

Appropriate Assessment Addendum

for

**Ipswich Borough Council
Core Strategy and Policies**

May 2011



Final

Quality control

Appropriate Assessment
Addendum

for

Ipswich Borough Council
Core Strategy and Development Management Policies

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1 Introduction

1.1 Core Strategy and Policies

- 1.1.1 In November 2007, Ipswich Borough Council published its Preferred Options for its Local Development Framework Core Strategy and Policies. The preferred options document set out an approach to providing a strategic vision and objectives to guide the development of Ipswich, it promoted a strategic approach to the development of the town, and provided an indication of the likely coverage of a suite of policies to control, manage and guide development.
- 1.1.2 In July 2009 the Proposed Submission Core Strategy and Policies was published. The July 2009 version of the Core Strategy and Policies was subsequently superseded by the final Proposed Submission Core Strategy and Policies, which was published in September 2009 for consideration by Ipswich Borough Council's Council meeting on 9th September 2009. Following revocation of the East of England Plan, focussed changes and minor changes were made to the Core Strategies and Policies Development Plan Document which were approved by Ipswich Borough Council on 27th October 2010. These changes are included at Appendix 1.
- 1.1.3 The Suffolk Coastal District Council Core Strategy and Development Management Policies are at a slightly earlier stage to the Ipswich Borough Council Core Strategy and Policies. It is considered that this may have effects in combination and consequently both plans were considered together in a joint project, although separate reports were produced for each Local Authority. The respective plan of Babergh District Council was not included in this assessment as it is at a less advanced stage, though current planning applications as at 2009 were taken into account.

1.2 Link with Suffolk Coastal District Council Core Strategies and Development Management Policies

- 1.2.1 It is considered that the development proposed within Suffolk Coastal may have a cumulative effect on nature conservation sites in the Borough. Previous appropriate assessments therefore assessed the impact of development in both Suffolk Coastal District and in Ipswich Borough.
- 1.2.2 Suffolk Coastal District Council's Core Strategy and Development Management Policies document is currently undergoing revision. A draft of the Submission stage was published on Suffolk Coastal District Council's website as part of the agenda for discussion by Cabinet in their meeting on 7th July 2009. The final Core Strategy was adopted by the Council as Interim Policy on 18th March 2010, prior to public consultation and submission to the Secretary of State to be examined.
- 1.2.3 In November 2010 Suffolk Coastal District Council published its reviewed Core Strategy and Development Management Policies for public consultation. A significant part of this work involved revisiting the evidence base for the district housing requirement following the Government's decision to abolish the Regional Spatial strategies. Taking into account all the evidence, the Council decided that a total of 7,590 additional homes would be required in the District between 2010 and 2027 – a small reduction from 450 to 446 homes per annum. However, the Reviewed Core Strategy has been written with a commitment to review by process by 2015 when further evidence will be available.

1.3 Previous Appropriate Assessments

- 1.3.1 An Appropriate Assessment for the Core Strategy and Policies was published in September 2009¹. Following comments from consultees, notably Natural England, a Clarification Summary was prepared in January 2010². The Clarification Summary did not alter the content of the Appropriate Assessment but explained some of the technical detail in a different way so that it was clearer.

¹ The Landscape Partnership (1 September 2009) Appropriate assessment for Ipswich Borough Council Proposed Submission Core Strategy and Policies.

² The Landscape Partnership (January 2010) Clarification Summary for Ipswich Borough Council Proposed Submission Core Strategies and Policies

1.3.2 An updated Appropriate Assessment in November 2010 assessed the focussed changes to the Core Strategies and Policies Development Plan Document³. This updated Appropriate Assessment did not re-assess parts of the Development Plan which were not changed, and is intended to be read in conjunction with the previous Appropriate Assessment of September 2009. Minor changes were not reassessed where they did not significantly change the nature conservation impact of the Development Plan Document.

1.4 Update of the Habitat Regulations

1.4.1 Appropriate Assessment is required under the Conservation of Habitats and Species Regulations 2010, which superseded in April 2010 the previous Conservation (Natural Habitats &c.) Regulations 1994 as amended by the Conservation (Natural Habitats &c.) (Amendment) Regulations 2007. These regulations are often abbreviated to, simply, the 'Habitats Regulations'. The 2010 Habitats Regulations consolidate the previous Regulations and amendments and in respect of land-use plans the Regulations are unchanged.

1.5 The role of this Addendum

1.5.1 This Addendum responds to three changes since the September 2009 Appropriate Assessment was published and subsequent Clarification Summary was prepared. These changes are

- A small reduction in housing numbers in Ipswich Borough's Core Strategy, (as reported in the updated Appropriate Assessment of November 2010);
- A re-appraisal of housing numbers in the Suffolk Coastal Reviewed Core Strategy, possibly altering cumulative effects;
- New survey data on the visitors to some European sites in Suffolk Coastal District, and an analysis of the impact of visitors upon the populations of the bird species for which the European sites are of importance: nightjar, woodlark and Dartford warbler. These data were drawn to the Council's attention in draft in January 2011 and were published in February 2011.

1.5.2 A report of visitor monitoring on Natura 2000 sites in Colchester and Tendring, Essex⁴, was also considered but the sample sizes were so small that it is considered that no meaningful results were obtained.

1.5.3 The changes in housing numbers mean that the 2009 Appropriate Assessment is out of date, although it could be argued that a small reduction in housing numbers is very unlikely to have an increased impact on any European site. The 2009 Appropriate Assessment contained an analysis of increased visitor numbers to some European sites, estimating an increase in visitors of 2% - 5% above the current baseline. It was not possible to conclude that this increase would have no adverse affect upon the integrity of any European site in the absence of mitigation. Consequently, mitigation was proposed to reduce impacts so that it was possible to conclude that the mitigated Core Strategy would have no adverse affect upon the integrity of any European site.

1.5.4 This addendum updates the previous Appropriate Assessments. It should be read in conjunction with the previous Appropriate Assessments; much of the previous content is not repeated here. The Appropriate Assessment for the Core Strategies and Policies therefore comprises three documents; the September 2009 Appropriate Assessment, the November 2010 updated Appropriate Assessment, and this document.

1.5.5 The November 2010 updated Appropriate Assessment, which looked at focussed changes to housing numbers is relevant in that all other changes were scoped out of the requirement for an assessment. The focussed changes to housing numbers are assessed in precisely the same way in this document and so the November 2010 update has been superseded by this document.

³ The Landscape Partnership (November 2010) Updated Appropriate Assessment for Ipswich Borough Council Focussed changes to Core Strategy and Policies Development Plan

2 Updates to data

2.1 Visitor survey data

2.1.1 The visitor survey was commissioned by a consortium led by Suffolk Wildlife Trust and Forestry Commission, and funded by the Haven Gateway Partnership. The survey was carried out in winter 2009/10 and summer 2010 by Footprint Ecology. Their final report was published on 10th February 2011⁵ and the use of this report is gratefully acknowledged. It is considered that the visitor survey and data analysis were generally carried out to high standards. The report is referred to as the 2010 South Sandlings Visitor Survey in the remainder of this report.

2.1.2 The 2010 South Sandlings Visitor Survey took place in an area east and north-east of Woodbridge, encompassing Tunstall Forest, Rendlesham Forest and surrounding areas. The study included Sandlings SPA (comprising Sandlings Forest SSSI, Blaxhall Heath SSSI, Sutton and Hollesley Heaths SSSI and Tunstall Common SSSI), Staverton Park and the Thicks SAC, , and small parts of Alde-Ore Estuary (SPA, SAC, Ramsar) and Deben Estuary (SPA, Ramsar). Visitors at a number of points within the study area were counted and many were asked a number of questions about their visit, including where they had come from, where they went on their visit, what they did, how they arrived on site for their visit and why they had chosen that place to visit.

2.1.3 Key messages from the 2010 South Sandlings Visitor Survey are

- 53% of total visitors entered the study area at just three points; the forest opposite Sutton Heath Estate (housing associated with MoD Woodbridge), Sutton Heath car park, and Iken.
- Visitors were not spread out evenly across the study area; there were 'hotspots' of visitors at Sutton Heath and in Rendlesham Forest at Tangham visitor centre; there were also spots of activity concentrated at the Rendlesham Forest runway car park and by the B1084, and in the north of Tunstall Forest at Tunstall Heath and Blaxhall Common. Heaths were used disproportionately more by visitors compared to equivalent areas of forestry plantation.
- In the study area there were 16 formal car parks providing a total of 261 spaces, and 106 locations used for informal parking providing 256 parking spaces. The density of visitors within the sites was closely related to the location of car parks; the visitor hotspots were close to the bigger and formal car parks; other spots of activity were close to small and/or informal car parks.
- 19% of visitors in summer and 6% of visitors in winter were tourists.
- 63% of visitors had dogs with them; the proportion being slightly higher in the winter than in summer
- Dog walking was undertaken by 52.8% of people interviewed; walking, exercise, family outings and cycling were undertaken by the majority of other visitors.
- 80% of all visitors arrived by car, and 17% of all visitors walked across the road from the Sutton Heath Estate into the adjacent forest.
- Half of all visitors who arrived on foot lived within 420m of the access point, and half of all visitors who arrive by car live less than 8km away. Over 75% of dog walkers lived within 10km of the access point.
- The number of houses within 5km of a site had a positive relationship with the number of visitors entering; the more houses there were, the more visitors there were.
- Most people stayed for 1 – 2 hours.
- 64% of visitors visited the sites at least weekly, and over half of these visited daily.

⁴ Habitat Regulations Assessment Survey and Monitoring. Year 1 Interim Report December 2010. Colchester Borough Council.

⁵ Cruickshanks K, Liley D and Hoskin R (2011) Suffolk Sandlings Living Landscape Project Visitor Survey Report. Footprint Ecology / Suffolk Wildlife Trust.

- Over half the visitors also said that they would visit coastal and estuary sites in the area
- There was a higher density of nightjar nests in the areas with the lowest category of visitor numbers, but no clear relationship between nest density across all categories of visitor numbers; for example the areas with the highest category of visitor numbers had more nightjar nests than those with an intermediate number of visitors.
- Public access had no apparent effect on the current distribution of woodlark nests in the Forest or on heaths.
- For non-SPA species, Dartford warbler nest density was negatively correlated to visitor numbers, but there was no apparent relationship between visitor numbers and silver-studded blue butterflies or ant-lion.

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

2.2 Revised housing numbers

Ipswich Borough

2.2.1 The housing provision was updated in the October 2010 Core Strategy and Policies Development Plan Document to reflect updated evidence. The Plan will allocate land for at least 3,951 dwellings between 2010 and 2021 in the Borough, with a requirement of 700 dwellings per year from 2021 to 2026. This is a slightly lower rate of housing growth than previously.

2.2.2 The previous Core Strategy contained proposals for 11,511 new dwellings, comprised of 2,552 dwellings with planning permission but not constructed as at April 2009, 636 dwellings with a resolution to grant planning permission at April 2008, 5,003 new allocations to 2021 and 3,320 new allocations in the period 2021 – 2025.

2.2.3 The October 2010 Core Strategy contains proposals for 10,261 new dwellings, comprising 2,058 dwellings with planning permission but not constructed at April 2010, 752 dwellings with a resolution to grant planning permission at April 2010, 3951 new allocations to 2021 and 3500 new allocations 2021 – 2026.

2.2.4 This focussed change required an updating of the assessment for Policy CS7 'The amount of housing required'. Focussed changes to policy CS10 change the mechanism for determining housing provision in the Ipswich northern fringe and include references to the proposed Country Park given in policy CS16, and so required an updating of the assessment with regard to mitigation. These updates were published in the November 2010 Updated Appropriate Assessment.

Suffolk Coastal

2.2.5 The November 2010 Reviewed Core Strategy, Policy SP2, contains proposals for 7,590 new dwellings, comprising 1,560 dwellings with planning permission and allocations deemed deliverable but not constructed at April 2010, 230 new dwellings on identified brownfield potential sites within existing physical limits boundaries, an estimated windfall of 540 dwellings, and 5,260 new allocations on greenfield land. This gives an annual requirement of 446 new dwellings per year from 2010 – 2027.

2.2.6 The total amount of the housing within Suffolk Coastal District is given in the November 2010 Reviewed Core Strategy, in its table 3.3, as 2,320 dwellings in the Eastern Ipswich plan area, 1,760 new dwellings in Felixstowe Walton and the Trimleys, and 3,510 in the remainder of Suffolk Coastal District.

2.2.7 This change requires an updating of the assessment for Policy SP2.

2.3 Implications for the Appropriate Assessment

2.3.1 The implications for the Appropriate Assessment is that an update is required to account for

- The reviewed housing numbers in Suffolk Coastal between 2010 - 2027
- The new visitor survey data available
- The new population predictions provided for Suffolk Coastal.

3 Updated impact assessment

3.1 Updated impact using original visitor survey data

- 3.1.1 This section looks at the group of people classified as 'day visitors' (i.e. those travelling a significant distance to a destination for recreation on an occasional basis rather than a local and/or regular use of a place close to home) and comprises a revision of Section 5.3 of the September 2009 Appropriate Assessment.
- 3.1.2 There is little information available regarding the destinations of Suffolk Coastal and Ipswich residents for their recreation. However, in 2004 the Suffolk Coast and Heaths Unit commissioned East of England Tourist Board to carry out a visitor survey of the AONB (EETB 2004⁶). A snap-shot survey was carried out in summer 2004 by questionnaires of visitors across the AONB.
- 3.1.3 The survey found that 55% of visitors to the AONB were 'day visitors' (page 9 of the research). The exact number of people visiting the AONB was not measured, but the proportion of visitors from each location of origin can be identified. The raw data has been obtained from East of England Tourism. A GIS analysis on those 430 'day visitors' who provided a postcode identified the proportion of those who originated from various places as listed in Table 2 below.
- 3.1.4 It is considered that 'day visitors' are people living near the AONB; these people are unlikely to book a significant amount of overnight accommodation. 'Day visitors' is therefore the best measure of potential impact to sites.
- 3.1.5 Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment.

Table 1. Proportion of day visitors to Suffolk Coast and Heaths AONB from location of origin (data from EETB 2004 as re-analysed)

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

- 3.1.6 The increase in population is related to the increase in housing available. For Ipswich, the projections in population growth suggest that there will be an average of 1.38 net additional people per new dwelling (Ipswich Borough Council pers comm.). This seems low, but is

⁶ EETB (2004) Suffolk Coast and Heaths Area of Outstanding Natural Beauty. Visitor Research 2004. Available from <http://www.suffolkcoastandheaths.org/uploads/SCH%20AONB%20Visitor%20Research%20Report%202004.pdf>

realistic considering the proportion of flats planned, an increase in the student population, and taking into account the continued decline in people per household in Ipswich, and ongoing national decline.

- 3.1.7 Suffolk County Council has published an updated population projection for Suffolk Coastal based on the Regional Spatial Strategy allocations being built⁷. It suggests that for 9,400 new households in the period 2001 – 2021 that the population would rise by 8,500 people, which is a net increase of 0.9 people per new house.
- 3.1.8 The Appropriate Assessment uses an average figure of population increase of 1.38 new people into the Borough per new dwelling in Ipswich Borough, and 0.9 new people per new dwelling in Suffolk Coastal District. These figures initially seem low, particularly where it appears that less than one new person on average will 'occupy' a new dwelling in Suffolk Coastal District. However, these figures are not occupancy rates for the new dwellings and should not be read as such. This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy. This reflects a trend towards a lower occupancy level per house caused by an increase in split households, an ageing population and the number of second homes across the Borough and District as a whole.
- 3.1.9 In other words some of the residents of those additional dwellings will come from existing dwellings within the area and so not be 'new' additional people. The patterns of people moving out of, within, between and into, Ipswich Borough or Suffolk Coastal District are complex, but the population predictions are realistic and there are no better alternatives
- 3.1.10 The proportionate growth in population in new housing development in Suffolk Coastal and elsewhere can be calculated by looking at the existing population, the predicted net increase in people, and therefore the proportionate increase.
- 3.1.11 Table 2 shows the projected increase in population for each of the study areas under consideration.

Table 2. The estimated numerical increase in population for new housing.

Town / area	Proposed new housing units	Estimated net increase in people ⁸
Ipswich Borough	10,261	14,160
Eastern Ipswich plan area	2,320	2,088
Felixstowe, Walton and the Trimleys	1,760	1,584
Remainder of Suffolk Coastal District	3,510	3,159
Shotley	404 ⁹	606
Totals	18,255	21,597

* based on population projections (see above paragraphs 5.3.6 and 5.3.7)

⁷ Suffolk County Council (2009) Projected changes in the population. Downloadable from web page <http://www.suffolk.gov.uk/Environment/FactsAndFigures/PopulationFigures.htm>

⁸ Based on populations described in the 2009 Appropriate Assessment; a net increase of 0.9 and 1.38 people per new dwelling for Suffolk Coastal and Ipswich respectively.

⁹ 404 dwelling retirement community planned – see <http://www.babergh.gov.uk/Babergh/Home/Planning+and+Building+Control/Planning+Information/HMS+Ganges+-+Revision/>. Assumption 1.5 people per dwelling.

- 3.1.12 Table 3 shows the proportionate increase in population for these areas of new housing. It is important to look at the increases of each development in combination, as well as individually, as each impact might be individually too small to give rise to a significant impact, but in combination could have an adverse affect.

Table 3. The proportionate increase in population for areas of new housing.

Town / area	Existing population size	Estimated increase in people (table 2)	Estimated % increase in local population (estimated increase / existing)
Ipswich Borough, plus adjoining Pinewood ward (Babergh district)	132,013 ¹⁰	14,160	10.7%
Eastern Ipswich plan area	20,014 ¹¹	2,088	10.4%
Felixstowe, Walton and the Trimleys	33,735 ¹²	1,584	4.7%
Remainder of Suffolk Coastal District	68,251 ¹³	3,159	4.6%
Shotley	2483 ¹⁴	606	24.4%
Totals	256,496	21,597	8.4%

- 3.1.13 The data in Tables 2 and 3 above can be used to calculate the extra number of people visiting European sites within the Suffolk Coast and Heaths AONB, subject to the following assumptions
- the pattern of day visits to sites by the new residents is similar to that of the existing population;
 - the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey;
 - an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity;
 - the relative proportions of day visitors and overnight visitors does not change; and
 - the summer snapshot survey is typical of visitors all year round.
- 3.1.14 The percentage increase of total visitors to European sites in the AONB is calculated, rather than a numeric increase, because the total number of visitors is not known. The percentage increase in total visitors to European sites takes into account the ratio of day visitors to overnight visitors (i.e. holiday makers), the proportion of visitors from each point of origin, and the increase of people in each point of origin. This can be expressed by the calculation (%day visitors) x (%from point of origin) x (%increase at point of origin).
- 3.1.15 Table 4 below calculates the increase in total visitors to the AONB based on the calculation above, for each point of origin and for the total. For clarity of calculation, percentages are

¹⁰ <http://neighbourhood.statistics.gov.uk> – 2001 census data for Pinewood (4013 people) plus 128,000 people for Ipswich (IBC core Strategy)

¹¹ <http://neighbourhood.statistics.gov.uk> – 2001 census data

¹² <http://neighbourhood.statistics.gov.uk> – 2001 census data

¹³ Whole district population 2006 is 122,000 (Core strategy) Deduct figures for Ipswich policy area and Felixstowe.

¹⁴ <http://neighbourhood.statistics.gov.uk> – 2001 census data

given as a proportion of 1 e.g. 55% is shown as 0.55. To reduce rounding errors, the total for column D is calculated from the totals for columns B and C.

Table 4. Predicted increase in total visitors to Suffolk Coast and Heath AONB.

Origin of day visitors to AONB	(A) proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1	(B) proportion of total AONB visitors (A x 0.55)¹⁵	(C) increase in local population from table 3 expressed as a fraction of 1	(D) The overall increase of all visitors to the AONB (B) x (C)
Ipswich Borough, plus adjoining Pinewood ward (Babergh district)	0.116	0.064	0.107	0.007
Eastern Ipswich plan area	0.067	0.037	0.104	0.004
Felixstowe, Walton and the Trimleys	0.04	0.022	0.047	0.001
Remainder of Suffolk Coastal District	0.265	0.146	0.046	0.007
Shotley	0.002	0.001	0.244	0.0002
Totals	0.495	0.272	0.084	0.0228

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

Table 5. The predicted percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal

Place of origin	The predicted proportionate increase in visitors to the AONB from each place of origin
Ipswich Borough, plus adjoining Pinewood ward (Babergh district)	0.7%
Eastern Ipswich plan area	0.4%
Felixstowe, Walton and the Trimleys	0.1%
Remainder of Suffolk Coastal District	0.7%
Shotley	0.02%
Totals	2.28%

¹⁵ only 55% of AONB visitors are day visitors; an increase in housing does not change the amount of holiday makers

- 3.1.17 Table 5 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.28%. The numbers in Table 5 do not add exactly to 2.28% due to rounding earlier in the calculations but the 2.28% is based on the totals. The increase in visitors can be apportioned as 0.7% for Ipswich Borough and 1.58% for Suffolk Coastal District.
- 3.1.18 The calculations of increased visitors to European sites are complex. Superficially, one would expect that an 8.4% increase in the combined population of Ipswich Borough and Suffolk Coastal District to cause an 8.4% increase in visitors to European sites in the Suffolk Coast and Heaths AONB. In reality, an 8.4% increase in population will result in a proportionate increase from only those visitors who come from Ipswich Borough and Suffolk Coastal District. Visitor numbers from elsewhere are unchanged, so the increase in the total number of visitors will be less than 8.4%.
- 3.1.19 Data presented in the Appropriate Assessment shows that about half (55%) of visitors to the Suffolk Coast and Heaths AONB were local people on a day trip, with the remainder being holiday makers staying in tourist accommodation. Of the locals on a day trip, about half (49.5%) were from Ipswich Borough and Suffolk Coastal District, with the remainder from elsewhere, for example, from Norwich or Bury St Edmunds. Combining these figures, half the visitors being on day trips, and half of these day trip visitors being from Ipswich Borough and Suffolk Coastal District, the calculation is that roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB.
- 3.1.20 With roughly around one-quarter of the day trips coming from residents in Ipswich Borough and Suffolk Coastal, those day trips are predicted to rise in proportion with the predicted 8.4% population increase i.e. the number of day trips from Ipswich Borough and Suffolk Coastal are expected to rise by 8.4% in the period 2010 – 2026/7. However, other sources of visitors (holidaymakers or day trips from elsewhere) will not rise accordingly, so the total visits from all sources is calculated to rise by around 2.28%. Figure 1, which is drawn to relative scale, is a bar chart where the length of the bar represents the number of visitors in each group. It shows the effect of the 8.4% increase in day trips from Ipswich Borough / Suffolk Coastal District in relation to the total visits from all sources.
- 3.1.21 There are a number of assumptions made regarding these calculations and people's behaviour, including
- 'New' people in the Borough / District will have the same visiting pattern as 'existing' people
 - Visits by holiday makers will not be affected by any increased use by local visitors
 - Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors
 - The separate breakdown of visits into 'day-trippers' and 'holidaymakers' was undertaken in the school summer holiday period when a greater proportion of 'holidaymakers' may have been present compared to other months
- 3.1.22 To allow for these assumptions, the approximate 2.28% increase in total visitors to the AONB is given as a range of 2% - 5%.
- 3.1.23 **It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB could be in the range of 2% - 5%** as a result of the Ipswich Borough Council and Suffolk Coastal District Council Core Strategy proposals.
- 3.1.24 Not all the European sites under assessment are within the Suffolk Coast and Heaths AONB, specifically the sites in Tendring District which are Hamford Water SPA, Hamford Water Ramsar site, Colne Estuary (Mid Essex Coast phase 2) SPA, Colne Estuary (Mid Essex Coast phase 2) Ramsar site, and Essex Estuaries SAC. The amount of visits to these sites from Suffolk Coastal District and Ipswich Borough are not known. It is considered that the greater distances to

these sites from Ipswich / Suffolk Coastal, compared to sites with the Suffolk Coast and Heaths AONB, means that the expected number of visits from Ipswich / Suffolk Coastal to the Essex sites is likely to be much less than to sites in Suffolk. The Essex sites are closer to other towns such as Harwich and Colchester, and the influence of those towns is considered to be much more dominant.

- 3.1.25 The Colchester visitor monitoring (see Section 1.5), although with very small sample size, showed that only a tiny proportion of visitors to European sites travelled from Ipswich or Suffolk Coastal.

3.2 Updated impact using new visitor survey data

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

Table 6. Approximate distribution of proposed housing allocations from Sandlings access points

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

- 3.2.4 The South Sandlings Visitor Survey data for the number of visitors, and the existing number of houses, within 0.5km distance bands up to 50km from access points to sites within the study area were kindly supplied by Steve Aylward of Suffolk Wildlife Trust (the commissioning group's project manager) and Footprint Ecology. The use of this data is gratefully acknowledged.
- 3.2.5 For each distance band up to 50km from the study area access points, Table 7 shows the existing housing numbers and visitor numbers supplied from the South Sandlings Visitor Survey. The proposed housing numbers are also listed, using the distribution given above. For clarity, the distribution of proposed housing within distance bands has been highlighted; there is no change to numbers in other bands. The increase in visitors is calculated by multiplying the existing visitors in each distance band by the proportionate increase in housing. The proportionate increase in housing is calculated by dividing the proposed housing numbers (existing number plus proposed new dwellings) by existing housing numbers.
- 3.2.6 To illustrate the calculations, if a distance band had 8 recorded visitors from 100 existing dwellings, and 50 new dwellings were proposed within a Core Strategy, then the proportionate increase in housing is $(100+50)/100 = 1.5$. The predicted number of new visitors is therefore $8 \text{ people} \times (100+50)/100$, giving a predicted number of 12 visitors.

Table 7. Predicted increase in visitor numbers to South Sandlings study area calculated as the number of existing visitors multiplied by the proportionate increase in dwellings (proposed / existing) within each distance band

Distance from access point (km)	Approximate Location of existing towns in relation to distance from access points	Number of existing dwellings	Number of existing visitors	Number of proposed dwellings	Number of predicted visitors
0 - 0.5	Sutton Heath estate	495	71	495	71
0.5 - 1		305	12	305	12
1 - 1.5		802	26	802	26
1.5 - 2	Rendlesham	1936	55	1936	55
2 - 2.5	Melton	2211	45	2211	45
2.5 - 3	Woodbridge	2024	29	2024	29
3 - 3.5		1812	44	1812	44
3.5 - 4		1471	21	1471	21
4 - 4.5		716	8	716	8
4.5 - 5	SCDC eastern plan area	653	6	3673	33.7
5 - 5.5		2164	12	2164	12
5.5 - 6		2269	7	2269	7
6 - 6.5		1558	7	1558	7
6.5 - 7	Saxmundham	2488	16	2488	16
7 - 7.5	Martlesham	2826	11	2826	11
7.5 - 8		3361	13	3361	13
8 - 8.5		2657	7	2657	7
8.5 - 9		1765	7	1765	7
9 - 9.5		1187	2	1187	2
9.5 - 10		1304	2	2004	3.1
10 - 10.5		1884	4	1884	4
10.5 - 11		2376	5	2376	5

Distance from access point (km)	Approximate Location of existing towns in relation to distance from access points	Number of existing dwellings	Number of existing visitors	Number of proposed dwellings	Number of predicted visitors
11 - 11.5	Framlingham, Felixstowe, eastern Ipswich	5574	11	5574	11
11.5 - 12		7065	8	7065	8
12 - 12.5		9048	14	10808	16.7
12.5 - 13		9848	7	9848	7
13 - 13.5		8119	7	8119	7
13.5 - 14	central Ipswich	6020	7	16281	18.9
14 - 14.5		6001	1	6001	1
14.5 - 15		7289	5	7989	5.5
15 - 15.5		6961	2	6961	2
15.5 - 16		4716	2	4716	2
16 - 16.5	Western Ipswich	6573	3	6573	3
16.5 - 17		5199	4	5199	4
17 - 17.5		5488	2	5488	2
17.5 - 18		4601	3	4601	3
18 - 18.5		2140	0	2140	0
18.5 - 19		2831	1	2831	1
19 - 19.5		1421	0	1421	0
19.5 - 20		1516	2	2216	2.9
20 - 20.5		1870	0	1870	0
20.5 - 21		1738	0	1738	0
21 - 21.5		2076	2	2076	2
21.5 - 22		1746	0	1746	0
22 - 22.5		1545	0	1545	0
22.5 - 23		2483	0	2483	0
23 - 23.5		2409	0	2409	0
23.5 - 24		2229	1	2229	1
24 - 24.5		2287	0	2287	0
24.5 - 25		1517	1	2217	1.5
25 - 25.5		3455	0	3455	0
25.5 - 26		4038	1	4038	1
26 - 26.5		4762	0	4762	0
26.5 - 27		4622	1	4622	1
27 - 27.5		5637	0	5637	0
27.5 - 28		5694	1	5694	1
28 - 28.5		4392	2	4392	2
28.5 - 29		2613	0	2613	0
29 - 29.5		2684	0	2684	0
29.5 - 30		3004	0	3004	0
30 - 30.5		2807	0	2807	0
30.5 - 31		1549	0	1549	0

Distance from access point (km)	Approximate Location of existing towns in relation to distance from access points	Number of existing dwellings	Number of existing visitors	Number of proposed dwellings	Number of predicted visitors
31 - 31.5		1853	0	1853	0
31.5 - 32		1931	0	1931	0
32 - 32.5		4916	0	4916	0
32.5 - 33		7166	1	7166	1
33 - 33.5		9392	0	9392	0
33.5 - 34		7896	0	7896	0
34 - 34.5		6345	2	6345	2
34.5 - 35		7947	1	7947	1
35 - 35.5		12714	3	12714	3
35.5 - 36		11523	1	11523	1
36 - 36.5		10084	0	10084	0
36.5 - 37		10980	0	10980	0
37 - 37.5		10937	2	10937	2
37.5 - 38		12992	0	12992	0
38 - 38.5		11420	1	11420	1
38.5 - 39		6578	0	6578	0
39 - 39.5		7071	1	7071	1
39.5 - 40		7930	1	7930	1
40 - 40.5		8830	0	8830	0
40.5 - 41		10081	0	10081	0
41 - 41.5		8352	1	8352	1
41.5 - 42		8429	0	8429	0
42 - 42.5		6388	1	6388	1
42.5 - 43		5502	0	5502	0
43 - 43.5		5197	1	5197	1
43.5 - 44		2623	0	2623	0
44 - 44.5		3550	0	3550	0
44.5 - 45		5576	0	5576	0
45 - 45.5		4676	0	4676	0
45.5 - 46		4839	0	4839	0
46 - 46.5		3465	0	3465	0
46.5 - 47		6665	1	6665	1
47 - 47.5		8176	1	8176	1
47.5 - 48		6198	1	6198	1
48 - 48.5		8790	0	8790	0
48.5 - 49		6508	0	6508	0
49 - 49.5		5118	0	5118	0
49.5 - 50		4319	0	4319	0
Totals			517		562.3

3.2.7 For those distance bands with significant housing allocations, the change in visitor numbers is large. For example, the allocation of 10,261 dwellings for Ipswich Borough Council at a nominal distance of 13.5km - 14km from the study area increases the number of visitors from that distance band from 7 to 18.9. Similarly, the allocation of 2,320 dwellings for the Eastern plan

area, plus 700 further allocations for the 'rest of Suffolk Coastal', increases the number of visitors from the 4.5km - 5km distance band from 6 to 33.7. However, for some distance bands there is no change in visitor numbers.

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

Assumptions and limitations

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

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

3.3 Changed understanding of impact compared to 2009 appropriate assessment

Reviewed housing numbers

- 3.3.1 The 2009 Appropriate Assessment calculated that the increase in visitors to European sites within the Suffolk Coast and Heaths AONB would be in the range of 2% - 5%. The revisions to housing numbers in both Core Strategies were too small to make any change to this range. The previous inability to ascertain no adverse effect upon the integrity on any European site, prior to mitigation, remains.

New visitor survey data

- 3.3.2 Calculations made using the 2010 South Sandlings Visitor Survey indicate that the increase in visitors to European sites (primarily Sandlings SPA, comprising Sandlings Forest SSSI, Sutton and Hollesley Heaths SSSI, Tunstall Common SSSI and Blaxhall Heath SSSI) would be in the range of 6% – 12%. Part of the reason for the increased predictions of visitor numbers may be because the South Sandlings is closer than many other European sites to the proposed allocations so the South Sandlings may receive a greater proportion than average of increased visits. The calculations do not take into account declining household size, so over the period of the Core Strategies the number of visits per dwelling might be expected to decrease rather than remain constant as assumed here
- 3.3.3 Visitors were not spread out evenly across the study area; the 2010 South Sandlings Visitor Survey found that there were 'hotspots' of visitors at Sutton Heath and in Rendlesham Forest at Tangham visitor centre; there were also spots of activity concentrated at the Rendlesham

Forest runway car park and by the B1084, and in the north of Tunstall Forest at Tunstall Heath and Blaxhall Common. Heaths were used disproportionately more by visitors, compared to equivalent areas of forestry plantation. In the study area there were 16 formal car parks providing a total of 261 spaces, and 106 locations used for informal parking providing 256 parking spaces. The density of visitors within the sites was closely related to the location of car parks; the main visitor hotspots were close to the bigger formal car parks; other minor areas of visitor activity were close to small and/or informal car parks. Except for those people living in the Sutton Heath estate adjacent to Sandlings Forest SSSI, practically all visitors arrived by car. Visitors were therefore heavily influenced by the location of car parks when deciding where within the area to visit. The overwhelming reason given for visiting was dog-walking, followed by walking. The points studied were therefore perceived by visitor as being suitable for these activities, with ground conditions, lengths of walk, and safety / attractiveness of the surroundings all being suitable.

- 3.3.4 This suggests that an increase in visitors from proposed housing allocations would typically result in an increased use of car parks and the existing hotspots of activity, rather than a uniform spread of visitor activity across the study area.
- 3.3.5 The 2010 South Sandlings Visitor Survey showed that there was a higher density of nightjar nests in the area with the lowest category of visitor numbers, but no clear relationship between nest density across all categories of visitor numbers; for example the highest category of visitor numbers had more nightjar nests than an intermediate number of visitors. Access patterns had no apparent effect on the current distribution of woodlark nests in the Forest or on heaths. This suggests that the current visitor numbers and distribution have not yet reached the level at which the SPA qualifying species (woodlark) are adversely influenced by visitor numbers, although the situation is less clear for nightjar.
- 3.3.6 Condition assessments by Natural England (see Appendix 2) show that the condition of Sandlings Forest SSSI, Blaxhall Heath SSSI and Tunstall Heath SSSI are all in favourable condition. Most of Sutton and Hollesley Heaths SSSI is in unfavourable recovering condition, although a small part is unfavourable due to inappropriate scrub control. Natural England has not recorded that the bird species on these component sites of Sandlings SPA are being unacceptably harmed by visitor disturbance.
- 3.3.7 The current lack of clearly demonstrable harm from existing visitor numbers, and a likelihood that the increase in visitors of 6% - 12% to the South Sandlings area would mean increased use of existing hotspots based around car parks, suggests that it is possible that there would be no adverse affect upon the integrity of Sandlings SPA from the housing allocations in the Ipswich and Suffolk Coastal Core Strategies. The number of assumptions in the data, and lack of knowledge of a threshold beyond which bird numbers would decline are, however, imponderables, and it is not ascertainable (i.e. complete certainty) that there would be no adverse affect upon integrity in the absence of mitigation.

Implications of new visitor survey on other sites

- 3.3.8 The South Sandlings Visitor Survey contains some information which may be relevant to other European sites outside the study area. The key messages listed below, in particular, may be relevant to other European sites.
- Heaths were used disproportionately more by visitors compared to equivalent areas of forestry plantation, suggesting people prefer to visit open landscapes rather than plantations.
 - The density of visitors within the sites was closely related to the location of car parks; if no car parking is available it is unlikely that there will be many visitors who live at a distance too far to walk to the site
 - 19% of visitors in summer and 6% of visitors in winter were tourists, suggesting that the impact of residents (especially on wintering birds on estuaries) is dominant compared to tourists

- Half of all visitors who arrived on foot lived within 420m of the access point, and 75% of all visitors who arrived by foot lived within 500m of the access point. Half of all visitors who arrive by car live less than 8km away. Over 75% of dog walkers lived within 10km of the access point.
- The number of houses within 5km of a site had a positive relationship with the number of visitors entering; the more houses there were, the more visitors there were (both in relation to people arriving on foot or by car).
- Over half the visitors in the study area also said that they would visit coastal and estuary sites in the area

3.3.9 Impacts of proposed strategic allocations, such as within the Eastern Plan area, can be identified using these key messages. A strategic allocation within 1km of a European site, such as the Stour and Orwell Estuaries SPA, is likely to generate a significant number of new visitors walking to the site, although if no car park is provided for visitors it is unlikely that people from elsewhere would visit to any great extent.

3.3.10 The three top inherent site characteristics given by visitors as reasons for visiting were the amount of habitat present, attractive scenery/views, and a choice of routes. The Stour and Orwell Estuaries SPA is likely to be perceived as having a large amount of habitat present and having attractive scenery/views. There is little choice of routes (upstream or downstream) but route choice may exist to/from the estuary.

3.3.11 It is concluded, in the light of updated housing numbers and the South Sandlings Visitor Study, that it is not possible to ascertain no adverse affect upon the integrity of European sites in the absence of mitigation.

4 Mitigation

4.1 Mitigation proposals

4.1.1 The principle of mitigation for remains as that described in the 2009 Appropriate Assessment, which is to reduce demand for visits to the European sites at risk of impact, and to manage existing sites with a specific high risk to re-distribute visitors from sensitive areas.

4.1.2 Detailed aims of such mitigation are

- To prevent a damaging increase in visitor number to all European sites across the Suffolk Coast and Heaths AONB
- To prevent an increase in visitor numbers to specific parts of European sites likely to be particularly affected – Orwell Estuary at Orwell Country Park

4.1.3 Detailed objectives are

- To provide new locations for countryside recreation, especially dog walking, for residents of existing and proposed housing, as a preferred alternative to visiting European sites
- To improve visitor infrastructure and management, including wardening, on existing sites to reduce the impact of increased visitors
- To quantify reductions in visitor harm achieved by mitigation projects

Mitigation for strategic allocations in Ipswich affecting the Orwell Estuary at Bridge Wood

4.1.4 It was considered in the 2009 Appropriate Assessment that a disproportionately large impact may arise on the Orwell Estuary at Bridge Wood, part of Orwell Country Park, as it is the closest European site to broad allocations in Ipswich and within 1km (walking) and/or 8km (driving) distance of existing and proposed housing. Consequently, a number of management measures should be implemented at the County Park to reduce visitor impact. Although some detailed management measures were given in the 2009 Appropriate Assessment (Section 7.2), these can be taken as examples and other measures may also be implemented as necessary. A detailed management plan will be drawn up separately at a later date and the management plan development process will be used to identify the specific measures considered appropriate.

4.1.5 An upgrade to the riverside walk along the River Gipping through central Ipswich is also proposed as mitigation, so that central Ipswich residents (new housing allocations are in central Ipswich) can enjoy riverside walks without travelling elsewhere.

4.1.6 The mitigation proposals relating to Orwell Country Park in the 2009 Appropriate Assessment remain valid and current.

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

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

4.1.8 A new Country Park or similar high-quality provision is proposed for a location to the north or north-east of Ipswich as mitigation for future housing development. A new Country Park has been under discussion for some time, and was suggested by the Haven Gateway Green Infrastructure Project¹⁶ independently of this Appropriate Assessment, in order to provide adequate green space for the population of greater Ipswich, particularly the northern part of the Borough. A suitable location would be accessible from major routes out of Ipswich, Woodbridge, and Felixstowe and therefore providing a facility for people from those towns. The Ipswich Borough Core strategy contains provision for a Country Park.

¹⁶ available at <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/evidence/studies/default.htm>

- 4.1.9 The new Country Park should be free to enter, contain areas for dog walking, children's play, and possibly more formal recreation such as orienteering, events such as Country Fairs, and a ranger service. A mixture of habitats including grassland, woodland and open water would make it more attractive and would also provide opportunities for delivery of BAP targets.
- 4.1.10 Information within the South Suffolk Visitor Survey suggest that a car park (preferably free) is essential, and that visitors would be likely to appreciate a café, toilets, a shop, a staffed information point, wildlife viewing areas, bins and benches, marked routes, children's facilities, and shelter for bad weather days. Substantial areas where dogs may be let off leads would be important to attract dog-walkers away from the heathland sites.
- 4.1.11 The three existing Suffolk County Council country parks currently attract a considerable number of people; in 2009/10 Brandon Country Park (13ha with access to over 1000ha of forest) attracted 175,000 visitors, Clare Country Park (13ha) attracted 180,000 people, and Knettishall Heath (158ha) attracted 75,000 people¹⁷. This demonstrates that Country Parks successfully attract recreational users, many of whom would otherwise have used other sites for recreation. It is therefore reasonable to assert that a new Country Park would also attract a large number of visitors.
- 4.1.12 As the new Country Park or similar alternative provision is necessary for the 'in-combination' impact of development within Ipswich Borough and Suffolk Coastal, it is appropriate that the arrangements for its implementation are shared equally by Ipswich Borough Council and Suffolk Coastal District Council, and could at least in part be funded by a tariff on new housing.
- 4.1.13 It is expected that the new Country Park will form a substantial part of the mitigation requirements for development within both Ipswich Borough and Suffolk Coastal District. However, evidence from Site Manager's surveys (Section 5.5), the Stour and Orwell Estuaries SPA disturbance report¹⁸ discussed in 6.2 above, and studies of heathland in Dorset (see 6.2 above) indicate that there may still be some residual disturbance of birds, probably caused by local people engaging in low-key recreational activities on European sites near their homes, such as dog-walking. These people would not necessarily always be attracted to Country Parks. This residual disturbance would be an impact referable in particular to the aggregation of smaller provisions across Suffolk Coastal District.
- 4.1.14 Visitor management on European sites within the Suffolk Coast and Heaths AONB requires a programme, as identified in the 2009 Appropriate Assessment, of
- identifying key sites where visitor pressure is currently, or close to, causing harm
 - identifying the origin of visitors to those identified key sites
 - writing and implementing a visitor management plan for key sites without such a plan, or revising existing plans, to reduce visitor impact. Reduction in visitor impact might mean changes to visitor infrastructure (e.g. car parks, paths), new or revised interpretation, wardening, provision of alternative recreation opportunities in less sensitive locations, etc, bylaws, identification of parts of sites where recreation will not be encouraged, etc.
 - A monitoring programme, to determine visitor numbers and allow the impact of the visitor numbers to be identified, throughout time. The impact of visitor numbers may be difficult to determine and would rely on Natural England's programme of SSSI Condition assessment.
- 4.1.15 The implementation body for this exercise is to be decided. The Suffolk Coast and Heaths Unit would be in a good position to carry this out, as they have an AONB-wide role, but others such as Suffolk County Council (e.g. Rights of Way Improvement Plan, Open Access), Natural England, Suffolk Coastal District Council, and the Sandlings Project would have an important

¹⁷ Suffolk County Council (January 2011) The future of country parks and recreation sites in Suffolk. Brandon Country Park. Clare Country Park. Knettishall Heath Country Park.

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

role. However, it is expected that funding should be directly related to housing provision, and at least in part funded for example by a tariff on new housing.

Mitigation for strategic allocations by Suffolk Coastal District Council

- 4.1.16 It is considered that strategic allocations, particularly in the Eastern plan area (i.e. east of Ipswich) and at Felixstowe could increase the visitor pressure on the Deben Estuary SPA and Stour and Orwell Estuaries SPA respectively.
- 4.1.17 Provided that strategic housing proposals for development to the east of Ipswich at Martlesham are greater than 1km from the Deben estuary (thus reducing the likelihood of access by many walkers), and improvements to locally accessible natural greenspace are made (thus providing alternative recreation), it is possible that visitor recreation activity would not substantially increase on the foreshore of the Deben Estuary SPA at Martlesham. Therefore, there is expected to be no new high levels of disturbance to what is currently little disturbed and a 'refuge' area for SPA-qualifying birds. However, a planning application Appropriate Assessment would be needed to look at site- and plan-specific issues. Natural England advised in its email of 15th February 2011 to Suffolk Coastal District that it believes '*that any adverse effects on N2K sites could be mitigated by the use of planning conditions/obligations/legal agreements (S106) to allow us to conclude no adverse effect on integrity. Suitable strategies are detailed in our letter to SCDC of 12 February 2010 which could be employed following AA at project level.*'
- 4.1.18 Provided that strategic housing proposals for development at Felixstowe Peninsula are greater than 1km from the Orwell estuary, and improvements to locally accessible natural greenspace are made, it is possible that visitor recreation activity would not substantially increase on the foreshore of the Stour & Orwell estuaries. Therefore it is expected that there are to be no new high levels of disturbance to what is currently little disturbed and a 'refuge' area for SPA-qualifying birds. However, a planning application Appropriate Assessment could be needed to look at site- and plan-specific issues.
- 4.1.19 The developments should deliver sufficient greenspace to accommodate the increased requirement for local recreation opportunities, so that there are no impacts upon the respective SPAs.

4.2 Implementation of the proposed mitigation

Ipswich Borough

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

Suffolk Coastal District

- 4.2.5 Strategic Policy SP17 – Green Space says that '*The Council will seek to ensure that communities have well-managed access to green space within settlements and in the countryside and coastal areas, in order to benefit health, community cohesion and greater understanding of the*

environment, without detriment to wildlife and landscape character. Where adequate green space is not provided as part of a development, developer contributions will be sought to fund the creation of appropriate green space and/or management and improvement of access to green space. In particular, the Council will work on green infrastructure opportunities with partners in strategic housing growth areas in order to suitably complement development proposals.'

4.2.6 Natural England previously had concerns regarding this policy's effectiveness on mitigation¹⁹. Following a change to this policy for the November 2010 Reviewed Core Strategy and Development Management Policies document, Natural England was able to withdraw that concern.

4.2.7 It is clear that Suffolk Coastal District is committed to providing the necessary mitigation.

4.3 Conclusion of the appropriate assessment

Policies subject to revision – housing numbers

4.3.1 It is ascertained that the October 2010 Core Strategy and Policies Development Plan, with the proposed mitigation, will have no adverse affect upon the integrity of any European site.

All other policies

4.3.2 All other policies in the October 2010 Core Strategy and Policies Development Plan remain not likely to have a significant effect on any European site.

Interactions between policies in this plan

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

In combination with plans from others

4.3.4 It is considered that one plan may have an effect in combination, which is the Suffolk Coastal District Core Strategy and Development Management Policies. All the above conclusions take into account any in combination effects. No other plans are considered to have an effect in combination.

4.4 Final conclusion

4.4.1 It is ascertained that the Core Strategy and Policies Development Plan Document will not have an adverse affect upon the integrity of any European site, alone and in combination with the Suffolk Coastal Core Strategy and Development Management Policies. There is a firm commitment to the necessary mitigation that will reduce the impact of housing growth to an insignificant level and enable this conclusion.

¹⁹ Letter of 10th February 2010 to Suffolk Coastal District Council

5 Consultation with Natural England

5.1 The role of Natural England

5.1.1 Natural England is the statutory advisor for nature conservation in England. Under the Conservation of Habitats and Species Regulations 2010, Natural England as the defined appropriate nature conservation body must be consulted by Ipswich Borough Council. The council must have regard to any representations made by Natural England.

5.2 Consultation with Natural England

5.2.1 A draft of this Appropriate Assessment Addendum was sent to Natural England's Suffolk office on 28th March 2011, requesting their advice. A reply was received on 6th April 2011, which in summary said that






- The new Addendum considers in full the details of the new South Sandlings report which, in our view, strengthens the need for all the previously agreed mitigation strategies in order to avoid adverse impact on all of the European sites within the Suffolk Coast & Heaths AONB.
- Natural England agrees that the mitigation strategies put forward in the AA of September 2009 followed by the Clarification Summary of January 2010 are still fully relevant.
- IBC's policy CS16 Green Infrastructure is a strong one and demonstrates a firm commitment to working with neighbouring authorities towards creating a new Country Park on the north eastern fringe of Ipswich which will be essential.

5.2.2 A copy of Natural England's full advice is included in Appendix 3. No changes were thought necessary to the Appropriate Assessment addendum following receipt of Natural England's advice, although the advice was fully noted.

Figures



Key

-  Visitors on holiday (45% of total existing)
-  Day trips (55% of total existing)
-  Day trips from elsewhere (50.5% of day trips)
-  Day trips from Ipswich and Suffolk Coastal (49.5% of day trips)
-  8.4% increase in day trips from Ipswich and Suffolk Coastal
▶ equivalent to 2.28% increase in total visitors

Ipswich Borough Council
LDF Appropriate Assessment

Visitors to the Suffolk Coast and Heaths AONB

Figure 01

March 2011

Appendix 1

Ipswich Borough Council Core Strategy and Policies Development Plan Document

Schedule of Post Submission Proposed Focused Changes, October 2010, as supplied by Ipswich Borough Council

Key to table

In the 'Change' column, new text is shown bold, underlined and italicised; deleted text is non-bold (struck through twice in track-changed sections). A copy of the Core Strategy and Policies DPD showing the tracked changes (proposed focused changes and minor amendments) is available to view on the web site and at the venues specified in the formal notice.

Policy/ paragraph	Change	Reason
Part A The Context		
Chapter 3 3.5	Add a new paragraph 3.5: <i><u>Ipswich Borough Council considers that a jobs-led growth strategy is the right one for Ipswich. However, the Council has amended the scale and speed of growth for Ipswich in this development plan document to take account of factors such as the recession, the likelihood of reduced funding for infrastructure, the extent to which flats and houses are best meeting local housing needs, and updated information about the housing land supply.</u></i>	To respond to the revocation of the East of England Plan. The Council decided on 27 th October 2010 (see Link 1 below) to proceed with the Core Strategy and Policies plan as submitted on 26 th March 2010, subject to focused changes to the targets to take account of more up to date evidence. The focused changes are set out in this schedule. The topic paper Reviewing the Ipswich Housing Figures also provides more background (see Link 2 below).
Part B The Strategy		
Chapter 6 6.8 Bullet 3	In bullet 3 change '15,400' to ' <u>14,000</u> ' and '(18,720 to 2025)' to ' <u>(17,500 by 2026)</u> ' in first sentence. In bullet 3 insert ' <u>on larger sites</u> ' after '35% of them' In bullet 3 amend end of sentence to read: (b) 18,000 additional jobs shall be provided in <u>the wider Ipswich area</u> Policy Area between 2001 and 2025.	To reflect changes made elsewhere in the plan to respond to the revocation of the East of England Plan (see policies CS6, CS7, CS12 and CS13).
Bullet 12	Amend bullet 12 to read ' To work with other local authorities in the <u>wider Ipswich area</u> Policy Area and with LSP partners to ensure a co-ordinated approach to planning and development. '	

Policy/ paragraph	Change	Reason
Policy CS6 Cross Boundary Working (formerly Ipswich Policy Area)		
Policy CS6	Delete the policy title 'The Ipswich Policy Area' and replace with ' <u>Cross Boundary Working</u> '	To respond to the revocation of the East of England Plan, which identified the Ipswich Policy Area.
8.65 (CS6)	Add the following text at the end of paragraph: ' <u>However, following the revocation of the Regional Spatial Strategy, the Ipswich Policy Area no longer has a basis in policy.</u> '	The policy was formerly called Ipswich Policy Area. The revocation of RSS has removed the policy basis for the Ipswich Policy Area, but the Council remains committed to cross boundary working with neighbouring authorities on growth and infrastructure matters. Therefore the policy has been retained and re-titled Cross Boundary Working. An amendment in the policy acknowledges that in future the mechanism for cross boundary working may be through continuation of the Ipswich Policy Area Board, or through other relevant forums.
8.66 (CS6)	Delete 'The Regional Spatial Strategy identifies' and 'as' from first sentence and add ' <u>is also</u> ' after Ipswich. Delete 'It is recognised as one of the main sub-regions in the East of England and has been' and add ' <u>The area was</u> ' and ' <u>in October 2006.</u> ' In last sentence. The amended paragraph reads: <u>Ipswich is also a key growth location within the Haven Gateway sub-region. The Haven Gateway comprises parts of Babergh, Mid Suffolk, Suffolk Coastal and all of Colchester, Ipswich and Tendring. The area was awarded Growth Point status in October 2006.</u>	The policy was formerly called Ipswich Policy Area. The revocation of RSS has removed the policy basis for the Ipswich Policy Area, but the Council remains committed to cross boundary working with neighbouring authorities on growth and infrastructure matters. Therefore the policy has been retained and re-titled Cross Boundary Working. An amendment in the policy acknowledges that in future the mechanism for cross boundary working may be through continuation of the Ipswich Policy Area Board, or through other relevant forums.
8.67 (CS6)	Delete whole paragraph.	
8.68 (CS6)	Delete whole paragraph. Replace with the following text: ' <u>In planning strategically for housing, employment and infrastructure provision in the wider Ipswich area, the Council will need to work closely with neighbouring local authorities to ensure a coordinated approach.</u> '	An amendment in the explanation acknowledges that the local authorities may choose a different area over which to coordinate cross boundary issues, or retain the Ipswich Policy Area boundary as the area of focus. Appendix 3 to the plan does identify the Ipswich Policy Area boundary. Alternatively there may be other groupings, such as the Suffolk Haven Gateway area, which may present an appropriate basis for cross boundary working on some issues.
Policy CS6	Delete heading ' <u>POLICY CS6: THE IPSWICH POLICY AREA</u> ' and replace with ' <u>POLICY CS6: CROSS BOUNDARY WORKING</u> '	
Policy CS6 a.	Amend point a) to read: ' <u>Formal working through the Ipswich Policy Area Board or other relevant forums</u> '	
8.69 (CS6)	Change 'Ipswich Policy Area' to ' <u>cross boundary</u> ' in first sentence.	
8.71 (CS6)	Add the following text at the end of paragraph: ' <u>The Board may need to be refocused following the revocation of Regional Strategies.</u> '	

Policy/ paragraph	Change	Reason
Policy CS7 The Amount of Housing Required		
8.75 (CS7)	<p>Change 'gives' to '<u>gave</u>' in first sentence.</p> <p>Add the following text at the end of paragraph: 'However, subsequent to the revocation of Regional Strategies, the Council revised this figure to 700 dwellings per annum (14,000 from 2001 to 2021) in the light of additional local evidence.'</p>	<p>To respond to the revocation of the East of England Plan. The housing target for the Borough has been reduced from 15,400 dwellings 2001 - 2021 to 14,000 over the same period (as an annualised rate, a reduction from 770 to 700 p.a.). Evidence for this has been set out in Appendix 4 to the Council report (Link 1 below). It includes local housing need figures, population and household forecasts, and capacity data. In revising the figures, the baseline has been updated to April 2010 as the most up to date figures available when RSS was revoked. The topic paper Reviewing the Ipswich Housing Figures also provides more background (Link 2 below).</p>
8.76 (CS7)	<p>Change 'eight' to '<u>nine</u>' in first sentence. Change number of dwellings from '15,400' to '<u>14,000</u>'. In the last sentence change April '2009' to '<u>2010</u>'.</p>	
Table 2 (CS7)	<p>Amend figures and table notes to reflect April 2010 baseline and 700 dwelling per annum housing target.</p>	
8.77 (CS7)	<p>Delete whole paragraph.</p>	
8.79 (CS7)	<p>Change year '2025' to '<u>2026</u>'. Delete last sentence of paragraph:</p> <p>'The Regional Spatial Strategy advises that for the years beyond 2021, we should assume an annual development requirement of 830 dwellings per year.'</p>	
8.80 (CS7)	<p>Change year '2025' to '<u>2026</u>'.</p>	
PolicyCS7	<p>Change '5,283' to '<u>3,951</u>' dwellings.</p>	
8.81 (CS7)	<p>Change year '2009' to '<u>2010</u>'.</p> <p>Change 'under 9,200' to '<u>under 6,800</u>' units.</p> <p>Delete 'Regional Spatial Strategy'.</p>	
8.82 (CS7)	<p>Change year '2009' to '<u>2010</u>'.</p> <p>Change '5,283' to '<u>3,951</u>' dwellings.</p>	
8.83 (CS7)	<p>Add the following text at the beginning of paragraph: <u>'The phasing of housing sites will be informed by the findings of the SHLAA, infrastructure delivery and the preparation of master plans.'</u></p>	
Tables 3 & 4	<p>Revise Figures to reflect new housing target.</p>	

Policy/ paragraph	Change	Reason
CS10 Ipswich Northern Fringe		
8.103 (CS10)	Change 'five year phase and the second six year phase' to <u>'ten years of the plan period.'</u> Change 'four' to <u>'five'</u> years in last sentence of paragraph.	To respond to the revocation of the East of England Plan which may affect the Core Strategy timetable, and accord with PPS3 Housing.
Policy	Delete last sentence of first paragraph: 'The precise number of dwellings required will be determined by the review of the Regional Spatial Strategy.' Delete sentence in second paragraph of policy: 'The new Regional Spatial Strategy that will allocate housing numbers to 2031 will have an impact on the precise scale of any required development in the Northern Fringe.'	The revocation of RSS necessitates changing how the total scale of growth at the Northern Fringe would be determined. This is now deferred to a future review of the Core Strategy rather than to the review of RSS (see also paragraph 8.114 below).
Policy CS10 b.	After ' <u>alongside all housing</u> ' add, ' <u>, including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration</u> '	Changes also respond at clause b and the penultimate paragraph of the policy, and 8.112 in the explanatory text, to the outcome of the Mersea Homes appeal, which was published on 30 th September 2010, and explicitly link policy CS10 with CS16.
Policy CS10	In the penultimate paragraph of the policy add after 'Westerfield Station' ' <u>, and provide the opportunity for the provision of a country park within the Northern Fringe as envisaged by CS16 and as shall be more particularly identified in the SPD</u> '	The Mersea Homes appeal decision is available at Link 3 below.
8.106 (CS10)	Delete paragraph 8.106	
8.107 (CS10)	Add the following new text at beginning of paragraph ' <u>The indicative capacity at the Northern Fringe identified in the Strategic Housing Land Availability Assessment is about 4,500 dwellings. This policy deals with the delivery of up to the first 1,000 of them.</u> Amend last sentence to read: <u>When determining its views on the precise number and timing of delivery of dwellings needed at the Northern Fringe, the Council will use a range of evidence including the Ipswich Housing Needs Study projections for the wider Ipswich area, projections for employment demand, ...</u> Delete final line 'for the Policy Area and the Borough area.'	

Policy/ paragraph	Change	Reason
8.108 (CS10)	<p>Delete the first two sentences 'The Council will continue to engage with the Regional Assembly in order to ensure that the best interests of the population of Ipswich are considered as part of the Regional Spatial Strategy process. The Council will seek justification of the overall growth numbers, and of the timetable for that expected growth.'</p> <p>Delete reference in third sentence to Ipswich Policy Area and amend to read, '... to ensure optimum sustainable distribution of housing within the <u>wider Ipswich area</u>, bearing in mind the amenity value...'</p>	As above.
8.111 (CS10)	Delete the end of the final sentence ' next version of the Regional Spatial Strategy, which will provide a housing target for Ipswich up to around 2031 ' and replace with ' <u>the next review of the Core Strategy.</u> '	
8.112 (CS10 continued)	Add new text to the end of the paragraph: <u>'Infrastructure requirements were considered during the appeal by Mersea Homes against the Council's refusal of outline planning permission for major residential led development at the Northern Fringe (application reference IP/09/00465/OUT). The Secretary of State dismissed the appeal on 30th September 2010. Key conclusions about infrastructure provision from the letter and the Inspector's report are reflected in the policy above.'</u>	
8.114 (CS10)	<p>Amend first sentence to read 'The total number of dwellings likely to be accommodated at the Northern Fringe <u>could be as much as 4,500 in the longer term, but this will be determined through a review of the Core Strategy</u>'</p> <p>Add new second sentence:- '<u>This will provide plenty of opportunity for interested parties – be they developers, landowners, local residents or others – to get involved and have their say prior to the extent of Northern Fringe development being determined.</u>'</p> <p>Amend third sentence to read 'However, to ensure that any development proposed for this area prior to 2021 conforms to a coherent plan, work on the supplementary planning document will commence as soon as the Core Strategy has been adopted.'</p> <p>Delete the final sentence 'The supplementary planning document would not be completed until after the next Regional Spatial Strategy is adopted'.</p>	At 8.114, to set out a clear mechanism for the future determination of Northern Fringe development.

Policy/ paragraph	Change	Reason
CS11 Gypsy and Traveller Accommodation		
8.116 (CS11)	<p>In the first sentence delete 'but a single issue review of the Regional Spatial Strategy has concluded that the Borough needs to provide an additional 15 permanent pitches by 2011, and a further 3% per year thereafter to 2021'.</p> <p>After the 1st sentence add the sentence '<u>A local assessment of the needs of Gypsies and travellers concluded that 1-3 additional pitches are needed in Ipswich by 2011, plus a transit site in the Ipswich area.</u>'</p>	<p>To respond to the revocation of the East of England Plan and use local evidence. The Council published a Suffolk Cross-Boundary Gypsy and Traveller Accommodation Assessment (GTAA) in 2007, which concluded that 1-3 pitches were needed in Ipswich by 2011, plus 10 transit pitches. However, the single issue RSS review allocated all districts a minimum requirement (for Ipswich 15 pitches by 2011) to help meet the regional shortfall. Following the revocation of RSS, the Council has reverted to the local evidence of need in the GTAA, but has not altered the policy approach (see Link 4 below).</p>
8.117 (CS11)	<p>Delete the first sentence 'As the Core Strategy and Policies will not reach adoption until late 2010, the Council is working in parallel with the plan process to meet the immediate Regional Spatial Strategy requirement.'</p> <p>Amend the end of second sentence to delete reference to 15 itches by 2011 and instead read:- '<u>... to identify possible sites to meet the need to provide additional pitches in the wider Ipswich area.</u>'</p>	As above
Policy	In the penultimate paragraph of the policy, delete the first line 'In line with Regional Spatial Strategy'	The local GTAA also identified a need for a transit site.
8.118 (CS11)	From the third sentence onwards delete '... have been set a target in RSS to provide additional pitches in the short and medium term. At present site provision is supported by a national grant scheme to assist in delivery.' And replace with ' <u>All four local planning authorities had needs identified by the Gypsies and Travellers Accommodation Assessment carried out in 2007.</u> '	The grant scheme referred to has been cancelled (however funding assistance is still available from the Homes and communities Agency).
8.120 (CS11)	Delete the first line of the first sentence 'Contrary to the regional allocation of 15 pitches' and 'carried out in 2007' so that it reads, ' <u>The local Gypsy and Traveller Accommodation Assessment identified a need ...</u> '	
8.122 (CS11)	Delete 'fifteen pitches identified by the Regional Spatial Strategy Single Issue Review' and replace with ' <u>additional pitches</u> '	

Policy/ paragraph	Change	Reason
CS12 Affordable Housing		
Policy CS12 a.	Change '40%' to <u>'35%'</u>	To respond to the revocation of the East of England Plan. Given the ongoing economic conditions, the reduction in the policy to 35% on larger schemes is more realistic. Appendix 4 to the Council report provides evidence of actual affordable housing provision 2001 - 2010.
8.126 (CS12)	Delete the entire existing paragraph.	The topic paper Reviewing the Ipswich Housing Figures also provides more background (see Link 2 below).
Policy CS13 Planning for Jobs Growth		
Policy CS13	Amend the first sentence to read: <u>'The Council will promote sustainable economic growth in the wider Ipswich area.'</u>	To respond to the revocation of the East of England Plan, which identified the Ipswich Policy Area. The Council remains committed to cross boundary working to deliver jobs growth, and the joint Employment Land Review for the Suffolk Haven Gateway authorities (2009) recommends this approach (see Link 5 below). Therefore the policy has been amended to refer to the 'wider Ipswich area'. The jobs target has not changed.
8.140 (CS13)	Delete most of existing paragraph and replace with: <u>'Ipswich is a key economic driver of the County and the Haven Gateway area. The Haven Gateway Employment Land Study 2005 forecast growth of 17,800 jobs in Ipswich between 2001 and 2021 (see Table 5).'</u>	For clarity following the deletion of much of paragraph 8.140.
8.141 (CS13)	Before 'joint' in the first sentence add <u>'more recent (2009)'</u> Delete 'the three authorities' and add <u>'Ipswich Borough Council, Suffolk Coastal District Council and Babergh District Council'</u>	
8.144 (CS13)	After 'Ipswich Policy Area Board' add <u>'or other joint working forums'</u> Delete 'in the Regional Spatial Strategy'	Reference to joint working forums has been added to reflect policy CS6.

Policy/ paragraph	Change	Reason
8.145 (CS13)	Delete entire paragraph	
8.147 (CS13)	In the penultimate sentence delete 'Regional Spatial Strategy' and replace with ' <u>Employment Land Review</u> '	
Part C Development Control Policies		
DC31	In clause c. delete 'achieving a density of at least 30dph' Change 'take' to ' <u>taken</u> '	To respond to revisions to PPS3 Housing and the shift in current applications away from flats and towards houses. This change will only affect the more peripheral parts of the borough away from the town and district centres. There remains a general requirement for the efficient use of land in PPS3, and therefore we would not expect to see a significant reduction in densities being achieved. Hence the average of 35 d.p.h. for capacity calculations is retained.
Part D Implementation, Targets, Monitoring and Review		
Chapter 10 10.4 Bullet 3 Bullet 4	At the end of bullet point 'Ipswich Policy Area Board' add ' <u>Following revocation of the East of England plan the Board may need to be refocused, for example to relate to a different geography, but the Council remains committed to cross boundary working on strategic issues.</u> ' In bullet point 'Regional Cities East' add ' <u>previously</u> ' before 'with support'	To respond to the revocation of the East of England Plan which identified the Ipswich Policy Area, and ensure consistency with policy CS6 on Cross Boundary Working. 'Previously' refers to the fact that to date RCE has enjoyed the support of the East of England Development Agency, but EEDA is to be abolished. It is anticipated that some functions may transfer to new organisations such as Local Enterprise Partnerships in due course.

Appendix 2






SSSI condition summary

Compiled: 01 Mar 2011

See the [SSSI glossary](#) for an explanation of terms.

SSSI name: Blaxhall Heath

% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
100.00%	0.00%	100.00%	0.00%	0.00%	0.00%

 % Area favourable
 % Area unfavourable recovering
 % Area unfavourable no change
 % Area unfavourable declining
 % Area destroyed / part destroyed



Report completed.






SSSI condition summary

Compiled: 01 Mar 2011

See the [SSSI glossary](#) for an explanation of terms.

SSSI name: Sandlings Forest

% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
100.00%	0.00%	100.00%	0.00%	0.00%	0.00%

 % Area favourable
 % Area unfavourable recovering
 % Area unfavourable no change
 % Area unfavourable declining
 % Area destroyed / part destroyed



Report completed.






SSSI condition summary

Compiled: 01 Mar 2011

See the [SSSI glossary](#) for an explanation of terms.

SSSI name: Tunstall Common

% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
100.00%	0.00%	100.00%	0.00%	0.00%	0.00%

	% Area favourable
	% Area unfavourable recovering
	% Area unfavourable no change
	% Area unfavourable declining
	% Area destroyed / part destroyed



Report completed.

SSSI condition summary

Compiled: 01 Mar 2011

See the [SSSI glossary](#) for an explanation of terms.

SSSI name: Sutton And Hollesley Heaths

% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
92.73%	0.00%	92.73%	0.00%	7.27%	0.00%

■	% Area favourable
■	% Area unfavourable recovering
■	% Area unfavourable no change
■	% Area unfavourable declining
■	% Area destroyed / part destroyed



Report completed.

Condition of SSSI units

Compiled: 01 Mar 2011

See the [SSSI glossary](#) for an explanation of terms.

Team - Norfolk And Suffolk - SSSI name - Sutton And Hollesley Heaths - Staff member responsible for site - Monica O-Donnell

Region	County	District	Main habitat	Staff member responsible for unit	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	1	1009151	11.80	15 Mar 2009	Unfavourable declining	The heather is mostly mature/degenerate ling with occasional bell heather and areas of acid grassland. There are also areas of dense bracken and bracken is interspersed throughout the rest of the site. Small clumps of trees were planted towards the rear of the site where there is also area of mature birch and pine. A sandy pit on the site, about a metre deep, has developed a more diverse flora with plentiful lichen and bell heather and this forms an excellent habitat for invertebrates.	Inappropriate scrub control
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	2	1009152	52.16	15 Mar 2009	Unfavourable recovering	Unit 2 is due to be grazed with Exmoor ponies and Hebridean sheep, which will benefit the site. This unit has mature heather in sometimes thick stands with occasional Erica and heath bedstraw and frequent sheep's sorrel, although it is generally species poor, as is expected with this type of heathland. Extensive tree and scrub clearance has taken place, retaining occasional trees and areas of bracken have been sprayed. In cleared areas there is heather and gorse re-establishment.	
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	3	1009153	40.00	15 Mar 2009	Unfavourable recovering	Unit 3 is due to be grazed with Exmoor ponies and Hebridean sheep, which will benefit the site. Unit 3 has a diverse range of habitats including heather dominated heath, mature pine, stands of birch over heather, large and smaller areas of clear fell, rotivated and bare areas. Pioneer/building heather and tree saplings are coming through in areas previously felled, and here the development of heath will be encouraged by grazing. Suffolk Wildlife Trust report that there are good populations of Woodlark and Redstart in this area.	
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	4	1009154	23.32	24 Sep 2010	Unfavourable declining	Whilst small areas of heathland vegetation can be found, most of this unit is dominated by secondary woodland with dense bracken beneath the trees, which is suppressing the heathland species. Although a small area has been cleared of scrub at the western end, most of the area has remained unmanaged since the last assessment and the effect the trees and bracken have had on the soils would have increased.	Inappropriate scrub control
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath -	Monica O-Donnell	5	1009155	23.08	15 Mar 2009	Unfavourable recovering	In the open areas of this unit there is a good mix of ling and bell heather (both abundant) with appropriate amounts	

			lowland								of heathland grasses/sedges and flowers. In areas cleared of trees regenerating vegetation includes heather. Rabbits and deer are grazing the regenerating vegetation. Significant areas of pine plantation remain.
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	6	1009156	45.16	15 Mar 2009	Unfavourable recovering	This unit comprises open heath, a mosaic of mature/degenerate ling and bell heather, with areas of young birch and pine and some areas of older birch, dense gorse and bracken. Where areas of pine/birch have been felled and over the site of a fire that affected approx a third of the unit some years ago, pioneer ling is establishing, along with some bracken. A continuation of this management will enhance the condition of this unit.	
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	7	1009157	60.63	15 Mar 2009	Unfavourable recovering	This unit comprised areas of heather in different growth phases, with some dense bracken and gorse which has been partially cleared. There is an established plantation in the centre of the unit, fringed with old oak pollards.	
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	8	1009158	40.13	15 Mar 2009	Unfavourable recovering	In this unit there is a mixture of acid grassland and heather, including ling, bell heather, fescues, heath bedstraw, lichens, sheep's sorrel and sedges. On the western side of the unit there is a mix of trees, with young birch and pine scattered across the site. Tree clearance is taking place.	
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	9	1009159	59.41	17 Aug 2010	Unfavourable recovering	Assessment carried out by Monica O'Donnell and Emma Quick on 29 July with a return visit by Emma on 5 August. This site is undergoing a tree clearance programme at the current time and the area that has already been clear felled is showing signs of recovery with heather re-establishment. An area towards the north (the bottom part) of the site is being grazed by hebridean sheep owned by the Suffolk Wildlife Trust. Heather has been cut (in one block) in some areas to create a diversity in the structure of the vegetation (allow natural regeneration). The current management is successfully improving the biodiversity of the site.	
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	10	1009160	39.19	15 Mar 2009	Unfavourable recovering	This unit contains a mosaic of rabbit-grazed acid grassland, gorse, bracken and heather interspersed with suitable amounts of bare ground. The majority of the heather is building/mature. Sheep's sorrel, lichens and heath bedstraw are frequent through the unit. There is a block of mature pine plantation on the south-east side of the unit and some self sown pines on the north-west side.	
East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	11	1009161	44.86	15 Mar 2009	Unfavourable recovering	The adjacent units 11 and 12 are very similar in composition. They are dominated by mature/degenerate heather, with some sheep sorrel and heath bedstraw, but few other herb species, as is usual for this type of heathland. Bare ground is mostly confined to the tracks and there are occasional areas of dense bracken. Young and mature birch & pine are scattered though the site and some areas of trees have been cleared, to help to create more diverse heathland vegetation.	

East Of England	Suffolk	Suffolk Coastal	Dwarf shrub heath - lowland	Monica O-Donnell	12	1009162	43.50	15 Mar 2009	Unfavourable recovering	The adjacent units 11 and 12 are very similar in composition. They are dominated by mature/degenerate heather, with some sheep sorrel and heath bedstraw, but few other herb species, as is usual for this type of heathland. Bare ground is mostly confined to the tracks and there are occasional areas of dense bracken. Young and mature birch & pine are scattered though the site and some areas of trees have been cleared, to help to create more diverse heathland vegetation.
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Report completed.

Appendix 3

Nick Sibbett

From: Williams, Pat (NE) [Pat.Williams@naturalengland.org.uk]
Sent: 06 April 2011 14:44
To: Nick Sibbett
Cc: Meadows, Michael (NE)
Subject: Appropriate Assessment of Core Strategy IBC

Dear Nick

Thank you for the Addendum to the AA for the IBC Core Strategy and Policies which considers changes in housing numbers and the evidence in the South Sandlings Visitor Survey Report. We have the following comments to make:

- The new Addendum considers in full the details of the new South Sandlings report which, in our view, strengthens the need for all the previously agreed mitigation strategies in order to avoid adverse impact on all of the European sites within the Suffolk Coast & Heaths AONB, as it demonstrates that people do travel considerable distances from their homes for recreational purposes and therefore the new housing allocations are likely to result in increased recreational pressure on the Sandlings SPA, particularly the large housing allocation for East Ipswich area.
- Natural England agree that the mitigation strategies put forward in the AA of September 2009 followed by the Clarification Summary of January 2010 and summarised in the Statement of Common Ground dated June 2010, are still fully relevant following the Addendum and as the wording in the AA applies to all European sites within the SC&H AONB this will, of course, include the Sandlings.
- IBC's policy CS16 Green Infrastructure is a strong one and demonstrates a firm commitment to working with neighbouring authorities on the enhancement and provision of green space with a strong drive towards creating a new Country Park on the north eastern fringe of Ipswich which will be essential to mitigate for adverse impacts on the N2K sites from increased recreational pressure resulting from increased housing.

I trust that clarifies our position on the Addendum.

Regards
Pat

Pat Williams
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www.naturalengland.org.uk

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