source. Wind speed and direction will also have an influence on deposition properties.

4.12.15 As a result, the relevant assessment benchmark for pollutant concentrations 'in the air' is referred to as a **critical level** expressed in units of $\mu\text{g}/\text{m}^3$ or $\mu\text{g m}^{-3}$ (micrograms per cubic metre). Whereas the relevant assessment benchmark for pollutant levels which settle from the air onto a surface (or deposit) is referred to as a **critical load**. This is expressed in units of kilograms of nitrogen per hectare per year ($\text{kgN}/\text{ha}/\text{yr}$ or $\text{kgN ha}^{-1} \text{ year}^{-1}$) for nitrogen deposition.

4.12.16 Where the change in concentration/deposition is predicted to be 1% of the identified critical level or critical load threshold or more, either alone or in combination, there is a risk that the relevant species and habitat could be affected. However, these thresholds are only tool to indicate when further ecological assessment and/or detailed air quality monitoring is required to determine the extent of impacts. Therefore, further ecological

¹¹ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. Available at: <https://publications.naturalengland.org.uk/publication/4720542048845824>

¹² Design Manual for Roads and Bridges (DMRB) (June 2024). Sustainability & Environment Appraisal LA 105 Air quality. Available at: <https://www.standardsforhighways.co.uk/search/af7f4cda-08f7-4f16-a89f-e30da703f3f4>



interpretation is often essential, to confirm the extent of likely impacts upon the relevant Habitats sites when a critical level or critical load of will be exceeded.

- 4.12.17 The Stour and Orwell Estuaries SPA and Ramsar site, Hamford Water SAC, SPA and Ramsar site, Colne Estuary SPA and Ramsar site, and Essex Estuaries SAC support a number of similar habitat types that are potentially sensitive to changes in air quality. These include coastal saltmarsh, vegetated shingle / coastal dune habitats and intertidal mudflats. Given the comparable ecological characteristics and sensitivities of these habitats, the potential effects of atmospheric pollutants, including nitrogen oxides (NO_x) and ammonia (NH₃) arising from traffic emissions, can be assessed collectively.
- 4.12.18 The nearest habitat / ecosystem type for nitrogen deposition on the APIS database¹³ for coastal saltmarsh is 'Pioneer, low-mid, mid-upper saltmarshes'. There are very few studies of Nitrogen deposition effects on these systems, but work undertaken in the Netherlands suggest coastal saltmarsh vegetation is Nitrogen limited (Mitsch & Gosselink, 2000), which would make it vulnerable to eutrophication effects from atmospheric Nitrogen deposition. These systems are typically inter-tidal, i.e. subject to continual, daily, periodic flooding with saline water. Therefore, overall atmospheric Nitrogen deposition is likely to be of low importance for these systems as the inputs are probably significantly below the large nutrient loadings from river and tidal inputs. There are no specific critical loads / levels for ammonia for this habitat, albeit it is noted that there may be some localized effects of ammonia from wintering wildfowl, especially large geese flocks.
- 4.12.19 The nearest habitat / ecosystem type on the APIS database for vegetated shingle or coastal dunes is 'Shifting coastal dunes' for Nitrogen deposition, albeit is not an accurate representation of the habitat type. The APIS database states that there is very little known about Nitrogen effects on these communities and it is assumed that the habitat acts in a similar way to acidic dune communities, albeit that moisture is strongly limiting and may moderate Nitrogen responses in early successional shingle habitats. The APIS database includes higher plants to consider impacts upon critical level for Ammonia deposition.
- 4.12.20 There is no nearest habitat / ecosystem type for intertidal mudflats on the APIS database to provide an established critical load estimate. The APIS database did consider that mudflats were sensitive to nitrogen deposition, but this habitat type has since been removed from the database. This habitat will be inter-tidal, i.e. subject to continual, daily, periodic flooding with saline water. Therefore, overall atmospheric Nitrogen deposition is likely to be of low importance for these systems as any inputs are probably significantly below the large nutrient loadings from river and tidal inputs. There are also no specific critical loads / levels for Ammonia for this habitat.

¹³ APIS. Available from <http://www.apis.ac.uk/>.



4.12.21 The relevant critical load / level Nitrogen deposition for the relevant habitats are as follows, in line with the APIS database:

- **Pioneer, low-mid, mid-upper saltmarshes (Coastal Saltmarsh):** 20-30 kgN ha⁻¹ year⁻¹
- **Shifting coastal dunes (Vegetated Shingle / Coastal Dunes):** 10-20 kgN ha⁻¹ year⁻¹

4.12.22 The relevant critical level for Ammonia deposition for the relevant habitats are as follows, in line with the APIS database:

- **Higher plants (Vegetated Shingle):** 3 µg NH₃ m⁻³ annual mean (uncertainty of 2-4 µg NH₃ m⁻³)

4.12.23 Based on the locations of the allocations SAMU7, MSA4 and SAE2, the only qualifying habitat likely to occur in close proximity to the proposed development is intertidal mudflat. Given the habitats limited sensitivity to traffic-related atmospheric nitrogen significant effects arising from vehicle emissions are not anticipated. Therefore, whilst project level HRAs should be secured for these at application stage, it is concluded that development associated with these allocations is unlikely to result in adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar site through air quality impacts from development alone.

4.12.24 However, the SAMU5 allocation is located immediately adjacent to areas of coastal saltmarsh and intertidal mudflat associated with Hamford Water SAC, SPA and Ramsar site. Consequently, there is a greater potential for traffic-related atmospheric pollutants, to adversely affect sensitive habitats and their supporting ecological functions. It may be possible to avoid significant effects during the construction phase by ensuring that construction traffic and associated vehicle movements are not routed within 200m of the designated site wherever practicable. Similarly, during the operational phase, potential air quality impacts could be avoided through the design of the development, including ensuring that no new roads or significant sources of traffic emissions are located within 200m of the boundary of the Habitats sites. Nevertheless, given the proximity of the allocation to the Habitats sites, further assessment will be required at the planning application stage to determine whether there are any air quality effects and whether mitigation measures are required. These matters should be considered through a project-level Habitats Regulations Assessment to enable the competent authority to conclude that adverse effects on the integrity of the Habitats site can be avoided.

Use of Mitigation Measures

4.12.25 Given the potential for site allocations and associated growth-promoting policies causing air quality from the development alone, it is indicated that the Council has embedded



mitigation measures within the Local Plan to minimise impacts from air quality on coastal Habitats sites.

- 4.12.26 To ensure that appropriate impacts from water quality can be avoided during the construction and operation phase, it is considered that Strategic Policy PPL4: Biodiversity and Geodiversity incorporates mitigation by requiring the submission of a project-level Habitats Regulations Assessment where likely significant effects on a Habitats site cannot be excluded:

“Where proposals for development are likely to significantly impact International and European sites, applications must be supported by a Habitats Regulation Assessment (HRA) to provide sufficient information to the Council to establish the likelihood and nature of impacts before a decision can be made. If necessary, this may need to be followed by a more detailed ‘Appropriate Assessment’ of the impacts.”

- 4.12.27 As a result, with a project level HRA secured for site allocations SAMU7, MSA4 SAE2 and SAMU5. It is considered that adverse impacts can be avoided upon coastal Habitats sites with this embedded mitigation secured.

Applying the Integrity Test

- 4.12.28 Taking account of the mitigation measures embedded within the Tendring Local Plan and those that will be secured at the project level, it is now considered that adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar site, Hamford Water SAC, SPA and Ramsar site, the Colne Estuary SPA and Ramsar site and the Essex Estuaries SAC can now be excluded. This conclusion applies to potential effects arising from air quality associated with development alone linked to the policies, site allocations and employment allocations considered at the Appropriate Assessment stage. The Plan is therefore considered capable of maintaining the structure, function and supporting processes of the relevant Habitats Sites and ensuring conservation objectives can be maintained.

4.13 Assessment of Impacts in Combination with Other Plans and Projects

- 4.13.1 A series of individually modest impacts may, in combination, produce a significant impact. Cumulative impacts may only occur over time, so plans or projects which are completed, approved but uncompleted, or proposed should all be considered. The assessment should not be restricted to similar types of plans and projects.
- 4.13.2 In the context of this AA, the relevant other plans to be considered in combination with the Tendring Local Plan are listed in Table 11 below.

**Table 11. Other plans or projects considered for in combination effects**

Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
Tendring District Council	Tendring District Local Plan 2013-2033 and Beyond. Section 2 Adopted January 2022		
Tendring District Council	Habitats Regulations Assessment of	Tendring District Draft Publication Local Plan Section 2, has been updated to include	



Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
Colchester City Council (formally Colchester Borough Council) and Tendring District Council	Tendring District Local Plan Publication Draft Section 2 (LUC, October 2018)		



Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
Colchester City Council (formally Colchester Borough Council)	Local Plan 2017 – 2033 Section 2 Adopted July 2022		
Colchester City Council (formally Colchester Borough Council)	Habitats Regulations Assessment - Publication Draft Colchester Local Plan Section 2: Proposed Main Modifications (LUC, September 2021)		
Colchester City Council (formally Colchester Borough Council)	HRA (AA) (June 2017, CBC Spatial Policy Team)	No adverse effect, once mitigation measures are in place.	
Babergh and Mid Suffolk District Councils			
Braintree District Council	HRA for North Essex Authorities Shared Strategic Part 1 for Local		



Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
	Plans - Pre-Submission (Regulation 19) (LUC, May 2017)		
Neighbourhood Development Plans	Individual plan level HRA reports		
Natural England			



Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
	and Orwell Estuaries Special Protection Area and Ramsar site (Natural England 2020) Jaywick to Harwich Access and Sensitive Features Appraisal (Natural England, 2017) Mersea Island Access and Sensitive Features Appraisal (Natural England, 2017) Habitats Regulations Assessment of England Coast Path proposals between Salcott and Jaywick (Natural England, 2020)	measures) will not have an adverse effect on the integrity of the Habitats sites within scope of each stretch, either alone or in combination with other plans and projects.	
Tendring District Council	Habitats Regulations Assessment (HRA) – Bathside Bay, Stour Road, Harwich (Royal Haskoning, Oct 2021). Consented	Proceeded to IROPI signed by SoS, due to the predicted adverse effect on the integrity of the Stour and Orwell SPA and Ramsar site was secured. Compensation for the loss of 69ha of intertidal mudflats and 2.8ha of coastal saltmarsh was	Proposed compensation site is located in close proximity to the site allocation SAMU5. Any project level HRA will need to consider the



Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
	originally under 10/00203 and subsequently under 21/01810/VOC, 21/01792/VOC, 21/01816/DISCON, 21/ 1817/DISCON, 21/01624/DISCON, 21/01625/DISCON, 23/01750/DISCON, 23/01752/DISCON and 23/01594/FUL.	required. This includes the delivery of 69ha of new mudflats and 10 – 20ha of new intertidal salt marsh at a site south-east of Little Oakley. (Application 21/02144/FUL, approved 20 March 2024)	potential in combination impacts of a development adjacent to the forthcoming large compensation site for intertidal mudflats and saltmarsh.
UK Government as approval authority for Development Consent Orders (DCOs) for Nationally Significant Infrastructure Projects	Habitats Regulations Assessment for an Application Under the Planning Act 2008 Five Estuaries Offshore Wind Farm (UK Government, Dec 2025)	Due to predicted adverse impacts on Habitats sites <u>outside</u> of the scope for this HRA, both Offshore Wind Farm HRAs proceeded to IROPI and compensatory measures secured under a Schedule of the DCOs issued by UK Government. Based on the information before him and the amended oLEMP, the Secretary of State is satisfied that the Project, either alone or in-combination with other plans or projects, will not adversely affect the integrity of the avocet feature of the Hamford Water SPA and Stour and Orwell Estuaries SPA, and will not adversely affect the integrity of the black-tailed godwit feature of the Hamford Water SPA and Ramsar site,	None.



Statutory Body	Title of HRA or Project	Findings of HRA or Project	Potential for in combination effects
	Habitats Regulations Assessment for an Application Under the Planning Act 2008 North Falls Offshore Wind Farm (UK Government, May 2026)	Stour and Orwell Estuaries SPA and Ramsar site, and the Blackwater Estuary SPA and Ramsar site. The ExA was satisfied that an AEoI from the Project alone or in-combination could be excluded for Stour and Orwell Estuaries SPA and Ramsar site [ER.C.1.4.67]. Based on the information before him, the Secretary of State is satisfied that the Project, either alone or in-combination, will not adversely affect the integrity of the Stour and Orwell Estuaries SPA and Ramsar site.	

4.13.3 Therefore, the only potential in-combination effect identified from the Local Plan and other plans or projects relates to the proximity of allocation SAMU5 to the proposed Bathside Bay compensation site. Any potential cumulative impacts will need to be fully considered as part of the detailed design of the development and accompanying application submission. A project-level Habitats Regulations Assessment will be required at application stage to demonstrate that the proposal, either alone or in combination with other plans and projects, will not result in an adverse effect on the integrity of the relevant Habitats sites.

4.13.4 Additional in combination effects which need to be considered as part of the Local Plan are outlined below:

Recreational Disturbance

4.13.5 All net new residential development within Tendring District is subject to the requirements of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The RAMS provides a strategic mitigation mechanism to address the in-combination recreational disturbance effects arising from planned residential growth



across Essex and ensures that adverse effects on the integrity of coastal Habitats Sites can be avoided.

- 4.13.6 The Essex Coast RAMS was originally published in 2020 and has subsequently been reviewed and updated following a five-year review of the strategy, associated evidence base and mitigation measures. The revised Essex Coast RAMS (2026) was formally adopted by Tendring District Council on 26 June 2026 and now supersedes the previous strategy and SPD for mitigating recreational disturbance impacts arising from new residential development within the ZOI.
- 4.13.7 The updated strategy secures financial contributions from qualifying residential development located within the Essex Coast RAMS ZOI. The revised Essex Coast RAMS (2026) has not altered the extent of the ZOI, which continues to encompass the entirety of the Tendring District. The adopted ZOI is shown in Appendix 10 of this HRA.
- 4.13.8 The mitigation measures funded through developer contributions are delivered through Bird Aware Essex Coast¹⁴. Bird Aware Essex Coast seeks to reduce recreational disturbance to qualifying bird species by raising awareness of the importance of the Essex coastline for overwintering and migratory birds, promoting responsible visitor behaviour and delivering a range of education, engagement and monitoring measures.
- 4.13.9 The Essex Coast RAMS (2026) has updated the required mitigation tariff to £476 per residential unit, effective from 1 August 2026. The tariff will continue to be reviewed and updated at the start of each financial year to reflect inflation and ensure that sufficient funding is available to deliver the required mitigation measures. The contribution will be secured through a planning obligation or a Section 111 payment, as appropriate, to ensure that the necessary mitigation is in place prior to the occupation of development.

Air quality

- 4.13.10 New development delivered through the Tendring Local Plan has the potential to contribute to adverse air quality effects in combination with other plans and projects. The principal pathway for such effects is through increases in traffic movements, which may result in elevated concentrations of atmospheric pollutants and nitrogen deposition affecting Habitats sites located in close proximity to the road network.
- 4.13.11 In accordance with Natural England guidance¹⁵ and the Design Manual for Roads and Bridges (DMRB) LA 105: Air Quality¹⁶, roads located within 200 m of a Habitats Site are

¹⁴ <https://birdaware.org/essex/>

¹⁵ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. Available at: <https://publications.naturalengland.org.uk/publication/4720542048845824>

¹⁶ Design Manual for Roads and Bridges (DMRB) (June 2024). Sustainability & Environment Appraisal LA 105 Air quality. Available at: <https://www.standardsforhighways.co.uk/search/af7f4cda-08f7-4f16-a89f-e30da703f3f4>



considered to have the potential to influence qualifying habitats and species through traffic-related emissions. Beyond this distance, the effects of vehicle emissions are generally expected to reduce substantially and are typically considered unlikely to result in significant effects.

- 4.13.12 Whilst the DMRB methodology is principally intended for the assessment of motorway and trunk road schemes (A-roads), consideration should also be given to potential emissions arising from local road networks, including B-roads and unclassified roads, where these occur in close proximity to sensitive ecological receptors. Accordingly, roads located within 200 m of the relevant coastal Habitats sites within Tendring District have been identified and mapped, as presented in Appendix 11.
- 4.13.13 The review of the local road network indicates that no motorways are present immediately adjacent to the coastal Habitats sites within Tendring District. However, two sections of A-road are located in close proximity to the Stour and Orwell Estuaries SPA and Ramsar site, namely the A137 crossing at Cattawade Marshes and the A120 corridor at Harwich. These locations therefore represent the principal areas where traffic-related air quality effects could potentially occur.
- 4.13.14 A further eight road links were identified for consideration as they are located within 200 m of the Colne Estuary SPA and Ramsar site, the Stour and Orwell Estuaries SPA and Ramsar site, and the Essex Estuaries SAC. These comprise five B-roads and three unclassified roads. Whilst the delivery of the Local Plan may generate some additional traffic movements on these routes, the likelihood of these increases resulting in significant traffic-related air quality effects on the qualifying habitats or species of the Habitats sites is considered to be extremely low. This reflects the relatively limited traffic volumes typically associated with such roads and the consequent low risk of materially increasing concentrations of atmospheric pollutants or nitrogen deposition at nearby designated sites. Accordingly, adverse effects on the integrity of the relevant Habitats sites arising from traffic emissions on these road links are not anticipated. As a result, only the two A-road locations are considered at risk from in-combination effects.
- 4.13.15 It is highlighted that the area around A120 corridor at Harwich is already subject to high levels of disturbance due to existing infrastructure and the Bathside bay development. The habitats at this site would be considered 'intertidal mudflat'. The habitats around the A137 crossing at Cattawade Marshes is less subject to on-going disturbance and the habitats contain 'intertidal mudflats' and 'Coastal saltmarsh'.
- 4.13.16 As outlined in the air quality section, the nearest habitat / ecosystem type for nitrogen deposition on the APIS database¹⁷ for coastal saltmarsh is 'Pioneer, low-mid, mid-upper

¹⁷ APIS. Available from <http://www.apis.ac.uk/>.



saltmarshes'. However, 'intertidal mudflats' are not considered sensitive to nitrogen deposition.

4.13.17 Therefore, only A137 crossing at Cattawade Marshes is considered sensitive to adverse air quality from traffic emissions in combination with other plans and projects. As a result, it is reiterated that relevant critical load Nitrogen deposition and Ammonia concentrations for 'coastal saltmarsh' is as follows, in line with the APIS database:

- **Pioneer, low-mid, mid-upper saltmarshes (Coastal Saltmarsh):** 20-30 kgN ha⁻¹ year⁻¹
- **Higher plants (Vegetated Shingle):** 3 µg NH₃ m⁻³ annual mean (uncertainty of 2-4 µg NH₃ m⁻³)

4.13.18 However, it is highlighted that as part of the evidence base supporting the Babergh and Mid Suffolk Joint Local Plan Part 1, baseline air quality monitoring was undertaken adjacent to the A137 at Cattawade Marshes by the UK Centre for Ecology & Hydrology (UKCEH). Monitoring was undertaken between September 2021 and August 2022 using Gradko diffusion tubes and UKCEH ALPHA® samplers to measure concentrations of nitrogen dioxide (NO₂) and ammonia (NH₃). Three monitoring locations were established, including two roadside locations approximately 2 m from the carriageway and a third location approximately 12 m from the road to assess the influence of distance from traffic emission sources and determine whether other emission sources are influencing the emission levels.

4.13.19 The monitoring programme assessed annual mean concentrations of NO₂ and NH₃ within the ambient air and therefore considered compliance with the relevant critical levels for atmospheric pollutants. Nitrogen dioxide was used as a key indicator of traffic-related emissions given that it is predominantly associated with fuel combustion from motor vehicles and other anthropogenic sources. Concentrations of NO₂ are generally highest in areas subject to elevated traffic flows and typically decline with increasing distance from emission sources.

4.13.20 The monitoring results recorded NO₂ concentrations of 18.2 µg m⁻³ and 16.4 µg m⁻³ at the roadside monitoring locations on either side of the A137, both of which exceeded the local background concentration reported through the Air Pollution Information System (APIS). However, concentrations declined to 13.3 µg m⁻³ at the monitoring location approximately 12 m from the road edge and closest to the estuary, demonstrating a rapid reduction in pollutant concentrations with distance from the emission source. All recorded concentrations remained well below the relevant UNECE critical level for nitrogen oxides of 30 µg m⁻³ as an annual mean and 75 µg m⁻³ as a 24-hour mean. Consequently, the available evidence indicates that existing traffic emissions at this location are unlikely to be resulting in adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar site.



- 4.13.21 Whilst most recent evidence indicates that existing traffic emissions at A137 are unlikely to be adversely affecting coastal saltmarsh vegetation associated with the Stour and Orwell Estuaries SPA and Ramsar site, it is recommended that any large-scale Strategic Allocation Mixed-Use development should consider air quality considerations as part of the associated Habitats Regulations Assessment and be supported by an appropriate traffic scoping assessment, where necessary. This assessment should identify and quantify the Annual Average Daily Traffic (AADT) and Heavy Duty Vehicle (HDV) AADT flows associated with the development, including any changes in traffic levels at the A137 crossing adjacent to Cattawade Marshes, where the designated site is located in close proximity to the road network.
- 4.13.22 Where the assessment identifies increases of more than 1,000 AADT movements and 200 HDV AADT movements, or where existing traffic levels already exceed these thresholds and the proposed development would result in a significant increase in traffic flows, further ecological interpretation / air quality assessment may be required. Such assessment should determine whether traffic-related emissions could result in adverse effects on the qualifying habitats and species of the relevant Habitats sites through increases in atmospheric pollutant concentrations or nitrogen deposition. These thresholds are widely applied in ecological air quality assessments as they represent the minimum level above which traffic modelling can predict changes in traffic conditions and associated emissions with a reasonable degree of confidence.

Use of Mitigation Measures

Recreational disturbance

- 4.13.23 Given the potential for site allocations and associated growth-promoting policies causing recreational disturbance from in combination with other plans and projects, it is indicated that the Council has embedded mitigation measures within the Local Plan to minimise impacts from increased recreational pressure on coastal Habitats sites.
- 4.13.24 This includes the following wording embedded within Strategic Policy PPL4 - Biodiversity And Geodiversity, advised by Natural England:
- An Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (now called Essex Coast Bird Aware) has been completed in compliance with the Habitats Regulations. Contributions will be secured, within the Zones of Influence, towards mitigation measures in-combination impacts only identified in RAMS and any subsequent updated or successor strategy.*
- 4.13.25 This text ensures that the requirements of the Essex Coast RAMS (2026), including the RAMS mitigation tariff is embedded into the Local Plan. As a result, this ensures that recreational disturbance impacts upon coastal Habitats sites will be avoided in combination with other plans and projects.

Air Quality



4.13.26 To avoid adverse air quality effects arising in combination with other plans and projects, Strategic Policy PPL4: Biodiversity and Geodiversity incorporates an important safeguard by requiring the submission of a project-level Habitats Regulations Assessment (HRA) where likely significant effects on a Habitats site cannot be excluded. This policy mechanism ensures that any development with the potential to increase traffic emissions in proximity to sensitive Habitats sites is subject to further assessment and, where necessary, appropriate mitigation prior to the granting of planning permission. The policy states:

"Where proposals for development are likely to significantly impact International and European sites, applications must be supported by a Habitats Regulation Assessment (HRA) to provide sufficient information to the Council to establish the likelihood and nature of impacts before a decision can be made. If necessary, this may need to be followed by a more detailed 'Appropriate Assessment' of the impacts."

4.13.27 The inclusion of this policy requirement provides a mechanism for the assessment and mitigation of any air quality impacts identified at the project level for large-scale Strategic Allocation Mixed-Use development, ensuring that adverse effects on the integrity of the relevant Habitats sites can be avoided. Accordingly, subject to compliance with Policy PPL4 and the implementation of any necessary mitigation measures identified through project-level assessment, adverse effects on site integrity arising from air quality impacts in combination with other plans and projects can be excluded.

Applying the Integrity Test

4.13.28 Taking account of the mitigation measures embedded within the Tendring Local Plan and those that will be secured at the project level, it is now considered that adverse effects on the integrity of the coastal Habitats sites can be excluded. This conclusion applies to potential effects arising from recreational disturbance and air quality associated with development in combination with other plans and projects. The Plan is therefore considered capable of maintaining the structure, function and supporting processes of the relevant Habitats sites and ensuring conservation objectives can be maintained.

4.14 Re-applying the integrity test

4.14.1 Mitigation has been embedded within policy 'Strategic Policy PPL4 - Biodiversity And Geodiversity' and 'Strategic Policy PPL5: Water Conservation, Drainage And Sewerage' to development can proceed without an Adverse Effects on the Integrity of a Habitats site from functionally linked land, disturbance, water quality and air quality.



- 4.14.2 Additional detailed considerations have also been embedded as part of Strategic Allocation Mixed-Use (SAMU) and Strategic Allocation Housing (SAH) policies to avoid recreational disturbance and water quality impacts, which covers all site allocations of more than 100 dwellings within the Local Plan.
- 4.14.3 With the implementation and securing of the embedded mitigation measures, it can now be concluded that the Proposed Development will not result in an Adverse Effect on Integrity, either from the development alone or in combination with plans and projects, on any Habitats site included within the Appropriate Assessment. Potential impact pathways relating to functionally linked land, disturbance, water quality, and air quality have therefore been adequately addressed.



5. Conclusion

- 5.1.1 This Habitats Regulations Assessment, including Appropriate Assessment, considers the impacts arising from the Tendring Local Plan.
- 5.1.2 In applying the HRA Test 2 –the integrity test at AA stage - based on the development type and proximity to Habitats (European) sites, the potential for in combination effects resulting from other plans or projects has also been assessed and avoidance and/or mitigation measures have been considered. Embedded mitigation measures for projects will need to be considered in project level HRA/AA reports and secured by way of any planning consent. Therefore, there will be no need for further assessment for this Local Plan.
- 5.1.3 Consequently, this HRA report including Appropriate Assessment indicates that the Tendring Local Plan is not predicted to have any Adverse Effect On Site Integrity on any Habitats sites, either alone or in combination with other plans and projects



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7. Appendices

Appendix 1. HRA Screening of Individual Policies

Where mitigation is necessary to avoid Likely Significant Effects (LSE), then in line with CJEU *People over Wind* court ruling, this cannot be taken into consideration at HRA Screening Stage 1. Any policies providing mitigation are therefore also carried forward to Stage 2 Appropriate Assessment.

Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
SPL1a- Presumption in Favour of Sustainable Development									The policy provides confirmation that the Council will be in favour of sustainable development which improves the economic, social and environmental conditions in the area.



Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									No impact pathways identified from the proposed policy. An LSE is not predicted on Habitats sites within the scope of the HRA. Therefore, this policy can be screened out.
SPL1 - Managing Growth									The policy outlines the settlement hierarchy to manage growth across District. No impact pathways identified from the proposed policy. An LSE is not predicted on Habitats sites within the scope of the HRA.

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Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									of use of existing community centres will be supported. No impact pathways identified from the proposed policy. An LSE is not predicted on Habitats sites within the scope of the HRA. Therefore, this policy can be screened out.
HP4 – Cemeteries, Crematoriums and Burial Sites									The policy sets where the future expansion of new crematoriums and crematories will be located, as well as the information required for new burial sites and crematoriums.

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Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denigie SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
LP1 - Housing Supply		Yes	Yes	Yes	Yes	Yes		Yes	

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Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
LP8 - Backland Residential Development									
LP9 - Gypsy and Traveller Sites		Yes	Yes	Yes	Yes	Yes		Yes	



Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									in increased impacts from recreational disturbance. Therefore, there is potential for a LSE from this impact pathway. As a result, this policy must be screened in.
LP10 - Care, Independent and Assisted Living, Secure Institutions									The policy sets out the criteria of care homes, extra-care housing and other forms of specialist accommodation and the circumstances on when the LPA would support new development. No impact pathways identified from the proposed

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Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
PP2 - Retail Hierarchy									
PP3 - Village and Neighbourhood Centres									

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Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
PP6a - Extensions to Existing Employment Sites in the Countryside			Yes		Yes	Yes		Yes	



Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
PP7 - Employment Allocations			Yes		Yes	Yes		Yes	
PP8 -Tourism			Yes		Yes	Yes		Yes	

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Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									even if the wider works are supported in principle. Therefore, with these measures embedded, a LSE is not predicted on Habitats sites within the scope of the HRA from the policy. Therefore, this policy can be screened out.
PP16 - St Osyth Village Centre			Yes		Yes				The policy indicates the Councils support for a new car park within St Osyth village centre, as well as within the Coastal Protection Belt, in exceptional circumstances. The Coastal

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Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									No impact pathways identified from the proposed policy. A LSE is not predicted on Habitats sites within the scope of the HRA. Therefore, this policy can be screened out.
PPL3 - The Rural Landscape									No impact pathways identified from the proposed policy. A LSE is not predicted on Habitats sites within the scope of the HRA. Therefore, this policy can be screened out.

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Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									No impact pathways identified from the proposed policy. A LSE is not predicted on Habitats sites within the scope of the HRA. Therefore, this policy can be screened out.
PPL10a - Operational Energy and Carbon (Net Zero) in Homes and Buildings									The policy sets the Council's approach to ensure that new development must Net Zero Energy and Carbon in operation. No impact pathways identified from the proposed policy. A LSE is not

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Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									infrastructure within the District. No impact pathways identified from the proposed policy. An LSE is not predicted on Habitats sites within the scope of the HRA. Therefore, this policy can be screened out.
DI1 - Infrastructure Delivery and Impact Mitigation									No impact pathways identified from the proposed policy. An LSE is not predicted on Habitats sites within the scope of the HRA.



Policy	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									Therefore, this policy can be screened out .



Appendix 2. HRA Screening of allocation sites

Where mitigation is necessary to avoid Likely Significant Effects (LSE), then in line with CJEU *People over Wind* court ruling, this cannot be taken into consideration at HRA Screening Stage 1. Any site allocations providing mitigation are therefore also carried forward to Stage 2 Appropriate Assessment.

Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
Adopted Strategic Housing Allocations from Tendring Local Plan 2013-2033 and Beyond - Section 2 (Adopted 25th January 2022)									
SAMU1 - Development And Delivery Of Tendring Colchester Borders Garden Community									The strategic housing allocation has been adopted as part of the previous Local Plan. Minor amendments have been secured to the policy wording to ensure up to date SANG consideration applies to the development.
SAMU2 - Development At									The strategic housing allocation has been adopted as part of the previous Local Plan. Minor amendments

[illegible]



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									disturbance, water quality and air quality impacts. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
SAMU6 – Weeley Green Garden Village		Yes	Yes	Yes	Yes	Yes		Yes	The allocation site is located within the Zone of Influence of the Essex Coast RAMS, so the proposals could result in adverse impacts from recreational disturbance. There is also a potential for impacts upon functionally linked land within the on-site arable land.



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree		Yes			Yes			Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									located immediately adjacent to the Stour and Orwell Estuaries SPA and Ramsar site. Furthermore, the development is within the Manningtree WRC catchment, which does not have the headroom capacity to deal with increased growth. Therefore, there is considered potential impacts upon the Habitats sites from water quality, air quality and disturbance during the construction and operation phases. Therefore, an LSE is predicted on the listed



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
SAMU8 – Development of Hare Green Garden Village	Yes	Yes	Yes	Yes	Yes			Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									Therefore, there could result in water quality impacts as unmanaged wastewater or other water quality impacts could be caused due to the hydrological links of Tenpenny Brook and Bentley Brook to the Colne Estuary SPA and Ramsar site, as well as the Essex Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
SAMU9 – Development of	Yes	Yes	Yes	Yes	Yes	Yes		Yes	This strategic site allocation is located within the Zone of



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
Horsley Cross Garden Village									
SAH1 – Development at Vicarage Farm Off Main Road and South of A120, Harwich						Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									other impact pathways have been identified by the proposals. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
SAH2 - Land north of Thorpe Road, Kirby Cross.		Yes	Yes	Yes	Yes	Yes		Yes	This site allocation is located within the Zone of Influence of the Essex Coast RAMS, where new residential development is predicted to result in recreational disturbance upon coastal Habitats sites. No other



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									impact pathways have been identified by the proposals. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
SAH 6 - Land east of Cockaynes Lane, Alresford	Yes	Yes	Yes	Yes	Yes			Yes	The allocation site is located within the Zone of Influence of the Essex Coast RAMS, so the proposals could result in adverse impacts from recreational disturbance. There is also a potential for impacts upon functionally linked land.



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
SAH7 - Land east of Admirals Green and north of Weeley Road, Great Bentley		Yes	Yes	Yes	Yes			Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
SAH8 - Land East of Amerells Road, Little Clacton		Yes	Yes	Yes	Yes	Yes		Yes	
SAH9 - Land south of Clacton Road, St Osyth		Yes	Yes	Yes	Yes				



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									The site could also result in impacts from adverse water quality, due its proximity to a Statutory Main River, which feeds into the Colne Estuary. In addition, there is capacity issues within the St Oysth WRC which must be addressed. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
SAH11 - Land North of Lifehouse Spa &		Yes	Yes	Yes	Yes	Yes		Yes	The allocation site is located within the Zone of Influence of the Essex Coast RAMS,



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
Hotel, Thorpe-le-Soken									
MSA1 - Durite Works, Valley Road, Harwich						Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									in adverse impacts from recreational disturbance. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
MSA2 - Land adjacent Branscombe Close, Frinton.		Yes			Yes	Yes		Yes	This site allocation is located within the Zone of Influence of the Essex Coast RAMS, where new residential development is predicted to result in recreational disturbance upon coastal Habitats sites. No other impact pathways have been identified by the proposals.



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA3 - Affinity Water, Mill Hill, Manningtree		Yes			Yes			Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									development. As a result, the development may also result in water quality impacts. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
MSA4 - Crisp Malting, School Lane, Mistley		Yes			Yes			Yes	This site allocation is located within the Zone of Influence of the Essex Coast RAMS, where new residential development is predicted to result in recreational disturbance upon coastal Habitats sites.



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									The development is also located within 100m of the Stour and Orwell Estuaries SPA and Ramsar site. In addition, it is within Manningtree WRC which contains no headroom capacity. Therefore, there is considered potential impacts upon the Habitats sites from water quality, air quality and disturbance during the construction and operation phases. Therefore, an LSE is predicted on the listed



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA5 - Brightlingsea Telephone Exchange, 16 New Street, Brightlingsea		Yes	Yes	Yes	Yes				



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA6 - Land at Pannell Place, Brightlingsea		Yes	Yes	Yes	Yes				
MSA7 - Land south-west of Colchester	Yes	Yes	Yes	Yes	Yes			Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
Main Road, Alresford									
MSA8 - Land adj Village Hall, Harwich Road, Beaumont		Yes	Yes		Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									recreational disturbance. No other impact pathways have been identified by the proposals. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
MSA9 - Land south of Windmill Road and east of Straight Road, Bradfield		Yes			Yes			Yes	The allocation site is location within the Zone of Influence of the Essex Coast RAMS, so the proposals could result in adverse impacts from recreational disturbance. The site is also within the Manningtree WRC, which



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									contains no headroom capacity. As a result, impacts from water quality upon the Stour and Orwell Estuaries SPA and Ramsar site cannot be ruled out. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in .
MSA10 - Land south of Weeley Road, Great Bentley		Yes	Yes	Yes	Yes			Yes	The allocation site is located within the Zone of Influence of the Essex Coast RAMS, so the proposals could result in adverse impacts from recreational disturbance.



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA11 - Land west of Parsons Hill, Great Bromley		Yes	Yes	Yes	Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									into Tenpenny Brook, which provides an impact pathway to the Colne Estuary SPA and Ramsar site and Essex Estuaries SAC. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
MSA12 - Land south of Hall Road, Great Bromley		Yes	Yes	Yes	Yes	Yes		Yes	The allocation site is located within the Zone of Influence of the Essex Coast RAMS, so the proposals could result in adverse impacts from recreational disturbance. In addition, the development is



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									within the Great Bromley WRC, which does not have sufficient capacity to deal with increased housing. Great Bromley WRC feeds into Tennpenny Brook, which provides an impact pathway to the Colne Estuary SPA and Ramsar site and Essex Estuaries SAC. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA13 - Land west of Main Road, Great Holland		Yes	Yes	Yes	Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA14 - Land east of Kirby Road, Great Holland		Yes	Yes	Yes	Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA15 - Land north east of Wix Road, Great Oakley		Yes			Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA16 - Land south of Orchard Close, Great Oakley		Yes			Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA17 - Land north of Walton Road, Kirby-le-Soken		Yes			Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA19 - Land west of Manningtree Road, Little Bentley		Yes			Yes			Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA20 - Land south of Shop Road, Little Bromley		Yes			Yes			Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA21 - Land east of Heckfords Road, Great Bentley		Yes	Yes	Yes	Yes			Yes	
MSA22 - Haulage Depot, Heath Road, Tendring Green		Yes			Yes			Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									No other impact pathways have been identified by the proposals. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
MSA23 - Land at Avocet Place, Thorrington		Yes	Yes	Yes	Yes				The allocation site is located within the Zone of Influence of the Essex Coast RAMS, so the proposals could result in adverse impacts from recreational disturbance. Therefore, an LSE is predicted on the listed



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA24 - Land east of Bentley Road, Weeley Heath		Yes	Yes	Yes	Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA25 - Land south of Mill Lane, Weeley Heath		Yes	Yes	Yes	Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA26 - Land south of Colchester Road, Wix		Yes			Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA28 - Land North of Rectory Road, Wrabness		Yes			Yes	Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA29 - Land at Weeley Council Offices		Yes	Yes	Yes	Yes			Yes	
MSA30 - Former Tendring Hundred						Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
Waterworks Site, Clacton									
MSA31 - Land adjoining Harwich & Parkeston Football Club, Dovercourt						Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA32 - Station Yard / Avon Works, Walton						Yes		Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA33 - Former Wellhouse Site, Chestnut Way, Brightlingsea		Yes	Yes	Yes	Yes				



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA34 - Vicarage Field, Church Road, Brightlingsea		Yes	Yes	Yes	Yes				



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA35 - Land North of Robinson Road, Brightlingsea		Yes	Yes	Yes	Yes				



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA36 - Land North of Wix Road, Bradfield		Yes			Yes			Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
MSA37 - Paddock Site South of Bradfield Playing Field, East of the Street, Bradfield		Yes			Yes			Yes	



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
									contains no headroom capacity. As a result, impacts from water quality upon the Stour and Orwell Estuaries SPA and Ramsar site cannot be ruled out. Therefore, an LSE is predicted on the listed Habitats sites. Therefore, this site allocation must be screened in.
Proposed Employment Allocations									
SAE1 - Carless Extension, Harwich									The policy wording ensures that any new extension to the existing refinery must ensure compliance with the

[illegible]



Proposed allocation sites	Abberton Reservoir SPA & Ramsar site	Blackwater Estuary SPA and Ramsar site	Colne Estuary SPA and Ramsar site	Denige SPA and Ramsar site	Essex Estuaries SAC	Hamford Water SPA, Ramsar site and SAC	Outer Thames Estuary SPA	Stour and Orwell Estuaries SPA and Ramsar site	Will Policy have Likely Significant Effect (LSE) on Habitats sites?
Policy SAE3 – Collierswood Farm			Yes					Yes	

[illegible]



Appendix 3. Results of embedding mitigation within the Appropriate Assessment

Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
Policies								
LP1 - Housing Supply		Yes	Yes	Yes		Yes	Yes	No Adverse Effects On site Integrity to identified Habitats sites with mitigation embedded.
LP9 - Gypsy and Traveller Sites			Yes				Yes	No Adverse Effects On site Integrity to identified Habitats sites with mitigation embedded.



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
PP6a - Extensions to Existing Employment Sites in the Countryside			Yes	Yes				
PP7 - Employment Allocations		Yes			Yes	Yes		
PP8 - Tourism			Yes					



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
PP16 - St Osyth Village Centre			Yes					
Site Allocations								
SAMU5 - Development Off Deane's Lane And Oakley Road, Dovercourt								



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
SAMU6 – Weeley Green Garden Village		Yes	Yes				Yes	
SAMU7 - Saltings Quarter, Riverside Avenue, Manningtree			Yes	Yes		Yes	Yes	
SAMU8 – Development		Yes	Yes	Yes			Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
of Hare Green Garden Village								
SAMU9 – Development of Horsley Cross Garden Village		Yes	Yes				Yes	
SAH1 – Development at Vicarage Farm Off Main Road and South of A120, Harwich			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
SAH2 - Land north of Thorpe Road, Kirby Cross.			Yes				Yes	
SAH 6 - Land east of Cockaynes Lane, Alresford			Yes				Yes	
SAH7 - Land east of Admirals Green and north of			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
Weeley Road, Great Bentley								
SAH8 - Land East of Amerells Road, Little Clacton			Yes				Yes	
SAH9 - Land south of Clacton Road, St Osyth			Yes	Yes			Yes	
SAH11 - Land North of Lifehouse Spa		Yes	Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
& Hotel, Thorpe-le-Soken								
MSA1 - Durite Works, Valley Road, Harwich			Yes				Yes	
MSA2 - Land adjacent Branscombe Close, Frinton.			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
MSA3 - Affinity Water, Mill Hill, Manningtree			Yes	Yes			Yes	
MSA4 - Crisp Malting, School Lane, Mistley			Yes	Yes		Yes	Yes	
MSA5 - Brightlingsea Telephone Exchange, 16			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
New Street, Brightlingsea								
MSA6 - Land at Pannell Place, Brightlingsea			Yes				Yes	
MSA7 - Land south-west of Colchester Main Road, Alresford		Yes	Yes				Yes	
MSA8 - Land adj Village Hall,			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
Harwich Road, Beaumont								
MSA9 - Land south of Windmill Road and east of Straight Road, Bradfield			Yes	Yes				
MSA10 - Land south of Weeley Road, Great Bentley			Yes				Yes	
MSA11 - Land west of			Yes	Yes			Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
Parsons Hill, Great Bromley								
MSA12 - Land south of Hall Road, Great Bromley			Yes	Yes			Yes	
MSA13 - Land west of Main Road, Great Holland			Yes				Yes	
MSA14 - Land east of Kirby			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
Road, Great Holland								
MSA15 - Land north east of Wix Road, Great Oakley			Yes				Yes	
MSA16 - Land south of Orchard Close, Great Oakley			Yes				Yes	
MSA17 - Land north of Walton			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
Road, Kirby-le-Soken								
MSA19 - Land west of Manningtree Road, Little Bentley			Yes				Yes	
MSA20 - Land south of Shop Road, Little Bromley			Yes				Yes	
MSA21 - Land east of			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
Heckfords Road, Great Bentley								
MSA22 - Haulage Depot, Heath Road, Tendring Green			Yes				Yes	
MSA23 - Land at Avocet Place, Thorrington			Yes				Yes	
MSA24 - Land east of Bentley			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
Road, Weeley Heath								
MSA25 - Land south of Mill Lane, Weeley Heath			Yes				Yes	
MSA26 - Land south of Colchester Road, Wix			Yes				Yes	
MSA28 - Land North of			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
Rectory Road, Wrabness								
MSA29 - Land at Weeley Council Offices			Yes				Yes	
MSA30 - Former Tendring Hundred Waterworks Site, Clacton			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
MSA31 - Land adjoining Harwich & Parkeston Football Club, Dovercourt			Yes				Yes	
MSA32 - Station Yard / Avon Works, Walton			Yes				Yes	
MSA33 - Former Wellhouse Site, Chestnut			Yes				Yes	



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
Way, Brightlingsea								
MSA34 - Vicarage Field, Church Road, Brightlingsea			Yes				Yes	
MSA35 - Land North of Robinson Road, Brightlingsea							Yes	

Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
MSA36 - Land North of Wix Road, Bradfield			Yes	Yes			Yes	
MSA37 - Paddock Site South of Bradfield Playing Field, East of the Street, Bradfield			Yes	Yes			Yes	
Proposed Employment Sites								



Policy	Land Take	Impacts on protected species outside the designated site	Disturbance	Water Quality	Water Quantity	Air Quality	Potential for In Combination Effects	With proposed mitigation embedded, can adverse impacts on site integrity of the identified Habitats sites be avoided?
SAE 2 - Freeport East, Bathside Bay and the A120 Corridor						Yes		
SAE3 - Collierswood Farm A120 Strategic Business Park		Yes						



Appendix 4. Characteristics of Habitats sites within 20km

Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
Abberton Reservoir Abberton Reservoir is a large storage reservoir built in a long shallow valley. It is the largest freshwater body in Essex and is one of the most important reservoirs in Britain for wildfowl. It is less than 8 km from the coast and its primary role is as a roost for the local estuarine wildfowl population.				
<u>Abberton</u> Reservoir SPA EU Code: UK9009141	718.31	- A005 <i>Podiceps cristatus</i>; Great crested grebe (Non-breeding) - A017 <i>Phalacrocorax carbo</i>; Great cormorant (Breeding) - A036 <i>Cygnus olor</i>; Mute swan (Non-breeding) - A050 <i>Anas penelope</i>; Eurasian wigeon (Non-breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: - The extent and distribution of the habitats of the qualifying features - The structure and function of the habitats of the qualifying features - The supporting processes on which the habitats of the qualifying features rely	1. Siltation Silt entering the reservoir via Layer Brook is gradually accumulating in the western and central sections. This increases water turbidity and reduces light penetration, limiting the growth of the submerged aquatic plants on which the reservoir's fauna – including many of the waterbirds – largely depends. Siltation also reduces the water depth and increases the already high nutrient load. Now that concrete banks have been removed as



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
			• The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.	



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• A125 <i>Fulica atra</i>; Common coot (Non-breeding) • Waterbird assemblage		there is occasional trespassing. Disturbance from the air by low-flying civilian and military aircraft occurs several times each year and is more difficult to manage 3. Changes in species distributions The reservoir's breeding colony of tree-nesting cormorants has declined from a peak of over 500 pairs in the mid-1990s to about 160 pairs in 2010. Reasons for the decline are unknown. Possibilities include a reduction in suitable nest sites, predation (possibly linked to lower water levels in the central section), cormorant control measures at fisheries, or a decline in summer food supply within foraging distance of the colony



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				4. Bird strike Mute swans, and possibly other species, have been killed as a result of colliding with overhead powerlines near the reservoir 5. Water Pollution Water stored in the reservoir is high in nutrients (eutrophic) as it comes from intensively farmed catchment areas. As a result, algal blooms are regular in summer. In some years these may include toxic blue-green algae that can kill wildfowl, though no significant mortality has been recorded. 6. Air Pollution: risk of atmospheric nitrogen deposition



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				The site is identified as at risk from air pollution as Nitrogen deposition levels exceed the site-relevant critical load for ecosystem protection. However, the site's Nitrogen load is likely to be dominated by levels in the water entering the reservoir (mainly from the distant Ouse catchment) rather than direct deposition.
<u>Abberton Reservoir Ramsar site</u> RIS Code: UK11001	726.2	Ramsar criterion 5 Assemblages of international importance: Species with peak counts in winter: 23787 waterfowl (5 year peak mean 1998/99-2002/2003) Ramsar criterion 6 – species/populations	Not applicable.	None present.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: • Gadwall, <i>Anas strepera strepera</i> • Northern shoveler, <i>Anas clypeata</i> Species with peak counts in winter: • Eurasian wigeon, <i>Anas Penelope</i>. Species/populations identified subsequent to designation for possible		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		future consideration under criterion 6. Species with peak counts in spring/autumn: • Mute swan, <i>Cygnus olor</i>, • Common pochard, <i>Aythya ferina</i>		
Alde–Ore Estuary The site comprises the estuary complex of the rivers Alde, Butley and Ore, including Havergate Island and Orfordness. There are a variety of habitats including, intertidal mudflats, saltmarsh, vegetated shingle (including the second-largest and best-preserved area in Britain at Orfordness), saline lagoons and grazing marsh. The Orfordness/Shingle Street landform is unique within Britain in combining a shingle spit with a cusped foreland. The site supports nationally-scarce plants, British Red Data Book invertebrates, and notable assemblages of breeding and wintering wetland birds.				
<u>Ald-Ore Estuary SPA</u> EU Code: UK9009112	2403.5	• A081 – <i>Circus aeruginosus</i> – Western Marsh Harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:	7. Hydrological changes Flood wall breaches in December 2013 (due to tidal surge) has led to flooding of Hazelwood Marshes and Lantern Marshes



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• A183 – <i>Larus fuscus</i> – Lesser Black-backed Gull • A151 – <i>Philomachus pugnax</i> – Ruff • A132 – <i>Recurvirostra avosetta</i> – Pied Avocet • A195 – <i>Sterna albifrons</i> – Little Tern • A191 – <i>Sterna sandvicensis</i> – Sandwich Tern • A162 – <i>Tringa totanus</i> – Common Redshank	• The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.	south (both currently intertidal). This has lead to a loss of nesting habitat and saline lagoons 8. Public Access/Disturbance Human disturbance to nesting birds on beaches, notably on Orfordness and Shingle Street, by people accessing the southern end of the ness by boat, plus walkers along beach from Aldeburgh, and recreational beach users at Shingle Street. Human trampling affects vegetated shingle habitat. Military and private aircraft (paramotors, helicopters and planes) regularly fly low over the site leading to disturbance of SPA features, wintering and breeding birds. 9. Inappropriate coastal management



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				Maintaining coastal defences at Bawdsey and Slaughden is leading to increased shingle recharge requirements at Slaughden, and loss of shingle beach at southern end of SAC at Bawdsey. 10. Coastal squeeze Seawalls afford little scope for natural adaption of the estuary to sea level rise through roll back of habitat. Saltmarsh is at risk of being squeezed in the future (although currently the estuary is perceived as in balance) and limited areas of natural habitat transition within the site could be lost. The developing policy of the Alde and Ore Estuary Partnership should consider scope for natural adaption to sea level rise.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				11. Inappropriate pest control Fox predation/disturbance is a key issue for breeding birds on Orfordness, particularly Lesser black backed gulls. Foxes can cause gulls and other breeding birds to abandon nesting sites, and predate adult birds and chicks. 12. Changes in species distributions There are negative population trends in bird species using the site. Breeding locations are moving within and away from the designated site, possibly due to habitat change on site, as a reaction to other species and due to draw of other adjacent hinterland habitat. This requires



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				further investigation and possible mitigation. 13. Invasive species Spartina is encroaching on estuarine muds. With Spartina at the front, and reed encroaching at the back, saltmarsh could be squeezed out. 14. Air Pollution: impact of atmospheric nitrogen deposition Air pollution impacts on vegetation diversity. Aerial deposits of nitrogen may exceed the site relevant critical load (20 – 30 kg N ha⁻¹ yr⁻¹) above which the diversity of saltmarsh vegetation begins to be altered (possibly to reed) and adversely impacted. Many land use practices contribute to this



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				problem locally including land spreading, outdoor pigs, high nutrient inputs on fields 15. Fisheries: Commercial marine and estuarine There are many different fishing pressures close to shore that may include bycatch of juvenile fish and disturbance of fish nursery areas that could potentially have an impact on Little tern <i>Sterna Albifrons</i> by reducing suitable feeding areas.
<u>Alde-Ore Estuary Ramsar</u> RIS Code: UK11002	2546.99	Ramsar criterion 6 – species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation):	Not applicable.	1. Erosion English Nature provides advice to the Environment Agency and coastal local authorities in relation to flood and coastal protection management. This will inform the development of the Suffolk



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		Species regularly supported during the breeding season: • Lesser black-backed gull, <i>Larus fuscus graellsii</i> Species with peak counts in winter: • Pied avocet, <i>Recurvirostra avosetta</i>. • Common redshank, <i>Tringa totanus totanus</i>		Estuaries strategies and the second generation shoreline management plan. A Management Scheme is required, taking into account the effects of erosion. A Coastal Habitat Management Plan will be produced for this site.
<u>Alde, Ore and Butley Estuaries SAC</u> EU Code: UK0030076	1632.63	• H1130. Estuaries • H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	Same as Alde-Ore Estuary SPA (See above)



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		H1330. Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)	- The extent and distribution of qualifying natural habitats - The structure and function (including typical species) of qualifying natural habitats, and - The supporting processes on which qualifying natural habitats rely	
Blackwater Estuary (Mid-Essex Coast Phase 4) The Blackwater Estuary is the largest estuary in Essex north of the Thames and, is one of the largest estuarine complexes in East Anglia. Its mudflats, fringed by saltmarsh on the upper shores, support internationally and nationally important numbers of overwintering waterfowl. Shingle and shell banks and offshore islands are also a feature of the tidal flats. The surrounding terrestrial habitats; the sea wall, ancient grazing marsh and its associated fleet and ditch systems, plus semi-improved grassland are also of high conservation interest. This rich mosaic of habitats supports an outstanding assemblage of nationally scarce plants and a nationally important assemblage of rare invertebrates. There are 16 British Red Data Book species and 94 notable and local species.				
<u>Blackwater Estuary SPA</u> UK9009245	4395.15	A046a <i>Branta bernicla bernicla</i>; Dark-bellied brent	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the	Same as Essex Estuaries SAC (see below)



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		goose (Non-breeding) • A059 <i>Aythya ferina</i>; Common pochard (Breeding) • A082 <i>Circus cyaneus</i>; Hen harrier (Non-breeding) • A137 <i>Charadrius hiaticula</i>; Ringed plover (Breeding) • A141 <i>Pluvialis squatarola</i>; Grey plover (Non-breeding) • A149 <i>Calidris alpina alpina</i>; Dunlin (Non-breeding) • A156 <i>Limosa limosa islandica</i>; Black-tailed godwit (Non-breeding)	aims of the Wild Birds Directive, by maintaining or restoring: • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.	



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• A195 <i>Sterna albifrons</i>; Little tern (Breeding) • Waterbird assemblage		
<u>Blackwater Estuary Ramsar site</u> UK11007	4395.15	<u>Ramsar criterion 1</u> Qualifies by virtue of the extent and diversity of saltmarsh habitat present. This site, and the four others in the Mid-Essex Coast complex, includes a total of 3,237 ha that represent 70% of the saltmarsh habitat in Essex and 7% of the total area of saltmarsh in Britain. <u>Ramsar criterion 2</u> The invertebrate fauna is well represented and	Not applicable.	None present.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		includes at least 16 British Red Data Book species. In descending order of rarity these are: Endangered: a water beetle <i>Paracymus aeneus</i> ; Vulnerable: a damselfly <i>Lestes dryas</i> , the flies <i>Aedes flavescens</i> , <i>Erioptera bivittata</i> , <i>Hybomitra expollicata</i> and the spiders <i>Heliophanus auratus</i> and <i>Trichopterna cito</i> ; Rare: the beetles <i>Baris scolopacea</i> , <i>Philonthus punctus</i> , <i>Graptodytes bilineatus</i> and <i>Malachius vulneratus</i> , the flies <i>Campsicemus magius</i> and <i>Myopites eximia</i> , the moths <i>Idaea ochrata</i> and <i>Malacosoma castrensis</i> and the spider <i>Euophrys</i> .		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		Ramsar criterion 3 This site supports a full and representative sequences of saltmarsh plant communities covering the range of variation in Britain. Ramsar criterion 5 Assemblages of international importance; species with peak counts in winter; 105061 waterfowl (5 year peak mean 1998/99-2002/2003) <u>Ramsar criterion 6</u> Species/populations occurring at levels of international importance: Species with peak counts in winter:		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• <i>Pluvialis squatarola</i>; Grey plover • <i>Calidris alpina alpina</i>; Dunlin • <i>Limosa limosa islandica</i>; Black-tailed godwit Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in winter: • <i>Tadorna tadorna</i>; Common shelduck • <i>Pluvialis apricaria apricaria</i>; European golden plover		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		<i>Tringa totanus tetanus</i>; Common redshank		
Colne Estuary Colne Estuary is a comparatively short and branching estuary, with five tidal arms which flow into the main river channel. The estuary has a narrow intertidal zone predominantly composed of flats of fine silt with mudflat communities typical of south-eastern estuaries. The estuary is of European / international importance for wintering Brent Geese and Black-tailed Godwit and of national importance for breeding Little Terns and five other species of wintering waders and wildfowl. The variety of habitats which include mudflat, saltmarsh, grazing marsh, sand and shingle spits, disused gravel pits and reedbeds, support outstanding assemblages of invertebrates and plants				
<u>Colne Estuary SPA</u> EU Code: UK9009243	2,719.93	- Dark-bellied brent goose (<i>Branta bernicla bernicla</i>), Non-breeding - Hen harrier (<i>Circus cyaneus</i>), Non-breeding - Little tern (<i>Sternula albifrons</i>), Breeding	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features	Same as Essex Estuaries SAC



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• Pochard (<i>Aythya ferina</i>), Breeding • Redshank (<i>Tringa totanus</i>), Non-breeding • Ringed plover (<i>Charadrius hiaticula</i>), Breeding • Waterbird assemblage, Non-breeding	• The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and • The distribution of the qualifying features within the site	
<u>Colne Estuary Ramsar site</u> RIS Code: UK11015	2,719.93	Ramsar criterion 1 The site is important due to the extent and diversity of saltmarsh present. This site, and the four other sites in the Mid-Essex Coast complex, includes a total of 3,237 ha, that represent 70% of the	Not applicable.	Not present.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		<u>Ramsar criterion 6</u>		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		Species with peak counts in winter: • <i>Branta bernicla bernicla</i>; Dark-bellied Brent Goose - 3165 individuals, representing an average of 1.4% of the population (5 year peak mean 1998/9-2002/3) • <i>Tringa totanus totanus</i>; Common redshank - 1624 individuals, representing an average of 1.3% of the GB population (5 year peak mean 1998/9-2002/3) Species/populations identified subsequent to designation for possible future consideration under criterion 6.		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		Species with peak counts in winter: • <i>Limosa limosa islandica</i>; Black-tailed godwit - 402 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/9- 2002/3)		

Crouch & Roach Estuaries

The Rivers Crouch and Roach are situated in South Essex. The River Crouch occupies a shallow valley between two ridges of London Clay, whilst the River Roach is set predominantly between areas of brick earth and loams with patches of sand and gravel. The intertidal zone along the Rivers Crouch and Roach is 'squeezed' between the sea walls of both banks and the river channel. This leaves a relatively narrow strip of tidal mud unlike other estuaries in the county, which, nonetheless, is used by significant numbers of birds. One species is present in internationally important numbers, and three other species of wader and wildfowl occur in nationally important numbers. Additional interest is provided by the aquatic and terrestrial invertebrates and by an outstanding assemblage of nationally scarce plants



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
<u>Crouch & Roach Estuaries SPA</u> EU Code: UK9009244	1735.58	- Dark-bellied brent goose; <i>Branta bernicla bernicla</i> (Non-breeding) - Waterbird assemblage	The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: - the extent and distribution of the habitats of the qualifying features - the structure and function of the habitats of the qualifying features - the supporting processes on which the habitats of the qualifying features rely - the populations of qualifying features - the distribution of qualifying features within the site	Same as Essex Estuaries SAC (see below)



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
<u>Crouch & Roach Estuaries Ramsar site</u> RIS Code: UK11058	1735.58		Not applicable.	Not present.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• Curved Hard-Grass <i>Parapholis incurva</i> • Borrer's Saltmarsh grass <i>Puccinellia fasciculata</i> • Stiff Saltmarsh Grass <i>Puccinellia rupestris</i> • Spiral Tasselweed <i>Ruppia cirrhosa</i> • One-Flowered Glasswort <i>Salicornia pusilla</i> • Small Cord-Grass <i>Spartina maritima</i> • Shrubby Seablite <i>Suaeda vera</i> • Sea Clover <i>Trifolium squamosum</i> Several important invertebrate species are		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity

The Deben Estuary

The Deben Estuary lies within Suffolk Coastal District at the southern border of Suffolk. The estuaries include extensive mud-flats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The mud-flats hold *Enteromorpha*, *Zostera* and *Salicornia* spp. In summer, the site supports important numbers of breeding Avocet while in winter they hold major concentrations of waterbirds, especially geese, ducks and waders. The geese also feed, and waders roost, in surrounding areas of agricultural land outside the SPA.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
<u>Deben Estuary SPA</u> EU Code: UK9009261	978.93	- A046a Dark-bellied brent goose <i>Branta bernicla bernicla</i> (Non-breeding); - A132 Pied avocet, <i>Recurvirostra avosetta</i> (breeding)	The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: - the extent and distribution of the habitats of the qualifying features - the structure and function of the habitats of the qualifying features - the supporting processes on which the habitats of the qualifying features rely - the populations of qualifying features - the distribution of qualifying features within the site	1. Coastal squeeze The Deben Estuary coastline is undergoing widespread decline in the quality of saltmarsh, and an increase in lower marsh habitats at the expense of mid and upper marsh vegetation communities. This is likely due to impacts from climate change, such as rising sea level. Unless changes are made to the management of the coastline, Habitats supporting qualifying SPA birds will be lost or degraded through coastal squeeze, sedimentation and reduced exposure. 2. Public access/disturbance The Deben Estuary is subject to land and water-based activities, including boating and water sports; walking; wildfowling; and



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				low flying aircrafts. These activities are likely to impact Habitats supporting breeding and overwintering water birds. A better understanding of which species and Habitats are most susceptible; which types of activity are most disturbing; and which locations and times of year are most sensitive is required to ensure the Estuaries are appropriately managed 3. Changes in species distribution <i>Spartina anglica</i> is encroaching onto estuarine muds. This may reduce bird roosting and feeding areas of saltmarsh and mudflat. 4. Air Pollution: Impacts of atmospheric nitrogen deposition



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				Modelled aerial deposits of nitrogen within Deben Estuary exceed the threshold limit above which the diversity of saltmarsh vegetation begins to be altered (possibly to reed) and adversely impacted. This is likely being caused by in combination impacts from land spreading and land use practices with high nutrient inputs e.g. outdoor pig farms. 5. Water Pollution Inappropriate water quality may impact on the supporting habitats of SPA birds. Eutrophication may be having an influence on reed growth and saltmarsh composition. Increased flood events could lead to habitat change/loss of diversity. Nutrient run off from farming operations could exacerbate the issue.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				Further monitoring and management of key issues are required. 6. Fisheries: Commercial marine estuarine In combination impacts from fisheries in European Marine Sites need to be monitored and appropriately managed to avoid potential threats to site condition.
<u>Deben Estuary Ramsar site</u> RIS Code: UK11017	978.93	Qualifying Species/populations (as identified at designation) Ramsar criterion 2 Supports a population of the mollusc <i>Vertigo angustior</i> (Habitats Directive Annex II (S1014); British Red Data Book Endangered). Martlesham Creek is one of	Not applicable.	1. Erosion English Nature provides advice to the Environment Agency and coastal local authorities in relation to flood and coastal protection management. This will inform the development of the Suffolk Estuaries strategies and the second generation shoreline management plan.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		only about fourteen sites in Britain where this species survives Species with peak counts in winter: • Dark-bellied brent goose, <i>Branta bernicla bernicla</i>, Species currently occurring at levels of national importance: Species with peak counts in spring/autumn: • Black-tailed godwit , <i>Limosa limosa islandica</i>. • Bean goose, <i>Anser fabalis fabalis</i>. • Common shelduck, <i>Tadorna tadorna</i>.		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		- Pied avocet, <i>Recurvirostra avosetta</i> - Spotted redshank, <i>Tringa erythropus</i>, - Common redshank , <i>Tringa totanus totanus</i>, Species Information Nationally important species occurring on the site. Invertebrates: <i>Vertigo angustior</i> (Nationally Scarce) & <i>Vertigo pusilla</i> (Nationally Scarce)		

Dengie

Dengie is a large and remote area of tidal mudflat and saltmarsh at the eastern end of the Dengie peninsula, between the Blackwater and Crouch Estuaries. The saltmarsh is the largest continuous example of its type in Essex. Foreshore, saltmarsh and beaches support an outstanding assemblage of rare coastal flora. It hosts internationally and nationally important wintering populations of wildfowl and



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
waders, and in summer supports a range of breeding coastal birds including rarities. The formation of cockleshell spits and beaches is of geomorphological interest				
<u>Dengie SPA</u> (Mid-Essex Coast Phase 1) EU Code: UK9009242	3127.23	• <i>Branta bernicla bernicla</i>; Dark-bellied brent goose (Non-breeding) • <i>Pluvialis squatarola</i>; Grey plover (Non-breeding) • <i>Circus cyaneus</i> Hen harrier (Non-breeding) • <i>Calidris canutus</i>; Knot (Non-breeding) • Waterbird assemblage (Non-breeding)	The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: • the extent and distribution of the habitats of the qualifying features • the structure and function of the habitats of the qualifying features • the supporting processes on which the habitats of the qualifying features rely • the populations of qualifying features	Same as Essex Estuaries SAC



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
			the distribution of qualifying features within the site	
<u>Dengie Ramsar Site</u> (Mid-Essex Coast Phase 1) RIS Code: UK11018	3127.23	Ramsar criterion 1 Qualifies by virtue of the extent and diversity of saltmarsh habitat present. Dengie, and the four other sites in the Mid-Essex Coast Ramsar site complex, includes a total of 3,237 ha, that represent 70% of the saltmarsh habitat in Essex and 7% of the total area of saltmarsh in Britain. Ramsar criterion 2 Dengie supports a number of rare plant and animal species. The Dengie has 11 species of nationally scarce plants: sea kale <i>Crambe maritima</i>, sea barley <i>Hordeum marinum</i>, golden samphire <i>Inula crithmoides</i>,	Not applicable.	None available.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		lax flowered sea lavender <i>Limonium humile</i>, the glassworts <i>Sarcocornia perennis</i> and <i>Salicornia pusilla</i>, small cord-grass <i>Spartina maritima</i>, shrubby sea-blite <i>Suaeda vera</i>, and the eelgrasses <i>Zostera angustifolia</i>, <i>Z. marina</i> and <i>Z. noltei</i>. The invertebrate fauna includes the following Red Data Book species: a weevil <i>Baris scolopacea</i>, a horsefly <i>Atylotus latistriatus</i> and a jumping spider <i>Euophrys browni</i>. Ramsar criterion 3 This site supports a full and representative sequences of saltmarsh plant communities covering the range of variation in Britain. <u>Ramsar criterion 5</u>		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		Assemblages of international importance; species with peak counts in winter; 43828 waterfowl (5 year peak mean 1998/99-2002/2003) <u>Ramsar criterion 6</u> Species/populations occurring at levels of international importance: Species with peak counts in winter: • <i>Tringa totanus tetanus</i>; Common redshank Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in winter:		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• <i>Branta bernicla bernicla</i>; Dark-bellied brent goose • <i>Haematopus ostralegus ostralegus</i>; Eurasian oystercatcher • <i>Pluvialis squatarola</i>; Grey plover • <i>Limosa lapponica lapponica</i>; Bar-tailed godwit • <i>Calidris canutus</i>; Red knot		
Essex Estuaries The Mid-Essex Coast comprises an extensive complex of estuaries and intertidal sand and silt flats, including several islands, shingle and shell beaches and extensive areas of saltmarsh. The proposed SPA follows the boundaries of five SSSIs: the Colne Estuary, the Blackwater Estuary, Dengie, the River Crouch Marshes and Foulness.				
<u>Essex Estuaries SAC</u>	46109.95	• <u>H1110</u> Sandbanks which are slightly	Ensure that the integrity of the site is maintained or restored as	1. Coastal Squeeze:



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
UK0013690		covered by sea water all the time; Subtidal sandbanks • H1130 Estuaries • H1140 Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats. • H1310 Salicornia and other annuals colonizing mud and sand; Glasswort and other annuals colonising mud and sand • <u>H1320</u> <i>Spartina</i> swards (<i>Spartinion maritimae</i>); Cord-grass swards • H1330 Atlantic salt meadows (<i>Glauco-</i>	appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring: • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely	Coastal defences along much of the Essex coastline prevent intertidal habitats from shifting landward in response to rising sea levels. As a result, these habitats are being gradually degraded and reduced in extent, with knock-on effects on the waterbirds and other species they support. 'managed realignment' schemes and additional intervention measures to create new areas of intertidal habitat and reduce erosion rates are being implemented but more will be needed to offset future losses. Grazing marshes in the SIP area are important for waterbirds and are also threatened by sea level rise because most are near or below mean high tide level,



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		<i>Puccinellietalia maritima</i>) • <u>H1420</u> Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>)		currently protected behind seawalls. 2. Public Access/Disturbance: Breeding and overwintering waterbirds are susceptible to human disturbance from a range of land- and water-based activities - including boating and watersports, walking, bait-digging, fishing and wildfowling - as well as low-flying aircraft. Some activities, such as powerboating, may produce physical disturbance to habitats. Moderate levels of disturbance in less sensitive locations may have no significant effect on the numbers of birds using the SIP area but the types, levels and locations of potentially disturbing activities are constantly changing. Managing the changes to



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				minimise the risk of disturbance impacts will require a better understanding of which species and habitats are most susceptible, which types of activity are most disturbing, and which locations and times of year are most sensitive. 3. Fisheries: Commercial marine and estuarine Commercial fishing activities categorised as Amber or Green under Defra's revised approach to commercial fisheries in EMSs are being assessed by Kent and Essex Inshore Fisheries and Conservation Authority (KEIFCA) to determine whether management is required. For activities categorised as Amber and Green these assessments should take account of any



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				relevant in-combination effects with other fishing activities. Shellfish dredging over subtidal habitats has been identified as an Amber activity and is considered a high priority for assessment and development of possible management for the site. 4. Planning Permission: general Several of the issues affecting the Essex Estuaries and the management of disturbance effects on the sites are related to each other, and addressing them is likely to require an improved overview of the relative sensitivities of different habitats, species and locations to different types of development (perhaps summarised as sensitivity maps and matrices for the SIP area). Difficult issues include: (a)



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				Assessing the cumulative effects of numerous, small and often 'non-standard' developments (b) Development outside the SPA/SAC boundaries can have negative impacts, particularly on the estuaries' birds (c) Assessing the indirect, 'knock-on' effects of proposals (d) Pressure to relax planning conditions on existing developments. 5. Changes in species distributions Declines in the numbers of some of the waterbird species using the Essex Estuaries SIP area may be due to changes in their distributions or population levels at a national or continental scale, possibly linked to climate change. For example, milder winters may be allowing birds to overwinter



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				closer to their northern breeding grounds, or changes on the breeding grounds may be reducing breeding success. When assessing SPA condition, distinguishing these types of large-scale effect from effects produced by changes within the site itself is important. 6. Invasive Species: An increase in Pacific oyster <i>Crassostrea gigas</i> settlement and colonisation within the European Marine Site (EMS) may result in areas of foreshore being covered in such numbers as to make them difficult to access and utilise as feeding grounds for overwintering birds. The importance of Pacific oysters for the local shellfish industry is recognised, however Natural England would not like to



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				see an overall increase in the extent of foreshore across the EMS populated by Pacific oysters. Other non-native invasive species such as the American whelk tingle Urosalpinx cinerea and Slipper limpet Crepidula fornicata are known to occupy subtidal muddy habitats, potentially impacting native communities through competition for resources and predation. 7. Fisheries: Recreational marine and estuarine Recreational bait digging may impact waterbirds by reducing prey availability and creating disturbance in intertidal feeding areas. It could also damage the intertidal mudflats and sandflats and associated sub-features and communities, such as eelgrass



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				beds. The extent of the activity and potential impacts on site features are not currently well understood. 8. Fisheries: Recreational marine and estuarine Bottom towed fishing gear (i.e. any fishing instrument designed to take sea fisheries resources from the seabed) has been categorised as a 'Red' for the interest features listed, specifically the seagrass beds <i>Zostera</i> spp, a sub-feature of the SAC, as part of Defra's revised approach to commercial fisheries management in European Marine Sites (EMS). Appropriate management measures will be implemented and enforced by Kent and Essex Inshore Fisheries and Conservation Authority



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				(IFCA) who have put in place the 'Bottom Towed Fishing Gear Byelaw' within the SAC to prohibit the above fishing gear being used over the majority of known seagrass beds.
Foulness Foulness is part of an open coast estuarine system comprising grazing marsh, saltmarsh, intertidal mudflats and sandflats which support nationally rare and nationally scarce plants, and nationally and internationally important populations of breeding, migratory and wintering waterfowl				
<u>Foulness SPA</u> EU Code: UK9009246	10968.9	- Hen harrier; <i>Circus cyaneus</i> (Non-breeding) - Dark-bellied brent goose; <i>Branta bernicla</i> (Non-breeding) - Eurasian oystercatcher; <i>Haematopus ostralegus</i> (Non-breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features	Same as Essex Estuaries SAC (see above)



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• Grey plover; <i>Pluvialis squatarol</i> (Non-breeding) • Bar-tailed godwit; <i>Limosa lapponica lapponica</i> (Non-breeding) • Red knot; <i>Calidris canutus</i> (Non-breeding) • Pied avocet; <i>Recurvirostra avosetta</i> (Breeding) • Ringed plover; <i>Charadrius hiaticula</i>; (Breeding) • Common redshank; <i>Tringa totanus</i> (Non-breeding) • Sandwich tern; <i>Sterna sandvicensis</i> (Breeding) • Common tern; <i>Sterna hirundo</i> (Breeding)	• The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site	



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• Little tern; <i>Sterna albifrons</i> (Breeding) • Waterbird assemblage		
<u>Foulness</u> <u>Ramsar site</u> RIS Code: UK11026	10968.9	Ramsar criterion 2 The site supports a number of nationally-rare and nationally-scarce plant species, and British Red Data Book invertebrates. Ramsar criterion 3 The site contains extensive saltmarsh habitat, with areas supporting full and representative sequences of saltmarsh plant communities covering the range of variation in Britain. Ramsar criterion 5 Assemblages of international importance; species with peak counts in winter; 82148 waterfowl (5	Not applicable.	None present.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		year peak mean 1998/99-2002/2003) Ramsar criterion 6 Species/populations occurring at levels of international importance: Species with peak counts in spring/autumn: • Dark-bellied brent goose; <i>Branta bernicla bernicla</i> • Grey plover; <i>Pluvialis squatarola</i> • Red knot; <i>Calidris canutus</i> Species with peak counts in winter: • Bar-tailed godwit; <i>Limosa lapponica lapponica</i>		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
Hamford Water Hamford Water is a large, shallow estuarine basin comprising tidal creeks and islands, intertidal mud and sand flats, and saltmarsh supporting rare plants and invertebrates, as well as internationally important species/populations of migratory waterfowl.				
Hamford Water <u>SPA</u> EU Code: UK9009131A	3,532.56	• <i>A046a Branta bernicla bernicla; Dark-bellied brent goose (Non-breeding)</i> • <i>A048 Tadorna tadorna; Common shelduck (Non-breeding)</i> • <i>A052 Anas crecca; Eurasian teal (Non-breeding)</i> • <i>A132 Recurvirostra avosetta; Pied avocet (Non-breeding)</i> • <i>A137 Charadrius hiaticula; Ringed plover (Non-breeding)</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and,	1. Coastal squeeze Areas of intertidal saltmarsh, mudflats, sand and shingle used by overwintering and breeding birds for feeding, roosting and/or nesting are under threat from coastal squeeze. The consequences of climate change, including sea level rise and an increased frequency in coastal storms and tidal surges, are likely to be contributing factors in coastal squeeze. Tectonic subsidence along the east coast of England and hard sea defences are also likely to exacerbate the issue.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
			The distribution of the qualifying features within the site	



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site. This requires further investigation. 5. Fisheries: Commercial marine and estuarine Commercial fishing activities categorised as ‘amber or green’ under Defra’s revised approach to commercial fisheries in European Marine Sites require assessment and (where appropriate) management. This assessment will be undertaken by Kent and Essex Inshore Fisheries Conservation Authority (IFCA). For activities categorised as



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				'green', these assessments should take account of any in-combination effects of amber activities, and/or appropriate plans or projects, in the site.
<u>Hamford Water Ramsar site</u> RIS Code: UK11028	2187.21	Ramsar criterion 6 – species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: • Ringed plover, <i>Charadrius hiaticula</i> • Common redshank, <i>Tringa totanus totanus</i> Species with peak counts in winter:	Not applicable.	1. Erosion There is a programme of recharge of dredged material from off-site that has alleviated some of the habitat loss on site. The Essex Coast and Estuaries Coastal Habitat Management Plan (CHaMP) (Anon. 2002) covers the site and it is expected to inform the shoreline management plan as well as local plan policies. The possibility of managed realignment schemes to address erosion impacts may be considered



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
<u>Hamford Water SAC</u> EU Code: UK0030377	50.34	S4035. <i>Gortyna borelii lunata</i>; Fisher's estuarine moth		



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
			• The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site	

Orfordness - Shingle Street

Orfordness is an extensive shingle structure consisting of a foreland, a 15 km-long spit and a series of recurves running from north to south. It supports some of the largest and most natural sequences in the UK of shingle vegetation affected by salt spray. The southern end has a particularly fine series of undisturbed ridges, with zonation of communities determined by the ridge pattern. Pioneer communities with sea pea *Lathyrus japonicus* and false oat-grass *Arrhenatherum elatius* grassland occur. Locally these are nutrient-enriched by the presence of a gull colony; elsewhere they support rich lichen communities.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
Drift-line vegetation occurs on the sheltered, western side of the spit, at the transition from shingle to saltmarsh, as well as on the exposed eastern coast. The drift-line community is widespread and comprises sea beet <i>Beta vulgaris ssp. maritima</i> and orache <i>Atriplex spp.</i> The site also includes a series of percolation lagoons that have developed in the shingle bank adjacent to the shore at the mouth of the Ore estuary. The salinity of the lagoons is maintained by percolation through the shingle, although at high tides sea water can overtop the shingle bank. The fauna of these lagoons includes typical lagoon species, such as the cockle <i>Cerastoderma glaucum</i>, the ostracod <i>Cyprideis torosa</i> and the gastropods <i>Littorina saxatilis tenebrosa</i> and <i>Hydrobia ventrosa</i>. The nationally rare starlet sea anemone <i>Nematostella vectensis</i> is also found at the site. The adjacent estuarine and intertidal habitats are designated separately as the Alde, Ore and Butley Estuaries SAC.				
<u>Orfordness - Shingle Street SAC</u> EU Code: UK0014780	888	• <i>H1150. Coastal lagoons</i> • <i>H1210. Annual vegetation of drift lines</i> • <i>H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and	Sames as Alde-Ore Estuaries (see above)



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
			The supporting processes on which qualifying natural habitats rely	
Outer Thames Estuary The Outer Thames Estuary SPA is located on the east coast of England between the counties of Norfolk (on the north side) and Kent (on the south side) and extends into the North Sea. The site comprises areas of shallow and deeper water, high tidal current streams and a range of mobile mud, sand, silt and gravely sediments extending into the marine environment, incorporating areas of sand banks often exposed at low tide. Intertidal mud and sand flats are found further towards the coast and within creeks and inlets inland down the Blyth estuary and the Crouch and Roach estuaries. The diversity of marine habitats and associated species is reflected in existing statutory protected area designations, some of which overlap or about the SPA.				
Outer Thames Estuary SPA EU Code: UK9020309	392451.66	- A001 <i>Gavia stellata</i>; Red-throated diver (Non-breeding) - A193 <i>Sterna hirundo</i>; Common tern (Breeding) - A195 <i>Sternula albifrons</i>; Little tern (Breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features	1. Fisheries: Commercial marine and estuarine: Commercial fishing activities categorised as ‘amber or green’ under Defra’s revised approach to commercial fisheries in European Marine Sites (EMS) require assessment and (where appropriate) management. This assessment will be undertaken by



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
			• The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site	the Eastern IFCA and the Kent & Essex IFCA, and the Marine Management Organisation. For activities categorised as 'green', these assessments should take account of any in-combination effects of amber activities, and/or appropriate plans or projects, in the site. The gear types being assessed are towed demersal gear and dredges, and suction dredges for cockles as well as static/passive fishing gear methods such as set gillnets and drift netting represent potentially the most serious direct risk from fishing activity to the birds themselves. Disturbance and displacement effects may arise from boat movements associated with fishing activities. Removal of fish and larger



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				molluscs can have a significant impact on the structure and functioning of benthic communities. Entanglement in static fishing nets is an important cause of death for red-throated divers in the UK waters. Netting is widespread across the sandbanks but is seasonal and occurs primarily when the Red-throated diver population is not at its peak. The scale of by-catch within the site has been assessed by the Kent & Essex IFCA and was not found to be problematic and so can be deemed to be low-risk.

Sandlings

The Sandlings SPA lies near the Suffolk Coast between the Deben Estuary and Leiston. In the 19th century, the area was dominated by heathland developed on glacial sandy soils. During the 20th century, large areas of heath were planted with blocks of commercial conifer forest and others were converted to arable agriculture. Lack of traditional management has resulted in the remnant areas of heath being



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
subject to successional changes, with the consequent spread of bracken, shrubs and trees, although recent conservation management work is resulting in their restoration. The heaths support both acid grassland and heather-dominated plant communities, with dependant invertebrate and bird communities of conservation value. Woodlark <i>Lullula arborea</i> and Nightjar <i>Caprimulgus europaeus</i> have also adapted to breeding in the large conifer forest blocks, using areas that have recently been felled and recent plantation, as well as areas managed as open ground.				
<u>Sandlings SPA</u> EU Code: UK9020286	3,391.80	- A224 <i>Caprimulgus europaeus</i>; European nightjar (Breeding) - A246 <i>Lullula arborea</i>; Woodlark (Breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: - The extent and distribution of the habitats of the qualifying features - The structure and function of the habitats of the qualifying features - The supporting processes on which the habitats of the qualifying features rely	2. Changes in species distributions Woodlark and Nightjar populations on the Suffolk coast have declined by 65% and 66% respectively since notification in 2001. 3. Inappropriate scrub control Scrub encroachment is reducing habitat suitability for Woodlark and Nightjar. Regular management is essential to maintain and restore the supporting heathland habitat to favourable condition.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
			- The population of each of the qualifying features, and, - The distribution of the qualifying features within the site	4. Deer A large deer population exerting grazing pressure on habitats will affect quality of nesting habitat. There is also potential for deer to trample nests 5. Air Pollution: impact of atmospheric nitrogen deposition Nitrogen deposition exceeds site relevant critical loads 6. Public Access/Disturbance The need to understand recreational pressure and implement appropriate management is an ongoing issue. Recreational pressure could be increased by new housing developments in the area and by the potential displacement of



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				visitors during the construction of Sizewell C.
Southern North Sea				
Southern North Sea SAC EU Code: UK0030395	3695100	harbour porpoise (<i>Phocoena phocoena</i>)	To ensure that the integrity of the site is maintained and that it makes the best possible contribution to maintaining Favourable Conservation Status (FCS) for Harbour Porpoise in UK waters. In the context of natural change, this will be achieved by ensuring that: 1. Harbour porpoise is a viable component of the site; 2. There is no significant disturbance of the species; and 3. The condition of supporting habitats and processes, and the availability of prey is maintained.	1. Entanglement/Bycatch 2. Contaminants 3. Anthropogenic underwater sound 4. Reduction in prey resource 5. Collision with vessels or installations
Staverton Park and The Thicks, Wantisden				



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
This site is representative of old oak <i>Quercus spp.</i> woods, and its ancient oaks have rich invertebrate and epiphytic lichen assemblages. Despite being in the most 'continental' part of southern Britain, the epiphytic lichen flora of this site includes rare and Atlantic species, such as <i>Haemotomma elatinum</i>, <i>Lecidea cinnabarina</i>, <i>Thelotrema lepadinum</i>, <i>Graphis elegans</i> and <i>Stenocybe septata</i>. Part of the site includes an area of old holly <i>Ilex aquifolium</i> trees that are probably the largest in Britain. The site has a very well-documented history and good conservation of woodland structure and function.				
<u>Staverton Park and The Thicks SAC</u> EU Code: UK0012741	84.28	H9190. Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains; Dry oak-dominated woodland	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; - The extent and distribution of qualifying natural habitats → The structure and function (including typical species) of qualifying natural habitats, and - The supporting processes on which qualifying natural habitats rely	1. Forestry and woodland management Dense bracken in places prevents regeneration. 2. Disease Acute Oak Dieback is found at the site, other tree disease may be present. 3. Public Access/Disturbance The site is accessed illegally, leading to an increased risk of damage and fires on the site. 4. Deer



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				Deer browsing prevents regeneration in parts of the wood. 5. Hydrological changes A change in the water table could be leading to stress in the older trees. 6. Air Pollution: impact of atmospheric nitrogen deposition Nitrogen deposition exceeds site relevant critical loads. The impact is unclear, but this could be a contributing factor to the observed thick bracken which prevents regeneration of the wood.

The Stour and Orwell estuaries

These estuaries straddle the eastern part of the Essex/Suffolk border in eastern England. The estuaries include extensive mud-flats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The mud-flats hold *Enteromorpha*, *Zostera* and *Salicornia* spp.



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
The site also includes an area of low-lying grazing marsh at Shotley Marshes on the south side of the Orwell. In summer, the site supports important numbers of breeding Avocet <i>Recurvirostra avosetta</i>, while in winter they hold major concentrations of water birds, especially geese, ducks and waders. The geese also feed, and waders roost, in surrounding areas of agricultural land outside the SPA. The site has close ecological links with the Hamford Water and Mid-Essex Coast SPAs, lying to the south on the same coast				
<u>Stour and Orwell Estuaries SPA</u> EU Code: UK9009121	3676.92	<u>Qualifying Features</u> potentially affected: Annex I species: Over winter: Hen Harrier <i>Circus cyaneus</i> This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species: Over winter: Black-tailed Godwit <i>Limosa limosa islandica</i>	With regard to the individual species and/or assemblage of species for which the site has been classified ("the Qualifying Features" listed below); Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive. Subject to natural change, to maintain or restore:	1. Coastal squeeze Coastal defences are present along most of the Orwell coastline to mitigate for impacts from climate change, such as rising sea level. Unless changes are made to the management of the coastline, Habitats supporting qualifying SPA birds will be lost or degraded through coastal squeeze, sedimentation and reduced exposure. 2. Public access/disturbance Stour and Orwell Estuaries is subject to land- and water-based activities, including boating and



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		- Dunlin <i>Calidris alpina alpina</i> - Grey Plover <i>Pluvialis squatarola</i> - Pintail <i>Anas acuta</i> - Redshank <i>Tringa totanus</i> - Ringed Plover <i>Charadrius hiaticula</i> - Shelduck <i>Tadorna tadorna</i> - Turnstone <i>Arenaria interpres</i> The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl including: - Cormorant <i>Phalacrocorax carbo</i> - Pintail <i>Anas acuta</i>	The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The populations of the qualifying features; The distribution of the qualifying features within the site.	water sports; walking; bait-digging; fishing; wildfowling; and military overflight training. These activities are likely to impact habitats supporting breeding and overwintering water birds. A better understanding of which species and habitats are most susceptible; which types of activity are most disturbing; and which locations and times of year are most sensitive is required to ensure the Estuaries are appropriately managed. 3. Changes in species distribution Declines in the number of bird species present at Orwell coastline have occurred. This is likely to be the result of changes in population and distribution on



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• Ringed Plover <i>Charadrius hiaticula</i> • Grey Plover <i>Pluvialis squatarola</i> • Dunlin <i>Calidris alpina alpina</i> • Black-tailed Godwit <i>Limosa limosa islandica</i> • Redshank <i>Tringa totanus</i> • Shelduck <i>Tadorna tadorna</i> • Great Crested Grebe <i>Podiceps cristatus</i> • Curlew <i>Numenius arquata</i> • Dark-bellied Brent Goose <i>Branta bernicla bernicla</i> • Wigeon <i>Mareca penelope</i>		an international scale, due to climate change. 4. Invasive species An increase in <i>Spartina anglica</i> may be affecting the growth of <i>Spartina maritima</i>, a key habitat feature for qualifying bird roosting and feeding areas of saltmarsh and mudflat. 5. Planning permission: General The issue of development in combination with other factors is not fully understood. To ensure management is appropriate to the SPA a better understanding of the sensitivities relating to each habitat, species and location to different types of development is required. Difficult issues highlighted by the SIP include; a) Assessing the cumulative effects



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		• Goldeneye <i>Bucephala clangula</i> • Oystercatcher <i>Haematopus ostralegus</i> • Lapwing <i>Vanellus vanellus</i> • Knot <i>Calidris canutus</i> • Turnstone <i>Arenaria interpres</i>		of numerous, small and often 'non- standard' developments. b) Development outside the SPA boundary can have negative impacts, particularly on the estuaries' birds. c) Assessing the indirect, 'knock-on' effects of proposals. d) Pressure to relax planning conditions on existing developments. 6. Air pollution: impact from atmospheric nitrogen deposition Atmospheric nitrogen deposition exceeds the relevant critical loads for coastal dune Habitats used by breeding terns and hence there is a risk of harmful effects. 7. Inappropriate coastal management



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
				Due to the presence of existing hard sea defences, such as sea walls there is little scope for adaptation to rising sea levels. Any freshwater habitats behind failing seawalls are likely to be inundated by seawater, which would result in the loss of this habitat within the SPA. 8. Fisheries: Commercial and estuarine Commercial fishing activities can be very damaging to inshore marine habitats and the bird species dependent on the communities they support. Any 'amber or green' categorised commercial fishing activities in marine Habitats sites are assessed by Kent and Essex Inshore Fisheries Conservation Authority (IFCA). This



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
<u>Stour and Orwell Estuaries Ramsar site</u> RIS Code: UK11067	3676.92		There are no Conservation Objectives set for Ramsar sites.	



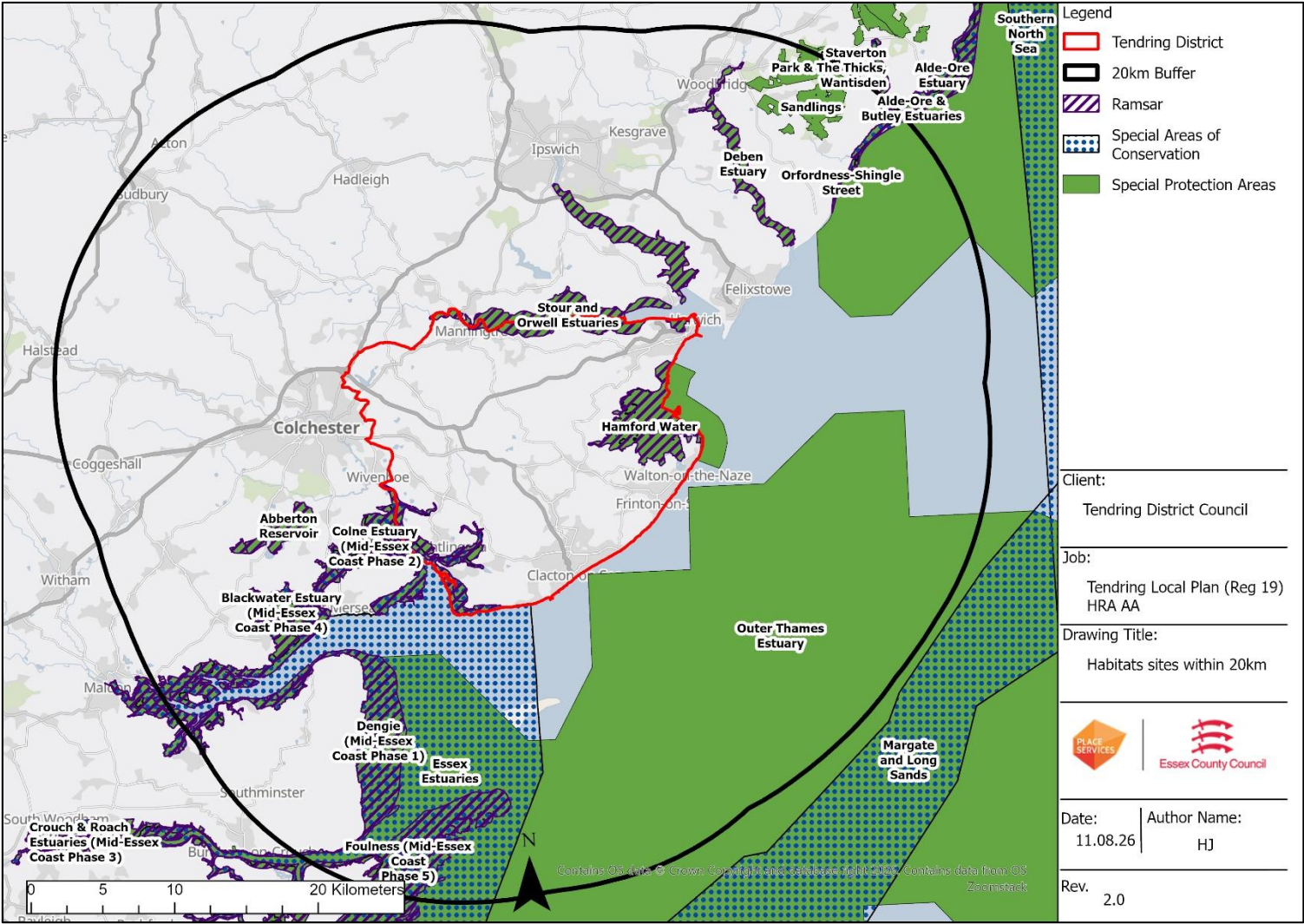
Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
		Ramsar criterion 5 Assemblages of international importance; species with peak counts in winter; 63,017 waterfowl. Ramsar criterion 6 Species/ populations occurring at levels of international importance: Species with peak counts in spring/autumn: • Redshank, <i>Tringa totanus totanus</i> • Species with peak counts in winter: • Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i>		Strategy for the site is being produced. The notes in the RIS for Ramsar sites of factors affecting site's ecological character are not considered as necessary for HRA screening purposes. The assessment under the provisions of the Habitats Regulations is strictly limited to the qualifying features which meet the Ramsar criteria. Where the qualifying features of a Ramsar site would or could be adversely affected by a plan or project, the tests at Appropriate Assessment would need to be based on Article 4 of the Ramsar Convention, which allows a Contracting Party (in this case the UK government) to delete or restrict the boundaries



Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity

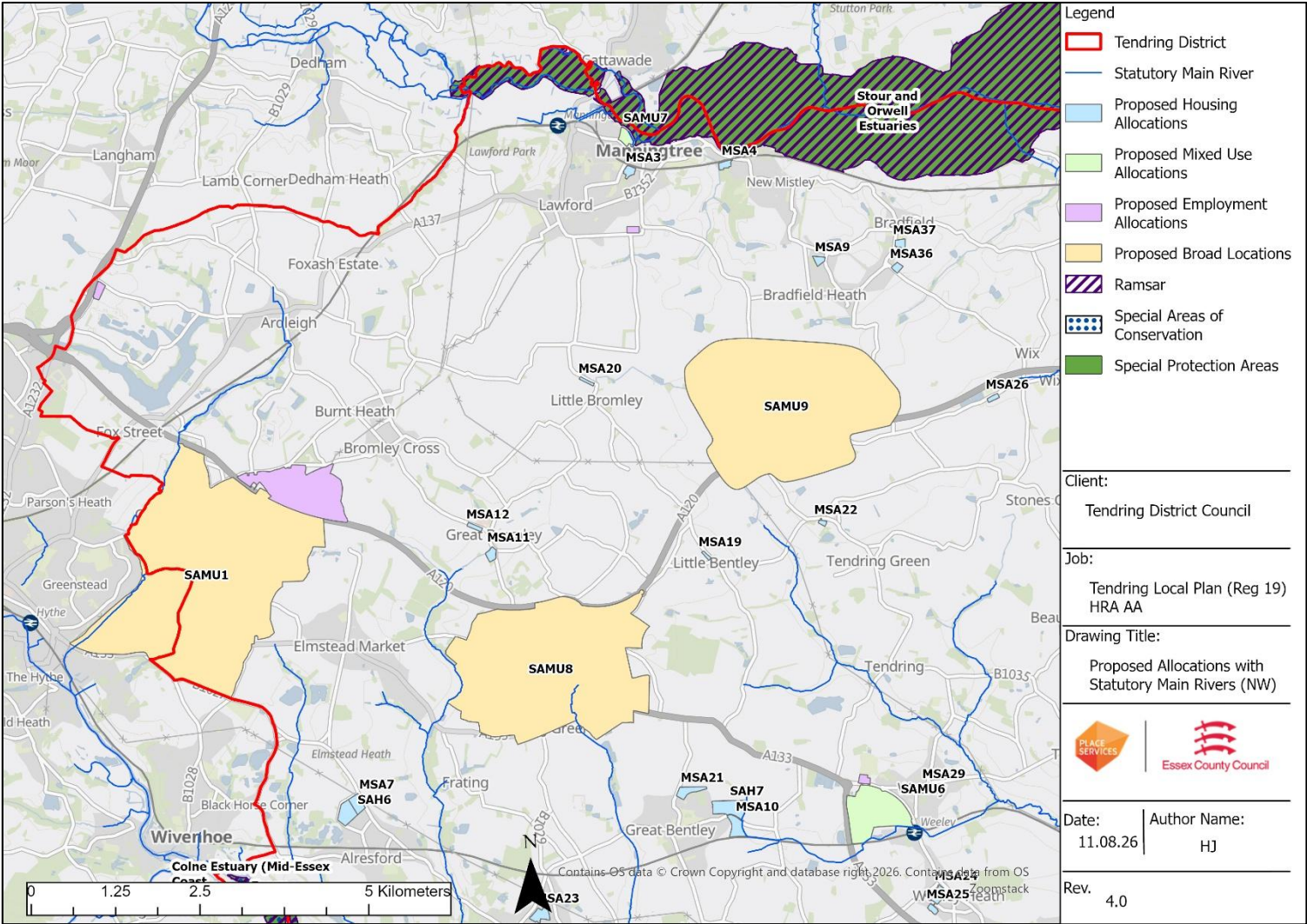


Appendix 5. Habitats sites within 20km of the District boundaries

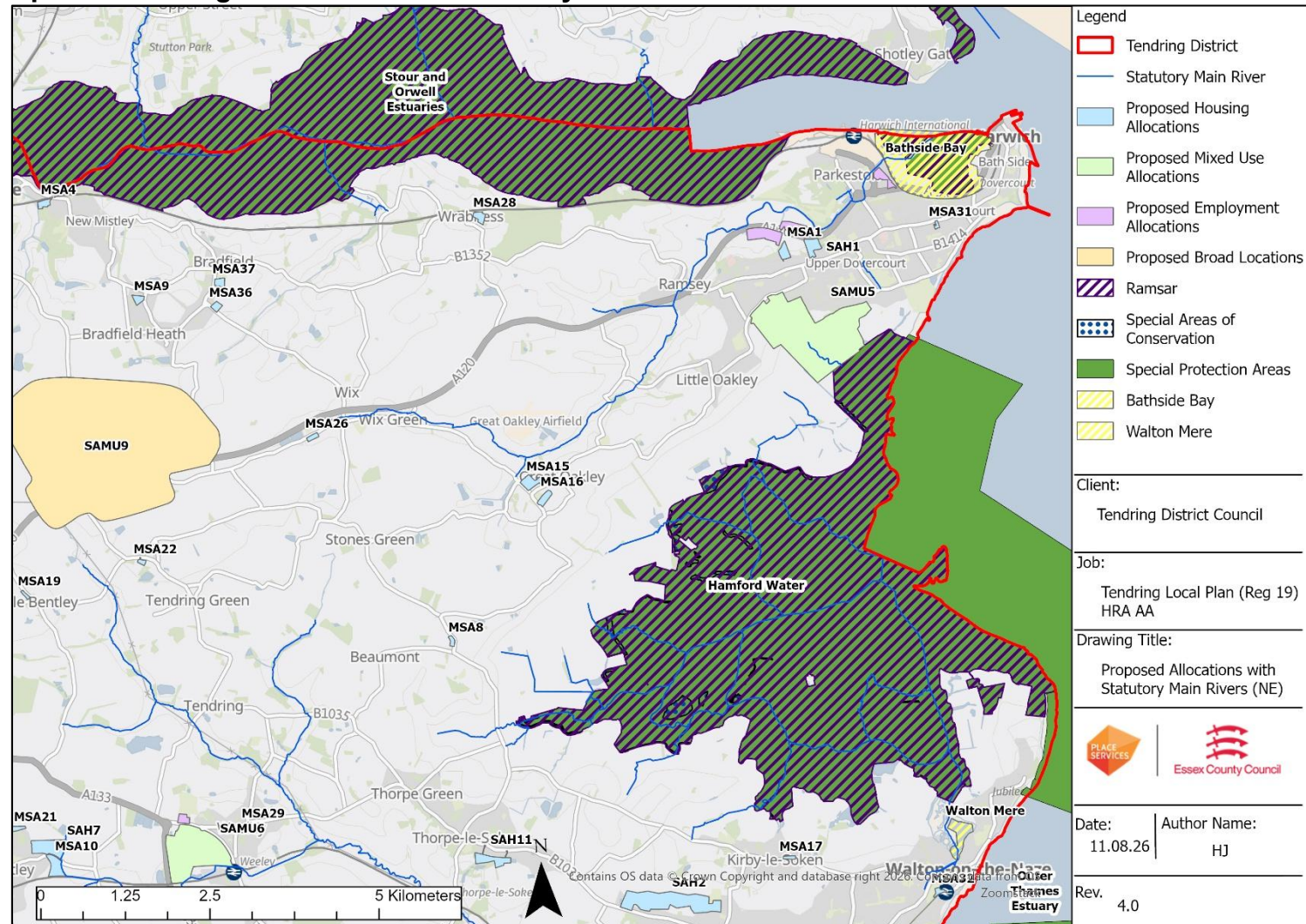




Appendix 6. Proposed Housing Allocations and Statutory Main Rivers - North West

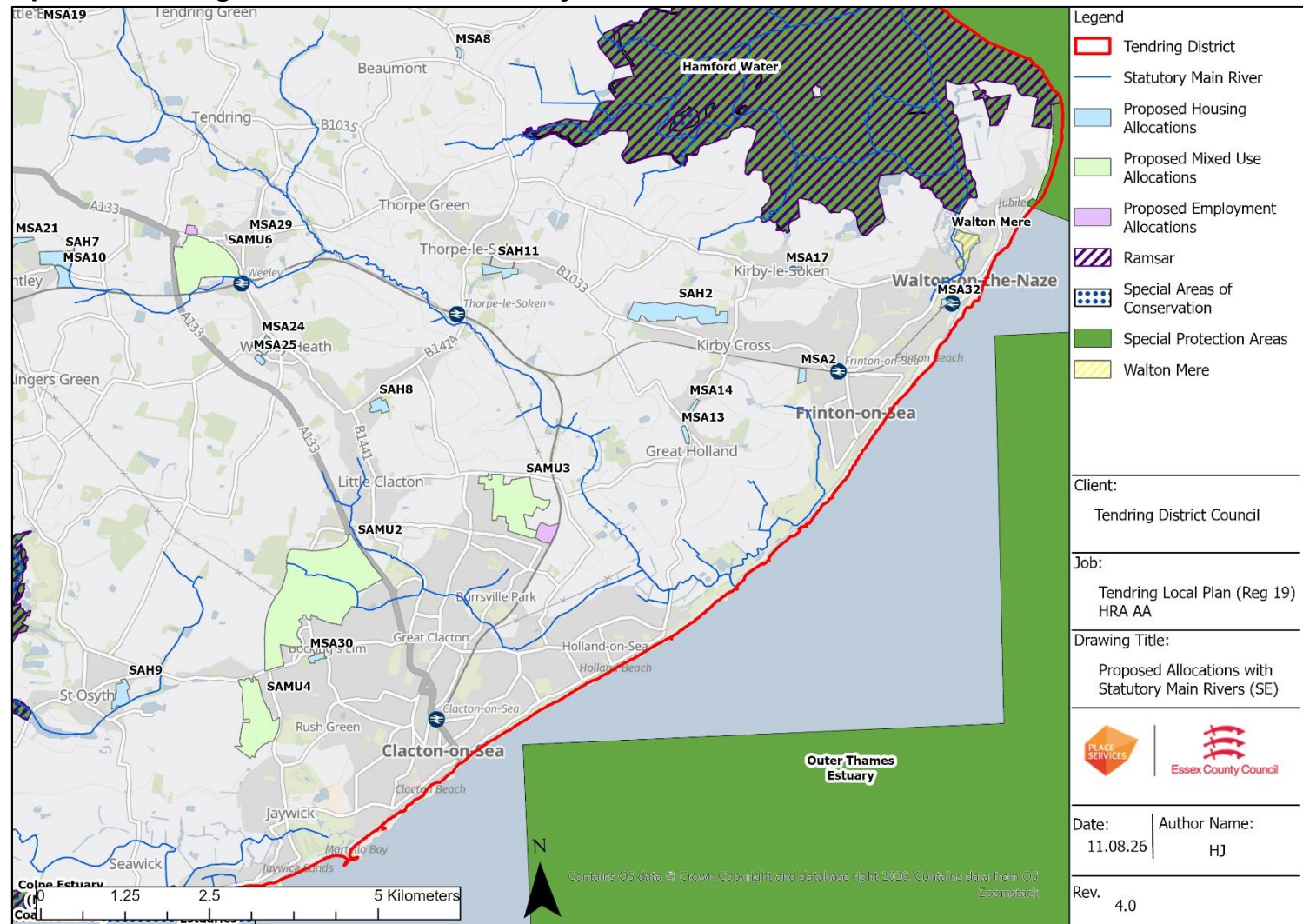


Appendix 7. Proposed Housing Allocations and Statutory Main Rivers - North East



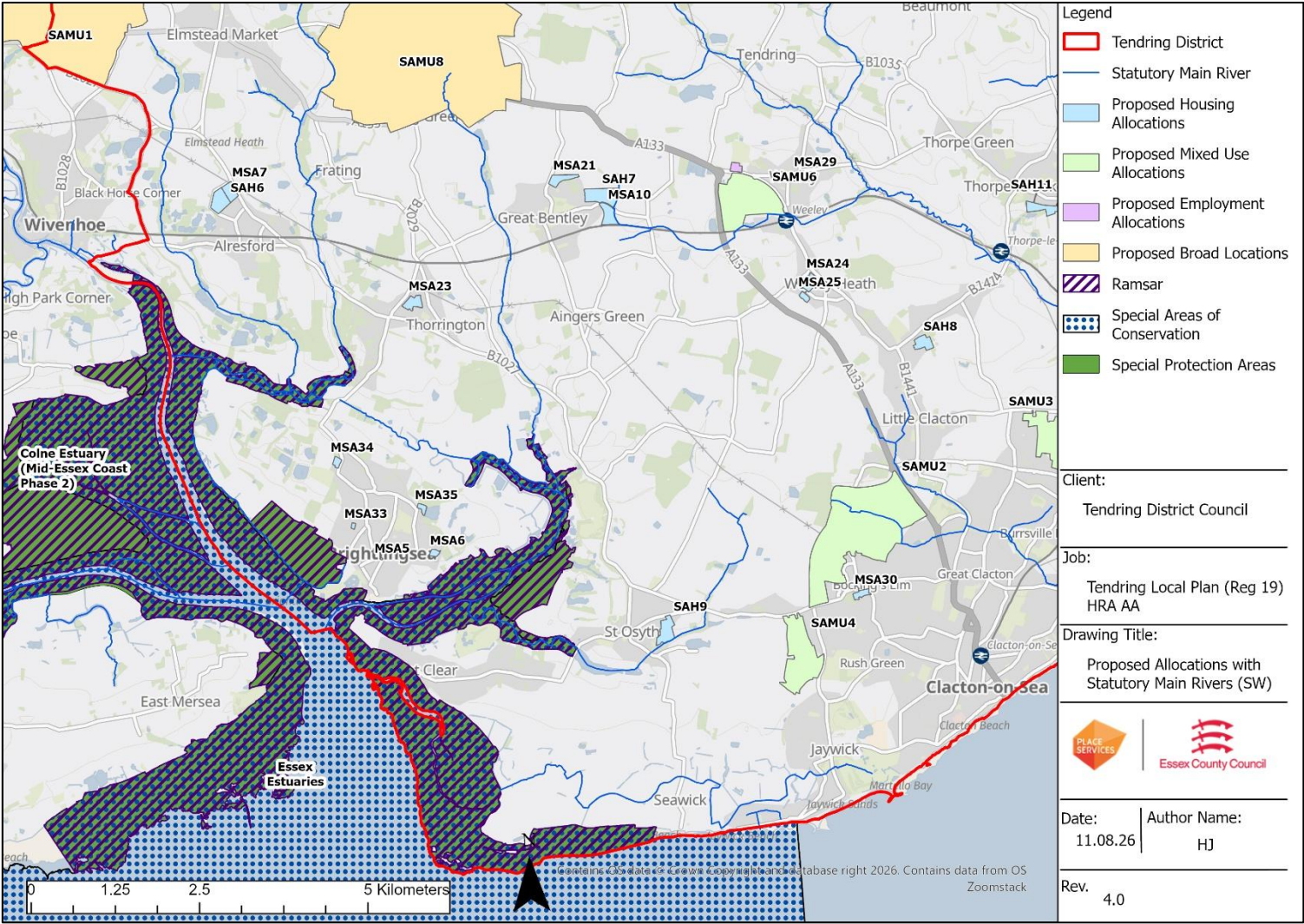


Appendix 8. Proposed Housing Allocations and Statutory Main Rivers - South East



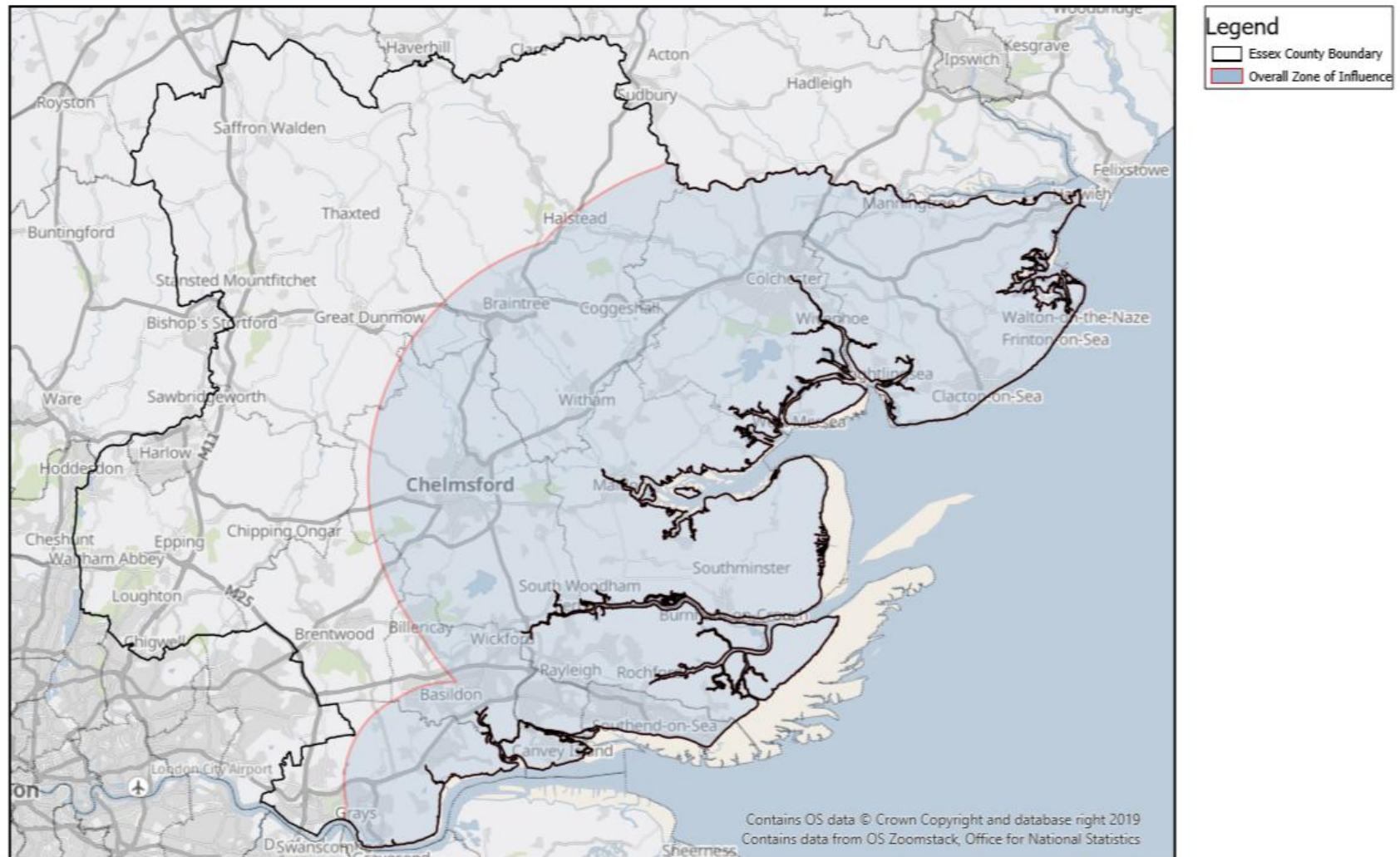


Appendix 9. Proposed Housing Allocations and Statutory Main Rivers - South West



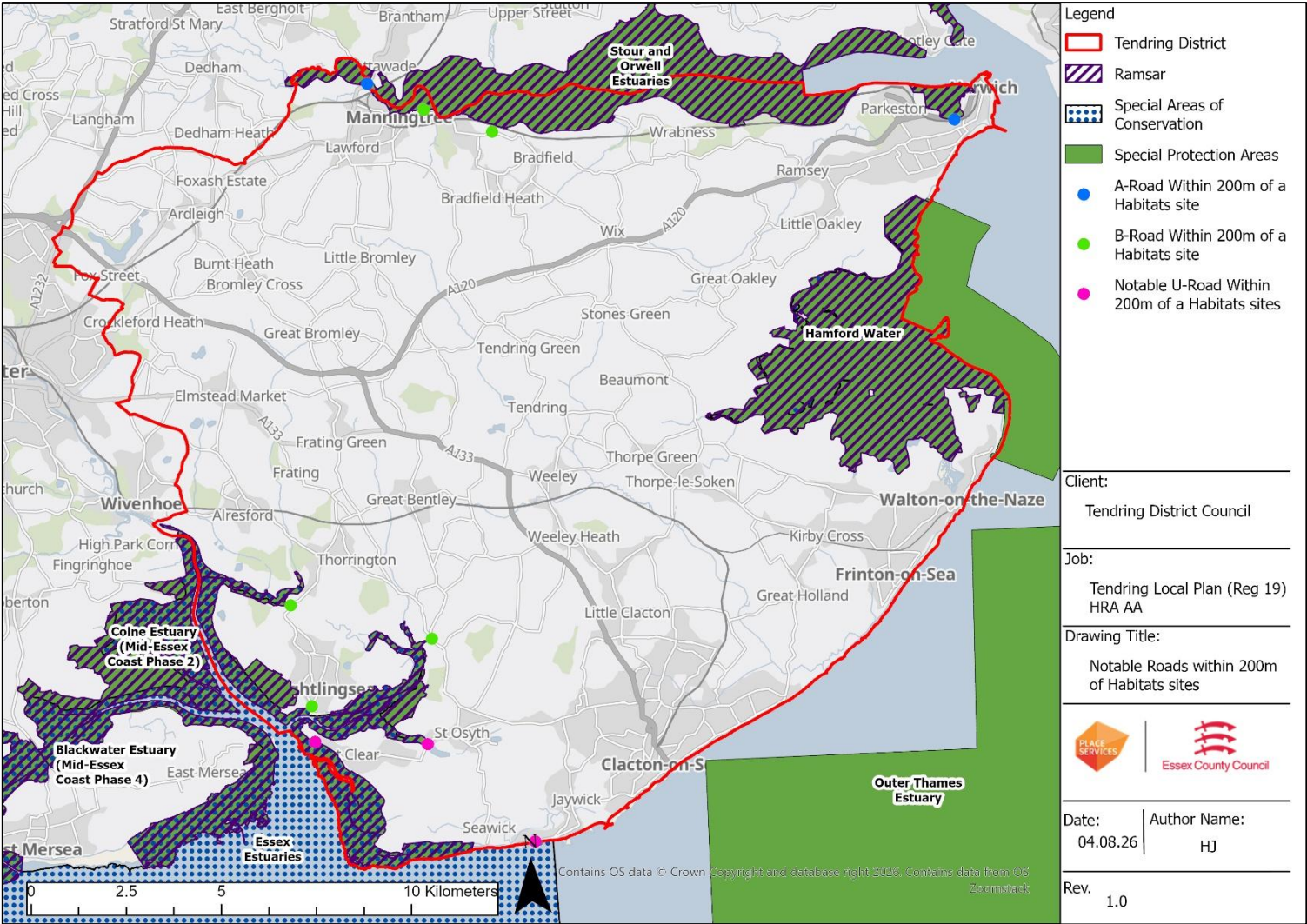


Appendix 10. Essex Coast RAMS Zone of Influence





Appendix 11. Notable Roads within 200m of Habitats sites





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